




Chief Executive's Report
Draft Kildare County Development Plan
2023-2029
Public Consultation



**Draft
Kildare County
Development Plan
2023-2029
Volume 1**

MARCH 2022



CDP
2023
2029
OUR KILDARE
OUR PLAN

Kildare County Council
Planning Department
19th July 2022

Glossary

AA	Appropriate Assessment
CDP	County Development Plan
CARO	Climate Action Regional Office
DMURS	Design Manual for Urban Roads and Streets
EMRA	East and Midlands Regional Assembly
HNDA	Housing Needs Demand Assessment
LAP	Local Area Plan
NPF	National Planning Framework
NTA	National Transport Authority
OPR	Office of the Planning Regulator
OPW	Office of Public Works
PPN	Public Participation Network
P&D	Planning and Development
RSES	Regional Spatial and Economic Strategy
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SPPR	Specific Planning Policy Requirements (as referred to in Section 28 Guidelines)
SuDS	Sustainable Urban Drainage Systems
TII	Transport Infrastructure Ireland

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PART 1 INTRODUCTION

Part 1 of this report outlines the statutory process for the preparation of the Chief Executive’s report; the purpose of the Chief Executive’s report; and an overview of the consultation process carried out for the Draft stage of the Development Plan process.

1.1 Legislative Context for this Report

In accordance with Section 12 (4) of the Planning and Development Act 2000 as amended (hereafter referred to as the Act), the Chief Executive is required to prepare a report on any submissions or observations received during the public consultation period and submit the report to the Elected Members for their consideration.

This report lists the persons or bodies who made submissions or observations, provides a summary of the submissions made and the issues contained therein, gives the response of the Chief Executive with respect to the issues raised, taking account of any directions of the elected members, the proper planning and sustainable development of the area, the statutory obligations of the local authority and all relevant policies or objectives of the Government or of any Minister of the Government. The report also summarises the issues and recommendations raised by the Office of the Planning Regulator (OPR), the National Transport Authority (NTA) and the Eastern and Midlands Regional Assembly (EMRA) and outlines the manner in which those issues and recommendations should be addressed in the Development Plan.

1.2 Purpose of this Report

The purpose of this report is to report on the submissions and observations received from the public and prescribed bodies during a 10 week consultation period that took place between the 14th March and the 24th May 2022, following the publication of the statutory notice.

1.3 Overview of Public Consultation

The Act sets out a number of key stages for the review of a County Development Plan. Each of these stages includes a period of public consultation as set out hereunder:



Stage 2 – Public Consultation

In accordance with Section 12 (1)(b) of the Act, a public notice was published in the Irish Independent on the 14th of March 2022 informing the public of the publication of the Draft Kildare County Development Plan 2023-2029 and inviting members of the public to

participate in the public consultation process during a 10 week period from 14th March to the 24th of May 2022. Furthermore,

- Notices were also published in the Leinster Leader, the Nationalist and the Liffey Champion.
- Regular messages were published on Kildare County Council's social media, e.g. Facebook, Twitter and Instagram.
- Notification was sent to all Elected Members and Kildare Oireachtas members.
- Notification was sent to all statutory authorities.
- Notification was sent to all members of the Kildare Public Participation Network (approx. 1200) and Kildare Comhairle na nÓg.

Public Webinars

To facilitate a discussion and to provide an overview in relation to the policies, objectives, targets and actions within the Plan, three independently facilitated online public information sessions (webinars) were held as follows:

- Wednesday 6th April 7pm – 9pm,
- Wednesday 27th April 10am – 12pm and
- Wednesday 11th May 2pm – 4pm.

The webinars included a presentation from the Forward Planning Team followed by a questions and answers session. Over 100 members of the public in total attended the webinars which included community groups, climate action groups, residents' associations, environmental groups, businesses, media and citizens. The facilitator's report for the three meetings is attached to this report in Appendix D.

The Forward Planning Team also attended and presented to the Public Participation Network (PPN) at their online meeting to discuss the Plan.

Virtual Consultation Room & Podcast Series

A virtual consultation room and a podcast series of the Draft County Development Plan were made available on the Kildare County Council website during the 10 week public consultation process. See image of the Virtual Consultation room alongside with the link to the Virtual Consultation room provided below:



<https://draftkildarecdp2023-2029.ie/>

Bodies consulted

In accordance with Section 12 (1) (a) of the Planning and Development Act 2000 (as amended), the Draft Plan and Public Notice was referred to the Office of the Planning Regulator, An Bord Pleanála, Eastern and Midland Regional Assembly, Prescribed Authorities and Local Community Development Committees in the County. For the purposes of preparing a Development Plan, Prescribed Authorities are set out in Article 13 of the Planning and Development Regulations 2001 (as amended).

Discussions have and will continue to take place with the Local Community Development Committee (LCDC) in relation to the emerging Local Economic and Community Plan (LECP) which is currently underway.

Submission received

In total, 615 submissions were received during the public consultation period. A full list of submissions is included in Appendix C of this report.

1.4 Format of this Report

PART 1	Sets out the requirements and legislative background of this report.
PART 2	Summary of the submissions received from the Office of the Planning Regulator, the Eastern and Midlands Regional Assembly, the Dublin Transport Authority / National Transport Authority, Transport Infrastructure Ireland and Office of Public Works and the Chief Executive’s response and recommendation.
PART 3	Summary of the submissions received from the Statutory Stakeholders, Members of the Public and Interest Groups and the Chief Executive’s response and recommendation.
PART 4	Chief Executive’s Proposed Amendments to the Draft Plan
PART 5	Appendices

In Parts 2 and 3 of this report, the submissions have been summarised and presented in the order that they appear in the Draft Plan under each chapter in Volume 1, under three distinct sections in Volume 2 and under the Appendices of the Draft County Development Plan as follows:

VOLUME 1 – WRITTEN STATEMENT

- Chapter 1: Introduction and Strategic Context
- Chapter 2: Core Strategy and Settlement Strategy
- Chapter 3: Housing
- Chapter 4: Resilient Economy & Job Creation
- Chapter 5: Sustainable Mobility & Transport
- Chapter 6: Infrastructure and Environmental Services
- Chapter 7: Energy & Communications

- Chapter 8: Urban Centres and Retail
- Chapter 9: Our Rural Economy
- Chapter 10: Community Infrastructure and Creative Places
- Chapter 11: Built and Cultural Heritage
- Chapter 12: Biodiversity and Green Infrastructure
- Chapter 13: Landscape, Recreation and Amenity
- Chapter 14: Urban Design, Placemaking and Regeneration
- Chapter 15: Development Management Standards
- Chapter 16: Monitoring and Implementation
- Chapter 17: Infrastructural Assessment

VOLUME 2

- Chapter 1: Introduction
- Chapter 2: Small Towns and Environs Plans
- Chapter 3: Village Plans & Rural Settlements

APPENDICES

- Appendix 1 HND A
- Appendix 2 Wind Energy Strategy
- Appendix 3 Open Space and Outdoor Recreation
- Appendix 4 Rural Housing Design Guide
- Appendix 5 Record of Monuments and Places
- Appendix 6 Record of Protected Structures
- Appendix 7 Scenic Routes
- Appendix 8 Statement of Compliance with S 28 Guidelines
- Appendix 9 Core Strategy Methodology
- Appendix 10 Rural Housing Policy Report
- Appendix 11 Single Rural Dwelling Density Toolkit
- Appendix 12 Implementation and Monitoring Framework



For the purposes of reading **PART 2 and PART 3** of this report please note the following:


- Where a submission has suggested new text within the plan this is shown in **PURPLE** text.
- Where the Chief Executive proposes amended and new text this is coloured **RED** in this document.
- Where the Chief Executive proposes to delete text from the Daft Plan, this is shown as **STRIKETHROUGH**.
- Where the Chief Executive shows existing text from the Daft Plan as is, this is shown in **BLUE**.

1.5 Next Steps

The Elected Members have up to twelve weeks to consider the Chief Executive's Report. An Elected Members briefing/workshop will take place in August for discussion around the submissions and observations as required. The Elected Members will then either accept or amend the Draft Plan. In making the development plan, the members shall be restricted to considering the proper planning and sustainable development of the area to which the development plan relates, the statutory obligations of the authority and any relevant policies or objectives of the Government or any Minister of the Government.

Where the Elected Members decide to amend the Plan, a further period of public consultation will follow, as illustrated in Table 1 below.

Table 1 - Summary of the Review Process

STAGE	ACTION
Stage 2 Draft Plan	Draft Plan Public Consultation
	Prepare Chief Executive's Report on Draft Plan submissions
	Elected Members consider Chief Executive's Report on submissions and accept or amend the Draft Plan
Stage 3 Amendments to Draft Plan	Q 4 - 2022
Adopted Plan	End of 2022

Note: It should be noted that in accordance with Section 12 (16) of the Planning and Development Act 2000 (as amended) a person shall not question the validity of the development plan by reason only that the procedures as set out under subsections (3) to (5) of section 11 and subsections (1), (4), (5), (6), (7), (8) and (9) of Section 12 were not completed within the time required under the relevant subsection.

PART 2 SUBMISSIONS FROM OPR, EMRA, NTA, TII & OPW

2.1 Office of the Planning Regulator (OPR) (Sub No. 550)

Summary: General

The submission from the Office of the Planning Regulator (OPR) strongly commends the planning authority for the extent of policy direction and guidance on a wide range of issues in the dCDP, particularly those relating to economic development, tourism, rural housing and climate action. The OPR also commends the planning authority on the innovative approach to public consultation and particularly references the virtual consultation rooms and podcasts. The submission further notes that the dCDP has positively embraced many of the challenges and opportunities identified in the NPF and the RSES through its focus on delivering sustainable development in the MASP area and in the Key Towns. The OPR acknowledges the background analysis of existing physical, social and community infrastructure in each settlement and generally (with the exception of Clane) considers that the settlement hierarchy is acceptable.

The submission from the OPR provides a commentary on the overall plan and makes a series of recommendations (13) and observations (5) with respect to specific areas of the dCDP. The OPR also advises that where the planning authority decides not to comply with the recommendations of the OPR, or otherwise makes the plan in such a manner as to be inconsistent with the recommendations of the OPR, the chief executive must inform the OPR accordingly and state the reasons for the decision of the planning authority.

Chief Executive's Response

The positive comments regarding the overall plan content, evidenced based reports and public consultation strategy are welcomed and noted. The format and content of the submission are noted in particular the requirements in relation to Recommendations and Observations. In line with the format of the submission the response has been set out to correspond to each of the specific items raised.

The draft Kildare County Development Plan has been prepared having regard to statutory guidance, legislation and specific local characteristics and considerations, opportunities and constraints. County Kildare has experienced significant levels of growth and construction over the past number of years despite the unprecedented interruptions caused by the Covid 19 Global pandemic. The plan and associated development strategy must again pivot to address the substantial challenges facing society in terms of climate action and provide a sufficiently robust, though flexible, approach to sustainable development that delivers on the national strategic outcomes of the NPF, regional strategic outcomes of the RSES and county strategic objectives in the draft Plan (CSO 1.1 – CSO 1.18).

The draft Plan is underpinned by a series of aims and objectives, with particular reference to the core strategy objectives with various policies, objectives, actions and targets included with the sole purpose of delivering on the vision of the Draft Plan.

The Authority notes that a number of the recommendations relate to the quantum of lands zoned for new residential development in the County's settlements. The dCDP makes provision for the sustainable growth and development of all of the towns and villages across the county, through the provision of a housing target (in accordance with Section 28 guideline requirements) to inform the series of mandatory Local Area Plans that will be

prepared following the adoption of the CDP and includes housing supply targets for the smaller settlements which are not subject to mandatory LAPs. The Draft Plan emphasises the important role that the network of small towns, villages and rural towns will play in the success of the plan.

The NPF acknowledges the function and critical importance of these rural towns and highlights that these settlements require a proportionate and tailored approach to new development. The settlement plans set out in Volume 2 of the Draft Plan, supported by the bespoke and specific development objectives associated with each town/village/rural settlement, respond to the local character, scale, density and specific local context of each individual community. The development strategy also reflects the need to provide a sustainable alternative to rural housing in the open countryside by identifying opportunities for appropriately scaled residential developments and serviced sites schemes in accordance with the provisions of NPO 18b in order to ensure this ecosystem of communities can be maintained. It should be noted at the outset that the lands identified as serviced sites within these settlements are intended to act as a sustainable alternative/substitute to one off housing and not as a catalyst for additional population/housing growth. Development on lands identified for the purposes of delivering serviced sites will require all applicants to comply with the relevant rural housing policies etc. It should be further noted that the Council will also, subject to compliance with the relevant specific development objectives, support proposals for serviced sites on lands zoned new residential.

It is considered that the Core Strategy of the Draft Plan recognises the need to strike a balance between having an excess of zoned lands and being able to deliver new development to meet the needs of existing and future residents. The deliverability analysis carried out to inform the plan, has sought to address this by recognising that in an urban environment, there will be market constraints to delivery at any given time. In this regard, a degree of flexibility has been built into the distribution of the housing and population targets, in line with national and regional policy, to ensure an adequate supply to meet demand and a series of control measures within the plan have been included to manage the sustainable development of potential development lands. This flexibility requires close monitoring of housing delivery, taking account of the function of each settlement. In order for this to be fully integrated into the Draft Plan, it is proposed to include a series of new monitoring objectives for housing delivery as part of the Core Strategy of the Plan. This will enable the Council to maintain a flexibility in terms of delivering new housing and allows time to lapse for planning permissions which have not delivered.

Equally, the Council will proactively pursue active land management measures provided for under legislation, to ensure that land hoarding is discouraged, and that development potential is released through available mechanisms and initiatives including through central or other funding.

It is the planning authority's view that the development of a strong framework for monitoring of population and housing alongside active land management is crucial to the successful implementation of the National Planning Framework and the Regional Spatial Economic Strategy while also maintaining a strong recognition for the local development characteristics of smaller settlements in County Kildare. Such provision is supported in the Draft Plan under Appendix 12 – Monitoring and Implementation Framework and the inclusion of additional monitoring objectives which will take into account the issues raised in the following sections regarding excess zoning etc and the consideration of lands which have extant permissions and/or are actively engaged in the development management process.

It is proposed to include a new objective to implement a robust annual monitoring process for housing delivery (construction/completion) across settlements in County Kildare to include the performance of large-scale residential developments (Schemes for 100 units+) for each town/village/settlement to allow for ongoing assessment of delivery targets whilst ensuring overdevelopment does not occur in any particular area and to work with Irish Water and other infrastructure delivery agencies to ensure that the delivery of necessary infrastructure occurs in tandem (or in advance of) new development.

Chief Executive's Recommendation

Include new objective after CSO 1.18 as follows:

To monitor the delivery of new housing units and facilitating infrastructure (i.e. Irish Water Capital Investment Programme, Irish Rail DART + Programmes etc.) across County Kildare¹ on an annual basis to ensure general compliance with the County Development Plan Core Strategy and housing supply targets to inform possible redistribution if/where appropriate.

Chapter 1

The OPR considers the total county population projections for the plan period in the core strategy to be generally consistent with the population prescribed for County Kildare in the RSES and NPF Implementation Roadmap.

The OPR commends the planning authority for preparing the housing supply target (HST) for the six-year plan period in accordance with the Housing Supply Target Methodology for Development Planning (2020) and apportioning these across the various settlements in the county.

Core Strategy and Housing Supply Targets

The OPR highlights a number of areas where further detail is required.

OPR Recommendation No. 1

The Planning Authority is required to amend table 2.8 to address the following:

- (i) To identify the area of land zoned B; Existing residential/Infill in hectares and potential housing yield from same for the settlements at tiers 1-4 (i.e. Key Towns, Self-sustaining Growth Towns, Self-sustaining Towns and Towns)
- (ii) Include an additional column which outlines the shortfall/excess of lands zoned residential land for the aforementioned settlements
- (iii) To identify key settlement consolidation sites in the tier 4 settlements (Towns)
- (iv) Amend table 2.8 to be titled *Core Strategy Table*

The OPR also advise that clarification is required with respect to the variance in housing allocations in table 2.8 (Vol 1) and 3.2 (Vol 2) for Villages and Rural Settlements (as per *Observation No. 1* overleaf).

¹ In accordance with the CSO Housing Completion data

Chief Executive's Response

The comments regarding the Core Strategy of the draft Plans consistency with the prescribed population for Kildare from the NPF and RSES are noted.

The OPRs comments in relation to the plan's compliance with the Housing Supply Target Methodology for Development Planning (2020) are particularly welcome and acknowledged.

In relation to Recommendation No. 1, the draft County Development Plan has been underpinned by the National Strategic Objectives of the NPF, with particular reference to the objective for compact growth.

While the Draft CDP promotes the regeneration of the small town and village centres across County Kildare as mixed-use areas through the identification of opportunity sites on the objective maps in Volume 2 of the Draft Plan, it also acknowledges that there may be issues around site amalgamation, access and other development standards such as flood risk and riparian set back in terms of providing any substantial residential uses within these areas. Although residential uses will be encouraged, the focus for these areas will be rekindling the rural economic, civic and amenity function of these centres. Having regard to the foregoing, the potential housing yield from these lands will be such that it will not significantly impact on the Core Strategy and housing delivery targets. Notwithstanding the above, the detail in relation to specific 'opportunity' sites in any settlement governed by the 12 Local Area Plans in County Kildare will be further analysed as the various Local Area Plans are being prepared, at which stage the potential yields that could arise from such sites taking into account a number of factors, including but not limited to, wastewater treatment capacity issues and planning histories associated with all sites within the LAP area, will be determined.

The requirement to include additional details with respect to shortfall and excess of lands within the tier 1-4 towns is noted, however many of these settlements (with the exception of Athy and Naas for which LAPs were recently adopted) will be subject to new LAPs which will comply with the adopted Core Strategy. Such details would become redundant on adoption of new LAPs for these settlements in early stages of this CDP. Of note is the background work for Kildare Town, Maynooth and Environs and Newbridge which is currently underway with the intention of publication in Q4 of 2022 and into the early stages of 2023.

Furthermore, there are a number of strategic development sites within the larger settlements (Celbridge, Newbridge, Leixlip, Maynooth) where lands have been zoned for new residential development, which is dependent on the delivery of a piece of strategic infrastructure, the delivery of which is likely to be later in the specific plan period and possibly into the next.

These constraints highlight time and delivery limitations with particular sites and their interdependency with strategic infrastructure projects such. Maynooth Eastern Ring Road, Celbridge and Newbridge second bridge and DART+ West.

All zoned lands within the settlements in Volume 2 have been assessed and are considered to be either Tier 1 or Tier 2 and are capable of contributing towards the achievement of the relevant NSOs and NPOs. It is also important, in the context of the overall development strategy for both rural and urban areas in County Kildare, to consider the need to provide a balance between the deliverability of units and avoiding an overly rigid identification of specific capacity lands as part of the Core Strategy. This is particularly important in villages and rural settlements where sites which are well located in planning terms, may not, for various reasons, have come forward for development over previous plan periods, and may not during the current plan period. Notwithstanding this, this does not diminish their suitability from a planning perspective and new land activation measures will be employed where necessary to stimulate development where appropriate.

Furthermore, there are a series of robust development control measures within the plan to manage the sustainable development of zoned lands, namely but not exclusively, V GO 4 (Vol 2) to *'generally control the scale of individual development proposals to 10-15% of the existing housing stock of any village or settlement over the lifetime of the Plan in accordance with the Sustainable Residential Development in Urban Areas Guidelines (2009). For example, for a village of 800 people, the typical pattern and grain of existing development suggests that any individual scheme for new housing should not be larger than 26- 40 residential units and for villages/settlements with less than 300 persons new housing schemes should not be larger than 15 units'*. Such an approach allows for appropriately scaled development relative to its receiving environment (in terms of character and density etc) continuity of supply and choice so while it may be perceived that there is an excess of zoned lands, the development of same will be vigorously managed through the application of specific village/rural settlement objectives.

It is important to note that settlement consolidation sites have been identified, where appropriate, on the "Objectives" maps in Volume 2 of the Draft Plan (V2-1.1b Castledermot, V2-1.2b Derrinturn, V2-1.5b Rathangan) for each of the towns. It should be noted however, that other sites which may appear to be opportunity sites have identified flood risks and therefore will not be considered for vulnerable uses and/or have been identified for new roads objectives etc. and will not have a housing yield.

Furthermore, CSO 1.13 of the CDP states that it is an objective of the plan *'to engage with public infrastructure providers including Irish Water and local communities to provide serviced sites with appropriate infrastructure for people to build their own homes in designated towns and villages, subject to all other relevant planning and environmental criteria as a sustainable alternative to one off housing'*. Additionally, V GO 9 states that it is an objective of the Council to *'Restrict growth in a village/settlement where necessary physical and social infrastructure cannot be delivered. In the absence of the necessary physical or social infrastructure, the projected growth for that development centre may be allocated to other serviced settlements within the same Municipal District or adjoining Municipal District or to serviced towns within the upper range of the settlement hierarchy.'*

The approach taken considers the need to promote compact growth in a balanced way within each settlement area according to its role and function within the settlement hierarchy. A strict adherence to a precise growth limit in these settlements may restrict the Council's ability to comply with NPO 18b and to deliver on the plans county strategic objective to channel development into these villages.

Chief Executive's Recommendation

Amend Table 2.8 as follows:

Table 2.8: Core Strategy Table Settlement Hierarchy – Population and Housing Unit Targets Q1 2023 to Q2 2028.

OPR Observation No. 1

The Planning Authority is required to clarify the variance in housing allocations in table 2.8 (Vol 1) and 3.2 (Vol 2) for Villages and Rural Settlements.

Chief Executive's Response

The variance is as a result of additional lands being zoned to provide for choice, continuity of supply etc. See reference to management mechanisms discussed above, specifically VGO 9

of Volume 2. In the interests of clarity, reference shall be made to V GO 4 and V GO 9 as a footnote to table 2.8 to highlight and adequately demonstrate the control mechanisms and management tools provided within the plan.

Chief Executive's Recommendation

Include new footnote to Table 2.8 for 'Villages and Rural Settlements' as follows:

Objective V GO 4 (Volume 2) is to generally control the scale of individual development proposals to 10-15% of the existing housing stock of any village or rural settlement over the lifetime of the Plan in accordance with the Sustainable Residential Development in Urban Areas Guidelines (2009). Furthermore, Objective V GO 9 (Volume 2) is to restrict growth in a village/rural settlement where necessary physical and social infrastructure cannot be delivered. In the absence of the necessary physical or social infrastructure, the projected growth for that development centre may be allocated to other serviced settlements within the same Municipal District or adjoining Municipal District or to serviced towns within the upper range of the settlement hierarchy.

Update Table 3.2 (Volume 2) to align with Table 2.8 (Volume 1)

Settlement Hierarchy

The OPR submission acknowledges the background analysis of existing physical, social and community infrastructure in each settlement, which informed changes to the county settlement hierarchy. The Office notes the changes to the settlement hierarchy in respect of Narraghmore, Clogherinkoe, Kilkea and Maddenstown and has no comments to make regarding same.

The OPR notes that, with the exception of Clane, the settlement hierarchy is acceptable and consistent with the approach set out in the RSES. The OPR further notes that overall, it is considered that the HST/population allocations in the settlement hierarchy are appropriate for each tier and there is sufficient future housing growth directed to the larger urban settlements.

The OPR notes that Clane has been elevated from a tier 4 'Town' to a tier 3 'Self-sustaining Town' and notes that Variation No. 1 of the dCDP positioned Clane as a town (tier 4). The OPR considers that there is insufficient justification to support the designation of Clane as a 'Self-sustaining Town' and has serious concerns regarding the availability of rail or alternative high quality public transport. The OPR also notes that Clane has a low ratio of jobs to resident workers of only 0.377 which indicates high levels of outbound commuting and a weak employment base. The OPR further notes that no settlement capacity audit has been provided to demonstrate that it meets the criteria of a 'Self-sustaining Town'. Furthermore, the OPR notes the recent rapid population growth and extent of SHD development which has the potential to breach NPO 9. The submission states that there is a real danger that Clane will grow at a rate that is disproportionate to the capacity of its social and physical infrastructure to meet the needs of the community and will result in car dependant travel patterns, contrary to NSOs in the NPF for sustainable mobility and a transition to a low carbon and climate resilient society.

OPR Recommendation No. 2

The OPR recommends that, having regard to NPO 33, 53, 54, Variation no. 1 of the Kildare County Development Plan 2017-2023, the guidance in the RSES on settlement typologies, the absence of a rail station or high-quality public transport network serving the town and the

low ratio of jobs to resident workers, the OPR requires the planning authority to amend the settlement hierarchy in the Development Plan to include Clane in tier 4 'Towns'.

Chief Executive's Response

The positive comments regarding the overall settlement strategy devised for County Kildare are noted, of particular note is the OPR's consideration that (with the exception of Clane) the settlement hierarchy is acceptable and consistent with the approach advocated for in the RSES.

The OPR's commentary and recommendation with respect to the designation of Clane in the dCDP settlement hierarchy is noted and agreed.

Attention is drawn to the content of the Meeting Report dated 21st of February 2022 and specifically the recommendation of the Chief Executive in relation to item no. 5 (of that report) with respect to the designation of the town of Clane in County Kildare's Settlement Hierarchy. It was the Chief Executive's recommendation at the time that Clane be designated as a Town, and not a Self-Sustaining Town.

In designating settlements, the dCDP has taken into account the particular towns' potential to deliver housing however, employment, transport, education and other critical services are also key considerations. The overall development strategy for the County must also seek to balance national policy on the delivery of housing with including but not limited to the efficient use of existing transport (public and roads infrastructure) and water services infrastructure and government policy with respect to sustainable mobility and a transition to a low carbon and climate resilient society.

The many positive attributes of Clane are noted and acknowledged. However, the town has experienced significant housing growth over the last number of decades, and most recently has seen intercensal growth of ca. 578 persons (2011-2016), 1,734 persons (2006-2011) and 551 persons (2002-2006). A total population growth of 2,863 persons in 14 years. For the 2 most recent intercensal periods (2006-2011 and 2011-2016) it is, in simple calculus, close to a 50% increase since 2006, a number, which given the level of residential construction experienced in the town since 2016, is set to increase substantially in Census 2022. Regrettably, this increase has not been accompanied by commensurate delivery of social and physical infrastructure and has not been delivered at locations which are proximate to high-capacity or high-quality public transport corridors. Of significance (and also referenced by the OPR in their submission) is the extent of SHD developments permitted over the past 3/4 years. In excess of 1,000 houses have been permitted by An Bord Pleanála through this process, which, it should be noted, was well in excess of the growth targets set out for the sustainable growth of Clane in the Local Area Plan.

In order to fully assess the "self-sustainability" of the town of Clane, Kildare County Council commissioned AIRO to prepare an assessment of the overall function and performance of the settlement in the context of the relevant national and regional planning objectives.

In terms of historic population growth, the AIRO report indicates a growth from 4,417 persons in 2002 to 7,280 in 2016, with the period between 2006 and 2011 facilitating growth of ca. 1734 persons which equates to 34.9%. Such growth, at locations which are not proximate, or within distance of routes where active travel measures could realistically be employed, leads to a primarily private car dependent settlement, which is already particularly vulnerable with a single narrow river crossing at Alexandra Bridge.

The commuter flows from the settlement are a stark indicator of the weak employment base in the town. To compound this issue, ca. 1,313 persons (39.2%) of the resident workers in the town commute out of County Kildare to work. 36% of these work in Dublin and of these, 77% of those surveyed in the 2016 census, travel to work by private car.

Having regard to the foregoing, it is proposed to amend the settlement hierarchy to designate Clane as a town in the County Development Plan as the settlement aligns with the defining criteria for 'towns' and not those for 'self-sustaining towns' as contained within the Regional Spatial and Economic Strategy and contained in Table 2.8 of the dCDP.

Action TM A2 of the Plan (see response to submission from NTA and TII also) already requires Local Transport Plans to be prepared for each statutory LAP. A Local Area Plan will be prepared for Clane during the lifetime of the plan, and having regard to the foregoing, it is considered appropriate to include an additional objective in Chapter 2 requiring a Local Transport Plan, Settlement Capacity Audit and Social Infrastructure Audit to be prepared to inform the LAPs, in order to facilitate the integration of land use and transportation, to apply a tiered approach to zoning and to identify deficiencies in social infrastructure provision, all in order to provide a sustainable growth strategy for the town. This reflects recent work carried out for the Local Area Plans of Athy and Naas.

Chief Executive's Recommendation

Amend Table 2.8 of the plan to designate Clane as '~~Self-Sustaining~~ **Town**' and associated consequential amendments throughout the Plan.

Insert new objective after CSO 1.18 as follows:

To prepare a Local Transport Plan, Settlement Capacity Audit and Social Infrastructure Audit for each local area plan, in order to facilitate the integration of land use and transportation, to apply a tiered approach to zoning and to identify deficiencies in social infrastructure provision, all in order to provide a sustainable growth strategy for each town.

Sustainable Development

The OPR welcomes the clear policy intent in the draft Plan to direct growth to the larger settlements, provide for sufficient zoned and appropriately serviced land and to promote compact growth and regeneration. The OPR also notes the reduction in land zoned C: New Residential in most settlements from that provided for in the current development plan, which has clearly been informed by matters such as compact growth and flood risk analysis.

The OPR commends the planning authority for the extent of policies and objectives which promote sustainable settlement and transportation strategies in urban and rural areas and reductions in greenhouse gas emissions. The OPR does note however, that there are a number of cases where the approach to ensuring a sufficient supply of housing lands to meet the housing needs for certain settlements is not fully aligned with the core strategy of the draft Plan, and/or national and regional policy.

Chief Executive's Response

The OPRs general comments with respect to the overall sustainable approach to the county's development strategy are noted and the OPRs comments with respect to the reduction in land zoned for new residential development are acknowledged.

OPR Recommendation No. 3

The OPR requires the Planning Authority to review the housing supply targets for Kill, Derrinturn, Prosperous and Blessington in the context of the quantum of lands zoned C; New Residential in these areas and reduce the extent of zoning in these areas to meet the housing supply needs. The OPR requires that consideration be given to sequential approach, compact growth, servicing of zoned lands and the Flood Risk Management Guidelines.

Chief Executive's Response

The general comments in relation to the submission are noted. For clarity, each settlement referenced in this recommendation will be addressed individually having regard to local considerations and other significant matters pertaining to the particular settlement. The query regarding "Additional Provision" is noted. While acknowledging the provisions of the draft Guidelines on Development Plans relating to additional provision, the Council has adopted a bespoke and localised approach to the use of this mechanism which will provide for the potential of additional provision on a case-by-case basis within the main settlements of the county as part of the local area plan process (as was the case with the Athy and Naas LAPs). This allows each plan to consider the specific development circumstances of the individual settlement and have due regard to issues including extant permissions and the potential residential development yield from sites zoned town centre and existing residential/infill. This tailored approach also allows the Planning Authority to comprehensively consider local conditions and variables such as difficulties around site consolidation in town centre locations and more significantly for County Kildare, infrastructural constraints including but not limited to the delivery of strategic bridges over the River Liffey and water and waste water infrastructure upgrades that are due for completion during the plan period or soon thereafter. Such a position is considered to adhere to Section 4.4.3 of the draft guidelines which states that it is 'on a settlement basis, the precise extent to which zoned lands and sites in excess of that required to match the agreed housing supply target are provided, is to be determined by the planning authority'.

Furthermore, it is noted that the Council's programme for LAPs is based on the preparation of a series of evidence-based assessments including an Infrastructural Assessment (Settlement Capacity Audit), a Social Infrastructure Audit, and an Area Based Transport Assessment (ABTA) to determine the suitability and capacity of specific sites to accommodate particular land use zoning objectives. In this regard and given the significant development constraints identified in a number of settlements in the county, it is considered that applying 'additional provision' to settlements in the County Development Plan would be premature and potentially prejudicial to the outcome of the comprehensive evidence-based methodology which is central to the Council's Local Area Plan making process.

Kill

While it is noted that the quantum of lands identified for new residential development in Kill may exceed the core strategy requirement, it is of significance to note that the sites to the east and west of the town have the benefit of recent extant permissions, through the SHD process to An Bord Pleanála.

Lands to the east at Kill Hill (PI ref 20307013) are currently at condition compliance stage of the construction/delivery phase.

Lands to the west at Kill Hill (PI ref 19305416) are currently at condition compliance stage of the construction/delivery phase.

For reference both included Material Contravention statements.

Furthermore, a portion of the C: New Residential Lands to the south of the town also have a series of permissions dating from 2007.

Notwithstanding that the lands present well as suitable development for new housing, it is considered appropriate to manage further growth in the town, and therefore the remainder of these lands (as outlined in yellow, see image below) will be identified as *Strategic Reserve*. Amendments will also be required to the land use zoning matrix Table 2.2 and objectives associated with this zoning.

With respect to the flood risk area identified on the V; Equine zoned lands, these have been assessed and are considered to be a compatible and non-vulnerable use, as the flood risk area is an outdoor exercising arena. See response to the submission from the OPW also in this regard.

Updated justification tests are presented in Appendix E of this report.

Prosperous

Similar to Kill, a significant number of sites within the town of Prosperous are either under construction or within the planning application process.

Lands zoned C: New Residential (1.8ha) to the west have the benefit of planning permission under PI Ref 18/1166 granted on appeal under 19.304859. While it is noted that the lands are within a Flood Risk area, the application was accompanied by a detailed Flood Risk Analysis (FRA) prepared in accordance with the 'Planning System and Flood Risk Management Guidelines for Planning Authorities' (issued by the Department of Housing, Environment and Local Government) when lodged with the planning authority. An additional 12% compensatory flood storage is being provided on site and no houses are proposed to be constructed within the portion of the site that is subject to fluvial flooding. This report was accepted by Kildare County Council and An Bord Pleanála. Condition compliance is at an advanced stage and was submitted as recently as April 2022.

The lands zoned C: New Residential to the south-west (1.9ha) have the benefit of planning permission PI ref 19/48 (ABP appeal reference 306422) for a residential scheme.

The lands zoned C: New Residential (4.7ha) to the north is the subject of a current planning application (PI Ref 20/1403 which was refused in June 2022 by KCC but is within the Appeal period at time of writing). Similarly, the plot of land zoned C:New Residential (4.5ha) to the south of the town is also the subject of a current planning application (PI Ref 21/1503).

While the issues raised by the OPR are noted and notwithstanding the advice in the Draft Development Plan Guidelines regarding extant permissions, given that there are other robust management tools to ensure sustainable development at these locations such as phasing programmes and social infrastructure audits, the objectives of the Draft County Development Plan to channel new housing development into towns and villages and the capacity of both the primary and secondary schools in the town, it is not considered practical or reasonable to amend these zonings at this stage of the development management process or where there are construction works due to commence on site.

Derrinturn

The recommendation of the OPR in respect to Derrinturn is noted and acknowledged. Having regard to the capacity of the wastewater treatment plant, the duration of the County Development Plan and taking into account the Irish Water Capital Investment Plan 2020 –

2024 to include upgrade works to the Derrinturn Waste Water Treatment Plant, it is proposed to include a specific objective on the lands zoned C: New Residential (2.25ha and 3.8ha), to restrict development until such time as the Derrinturn Waste Water Treatment Plant is upgraded to allow for the phased consolidated development of the town to align with NPO 72c. It should be noted that Irish Water have confirmed to KCC that the upgrade to the Derrinturn Wastewater Treatment plant is scheduled under the current IW Capital Investment Programme. Design has commenced and will be delivered during the lifetime of the CDP and additional capacity will come available on completion of same.

The identified flood risk on lands zoned 'Town Centre' is noted and it is considered appropriate to change the zoning objective in this instance to 'Open Space' (see below).

Blessington

Lands identified as being at risk of flooding have been designated as open space in Blessington Environs. A site-specific flood risk assessment will be required to accompany any planning application for residential development on lands zoned 'C: New Residential'. In this regard, KCC is currently considering a planning application for 69 houses and a primary school on the Kilmalum Road (Ref. 21/1606) which is accompanied by a SSFRA. Furthermore, in relation to the other bank of land zoned 'New Residential' off the Naas Road, it is an objective of the Blessington Plan (BE O1) that a new link road is delivered in Phase 1 of that development, as part of an integrated masterplan with the adjoining lands zoned Open Space.

Note: The Strategic Flood Risk Assessment which was prepared to inform the Draft Plan includes (in Appendix B) a series of maps which illustrate the Land Use Zoning with Flood Risk Areas overlaid. It is not considered necessary to replicate these maps within the draft plan. For ease of reference, the SFRA is available at this link:

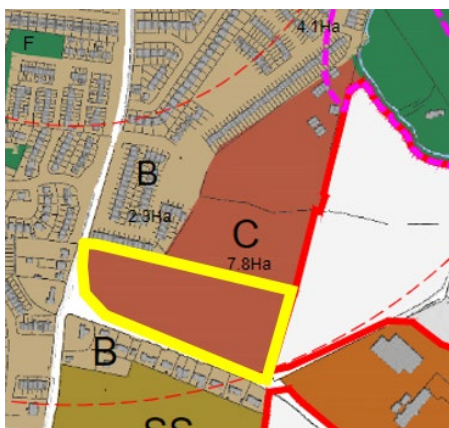
<https://consult.kildarecoco.ie/en/consultation/draft-kildare-county-development-plan-2023-2029>.

Chief Executive's Recommendation

Kill

Amend Land Use Zoning Map for Kill V2 1.3a as follows:

Change the zoning status of lands outlined in yellow below from 'C: New Residential' to 'SR: Strategic Reserve'.



Amend table 2.2 of Volume 2 to include new land use zoning objective as follows

Strategic Reserve: To protect lands from inappropriate forms of development which would impede the orderly expansion of the strategic urban centre in future plan periods.

Amend table 2.8 to include footnote under 'Villages and Rural Settlements' as follows

Objective V GO 9 (Volume 2) is to restrict growth in a village/rural settlement where necessary physical and social infrastructure cannot be delivered. In the absence of the necessary physical or social infrastructure, the projected growth for that development centre may be allocated to other serviced settlements within the same Municipal District or adjoining Municipal District or to serviced towns within the upper range of the settlement hierarchy.'

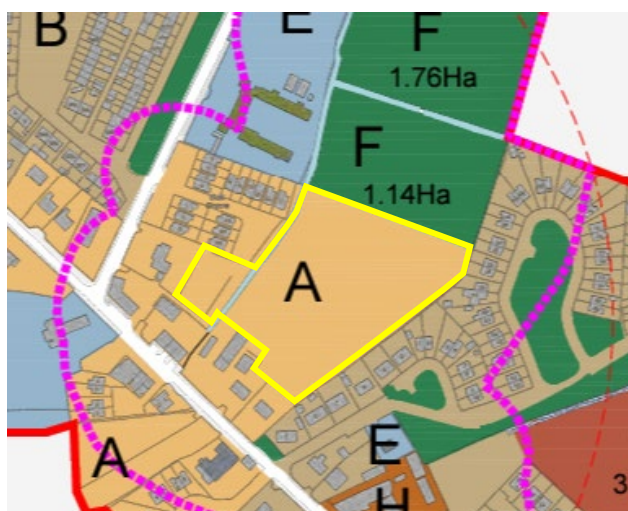
Derrinturn

Amend 'V2 2.3.6 New Residential' in Derrinturn Plan as follows:

- (i) No development shall take place on lands zoned C: New Residential (2.25ha and 3.8ha as identified on Map V2-1.2a) until such time as the Derrinturn Waste Water Treatment Plant is upgraded.
- (ii) Agree an overall masterplan for lands located within the south-eastern portion of the town (3.8ha) and which are zoned C: New Residential (see Map V2-1.2a). The masterplan shall show the overall site development in a phased manner, with the lands located in the southern and eastern sections of the overall site being developed first and the remaining lands developed in a sequential manner to the north and west. The masterplan shall have regard to the existing residential and public open space areas to the north and west.

Amend Land Use Zoning Map for Derrinturn V2 1.2b as follows:

Change the zoning status of lands outlined in yellow below from 'A: Town Centre' to 'F: Open Space'.



Kilcullen

The OPR acknowledges the intent of the planning authority to prepare a new local area plan (LAP) for Kilcullen. However, the OPR raises concerns with respect to the current LAP, which was prepared and adopted during the period of the Kildare County Development plan 2011 – 2017 which the OPR states has now expired, provides for a housing unit target of 709 units with approximately 24 hectares of lands zoned C: New Residential. The OPR

notes that the core strategy in the draft Plan however, provides for a significantly reduced housing supply target over the 2023 – 2039 plan period and suggests that there is a risk, that any zoning objectives in the LAP are not consistent with the core strategy and may result in development coming forward that is not consistent with compact growth and sequential development.

OPR Recommendation No. 4

This recommendation requires the planning authority to include a land use zoning map for the town of Kilcullen which specifically addresses the requirements of the Draft Development Plan Guidelines, the requirements for compact growth and sequential approach to development.

Chief Executive's Response

The content of the OPR submission with respect to Kilcullen is noted.

Attention is drawn to Section 19 (1) of the Planning and Development Act, 2000 (as amended) which sets out the legislative framework for the making of a Local Area Plan. Further attention is drawn to subsection (bb) which states:

(bb) Notwithstanding paragraph (b), a local area plan shall be made in respect of a town with a population that exceeded 1,500 persons (in the census of population most recently published before a planning authority makes its decision under subparagraph (i)) except where—

(i) the planning authority decides to indicate objectives for the area of the town in its development plan under section 10(2), or

(ii) a local area plan has already been made in respect of the area of the town or objectives for that area have already been indicated in the development plan under section 10(2).

In this regard, Kilcullen is a designated town in the 2016 census with a population of 3,473 persons and the Planning Authority has, heretofore, prepared a Local Area Plan for the town of Kilcullen which has, among other critical planning objectives, included a land use zoning map and a series of other objectives for the town.

With reference to the OPR's comment regarding the expiration of the Kilcullen LAP, it is prudent to note legal advice provided to the Council on the life of Local Area Plans/Development Plans, which advises that a plan, notwithstanding its stated period, does not "expire" and remains in place as the appropriate planning framework until replaced through the review process or revoked.

The intention of this recommendation is acknowledged in the context of aligning the provision and quantum of new residential zonings in Kilcullen with the core strategy of the County Development Plan, however, the formulation of a comprehensive development strategy for Kilcullen must be underpinned by robust planning considerations.

In preparing local area plans for settlements in Kildare, a series of evidence-based assessments are prepared to inform a sustainable development strategy for the town. The assessments which include but are not limited to, a Local Transport Plan (as required by the RSES), Social Infrastructure Audit, Settlement Capacity Audit (in accordance with the Draft Development Plan Guidelines) and mandatory environmental assessments.

In the absence of any or all of these assessments the planning authority cannot comprehensively appraise and appropriately assess the overall town, its movement and function and indeed the servicing of particular sites in consultation with Irish Water in a timely manner to align with the legislative time frame requirements associated with the making of the County Development Plan. Of further note is the “Guiding Principles” of the RSES, in terms of the integration of Land Use and Transport (page 187), Table 3.1, which highlights that the integration of land use and transportation planning is required to be underpinned by analysis of travel patterns and potential for sustainable modes. It is therefore not considered appropriate to propose a land use zoning in the absence of any supporting assessments or evidence-based reports (regardless of the size of the settlement).

The issue of citizen involvement and consultation is also significant given that the public consultation for the proposed material alterations is 4 weeks which is not considered as being a fair or reasonable period for the residents, community, landowners, businesses or Elected Members to meaningfully engage in such a substantial proposal (which is likely to result in amended zonings and a updated development strategy). Related to that, is the fact that there is no provision in the legislation to materially amend a “Proposed Material Alteration”, particularly that relates to the zoning of land, once that consultation is complete. The Council must, one way or the other accept or reject the proposed material alteration.

Chief Executive’s Recommendation

Having regard to the foregoing, particularly the absence of critical assessments required to inform the future development strategy for Kilcullen and the issues highlighted above with respect to public consultation, it is not considered appropriate to prepare and include a land use zoning map for the town of Kilcullen as a proposed material alteration of the dCDP. A Local Area Plan for Kilcullen (including Local Transport Plan, Settlement Capacity Audit etc), will be prepared during the lifetime of the plan to align with the Kildare County Development Plan 2023-2029. In this regard, an omission is noted in CSO 1.9 which is proposed to be amended to confirm this.

Amend CSO 1.9 as follows:

[Review and prepare on an ongoing basis a portfolio of Local Area Plans \(LAPs\) for the mandatory LAP settlements of Naas, Maynooth, Newbridge, Leixlip, Kildare, Athy, Celbridge, Kilcock, Monasterevin, Sallins, Clane and Kilcullen in accordance with the objectives of the County Development Plan and all relevant Section 28 Ministerial Guidelines.](#)

Clane

The OPR highlights a series of issues with respect to the town of Clane, notably that the population has “quadrupled” since 1991 and that the quantum of development permitted in conjunction with recent developments in the town, has led to a high probability that Clane’s 2016 population will exceed 30% before 2040 and would therefore breach NPO 9c of the NPF. The submission specifically refers to the extent of SHD permissions in the town which could provide for an additional 1,000 units and variance between it and the stated estimated capacity of these lands in the Clane Local Area Plan 2017-2023. The OPR also notes that CSO 1.9 of the draft plan does not list Clane as an LAP to be reviewed.

OPR Recommendation No. 5

The submission requires the planning authority to include an objective in Chapter 2 of the plan to prioritise the review of the Clane Local Area Plan to address surplus zoned residential lands that are not required to meet Clane's housing allocation for the plan period.

Chief Executive's Response

The exclusion of Clane in CSO 1.9 of the draft Plan is a typographical error and same will be rectified through a proposed material alteration.

Chief Executive's Recommendation

Amend CSO 1.9 as follows:

Review and prepare on an ongoing basis a portfolio of Local Area Plans (LAPs) for the mandatory LAP settlements of Naas, Maynooth, Newbridge, Leixlip, Kildare, Athy, Celbridge, Kilcock, Monasterevin, Sallins, Clane and Kilcullen in accordance with the objectives of the County Development Plan and all relevant Section 28 Ministerial Guidelines.

Villages

The OPR welcomes the inclusion of zoning plans for the villages and rural settlements. The OPR states that an assessment of the zoning plans in respect of key zoning changes from the Kildare County Development Plan 2017 – 2023, flood risk, capacity/absence of wastewater treatment and compact growth has been carried out and a number of issues identified.

The OPR notes that while the housing supply target of 366 units for the tier 5 villages indicates a requirement for between 24.4 ha and 36 ha of zoned residential lands using a density range of 10-15 units per hectare, the zoning maps provide for approximately 62 ha of C: New Residential zoned lands and approximately 9 ha of further land for SS: Serviced Sites.

The OPR notes that a number of sites have been zoned for new residential where flood risk has been identified and also notes that the wastewater treatment capacity in Allenwood is problematic.

Chief Executive's Response

The comments from the OPR with respect to the villages in Volume 2 of the Draft Plan are noted, particularly with respect to the core strategy and the potential over supply of residentially zoned lands to meet this target.

In this regard, attention is drawn to VG O4 of the draft plan which states that it is an objective of the council to *"generally control the scale of individual development proposals to 10-15% of the existing housing stock of any village or settlement over the lifetime of the Plan in accordance with the Sustainable Residential Development in Urban Areas Guidelines (2009). For example, for a village of 800 people, the typical pattern and grain of existing development suggests that any individual scheme for new housing should not be larger than 26- 40 residential units and for villages/settlements with less than 300 persons new housing schemes should not be larger than 15 units"*.

Furthermore, VGP 2 sets out that the Council will facilitate sustainable population growth in the identified villages with growth levels of up to 25% over the Plan period. Such mechanisms provide sufficient management and control over development while allowing flexibility in the development sites that may be brought forward.

As noted above the lands identified as serviced sites within these settlements are intended to act as a sustainable alternative/substitute to one off housing and not as a catalyst for additional population/housing growth as the Kildare Serviced Sites Scheme will apply on these lands, which will require all applicants to comply with the relevant rural housing policies etc, therefore same are not considered for inclusion in the core strategy. It is of significance to note that HP O23 restricts any development of these lands until such time as the scheme is adopted by the council and HO O54 requires that all applicants comply with the requirements of the local need criteria set out in Table 3.4 of the Draft Plan.

OPR Recommendation No. 6

The OPR requires the Planning Authority to review the housing supply targets for the villages of Allenwood, Crookstown, Narraghmore, Moone, Ballitore, Ballymore Eustace, Kilmeague, Suncroft and Johnstown in the context of the quantum of lands zoned C; New Residential in these areas and reduce the extent of zoning in these areas to meet the housing supply needs. The OPR requires that consideration be given to sequential approach, compact growth, servicing of zoned lands and the Flood Risk Management Guidelines.

Chief Executive's Response

The general comments in relation to specific settlements are noted. For clarity, each settlement referenced in this recommendation will be addressed individually having regard to local considerations and other significant matters pertaining to the particular settlement.

Johnstown

It is recommended that the lands zoned 'C' in Johnstown be changed to Q- Enterprise and Employment, so as to ensure the lands which are at risk of flooding are designated as a non-vulnerable use.

Allenwood

While it is noted that there is no capacity in the Allenwood WWTP and no upgrades are planned, the lands identified for new residential zoning are well located and should upgrade works be undertaken before 2029, the lands would provide a significant opportunity for consolidation of the settlement.

Similar to Derrinturn, it is proposed to include a specific objective restricting development until such time as the WWTP is upgraded.

Crookstown

Having regard to the level of social infrastructure particularly that already exists in Crookstown, and to alleviate the pressure on the rural countryside with respect to one-off housing, it is considered appropriate to zone lands for serviced sites within the village boundary.

Ballitore/Ballymore Eustace/Suncroft/Timolin

Updated justification tests have been prepared and these are presented in Appendix E of this report.

Ballitore/Ballymore Eustace/Kilmeague/Narraghmore/Moone/Suncroft

While it is noted that the OPR has made reference to the quantum of lands zoned for new residential development in the aforementioned settlements, attention is drawn to previously referenced VGO 2 to generally control the scale of individual development proposals to 10-15% of the existing housing stock of any village or settlement over the lifetime of the Plan in accordance with the Sustainable Residential Development in Urban Areas Guidelines (2009).

It is considered that such measures will facilitate the level of flexibility required in order to achieve the housing demand target over the lifetime of the plan while sustaining the vitality and vibrancy of the rural villages. It should also be noted that additional growth may only be facilitated where it can be demonstrated that the necessary social and physical infrastructure is in place or can be provided as part of the application to accommodate the proposed development. VGO 9 refers *“Restrict growth in a village/settlement where necessary physical and social infrastructure cannot be delivered. In the absence of the necessary physical or social infrastructure, the projected growth for that development centre may be allocated to other serviced settlements within the same Municipal District or adjoining Municipal District or to serviced towns within the upper range of the settlement hierarchy”*.

The implementation of VGO 9 will be assisted through VGO 8 which is to *“Require the submission of a social infrastructure assessment for schemes in excess of 10 no. units in villages/ settlements. Where deficiencies exist to facilitate the development, measures shall be proposed as part of a development scheme in order to provide for additional suitable social infrastructure (services/ facilities). Significant development will be restricted where there is an absence of a sufficiently developed local infrastructure such as schools and community facilities to cater for development”*.

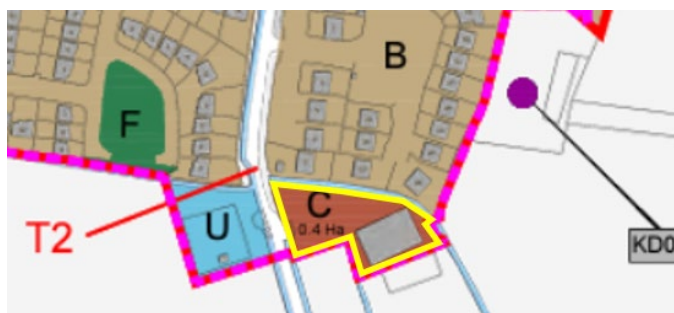
Therefore, while in excess of the required quantum of lands to accommodate the allocated housing growth targets may be perceived to be provided it is considered that sufficient management and control mechanisms exist within the plan (in addition to the housing delivery monitoring proposed earlier in this response) to provide for the sustainable growth of these communities.

Chief Executive’s Recommendation

Johnstown

Amend Land Use Zoning Map for Johnstown V2 3-8 as follows:

Change the zoning status of lands identified as ‘C: New Residential’ to ‘Q: Enterprise and Employment’.



Allenwood

Insert new section in Allenwood Village Plan, Volume 2, as follows:

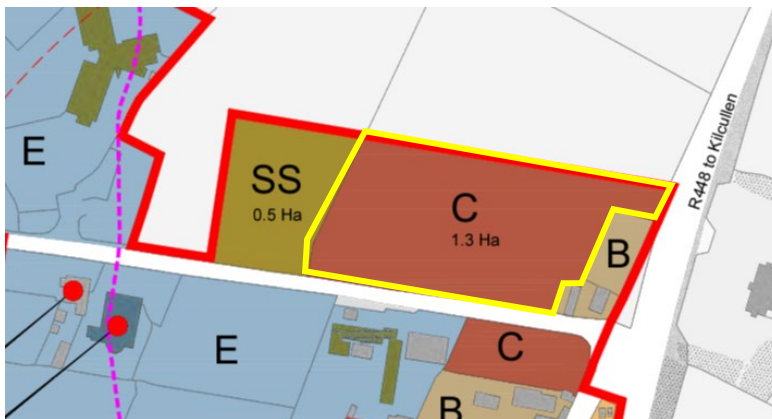
V2 3.2.10 New Residential

No development shall take place on lands zoned 'C: New Residential' (as identified on Map V2-3.1) until such time as the Allenwood Waste Water Treatment Plant is upgraded.

Crookstown

Amend Land Use Zoning Map for Crookstown Village V2-3.7 as follows:

Remove the proposed 0.5ha site as 'SS' (Serviced Sites) and amend the 1.3ha 'C' (New Residential) lands to the east of same to show as 'SS' (Serviced Sites) and to amend the village boundary accordingly



Rural Settlements

The OPR notes that while the HST allocation for the tier 6 rural settlements is for 137 housing units across 19 rural settlements, the zoning maps provide for c. 44 ha of SE: Settlement Expansion and a further c. 12.5 ha of land for SS: Serviced Sites. The OPR further notes that Timolin, Nurney and Rathcoffey have a current limitation on wastewater treatment capacity and that a number of sites have been zoned for new residential where flood risk has been identified.

Chief Executive's Response

It is noted that there are current limitations in Timolin, Nurney and Rathcoffey regarding wastewater treatment capacity and this is acknowledged in Volume 2. It is considered appropriate to include new objectives to require settlement expansion development to align with the upgrade of the wastewater treatment plants, which is anticipated to occur during the lifetime of the plan.

Chief Executive's Recommendation

Insert new Policy in Timolin Village Plan as follows:

V2 3.18.8 New Residential

No development shall take place on lands zoned 'C: New Residential' in Timolin until such time as the Timolin Waste Water Treatment Plant is upgraded.

Insert following text in Table 3.8 of V2 3.19.1 Rural Settlements Objectives:

No development shall take place on lands identified as 'Settlement Expansion' in Nurney and Rathcoffey until such time as the Waste Water Treatment Plant in the respective settlement is upgraded.

OPR Recommendation No. 7

The OPR requires the Planning Authority to review the housing supply targets for the rural settlements of Allen, Ardclough, Broadford, Calverstown, Rathcoffey, Cutbush, Kilmead and Milltown in the context of the quantum of lands zoned C; New Residential in these areas and reduce the extent of zoning in these areas to meet the housing supply needs. The OPR requires that consideration be given to sequential approach, compact growth, servicing of zoned lands and the Flood Risk Management Guidelines.

Chief Executive's Response

Rural Settlements are provided for in V2 3.1.3 of the Plan. Each of the 19. no rural settlements are subject to a development strategy and comprises of a settlement core, existing built-up area, settlement expansion (SE) area and a settlement boundary. The lands within the defined settlement boundaries do not constitute zoned land, and this is clearly stated in V2 3.1.3 of the Plan, i.e. there is no land zoned C: New Residential in the Rural Settlements.

In response to the OPR's particular concerns regarding Allen, Ardclough, Broadford, Calverstown, Rathcoffey, Cutbush, Kilmead and Milltown, the following is noted.

- The 'SE' sites in Allen, Broadford, Cutbush, Kilmead, Rathcoffey and Milltown are considered to present well in terms of compact and sequential growth, and all sites are located within walking distance of a primary school in each settlement. Whilst there is no primary school in Calverstown, it is considered that the SE sites present well in terms of compact and sequential growth.
- In Ardclough, a permitted housing development is nearing completion (Williams Grove) on lands identified 'SE'.
- The 'SE' sites in Allen and Broadford with identified flood risk will require a detailed site-specific flood risk assessment for any development of these lands.

It is therefore considered that the rural settlement policies and objectives contained in V2 3.1.4 and V2 3.1.5 provide choice and opportunity for compact sequential growth within the rural settlements, to align with government policy on rural regeneration. These settlement expansion areas and Serviced Sites have been included as a viable and sustainable alternative to one-off dwellings.

Chief Executive's Recommendation

No change.

Compact Growth and Regeneration

The OPR commends the planning authority on the range of policies and objectives in the draft Plan, which support compact growth and regeneration. The OPR also welcomes the intent of the planning authority to prepare Urban Design Frameworks and Town Centre Renewal Masterplans and implement public realm strategies to support 'placemaking'.

The OPR further notes that while the identification of opportunity sites is welcomed, the zoning maps do not show the CSO settlement boundary or identify key settlement consolidation sites including potential yield from same in the tier 4 towns that would contribute to compact growth in these settlements.

OPR Recommendation No. 8

The OPR requires amendments to the land use zoning maps to include

- a) the CSO settlement boundary
- b) the identification of key consolidation sites within the towns

Chief Executive's Response

The OPRs comments with respect to the inclusion of the CSO settlement boundaries are noted, same will be indicated on the settlement plans, where available from the CSO.

The positive comments regarding the preparation of Urban Design Frameworks and Town Centre Renewal Masterplans are noted, as are the comments with respect to the identification of opportunity sites to be identified on the LUZ maps. However, it is important to note that these areas have already been identified, where appropriate, on the "Objectives" maps in Volume 2 of the Draft Plan (V2-1.1b Castledermot, V2-1.2b Derrinturn, V2-1.5b Rathangan) for each of the towns. It should be noted however, that other sites which may appear to be opportunity sites, have identified flood risks and therefore will not be considered for vulnerable uses and/or have been identified for new roads objectives etc and will not have a housing yield.

Chief Executive's Recommendation

Amend settlement plans in Volume 2 to include (where available) CSO settlement boundaries in the **final** Plan.

Infrastructural Assessment

While the Office welcomes the infrastructural assessment in Appendix 17 and information provided on infrastructure and community/social facilities for each settlement in Volume 2, it is considered that it does not fully satisfy the Tiered Approach to Zoning in line with the requirements of NPO 72 (a, b & c) of the NPF, specifically, the assessment provides generalised statements in relation to tier 1 and 2 lands and is not supported by maps.

OPR Recommendation No. 9

The OPR requires further clarity with respect to the designation of tier 1 (serviced) and tier 2 (serviceable) lands in order to fully satisfy the tiered approach to zoning and provide clarity

regarding lands that are currently serviced and those that are capable of being serviced during the lifetime of the plan.

Chief Executive's Response

The comments regarding the infrastructural assessment in Chapter 17 are noted, as are the requirements for inclusion of further detail. All zoned lands within the settlements in Volume 2 have been assessed and are considered to be either Tier 1 or Tier 2 and are capable of contributing towards the achievement of the relevant NSOs and NPOs. It is also important, in the context of the overall development strategy for both rural and urban areas in County Kildare, to consider the need to provide a balance between the deliverability of units and avoiding an overly rigid identification of specific capacity lands as part of the Core Strategy. This is particularly important in villages and rural settlements where sites which are well located in planning terms, may not, for various reasons, have come forward for development over previous plan periods, and may not during the current plan period. Notwithstanding this, this does not diminish their suitability from a planning perspective and new land activation measures will be employed where necessary to stimulate development where appropriate.

In this regard, the Planning Authority is aware of the requirements of NPO 72 (a, b & c), however also note that Appendix 3 of the NPF (2018) makes reference to further guidance being provided in updated Statutory Guidance that will be issued under Section 28 of the Act. Such guidance has yet to be issued to Planning Authorities in order to assist the preparation of Infrastructural Assessments.

In the absence of same, it is considered reasonable to consider all development lands within settlements in the context of

- NSO 1 – Compact Growth
- NSO 3 – Strengthened Rural Economies and Communities
- NSO 10 – Access to Quality Childcare, Education and Health Services.

In addition to the availability of adequate infrastructure during the lifetime of the plan; both existing and planned, a series of site-specific objectives are now proposed for development lands where upgrades are planned and are not yet complete, restricting their development until such time as upgrade works are complete/operational regarding Derrinturn, Allenwood, Timolin, Nurney and Rathcoffey.

It is agreed to include a series of site-specific objectives for development lands where upgrades are planned and not yet complete, restricting their development until such time as upgrade works are complete/operational.

Chief Executive's Recommendation

Derrinturn

Amend 'V2 2.3.6 New Residential' in Derrinturn Plan as follows:

- (i) **No development shall take place on lands zoned C: New Residential (2.25ha and 3.8ha as identified on Map V2-1.2a) until such time as the Derrinturn Waste Water Treatment Plant is upgraded.**

Allenwood

Insert new section in Allenwood Village Plan, Volume 2, as follows:

V2 3.2.10 New Residential

No development shall take place on lands zoned 'C: New Residential' (as identified on Map V2-3.1) until such time as the Allenwood Waste Water Treatment Plant is upgraded.

Timolin

Insert new Policy in Timolin Village Plan as follows:

V2 3.18.8 New Residential

No development shall take place on lands zoned 'C: New Residential' in Timolin until such time as the Timolin Waste Water Treatment Plant is upgraded.

Nurney and Rathcoffey

Insert following text in Table 3.8 of V2 3.19.1 Rural Settlements Objectives:

No development shall take place on lands identified as 'Settlement Expansion' in Nurney and Rathcoffey until such time as the Waste Water Treatment Plant in the respective settlement is upgraded.

Standards and Guidelines

The OPR acknowledges the density figures as set out in Table 3.1 are generally in compliance with Specific Planning Policy Requirement (SPPR) 1 of the Urban Development and Building Height Guidelines and are welcomed.

The submission further notes that Table 14.4 identifies appropriate locations in the county where building height will be activity pursued in accordance with SPPR1 of the Urban Development and Building Height Guidelines and NPO 35. The designation of specific areas for increased height is welcomed and supported by the OPR.

The OPR has highlighted that the draft Plan includes numerical standards for plot ratio in section 15.2.1 and site coverage in section 15.2.2 and minimum separation distances of 22 metres between opposing first floor windows in section 15.2.3, which requires to be addressed in the context of NPO 13 in addition to the standards for private amenity open space in Table 15.4 which are not fully consistent with those in Appendix 1 of the aforementioned guidelines.

OPR Recommendation No. 10

The OPR require the planning authority to

- a) review and amend the site coverage and plot ratio standards and minimum separation distances between opposing windows and instead focus on assessing the individual development on performance-based criteria in accordance with NPO 13 and Appendix 1 of the Sustainable Urban Housing; Design Standards for New Apartment Guidelines (2020).
- b) review and amend the private open space standards in table 15.4 of the draft plan to be consistent with the aforementioned guidelines.

Chief Executive's Response

The comments of the OPR are noted and acknowledged, with particular reference to the metrics for plot ratios. In accordance with the relevant guidelines, standards in relation to plot ratios will be replaced with an objective which focuses on assessing the individual

development on performance-based criteria in accordance with NPO 13 and Appendix 1 of the Sustainable Urban Housing; Design Standards for New Apartment Guidelines (2020).

NPO 13 of the NPF states: *'In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.'*

Table 15.4 relates to dwellings, not apartments (which are addressed under Section 15.4.7), and it is considered appropriate that these standards remain, noting that the aforementioned section (15.4.7) requires that apartment developments comply with the relevant SPPRs of the Sustainable Urban Housing; Design Standards for New Apartment Guidelines.

Chief Executive's Response to Recommendation No. 10

Amend section 15.2.1 as follows:

15.2.1 Site Coverage and Plot Ratio

~~Site coverage standards are intended to avoid the adverse effects of overdevelopment particularly in urban areas thereby safeguarding sunlight and daylight within or adjoining a proposed layout of buildings. Traditionally, site coverage and plot ratio were used as tools to measure and control the extent of development. Site coverage relates to the percentage of the development site covered by buildings and structures (excluding the public roads and footpaths) and is calculated using the formula below:~~

$$\text{Site Coverage} = \frac{\text{Total area of ground covered by buildings}}{\text{Total ground area within the site curtilage}}$$

~~Plot ratio refers to the relationship between the extent of development proposed as a quotient of the total site area and is calculated using the formula below:~~

$$\text{Plot Ratio} = \frac{\text{Gross building floor area}}{\text{Gross site area}}$$

~~The maximum site coverage shall be 50% for residential development, 75% for industrial and 66% for retail and commercial development. Within town centre zones, the maximum site coverage shall be 80% for all development.~~

Appropriate site coverage and plot ratio will now be considered on a qualitative basis, rather than quantitative, having regard to the quality of design, response to site context (including sensitivity to Architectural Conservation Areas where applicable) and potential impacts on the surrounding environment. Higher site coverage levels of development may be permissible in certain limited circumstances such as:

- Locations adjacent to public transport corridors
- ~~To facilitate areas identified for~~ Locations identified for regeneration purposes.
- When an appropriate mix of both residential and commercial uses are proposed.
- Where exceptional design is achieved, meeting the requirements of Chapter 14.6 of this Plan and the Urban Design Manual –A companion document to the

Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas and the Sustainable Urban Housing; Design Standards for New Apartment Guidelines (2020) where applicable.

~~These site coverage standards shall be acceptable only where consistent with other standards such as open space requirements, car parking, plot ratio, building lines and building heights, fire safety and building regulations together with the amenity of adjoining dwellings / properties.~~

Delete Section 15.2.2 Plot Ratio

Amend section 15.2.3 as follows:

~~In general, a minimum distance of 22 metres between opposing above-ground floor level windows (including extensions to existing houses) will be required for habitable rooms, normally resulting in a minimum rear garden depth of 11 metres.~~ **Traditionally a minimum distance of 22m is required between directly opposing first floor windows.** However, in cases of innovative design, where overlooking into habitable rooms does not occur, this figure may be reduced, subject to ~~the maintenance of privacy,~~ **the protection of adjoining residential amenities and privacy, the quality of design and adherence to the Sustainable Urban Housing: Design Standards for New Apartment Guidelines (2020) where applicable.**

Housing

General

The OPR considers the policies and objectives for housing in Chapter 3 are acceptable and note that these provide sufficient direction on key policy areas such as promoting housing diversity and density and social/affordable housing. Furthermore, the OPR notes that it is the policy of the planning authority to implement with the Housing Section the HNDA (policy HO P3 refers), and to secure the implementation of the Kildare County Housing Strategy in accordance with national legislation.

Rural Housing

The OPR commends the planning authority for the evidence-based approach used to identify areas as Rural Areas Under Strong Urban Influence (Rural Category 1) and Stronger Rural Areas (Rural Category 2) and considers that the objectives for Zones 1 and 2 are generally consistent with NPO 19 of the NPF.

The OPR notes the preparation of the Rural House Design Guide and strongly commends the planning authority for the innovative approach taken in the preparation of the Single Rural Dwelling Density Toolkit which will provide guidance to applicants and decision makers on areas that have the capacity to absorb further rural dwellings. The OPR also welcomes the extent of policy and guidance provided for rural housing including information on environmental and technical considerations and a set of basic principles under which a rural one-off house application would be considered.

Access to National Roads

The OPR acknowledge that objective TM O80 generally addresses the above *Spatial Planning and National Roads Guidelines (2012)*, it is considered that section 3.16 – Access and Entrances would benefit from including a more explicit policy to restrict access from rural one-off houses to the national road network.

OPR Observation no. 2

The office notes the Spatial Planning and National Road Guidelines for Planning Authorities and requests that an additional policy be included under Section 3.16 which restricts access to the national road network in the county regardless of the housing circumstance of the applicant.

Chief Executive's Response

The comments of the OPR regarding the housing policies and objectives in Chapter 3 of the Draft Plan are noted.

The positive comments of the OPR regarding the Councils rural housing policies and objectives in the Draft Plan are noted and welcomed. Of particular note is the commendation for the Single Rural Dwelling Density Toolkit and the encouraging reference to environmental and technical considerations listed in the Draft Plan.

In relation to access to national roads, the Draft Plan is clear that all applications will be considered on their own merits in accordance with the policies and objectives of the plan. TMO80 in Chapter 5 is sufficiently robust, which states it is an objective of the Council to '*Avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 50kph apply as set out in the Spatial Planning and National Roads Guidelines, DECLG (2012)*'. However, a new policy can be included in Chapter 3 also particular to one-off housing.

Chief Executive's Recommendation

Include a new Policy under Section 3.16 Access and Entrances as follows:

Avoid the creation of new accesses for one-off dwellings onto national roads, regardless of the housing circumstance of the applicant, to comply with the requirements of the Spatial Planning and National Roads Guidelines, DECLG (2012).

Rural regeneration

The OPR welcomes the policy support for 'build your own home' opportunities within the existing footprint of rural settlements to provide an alternative to one-off housing in the countryside consistent with NPO 18b and notes that this is reflected in policies HO P22 and HO P23, which promote sustainable alternatives to one off housing and development on serviced sites in compliance with the council's serviced sites initiative scheme respectively.

The OPR particularly notes objective HO O53 to '*Identify a series of pilot project sites...*' and action HO A7 to '*Engage with the Department of Housing, Local Government and Heritage to leverage funding through the 'Croí Cónaithe' (Town) Fund to deliver serviced sites in towns and villages to cater for sustainable alternatives...*'

The OPR commends the approach to rural regeneration and the policies and objectives in section 3.13.6 in terms of the emphasis provided on supporting sustainable alternatives to

one off rural housing and for identifying specific serviced sites opportunities on zoning maps in a variety of smaller settlements.

Chief Executive's Response

The OPRs commendation of Kildare County Councils innovative approach to rural regeneration supported by the policies and objectives in section 3.13.6 in terms of the emphasis provided on supporting sustainable alternatives to one off rural housing are welcomed and acknowledged.

Chief Executive's Recommendation

No change

Economic Development, Employment and Retail Development

The Office welcomes the extent of policy direction and guidance provided in the draft Plan to support economic development consistent with the guiding principles and regional policy objectives in the RSES. The OPR notes the Economic Development Hierarchy is set out in section 4.4 (table 4.1) for tiers 1–4 inclusive and the Strategic Development Areas in the Metropolitan Area Strategic Plan and states that it is a welcome inclusion that sets out the sectoral opportunities for each tier.

The OPR considers the policies and objectives for economic development and enterprise to be generally consistent with the RSES and supports job creation with a focus on reducing emissions in locations that support more sustainable travel.

The OPR commends the planning authority for the wide range of policies and objectives supporting amongst others, further growth of FDI and SMEs, remote working, economic clusters and the knowledge economy and makes particular reference to policy RE P12 and objectives RE O71 to RE O80 which support low carbon and green and bio-economy.

The Office strongly welcomes the inclusion of Objective RE O14 as it supports achieving critical mass and driving sustainable economic development in the MASP area of the RSES.

The OPR welcomes the range of policies and objectives for retail development, which support further retailing in the core retail areas, provide direction on specific issues such as expenditure leakage in Athy and reinforce objectives in the relevant local area plans. The OPR notes that Section 8.7.3 provides policy direction for the smaller town centres.

The OPR considers the County Retail Hierarchy to be generally consistent with the Retail Hierarchy set out in Table 6.1 of the RSES.

The OPR notes that the planning authority has not prepared a county retail strategy as part of the draft Plan, however, considers that there is sufficient guidance and policy direction in chapter 8 of the draft plan, which includes a county retail hierarchy, defined core retail areas, specific policies/objectives for the larger towns and guidance/policy on specific retail uses.

Chief Executive's Response

The comments and commendations with respect to the policies and objectives for Economic Development, Employment and Retail Development are noted and acknowledged. The comments regarding the plans' compliance with the MASP and RSES are also welcomed.

Note: In response to the submission received from EMRA, one change is proposed to Table 8.1 Retail Hierarchy for County Kildare to correct a typographical error, to ensure consistency with the RSES.

Chief Executive's Recommendation

No change.

Rural Economy & Tourism

The OPR notes Section 4.19 which supports agriculture in the county including horticulture, forestry and rural enterprises and seeks to protect agriculture from incompatible urban developments.

Further acknowledgment is given by the OPR to Section 4.20 as it recognises the importance of the equine industry in the county and contains policies and objectives to protect and support the industry and its facilities.

The OPR also notes objectives RD O3 and RD O78, which support a climate resilient economy and the development of renewable energy production in rural areas where appropriate respectively.

The Office also welcomes objective RD O29 which states '*Support the development of renewable energy (wind and solar) on a percentage/no more than 50% of former industrial peatlands/cutaway bogs, in appropriate locations, subject to relevant environmental assessments*'.

The OPR commends the planning authority on the extent of policy direction and support for sustainable tourism development and would like to acknowledge, in particular, the high quality of the Tourism Map provided at the end of Chapter 4.

Chief Executive's Response

The comments and commendations with respect to the policies and objectives for Our Rural Economy and Tourism are noted and acknowledged.

Chief Executive's Recommendation

No change.

Sustainable Transport and Accessibility

The OPR notes that Chapter 5 – Sustainable Mobility and Transport is generally supportive and compliant with national and regional policies and section 28 Guidelines in respect of promoting active travel and sustainable modes of transport in the county. The submission highlights that Chapter 5 is well presented with highly commendable graphics including an overview of the key statistics relating to commuting and travel patterns in the main settlements and county.

The OPR welcomes the integration of land use planning and sustainable transport through the promotion of the '10-minute settlement' which seeks to ensure services and facilities are accessible within a 10 minute walk or cycle.

The OPR notes that the draft Plan sets out ambitious targets for modal share over the plan period and that a large proportion of employment (74%) and education (50%) journeys within the county are carried out by private car. The submission acknowledges that the draft Plan seeks to significantly reduce these figures over the lifetime of the plan to 50% and 40% respectively, which is welcomed, however highlight that the feasibility of achieving such a reduction over the lifetime of the plan may need to be reviewed in consultation with the National Transport Authority.

The OPR notes the commitment for the preparation and implementation of Local Transport Plans/transport strategies for each LAP area (objective TMA2) and states that same are essential for the development of integrated land use and sustainable transport within the county and are supported by the OPR.

With respect to car parking standards the OPR advises the planning authority to review section 15.7.8 to clarify the policy in relation to residential car parking standards to ensure that maximum standards are also applied to residential development.

OPR Recommendation No. 11

The OPR requires the planning authority to:

- (i) review and amend the car parking standards (Section 15.7.8) to ensure maximum standards are included for residential uses in accordance with accordance with NPO 13
- (ii) review and amend the car parking standards (Section 15.7.8) to ensure they are consistent with the Sustainable Urban Housing; Design Standards for New Apartment Guidelines (2020).

Chief Executive's Response

The comments and commendations with respect to Sustainable Mobility and Transport are noted and acknowledged.

The 10-minute settlement is a key concept that emerged at the pre-draft stage of the CDP process, especially from submissions from the community in response to the Issues Paper. It is envisaged that this concept will be a crucial component in the preparation and formulation of the county's suite of Local Area Plans.

It is acknowledged that the modal shift targets are optimistic, however the Local Authority will continue to work with the NTA through LAP and Masterplan processes to help realise a shift in car dependency.

It is agreed to amend the car parking standards and to ensure compliance with the Sustainable Urban Housing; Design Standards for New Apartment Guidelines (2020).

Chief Executive's Recommendation

Insert additional text under Section 15.7.8 (Car Parking) as follows:

Car parking standards are set out in Table 15.9 below to guide proposed development. Other than 'Residential' parking Parking standards are maximum standards. Residential development in areas within walking distances of town centres (800 metres i.e. a 10-minute walk) and high-capacity public transport services (Dart+ services, Bus Connects routes and any designated bus only or bus priority route) should be designed to provide for fewer parking spaces, having regard to the need to balance demand for parking against the need to promote more sustainable forms of

transport, to limit traffic congestion and to protect the quality of the public realm from the physical impact of parking.

Amend Table 0.9 Maximum Car Parking Standards as follows:

Apartment	1.5 spaces per 4 apartments 1 space per unit + 1 visitor space per 4 apartments for every 3-4 apartments
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Amend Section 15.7.8 of the draft Plan, as follows:

- New residential development should take account of the different criteria regarding car parking including:
 - A reduction of car parking standards will be considered on a case-by-case basis, having regard to 'Sustainable Urban Housing: Design Standards for New Apartments (2020)' where applicable.

Climate Action

The OPR acknowledges that the draft Plan incorporates positive policies and objectives supporting climate action as a key driver of development in accordance with NPO 52.

The OPR states that generally, the overall strategy for addressing climate action in the draft Plan is welcomed and supported and is clearly set out within the plan, particularly in relation to the policies in respect of settlement hierarchy, sustainable mobility and transport and renewable energy targets which are consistent with the NPF and RSES.

The OPR does note however, that references to some of the relevant environmental legislation including the *Climate Action Plan (2021)* needs to be updated throughout the plan to reflect the most up to date publications

Observation no. 3

The OPR requests that the draft plan is updated to reference the Climate Action Plan (2021) rather than Climate Action Plan (2019) and address any other emission related contents in the plan to ensure consistency with the 2021 Act.

Chief Executive's Response

The positive comments from the OPR with respect to the strategy for addressing climate action as a key driver of development in the county are noted and welcomed. The Climate Action Plan 2021 has been reviewed and additional changes to the Plan are now set out in Part 4 of this report.

Chief Executive's Recommendation

Amend reference to Climate Action Plan as follows:

Climate Action Plan ~~2019~~ 2021

Sustainable Urban Drainage Systems

The OPR welcomes the policy requirements and objectives in relation to the delivery and implementation of SuDS particularly Objective IN O27 which includes rural one-off residential developments.

The OPR notes the reference to the EU Water Framework Directive, the River Basin Management Plan and the Greater Dublin Area Strategic Drainage Study are noted in accordance with NPO 57, however no reference is included of “*Nature-based solution to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document’ (2021)*”. The OPR advises that this guidance document sets out a more systemic and sustainable approach to the management of rainwater and surface water in urban areas through the implementation of nature-based solutions.

OPR Observation no. 4

The OPR requests that the planning authority has regard to NPO 57 and includes reference to “*Nature Based Solutions to the Management of Rainwater and Surface Water Run-off in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document’ (2021)* in the Draft plan and reviews the provisions for surface water management to ensure the plan aligns with the aforementioned guidelines.

Chief Executive’s Response

The comments regarding SUDS are noted. The Planning Authority is aware of the rapidly changing requirements regarding Nature Based Drainage Solutions (NBDS) and are proposing a series of amendments to reflect the most up to date guidance. These amendments are included in Part 4 of this report.

It is also proposed to include a new action “To develop a ‘Sustainable Urban Drainage Systems Guidance Document’ for County Kildare within one year of the adoption of the Plan”.

Chief Executive’s Recommendation

Include new objective in Section 6.6 Surface Water/Drainage as follows:

To require all plans and projects to comply with the Best Practice Interim Guidance Document ‘*Nature-based solutions to the management of rainwater and surface water runoff in Urban Areas (2021)*’ published by the Department of Housing, Local Government and Heritage, or any subsequent updates to same.

Include new Action in Section 6.6 Surface Water/Drainage as follows:

To develop a ‘Sustainable Urban Drainage Systems Guidance Document’ for County Kildare within one year of the adoption of the Plan.

Renewable Energy

The OPR welcomes the inclusion of policies and objectives in respect of a wide range of renewable energy sources including wind, solar, hydro, geo-thermal, and bio-energy in accordance with NPO 54 and 55.

The OPR notes that in respect of national plans and policies related to renewable energy and wind energy, the planning authority is advised that reference to the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change 2017*

and the relevant strategies therein including *The National Renewable Energy Action Plan 2010 (Irish Government submission to the European Commission)*; *The Government's Strategy for Renewable Energy 2012 – 2020 (DCENR)*; *The Government's White Paper on Energy Policy - Ireland's Transition to a Low Carbon Energy Future 2015-2030 (DCENR)*; and *The Government's National Mitigation Plan, July 2017 (DCCA)* should be included.

The OPR welcomes the specific policies / objectives included for wind energy development including EC P4, EC O11, EC O12 and EC O13 and acknowledges that a Wind Energy Strategy forms part of the draft Plan.

The OPR notes that the planning authority states that the strategy has been prepared in accordance with the provisions of the Department of the Environment, Heritage and Local Government's Draft Guidelines for Planning Authorities on Wind Energy Development (2019) and constitutes a plan led approach to wind energy development in County Kildare.

The OPR acknowledges that the Wind Energy Strategy designates areas across the county where wind energy developments are acceptable in principle, are open for consideration and are not normally permissible and is informed by, amongst others, the county's Landscape Character Assessment which defines five classes of sensitivity across the county.

Overall, the OPR states that they welcome the methodology and evidence-based approach to developing the Wind Energy Strategy, which has had regard to the landscape character assessments in neighbouring counties.

However, having regard to the large area of the county where wind energy development is either 'acceptable in principle' or 'open for consideration', the OPR considers that the evidence basis for the targets in section 5.1 is not clear having regard to the capacity of the county to deliver wind energy and the national targets sets out in the *Climate Action Plan 2021*.

OPR Recommendation No. 12

The OPR requires the planning authority, having regard to NPO 55, the SPPR in the Interim Guidelines for Planning Authorities on Statutory Plans for Renewable Energy and Climate Change (2017) to amend Action EC A1 to read as follows (italics reflect the recommended amendment):

Prepare, within 1 year of the adoption of the County Development Plan a Sustainable Energy Climate Action Plan (SECAP) for County Kildare to *identify the target which County Kildare can contribute in delivering its share of overall Government targets on renewable energy and climate change mitigation over the plan period, and in particular wind energy production and the potential wind energy resource (in megawatts), and commence a variation to the County Development Plan.*

Chief Executive's Response

The contents of the submission as they relate to renewable energy are noted. It is agreed that Section 7.2 'Planning Policy Context' can be amended to include the additional references listed, in addition to Section 2.2 of the Wind Energy Strategy (Appendix 2 of dCDP). However, the Government's National Mitigation Plan (2017) was overturned by the Supreme Court in 2020 so this reference is not included.

Comments regarding the preparation of the WES are acknowledged, in addition to the strategy's general compliance with the requirements of the Draft Guidelines for Planning Authorities on Wind Energy Development (2019). The OPRs positive comments regarding the methodology is welcomed. It is considered reasonable to amend Action AC A1 as recommended.

Chief Executive's Recommendation

Amend Action EC A1 as follows:

Prepare, within 1 year of the adoption of the County Development Plan a Sustainable Energy Climate Action Plan (SECAP) for County Kildare **to identify the target which County Kildare can contribute in delivering its share of overall Government targets on renewable energy and climate change mitigation over the plan period, and in particular wind energy production and the potential wind energy resource (in megawatts), and commence a variation to the County Development Plan, as appropriate.**

Amend Section 7.2 as follows:

Include the following additional references:

- **Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change 2017**
- **The National Renewable Energy Action Plan 2010 (Irish Government submission to the European Commission)**
- **The Government's Strategy for Renewable Energy 2012 – 2020 (DCENR)**
- **The Government's White Paper on Energy Policy - Ireland's Transition to a Low Carbon Energy Future 2015-2030 (DCENR)**

Update Section 2.2 of the Wind Energy Strategy (Appendix 2 of the CDP) accordingly, as per Part 4 of this report.

Flood Risk Management

The OPR notes that a Strategic Flood Risk Assessment (SFRA) has been prepared which is informed by the *Planning System and Flood Risk Management Guidelines* and further notes that Chapter 6 sets out policies and objectives that have been integrated into the Draft Plan in order to ensure flood risk management in the County is controlled in compliance with the Flood Risk Guidelines.

The OPR welcomes Objective IN O31 and the implementation of the sequential approach to flood risk management which is supported by the OPR.

The OPR notes that while the inclusion of Flood Risk Assessment in areas on the land use zoning maps is welcomed, the planning authority should overlay the extent of Flood Zones A and B on the land use zoning maps for greater transparency especially since zoned land that can accommodate vulnerable uses encroaches into the defined Flood Risk assessment areas e.g. Blessington Environs and northwest of Prosperous.

OPR Observation no. 5

The OPR requests that the planning authority overlays the extent of Flood Zones A and B on the land use zoning maps in the draft Plan to provide for greater transparency and to inform

zoning decisions in line with NPO 57 and the Planning System and Flood Risk Management Guidelines (2009).

The OPR also requires the planning authority to review the SFRA to ensure that it is fully consistent with Plan Making Justification Tests contained in *the Planning System and Flood Risk Management Guidelines (2009)*.

Chief Executive's Response

The issues raised are noted. In this regard the Draft Plan has been updated to ensure full compliance with the requirements of *The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009)*. Updated Development Plan Justification Tests have been carried out in accordance with the Guidelines and are included in Appendix E of this report.

A significant number of sites which appear to be within flood risk areas have been through the Development Management Justification Tests whereby Site-Specific Flood Risk Assessments were carried out in accordance with the guidelines.

Furthermore, it is of significance to note that consultation with the OPW confirmed that where the Planning Authority is satisfied with the Site-Specific Flood Risk Assessments then these assessments should be used to inform the Flood Zones in the Strategic Flood Risk Assessment and subsequently the land use zoning, which is the case in the Draft Plan, with particular reference to Prosperous and Blessington.

In response to OPR's Observation no. 5, Volume 2 of the adopted plan will include a series of LUZ maps with Flood Risk Zones overlaid.

Chief Executive's Recommendation

Include updated Justification Tests, as included in Appendix E of this report, to the Strategic Flood Risk Assessment (SFRA) for the Plan.

Volume 2 of the adopted plan will include Flood Risk Zones overlaid on Land Use Zoning maps.

OPR Recommendation No. 13

The OPR requires the planning authority to review and amend the Strategic Flood Risk Assessment in Appendix C of the draft Plan to ensure that it is fully consistent with the Plan Making Justification Test as set out in the Guidelines. The review should include all zoned lands that can accommodate vulnerable uses including those referred to specifically in Recommendations 3, 6 and 7 and to omit or amend proposed zonings that do not meet the Justification Test in accordance with the provisions of the aforementioned Guidelines and Circular.

Chief Executive's Response

Updated Development Plan Justification Tests have been carried out in accordance with the Guidelines and are included in Appendix E of this report noting the outcome of the consultation with the OPW regarding the carrying out of site-specific flood risk assessments.

Chief Executive's Recommendation

Include updated Justification Tests, as included in Appendix E of this report, to the Strategic Flood Risk Assessment (SFRA) for the Plan.

Environment, Heritage and Amenities

The OPR welcomes the inclusion a number of policies and objectives in the draft Plan for the protection and conservation of the built heritage including archaeological sites, architectural conservation areas and protected structures as set out in Chapter 11. The preparation and implementation of the *County Kildare Heritage Plan 2019-2025* is also welcomed by the OPR in addition to the identification of Architectural Conservation Areas throughout the county. The OPR acknowledges and welcomes in accordance with Section 10(2)(e) of the Act, the inclusion of protected views and prospects in relation to Castletown House and Carton House. The inclusion of Scenic Routes and views as set out in appendix 7 are also supported by the OPR.

The OPR notes that Chapter 12 lists and maps the Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Natural Heritage Areas (NHAs) in the county and contains policies / objectives supporting their protection and conservation.

The OPR also notes that Table 12.5 lists wetland ecological sites and ranks them in terms of ecological importance and that Chapter 12 also contains policies / objectives for biodiversity sites, trees, woodlands and hedgerows, waterways and riparian zones, invasive species, geological sites, green infrastructure and SUDS.

The OPR commends the planning authority for the inclusion of green infrastructure concept maps showing inter alia, SPAs, NHA's, blueways, Coillte woodland and green corridors.

Chief Executive's Response

The contents of the OPR submission with respect to protection and conservation of the built heritage including archaeological sites, architectural conservation areas, protected structures, ecological sites and biodiversity protection are noted. The positive reference to the inclusion of Green Infrastructure concept maps are also acknowledged.

Chief Executive's Recommendation

No change.

Implementation and Monitoring

The OPR notes that Chapter 16 "Monitoring and Implementation" and its accompanying Framework set out in Appendix 12 is a clear, well-presented strategy for monitoring the progress of the development plan objectives in accordance with Section 10 of the *Draft Development Plan Guidelines (2021)*.

The OPR welcomes the use of specific actions within the draft Plan as part of the monitoring and implementation stage to enable measurable outcomes to be clearly assessed.

The approach set out within objective MIO1 and MIO2 are welcomed and supported by the OPR.

The OPR notes that Objective MIO1 seeks to undertake a comprehensive, detailed monitoring and evaluation programme for the lifetime of the development plan which

includes the annual monitoring report, 2 year progress report, RSES report, baseline report and SEA monitoring in an Environmental Report.

The OPR highly commends the preparation of Appendix 12 “Monitoring and Implementation Framework” and acknowledges that the framework clearly identifies each policy, objective and action within each chapter of the plan, the overarching guiding principles which underpin its delivery including “Quality of Life, Sustainability, Climate Action, resilience and Inclusivity”, the responsible department for the implementation of the policy objective and the monitoring and evaluation method to be used.

Chief Executive’s Response

The positive comments and support regarding objectives and actions in Chapter 16 are acknowledged.

The high commendation from the OPR regarding Appendix 12 “Monitoring and Implementation Framework” is noted and acknowledged.

Chief Executive’s Recommendation

No change.

2.2 Eastern and Midland Regional Assembly (EMRA) (No. 47)

This submission was approved by the members of the Eastern and Midland Regional Assembly on the 13th May 2022. The submission is overwhelmingly positive and complimentary of the Draft Plan. The summary below primarily focuses on the areas of the Plan which the Assembly believe could be strengthened / improved upon. The submission broadly follows the chapter headings of the Draft Development Plan.

Chapter 1 Introduction and Context

The Assembly welcomes the overview in Chapter 1 including the Strategic Vision, Strategic Objectives, the Policy Context and Socio-Economic Profile. Similarly, the Assembly welcomes a number of cross cutting principles of the RSES in the Introductory chapter. Section 1.4 of the Draft Plan could be strengthened through emphasising that the Plan is required to be consistent with the RSES.

Chief Executive's Response

Whilst Section 1.4.3 of the Plan described the Regional Strategy, it is agreed that Sections 1.4 and 1.4.3 can be amended to reinforce that the Plan is required to be consistent with the RSES.

Chief Executive's Recommendation

Amend Section 1.4 Policy Context:

A development plan shall, as far as practicable, be consistent with the Planning and Development Act 2000 (as amended), national plans, regional spatial and economic strategies, and policies and strategies which relate to the proper planning and sustainable development of land.

Amend Section 1.4.3 Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly

The aim of the Regional Spatial and Economic Strategy (RSES) is to strengthen the settlement structure of the Region and to capitalise on the individual and collective strengths of the region's cities, towns and rural areas. It provides policy responses in the form of Regional Policy Objectives to ensure that people's needs, such as access to housing, jobs, ease of travel and overall well-being are met. The Development Plan is required to be consistent with the RSES. The Strategy is underpinned by three key principles: healthy placemaking, climate action and economic opportunity.

Chapter 2 Kildare Core Strategy and Settlement Strategy

2.0 Core Strategy

The inclusion of the overall chapter aim is a positive addition to the Plan and the reference to the RSES, including the Dublin Metropolitan Area Strategic Plan (MASP), at Section 2.4.4 contextualises the Plan from a national and regional perspective.

2.1 Statutory Requirements

The Core Strategy must be consistent with Section 10 (2A), (2B) and (2C) of the Act.

2.2 Population

It is recommended that the MASP Transitional Population Projections adjusted to comply with NPO 68, in so far as they relate to County Kildare, are documented as part of Section

2.5.2 of the Draft Plan. It is also recommended that the Draft Plan clearly indicates how this additional allocation has been accounted for as part of Table 2.8, noting that the additional 10,000 population allocated to County Kildare is to the Key Town of Maynooth. Furthermore, it is noted that the 2021 population estimate has been used as the baseline for the population targets from 2023-2028. It is recommended that this issue is clarified as part of the Draft Plan and that the population growth figure for the plan period 2023-2028 is clearly stated and used for the purposes of the Core Strategy.

2.3 Housing Supply

Sections 2.5.3 and 2.5.4 of the Draft Plan in addition to the preparation of the Housing Need Demand Assessment have been welcomed.

2.4 Core Strategy Table

The title of Table 2.8 should be amended and called the Core Strategy Table given the requirement and best practice for a Core Strategy Table within the Plan.

It is unclear how the Local Authority has considered the quantum of existing zoned land already available and extant permissions, in determining the overall quantum of zoned land that is required for the plan period. It is recommended that the Core Strategy of the Draft Plan be revised to document same, ensuring that the overall quantum of residentially zoned land is in keeping with the population targets outlined as part of the RSES and the Housing Supply Targets.

It has not been demonstrated how specific consideration of infill/ brownfield and greenfield capacity has been included within the Core Strategy in order to ensure compliance with RPO 3.2 of the RSES and National Policy Objectives 3b and 3c of the NPF related to compact growth (Draft Development Plan Guidelines (August 2021) Chapter 4 and Appendix A relate).

2.5 Tiered Approach to Land Use Zoning

It is recommended that the Local Authority provide a Tiered Approach to Zoning in line with the requirements of NPOs 72a, b and c of the NPF, for all of the targeted development lands identified as part of the Draft Plan. This tiered approach will differentiate between zoned land that is serviced and zoned land that is serviceable within the life of the plan and detail an estimate of the full cost of delivery of the specified services. The Local Authority should consult with Section 3.1 of the RSES which details an asset-based approach in order to determine an overall growth strategy and settlement hierarchy.

2.6 Settlement Strategy

In relation to Section 2.12 and Table 2.7 of the Draft Plan, additional information could explain and justify changes to the settlement hierarchy from the existing County Development Plan, along with explanatory descriptions of self-sustaining towns and self-sustaining growth towns, available in the RSES.

The inclusion of Section 2.11 with respect to rural settlements in the countryside is a positive addition to the Plan and in keeping with RPO 4.78 which would augment the delivery of actions by local authorities, Irish Water, communities and other stakeholders in the provision of services and serviced sites.

2.7 Employment and Economic Considerations

The inclusion of dedicated sections detailing employment in Kildare are considered positive additions to the Draft Plan and the Assembly welcomes the indication that the primary focus for employment growth will be towards the Key Towns of Naas and Maynooth as set out in RSES.

2.8 Core Strategy Objectives

The Assembly noted the inclusion of a number of objectives that form part of the Core Strategy chapter that align with the RSES.

Chief Executive's Response

The Assembly's comments acknowledging the content of the Plan under their headings 2.0, 2.1, 2.3, 2.7 and 2.8 as above are noted and welcomed.

In relation to 2.2 Population, it is agreed that Section 2.5.2 of the Plan can be expanded to include reference to the MASP Transitional Population Projections. The additional population allocation for Maynooth of up to 10,000 people by the year 2031 is addressed in footnote 8 of Table 2.8. The precise allocation that will be attributed to Maynooth will be determined at Local Area Plan stage on foot of detailed assessments and audits of available social and physical infrastructure, to align with RSES's key principle of healthy placemaking.

The 2021 Population Estimate included in table 2.8 is not used as the baseline for population targets from 2023 to 2028 but does however provide an intercensal growth estimate for information purposes. The baseline for population targets and housing targets is the methodology employed to comply with the HSTG Guidelines, and not a population baseline.

In relation to 2.4, it is agreed to rename Table 2.8 to 'Core Strategy Table'.

The issues raised under headings 2.4 (Core Strategy), 2.5 (Tiered Approach to Zoning) and 2.6 (Settlement Strategy, the settlement types) are considered in response to the submission from the Office of the Planning Regulator.

On foot of Preliminary Census 2022 data published by the CSO in June 2022, updated text is now proposed for the Plan and contained in Part 4 of this report.

Chief Executive's Recommendation:

Amend Section 2.5.2 Population Projections for Kildare as follow:

The above figures for Kildare provide for a population range for the period to 2026 and onwards to 2031. Taking the higher range for each growth band the county population is projected to increase by 31,500 persons to 2026 with an additional 12,500 to the year 2031. The MASP Transitional Population Projections, adjusted to comply with NPO 68, allocate an additional population of 10,000 to the Key Town of Maynooth up to the year 2031. The precise allocation that will be attributed to Maynooth will be determined at Local Area Plan stage on foot of detailed assessments and audits of available social and physical infrastructure.

Amend title of Table 2.8 as follows:

Core Strategy Table ~~Settlement Hierarchy – Population and Housing Unit Targets Q1 2023 to Q2 2028.~~

Chapter 3 Housing

3.0 & 3.1 Housing

The Assembly welcomes the inclusion of policy and objectives that focus on ensuring sufficient zoned land in compliance with the Core Strategy and Settlement Strategy (Section 3.6) as well as a number of objectives in Section 3.9 related to compact growth.

3.2 Sustainable Rural Housing

It is recommended that prior to the finalisation of the Draft Plan, the Council ensures that the policy regarding housing in the open countryside is consistent with RPOs 4.80 and 4.81, NPO 19 of the NPF and the content of Circular Letter PL 2/2017 'Sustainable Rural Housing Guidelines for Planning Authorities 2005 – Local Needs Criteria in Development Plans'.

Chief Executive's Response

The Chief Executive is satisfied that the Rural Housing Policy is currently consistent with RPOs 4.80 and 4.81, NPO 19 of the NPF and the content of Circular Letter PL 2/2017 'Sustainable Rural Housing Guidelines for Planning Authorities 2005 – Local Needs Criteria in Development Plans'.

Chief Executives Recommendation:

No change.

Chapter 4 Resilient Economy and Job Creation

The Assembly welcomes the statement referring to the significance of climate action, sustainability and the Green Economy to the future economic development of the County. The references to the LECP, the County's Economic Development Strategy 2025, the support for the Strategic Development Employment Areas in the MASP, the significance of the retail sector, the supporting objectives for, inter alia, the agri-food, agriculture, equine industry, sustainable tourism and heritage of the county are all noted and welcomed.

Chief Executives Response

Noted.

Chief Executives Recommendation:

No change.

Chapter 5 Sustainable Mobility and Transport

The Assembly is very complimentary of a number of aspects of the Sustainable Mobility and Transport Chapter including its policies, objectives, actions and targets and the data used to inform same.

Objective TM O43 is noted which states that it is an objective of the Council to "*facilitate and support the extension of the DART+ line to Kilcock, the extension of the DART+ Southwest line to Naas/Sallins and Newbridge and the extension of the LUAS network...*". It is recommended that the Council revisit this particular objective as the inclusion of Newbridge is currently not part of the NTA's proposed DART+ programme as indicated in the Draft GDA Transport Strategy.

Chief Executive's Response

Measure RAIL 3 of the Draft Greater Dublin Area Transport Strategy refers to Dart Extension. It states that the NTA and Irish Rail will over the lifetime of the Strategy (2022 to

2042) extend the DART to deliver electrified rail services to Sallins/Naas; Kilcock and Wicklow. While it is not part of the DART+ or GDA Transport Strategy to extend the service to Newbridge, it is considered reasonable to amend TM O43 to seek to work with Irish Rail and the NTA to encourage an extension in the future.

Chief Executive's Recommendation:

Amend TM O43:

Facilitate and support the extension of the DART+ line to Kilcock, the extension of the DART+ Southwest line to Naas/Sallins and Newbridge (and promote a future extension to Newbridge in the next DART + programme / GDA Transport Strategy Review) and the extension of the LUAS network, in co-operation with Irish Rail, the Department of Transport and the National Transport Authority.

Chapter 6 Infrastructure and Environmental Services

The Assembly welcomes a number of policies in the 'Infrastructure' chapter to ensure water supply and other supporting infrastructure to meet the needs of a growing population. The Assembly also supports the Council's approach to the sustainable management of surface water using nature-based solutions through SuDS and the suite of supporting objectives set out in the Draft Plan which align with the Guiding Principles for SuDS set out in the RSES. The Draft Plan includes a number of objectives relating to the circular economy, waste management and environmental protection.

The Council is also directed to the potential and opportunities of the Bioeconomy as supported by RPO 7.34 of the RSES

Chief Executive's Response

It is noted that RPO 7.34 states:

'EMRA supports the National Policy Statement on Bioeconomy (2018) and supports the exploration of opportunities in the circular resource-efficient economy including undertaking a bioeconomy feasibility study for the Region to identify the area of potential growth in the Region to inform investment in line with the national transition objective to a low carbon climate resilient economy.'

Section 4.17 of the Plan addresses the Green / Circular Bio-Economy. It is considered reasonable to include an objective in support of RPO 7.34 and EMRA's bioeconomy feasibility study for the Region.

Chief Executive's Recommendation:

Insert new Objective after RE O80:

To support EMRA in undertaking a bioeconomy feasibility study for the region to identify areas of potential growth to inform investment.

Chapter 7 Energy and Communications

The Assembly welcomes the dedicated chapter to energy and communications.

The Draft Plan refers to the Climate Action Plan 2019 and related wind energy target EC T1. All references should be updated to reflect the new Climate Action Plan 2021, where applicable and the associated annex of actions should be reviewed as they relate to local authorities and sectoral emissions reduction targets.

EMRA is leading an ESPON EU research project (QGasSP) to identify a robust method for quantifying the relative GHG (greenhouse gas) impacts of alternative spatial planning policies, the outputs of which are anticipated in 2022, and should inform the Draft Plan as it progresses.

The Assembly welcomes the preparation of the County Wind Energy Strategy that accompanies the Draft Plan as well as the various policies relating to data centres and energy supply.

Chief Executive’s Response

All references to the Climate Action Plan 2019 will be updated to the 2021 Plan where appropriate. Further changes are also included, see Part 4 of this report. The ESPON EU project is noted.

Chief Executive’s Recommendation

To amend references as follows throughout the plan:

Climate Action Plan ~~2019~~ 2021

Chapter 8 Urban Centres and Retail

Kilcullen has been identified at the lower Level 4 small town centre as opposed to its higher position at Level 3 in the RSES Table 6.1. A county retail study/strategy was not prepared to accompany the draft Plan. It is recommended that the Council provide justification with respect to the change in the hierarchy as to that presented in the RSES.

The Assembly welcomes the recognition to the new guidelines published by the Government under Town Centre First: A Policy Approach for Irish Towns (2022) in Chapter 14 and recommends a complimentary reference to same be included within this chapter.

Chief Executive’s Response

It is agreed that Kilcullen should be identified at Level 3 in Table 8.1 ‘Retail Hierarchy for County Kildare’ to align with RSES.

It is also agreed to include a complimentary reference to ‘Town Centre First’ in Chapter 14 also.

Chief Executive’s Recommendation

Amend Table 8.1 Retail Hierarchy for County Kildare as follows:

Level 2	Major Town Centres & County (Principal) Town Centres Naas, Newbridge, Maynooth
Level 3	Town and/or District Centres & Sub-County Town Centres (Key Service Centres) Celbridge, Kilcock, Athy, Kildare, Monasterevin, Clane, Leixlip, Kilcullen
Level 4	Neighbourhood Centres, Local Centres-Small Towns and Villages Small Town Centres Kilcullen, Castledermot, Prosperous, Rathangan and Sallins

	Village Centres Straffan, Allenwood, Ballitore, Ballymore-Eustace, Crookstown, Derrinturn, Kill and Robertstown
Level 5	Corner Shops/Small Villages

Insert new Section as follows:

8.2.7 Town Centre First – A Policy Approach for Irish Towns

The Government’s Town Centre First policy acknowledges the challenges that town centre retail activities continue to experience, which is primarily due to the changing habits of consumers and, in particular, the rise of online shopping. The effects of this can be seen in settlements across the county, with most designated core retail areas suffering from sustained levels of high retail vacancy. The Town Centre First policy seeks to respond to this issue by increasing the focus on the ‘retail-led experience’ which includes a blend of retail services (including food and drink), leisure, entertainment and cultural uses. This approach fully aligns with the intentions of Kildare County Council to future proof town centres by making them more attractive visitor destinations, through the implementation of public realm improvement works and other bespoke regeneration initiatives. It is considered that the development of new and alternative uses and functions for town centres that maximise new recreational, tourist, cultural, employment and residential opportunities will help to secure the long term viability of the existing retail offer in the county’s town centres.

Chapter 9 Our Rural Economy

The Assembly considers this dedicated chapter to the rural economy as a welcome addition to the Draft Plan.

Chief Executive’s Response

Noted.

Chief Executive’s Recommendation:

No change.

Chapter 10 Community Infrastructure and Creative Places

The Assembly considers it necessary that the Plan ensures that social and community infrastructure can be adequately provided in a manner that supports the growth of County Kildare as envisioned in the RSES.

Chief Executive’s Response

The stated Aim of chapter 10 is to provide for and facilitate the development of healthy, sustainable, inclusive communities integrated with the timely delivery of a wide range of community, social, educational, recreational and cultural facilities where accessibility and social inclusion is provided for all, ensuring County Kildare develops as a location with an enhanced quality of life for its citizens and visitors alike. This aim is to be achieved through the stated objectives listed in the Plan. Of particular note are objectives SC O5 to SC O18. It is an Action of this Plan (SC A2) to prepare Social infrastructure Audits for the County’s Local Area Plans to identify gaps/deficiencies in community facilities and services including

the mapping of existing community, educational, sporting, childcare and healthcare facilities and to zone sufficient lands to accommodate identified requirements. The results of the SIA therefore inform zoning decisions and phasing requirements. It is also an objective to require SIAs to be prepared by developers proposing residential schemes of 20 units or more or commercial developments in excess of 2,000sqm (See Section 15.5.1 also).

Objective SC O78 ensures that childcare provision is delivered during phase 1 of any residential or commercial development and is operational prior to the occupation of the first residential unit.

Chapter 14 refers to Urban Design, Placemaking and Regeneration and this sets out KCC's policy responses to healthy placemaking. Objective UD O3 supports and promotes the 10-minute settlement concept across all towns and villages and requires that all Local Area Plans incorporate policies and objectives that will assist in its implementation.

It is an objective of the Plan to inform and engage with the preparation of the emerging Local Economic and Community Plan (LECP) which will promote and support the economic and community development of Kildare.

Chief Executive's Recommendation

No change.

Chapter 11 Built and Cultural Heritage

The Assembly welcomes the policies and objectives to enhance, integrate and protect the special physical, social, economic and cultural value of built heritage assets and ensure their preservation into the future.

The Council should have regard to the annex of actions in the Climate Action Plan 2021 as they relate to heritage properties, in particular the outputs of Action 205.

Chief Executive's Response

Action 205 of the Climate Action Plan 2021 reads as follows; 'Cooperate actively and share knowledge with international partners and climate-proof planning procedures for heritage properties'. It is considered however that the climate proofing of planning procedures is outside the scope of the Draft Plan. However, it is considered appropriate to support thermal upgrading through an additional objective.

Chief Executive's Recommendation:

To include an additional objective in Section 11.15 (Protected Structures) as follows:

The Council will support appropriate and sensitive thermal upgrade of protected structures and other heritage buildings. These works shall be undertaken with the necessary planning permission / statutory declarations with the advice of Kildare County Council's Architectural Conservation Officer.

Chapter 12 Biodiversity and Green Infrastructure

The Assembly welcomes the inclusion of a dedicated chapter on Biodiversity and Green Infrastructure and particularly welcomes the dedicated section on riparian zones and the

addition of Table 1.21 recommending riparian buffer zones adapted from the IFI Guidance which is a positive inclusion and aligns well with RPO 7.26 in the RSES.

The Assembly welcomes the inclusion of the Green Infrastructure Strategy and the preparation of the Kildare Open Space Strategy which informs the Draft Plan.

Chief Executive's Response and Recommendation

Noted. No change.

Chapter 13 Landscape, Recreation and Amenity

Target LR T2 should be reviewed to reflect any new provisions within the Climate Action Plan 2021.

Chief Executive's Response

Target LRT2 is 'On average, increase newly planted forest by 161 hectares per annum, in line with the Government's Climate Action Plan (2019)'. The subsequent Climate Action Plan 2021 removed this quantitative target and replaced this with a qualitative approach to afforestation, whereby a Forestry Programme is anticipated to be published in 2023.

Chief Executive's Recommendation:

Amend LR T2:

~~On average, increase newly planted forest by 161 hectare per annum, in line with the Government's Climate Action Plan (2019)~~ **2021 and emerging Forestry Programme (expected to be published in 2023)**

Chapter 14 Urban Design, Placemaking and Regeneration

The Assembly is complimentary to the addition of this chapter in the Draft Plan and it compliments other chapters which support the settlement growth and economic development of the County's towns and villages.

Chief Executive's Response and Recommendation

Noted. No change.

Other

The Assembly welcomes the Development Management Chapter, Implementation and Monitoring Framework chapter and Infrastructural Assessment chapter.

2.3 National Transport Authority (NTA) (No. 498)

Settlement Policies

It is suggested that CSO 1.9 could include reference to LTPs being prepared in conjunction with LAPs and objective CSP 1.12 is welcomed.

Chief Executive's Response

It is agreed that a policy objective should be included to refer to local transport plans. However, it is considered that equal weight should also be given to Social Infrastructure Audits and Settlement Capacity Audits in this regard.

Chief Executive's Recommendation

Include new objective after CSO 1.9 as follows:

To prepare a Local Transport Plan, Settlement Capacity Audit and Social Infrastructure Audit for each local area plan, in order to facilitate the integration of land use and transportation, to apply a tiered approach to zoning and to identify deficiencies in social infrastructure provision, all in order to provide a sustainable growth strategy for each town.

Transport Policy

The submission welcomes objectives TM O1 and action TM A1. In relation to TM A1, it is submitted that the NTA will assist with the preparation of a County Kildare Sustainable Mobility Plan where required and that all the objectives of such a plan should be aligned with the National Sustainable Mobility Policy, The National Investment Framework for Transport in Ireland (NIFTI) and the Draft Transport Strategy for the Greater Dublin Area 2022-2042.

Chief Executive's Response

The comments in relation to TM A1 are noted and considered acceptable.

Chief Executive's Recommendation

Amend TM A1 as follows:

Prepare a County Kildare Sustainable Mobility Plan that addresses the long-term mobility needs of communities and businesses in the county, in co-operation with the National Transport Authority that is aligned with the National Sustainable Mobility Policy (2022), the National Investment Framework for Transport in Ireland and the Draft Transport Strategy for the Greater Dublin Area 2022-2042.

Local Transport Plans (LTP)

The submission welcomes TM A2 of the Draft Plan.

Planning for Public Transport

Action TM A4 and objectives TM 09, TM 010 and TM 012 are welcomed.

The submission highlights the fact that the DART+ projects will improve journey time reliability and train frequency. It is submitted that the opportunity presented by the enhancement of this high-capacity public transport network should be reflected in the policies of the draft Plan.

Furthermore, it is submitted that the Plan should provide support to the measures required for the successful implementation of DART+ such as the removal of level crossings and the provision of alternative infrastructure solutions where required and as identified in the DART+ proposals.

Chief Executive's Response

It is considered acceptable to reference the opportunity presented by the DART+ projects to improve journey time reliability and train frequency in Objective TM O9. In relation to the submission that the draft Plan should provide support to the measures required for the successful implementation of DART+, it is considered that objective TM O9 adequately addresses this issue.

Chief Executive's Recommendation

Amend TM O9 as follows:

Facilitate and secure the delivery/implementation of the public transport projects that relate to County Kildare as identified within the Integrated Implementation Plan (2019-2024), (or any superseding document), including the DART+ programme (Including DART+ West and DART+ Southwest), BusConnects and the light rail investments. The DART+ projects present an opportunity to improve journey time, reliability, and train frequency.

Walking and Cycling

The submission notes the policies and objectives in the Plan which support the aim to encourage modal shift to sustainable modes and to this end to provide improved infrastructure for pedestrians and cyclists.

GDA Cycle Network Plan

The submission welcomes Section 15.7.1 and suggests that Section 15.7.2 refer to the National Cycle Manual (or any subsequent update).

It is also recommended to ensure that the cycle network contained in the Plan maps reflect the final GDA cycle network to be published alongside the Transport Strategy for the Greater Dublin Area 2022- 2042.

Chief Executive's Response

It is considered necessary to refer to the National Cycle Manual (and any subsequent update) in Section 15.7.2 as suggested. The recommendation to include the finalised cycle network maps in the Plan is noted and accepted, if the Transport Strategy for the Greater Dublin Area 2022-2042 is published at such a time during 2022 that provides the council with sufficient opportunity, given the legislative deadlines that relate to the plan making process, to add the maps to the Plan.

Chief Executive's Recommendation

Add the following text to Section 15.7.2 as bullet point number two:

New cycle parking shall be designed in accordance with the National Cycle Manual (2011 and any subsequent updates).

Replace the Draft GDA Cycle Network maps at the end of Chapter 5 with the final GDA Cycle Network maps if possible, subject to the timely publication date of the GDA maps relative to the legislative deadlines with respect to the emerging County Development Plan.

Permeability

The requirement for new developments to maximise permeability and connectivity to public transport networks is welcomed.

It is suggested that the Plan include a specific objective in relation to kissing gates. Kissing gates will not be supported in future NTA funded projects.

Chief Executive's Response

The suggestion to include a specific objective with regards to kissing gates is accepted. The amendment of objective TM O2 is proposed to include reference to kissing gates.

Chief Executive's Recommendation

Amend TM O2 as follows:

Promote and drive a human-centred, whole journey approach to improving transport infrastructure and accessibility in County Kildare to ensure a seamless user experience. The use of kissing gates in active travel projects will not be permitted in cases where they would deny access to those using mobility aids and non-standard bicycles.

Park & Ride

It is recommended that the draft Plan includes an objective to support the NTA, in accordance with the Draft Transport Strategy for the Greater Dublin Area 2022-2042, to secure the development of Park and Ride facilities

Chief Executive's Response

It is considered that Objective TM O46 adequately addresses the recommendation in relation to Park and Ride facilities.

Chief Executive's Recommendation

No change.

Strategic Road Network

To protect the strategic transport function of the national roads, including motorways, the submission recommends that the development objectives should be in accordance with the DOECLG Spatial Planning and National Roads Guidelines (2012), and that this should be referenced in the Development Plan.

Chief Executive's Response

In relation to the recommendation to reference the DOECLG Spatial Planning and National Roads Guidelines (2012), it is considered that Objectives TM O78, TM O79 and TM O80 adequately address same.

Chief Executive's Recommendation

No change.

Parking Standards

The submission welcomes that the draft Plan states that all parking standards are maximum. The NTA questions the inclusion of the provision of up to 2 car parking spaces per classroom in Table 0.9 of the draft Plan.

While it is acknowledged that these are maximum standards, it is possible that this level of provision could result in high car mode share. It is suggested that the list contained below Table 0.9, to which the Council will have regard, include 'Park and Stride' initiatives.

Chief Executive's Response

It is acknowledged that the provision of up to 2 car parking spaces per classroom for primary and secondary schools could result in high car mode share and therefore proposes an amendment to Table 0.9. Furthermore, the suggestion in relation to 'Park and Stride' initiatives is accepted.

Chief Executive's Recommendation

Amend Table 0.9 Maximum Car Parking Standards in Section 15.7.8 as follows:

Primary School	1 2 per classroom
Secondary School	1 2 per classroom

Amend the second bullet point after Table 0.9 in Section 15.7.8 as follows;

In addition, the Council will have regard to:

- Park and Stride initiatives;

Travel Trends Analysis

The submission notes the inclusion of the extensive trip length distribution and mode share analysis and the mode share targets for both work and education trips.

Volume 2 Settlements

The following recommendations are made in relation to Volume 2:

- In relation to the movement and transport objectives for the various settlements include reference to the GDA Cycle Network Plan (where appropriate) which is currently being finalised as part of the Draft Transport Strategy.
- Closely examine the specific requirements for the identified road proposals against the objectives and aims of the draft Plan and the GDA Transport Strategy in order to deliver the mode share targets identified.
- If feasible, locate the Community and Education zoning of the Blessington Environs centrally within the Kildare zoning area, to facilitate sustainable mode choices for school children.
- When finalised, add the proposed routes contained in the GDA Cycle Network Plan to the Blessington Environs Map.

Chief Executive's Response

The recommendation to reference the GDA Cycle Network Plan (where appropriate) in Volume 2 is accepted.

It is considered that there is a significant sway towards setting up the infrastructure to encourage a modal shift towards the use of sustainable modes of transport in the Movement and Transport objectives identified for each of the small towns and villages. A number of the movement and transport objectives with regards to roads relates to improving, upgrading or realigning roads or junction rather than proposing the development of new roads. For example:

Castledermot Small Town

- Objective ST C16 relates to the preparation of a Local Traffic Plan.
- Objectives ST C17 and ST C18 relate to active modes of transport and public transport infrastructure improvement.
- Objectives ST C21 and ST C22 relate to improving, upgrading, or realigning roads or junctions.
- Objective ST C23 relates to car parking.
- Objective ST C19 is the only objective related to the construction of new roads.

Allenwood Village

- Objectives V AL10, V AL11, V AL13 relate to improving, upgrading, or realigning roads or junctions.
- All other objectives (V AL12, V AL14, V AL15 & V AL16) relate to active modes of transport infrastructure improvement.

Based on the above, no changes are proposed to the Movement and Transport objectives of Volume 2.

An application has now been lodged with Kildare County Council for the development of a primary school on the subject site further to consultation with the Department of Education in relation to same. It is not proposed to amend the location of the school site at this time.

Chief Executive's Recommendation

Include a reference to the GDA Cycle Network Plan (where appropriate) in Volume 2.

To add the proposed routes contained in the GDA Cycle Network Plan to the Blessington Environs Map Ref. V2 – 2.1, subject to the timely publication date of the GDA maps relative to the legislative deadlines with respect to the emerging County Development Plan.

2.4 Transport Infrastructure Ireland (TII) (Sub No. 345)

Chapter 5 General

The strategic nature and role of the national road network is recognised in the Draft Plan. The strategic function of the motorway network to transport goods and people throughout the country needs to be addressed in the Draft Plan.

The submission requests a minor change to the Aim and Policy TM P1 in Chapter 5 to include the word ‘through’ when referring to movement within the county.

Chief Executive’s Response

The contents of the submission are noted. The change to the overall Aim of Chapter 5 and the change to Policy TM P1 are accepted.

Chief Executive’s Recommendation

Amend Aim as follows:

To promote and facilitate ease of movement within and through and access to County Kildare...

Amend TM P1 as follows:

Promote sustainable development through facilitating movement to, from, through and within the County

Section 5.3 Overarching Goals, Policies and Objectives

The submission from TII welcomes the explicit commitment at Action TM A2 for the preparation of Local Transport Plans / Transport Strategies as part of LAPs. TII states that where there are potential national road network implications, they would welcome and facilitate consultation in establishing the implementation of ABTAs. The submission requests that the Draft Plan change the reference to the ABTA as it only references the notes and there are a number of documents. The changes recommended are as follows:

“~~Prepare, implement and review (where appropriate) Local Transport Plans (LTPs)/Transport Strategies (TSs) for each of the statutory LAP settlements in County Kildare in consultation with the TII and NTA, based on the TII/NTA Area Based Transport Assessment Guidance, (published Notes (2018)... The Accessibility and Movement Objectives of Local Area Plans should be based on relevant LTPs”.~~

Chief Executive’s Response

Agree, in part to amend TM A2 as suggested.

Chief Executive’s Recommendation

Amend TM A2 as follows:

Prepare, implement and review (where appropriate) Local Transport Plans (LTPs)/Area Based Transport Assessments (ABTAs) ~~Transport Strategies (TSs)~~ for each of the statutory LAP settlements⁴ in County Kildare in consultation with the TII and the NTA, based on the following ABTA guidelines published by the TII/NTA – ABTA ‘How To Guide’, Pilot Methodology (September, 2021) and the Area Based Transport Assessment Advice Note (December, 2018) ~~TII’s Area Based Transport Assessment Guidance Notes (2018).~~

LTP/ABTAs will include the transport priorities for each settlement in terms of public transport infrastructure and services; cycle investment; improvements to the pedestrian environment; parking measures and road enhancements. LTP/ABTAs must be developed to provide a framework to cater for the movement of pedestrians, cyclists, public transport services and private vehicles which are aligned with the hierarchy of users and modal shift targets set out in this Plan. The Accessibility and Movement Objectives of Local Area Plans should be based on relevant LTP/ABTAs.

Section 5.4 Sustainable Movement

The TII notes that objective TM O27 and Action TM A6 relate to investigating the possibility of walking and cycling routes 'alongside' our national roads. The TII has concerns over the incompatibility with regards the function of national roads and public safety. The TII advises that any crossing of the national road network (under or over) will require prior consultation with TII and compliance with standards in TII publications and request that the objectives reflect the changes as follows:

TM O27: "from Athy along the N78 to the east as far as the M9 Motorway subject to the requirements of TII publications"

TM A6: "Develop a new pedestrian and cycle link from Celbridge to Leixlip, via Castletown House, through the former Hewlett Packard site, across the M4 to the Wonderful Barn and onto Leixlip Town Centre and Leixlip Louisa Station, in accordance with the requirements of TII publications."

Chief Executive's Response

The identified changes to TM O27 and TM A6 are noted and considered acceptable.

Chief Executive's Recommendation

Amend TM O27 as follows:

- from Athy along the N78 to the east as far as the M9 Motorway subject to the requirements of TII publications.

Amend TMA6 as follows:

... across the M4 to the Wonderful Barn and onto Leixlip Town Centre and Leixlip Louisa Station, in accordance with the requirements of TII publications.

Section 5.5 Road and Street Network

TII welcomes references to and observance of official policy in relation to national roads. In relation to the Priority Road and Bridge Projects identified under Table 5.4 those additional improvements should be undertaken in consultation with TII and it should be noted that TII may not be responsible for the funding of any such schemes or improvements.

Chief Executive's Response

The comments in relation to Section 5.5 of the Draft Plan are noted and accepted.

Chief Executive's Recommendation

No change

Section 5.6 Motorways

In respect of the Policy TM P5 and Objectives TM O71 through to TM O77 TII recommends that the official national road policy is included for clarity.

The submission states that the M4 Maynooth to Leixlip Scheme remains part of Project Ireland 2040, and the remaining nationally identified schemes are suspended. It is stated that Objectives TM O72, TM O75 and TM O76 appear to consist of works to motorways and / or their junctions that have not been identified as a national priority and are therefore not currently resourced under the NDP. The submission states that the status and funding of these projects need to be reviewed and clarified in accordance with TII publications and relevant Government transport policy.

The TII states that there needs to be clarification in relation to service areas in the Draft Plan.

In the above context the following recommendations are made:

Policy TM P5 (TII Recommendation 6)

“Work with Transport Infrastructure Ireland in accordance with the Spatial Planning and National Road Guidelines for Planning Authorities (2012) to develop and operate the motorway network through the County and to ensure that the carrying capacity, efficiency and safety of the network and associated junctions is protected, maintained and improved and to prevent development that could hinder the future upgrading of motorway routes and interchanges.”

TII Recommendation 7

Objectives TM O72 (Junction 7 of the M4); TM O75 (Junction 14 of the M7); and TM O76 (Junction 11 of the M7 and junction 1 of the M9) are to be restated *to consist of studies* to be carried out by Kildare County Council in consultation with TII and other relevant agencies.

TII Recommendation 8

Suggested amendment to TM O77:

~~“Support and facilitate the adequate provision of~~ *Proposals for Motorway Service Stations Areas* in accordance with the Spatial Planning and National Roads Guidelines for Planning Authorities, DECLG (2012) and the TII Motorway Service Area Policy guidance document (2014 or as may be amended during the life of this Plan).”

Chief Executive’s Response

Recommendation 6, 7 and 8 are noted and accepted.

Chief Executive’s Recommendation

Amend TM P5 as follows:

Work with Transport Infrastructure Ireland in accordance with the Spatial Planning and National Road Guidelines for Planning Authorities (2012) to develop and operate the motorway network through the County ...

Amend TM O72 as follows:

Improve the safety and capacity at the M4 Maynooth Interchange (Junction 7) and investigate the provision of a future improved connection to the M4, either at the current location or elsewhere, subject to the necessary studies to be carried out by Kildare County Council in consultation with TII and other relevant agencies.

Amend TM O75 as follows:

Improve the safety and capacity of the M7 Monasterevin Interchange (Junction 14) through the provision of an upgrade to the interchange **subject to the necessary studies to be carried out by Kildare County Council in consultation with TII and other relevant agencies.**

Amend TM O76 as follows:

Provide for all vehicle movements from the west to the south as well as from the south to the west at the M7 (Junction 11) / M9 (Junction 1) Interchange and to investigate the feasibility of providing for a M9/M7 interchange connection along the M7 at Junction 12 **subject to the necessary studies to be carried out by Kildare County Council in consultation with TII and other relevant agencies.**

Amend TM O77 as follows:

~~Support and facilitate the adequate provision of Motorway Service Stations in~~ **Ensure proposals for of Motorway Service Stations Areas are developed in accordance with identified in the Spatial Planning and National Roads Guidelines for Planning Authorities, DECLG (2012) and the TII Motorway Service Area Policy guidance document (2014 or as may be amended).** ~~during the life of this Plan).~~

Section 5.7 National Roads

The Draft Plan separates motorways objectives from national roads objectives and introduces reference to national 'routes' as though separate from the motorway network. The TII states this is inappropriate and confusing.

Additional connectivity to national roads should be developed in accordance with the S.28 Guidelines and Section 5.8.3 of the Transport Strategy for the Greater Dublin Area – Principles of Road Development, feasibility and environmental assessment, and demonstration of their compatibility with the strategic function of the national road network.

TII Recommendation 9 – Section 5.7 introduction:

“National roads are defined as arterial routes within DMURS for urban areas. In addition to the M4, M7 and M9 motorways there are three further national Routes roads in County Kildare.”

TII Recommendation 10 – TM O84

“Support the future development of the N3-N4 Barnhill to Leixlip Interchange in accordance with strategic development objectives and the Spatial Planning and National Roads: Guidelines for Planning Authorities, DECLG (2012).”

TII Recommendation 11 – TM A20

“Upgrade the section of the N81 National Secondary Road (Tallaght/Baltinglass) that is located within County Kildare, subject to funding and in accordance with the requirements of TII.”

Chief Executive's Response

Recommendation 9, 10 and 11 are noted and accepted.

Chief Executive's Recommendation

Combine Section 5.6 and Section 5.7 as follows:

5.6 Motorways National Road Network

The national road network consists of national primary and secondary roads, including motorways and associated junctions, outside the 50-60 kph speed limit zones for cities, towns, and villages.

In addition to the M4, M7 and M9 motorways there are three national roads in County Kildare.

- The N7 linking Naas and Dublin;
- The N81 running along the border between Kildare and Wicklow; and
- The N78 connecting Ballitore (Junction 3 on M9) and Athy and onwards to Ballylynan.

The motorway network primarily serves long and middle-distance traffic originating in or passing through the county including the transportation of freight. These routes have an important role to play in the economic development of the county and the state.

5.7 National Roads

National roads are defined as arterial routes within DMURS for urban areas. There are three National Routes in County Kildare.

- The N7 linking Naas and Dublin;
- The N81 running along the border between Kildare and Wicklow; and
- The N78 connecting Ballitore (Junction 3 on M9) and Athy and onwards to Ballylynan.

Add the objectives and targets of Section 5.7 to Section 5.6 and update the numbering of all parts of the remainder of Chapter 5.

Amend TM O84 as follows:

Support the future development of the N3-N4 Barnhill to Leixlip Interchange in accordance with strategic development objectives and the Spatial Planning and National Roads: Guidelines for Planning Authorities, DECLG (2012)

Amend TM A20 as follows:

Upgrade the section of the N81 National Secondary Road (Tallaght/Baltinglass) that is located within County Kildare, subject to funding and in accordance with the requirements of TII.

Section 5.8 Regional Roads

TII notes the inclusion in Table 5.5 in relation to the improvement of regional roads associated with the Blessington to Naas route and routes from Dunlavin and Baltinglass to

the M9/N9. TII advises that such a proposal would consist of works to the N81 and M9 motorway and / or their junctions that have not been identified as a national priority and are therefore not currently resourced under the NDP.

TII Recommendation 12: Amend Table 5.5 Measure 43.

“To improve regional road links between Wicklow and other counties, in particular the Blessington to Naas

route and routes from Dunlavin and Baltinglass to the M9/N9 in accordance with national transport policy requirements and in consultation with TII and other statutory agencies, as appropriate.”

Chief Executive’s Response

Recommendation 12 is noted and accepted.

Chief Executive’s Recommendation

Amend Table 5.5 Regional Roads Identified for Improvement as follows:

No. 43

To improve regional road links between Wicklow and other counties, in particular the Blessington to Naas route and routes from Dunlavin and Baltinglass to the M9/N9 in accordance with national transport policy requirements and in consultation with TII and other statutory agencies, as appropriate.

Chapter 15 – Development Management Standards

TII Recommendation 13:

Section 15.7 Transport - 15.7.6 Access Requirements should include a statement reflecting official policy regarding the creation of new or intensification of existing accesses onto the national road network outside of the urban speed limit. The following statement is suggested:

-

“In accordance with the Spatial Planning and National Roads Guidelines for Planning Authorities, DECLG (2012), the creation of additional access points from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 50kph apply will be avoided”.

TII Recommendation 14:

Section 15.13 Retail Development - 15.13.6 Motor Service Areas / Petrol Filling Stations should be renamed as “**Motorway Service areas**” for consistency throughout the Draft Plan.

TII Recommendation 15:

Section 15.15 Advertising and Signage a reinforcing statement re. advertising and signage on the national road network to be inserted in the Plan as follows: -

Proposals for signage on or at national roads will be assessed against Chapter 3 of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) and TII Policy on the Provision of Tourist & Leisure Signage on National Roads (March 2011).

Chief Executive's Response

Recommendation 13 and 15 are noted and accepted.

In relation to Recommendation 14 it is considered as the section refers to two individual components namely, Motorway Service Areas **and** Petrol-filling stations then this should be reflected in the heading title. Furthermore, a revision to the standards to reflect the requirement for electric car charging provision is also deemed necessary.

Chief Executive's Recommendation

Amend Section 15.7.6 (Access Requirements) by including the following:

- In accordance with the Spatial Planning and National Roads Guidelines for Planning Authorities, DECLG (2012), the creation of additional access points from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 50kph apply shall be avoided.

Change the title of the Sub-Section 15.13.6 as follows. This change may have consequential amendments throughout the Draft Plan to ensure a consistency in terminology.

Amend 15.15 (Advertising and Signage) by including the following:

- The siting of signage and advertising structures on, under, over or along a public road is subject to a sign licence in accordance with Section 254 of the Planning and Development Act 2000 (as amended).
- Proposals for signage on or at national roads will be assessed against Chapter 3 of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) and TII Policy on the Provision of Tourist & Leisure Signage on National Roads (March 2011).

2.5 Office of Public Works (OPW) (Sub 104)

Sequential Approach

Only if there are no reasonable sites available in zones of low flood probability should consideration be given to development in higher flood probability zones. It would appear that land use zoning within Flood Zones that would be considered inappropriate or require application of the Justification Test, in accordance with Table 3.2 of the Guidelines, has been proposed in a number of settlements, as detailed in the Comments on Specific Settlements.

Chief Executives Response

The OPW's concerns in relation to the application of the sequential approach to managing flood risk for the settlements in Volume 2 is noted. In response to the specific comments on various settlements, updated Justification tests have been prepared where appropriate and, in some instances, revised zoning proposals have been brought forward in accordance with the sequential approach.

Chief Executive's Recommendation

See revised Justification Tests published in Appendix E of this Report and response to individual settlements under SFRA.

Flood Zone Mapping

The submission states that while the inclusion of the various datasets on the flood zone mapping is helpful, it has resulted in somewhat cluttered mapping. The Guidelines on the Planning System and Flood Risk Management (DECLG/OPW, 2009) require Flood Zones to be defined, based on all available information in order for the sequential approach to be applied to land use zoning in flood risk areas. It would be preferable if mapping were included with Flood Zones A and B overlaid on the land use zoning.

Chief Executives Response

While the SFRA Report already includes maps showing Flood Zones overlaid on land use zones, it is agreed to include Flood Zones A and B on the settlement maps in Volume 2 for the final plan.

Chief Executive's Recommendation

Flood Zones A and B will be indicated on the settlement maps in Volume 2 for the final plan.

Justification Tests

The Justification Tests as set out in Appendix C are not consistent with the Plan Making Justification Test as set out in the Guidelines. Each criterion of the Plan Making JT must be satisfied for a zoning to be considered justified. Only land use zonings within or adjoining the core of settlements which have been targeted for growth can pass the Plan Making Justification Test. It would be beneficial if KCC were to clarify which settlements have been targeted for growth. The requirement for a Site Specific FRA at development management stage is not consistent with the requirements as set out in Criteria 3 of the Justification Test whereby a flood risk assessment to appropriate detail must have been carried out for the zoning in question as part of the development plan process.

For sites that are intended to be zoned for development following the application of a Justification Test where only a small proportion of the site is at risk of flooding, a policy objective might be attached to such zoning, where planning permission may be subject to the sequential approach having been adopted and applied, following a detailed FRA.

Chief Executive's Response

The OPW's concerns in relation to the application of the Plan Making Justification tests in accordance with the Guidelines is noted. In response to the detailed issues raised by the OPW, updated Justification tests have been prepared (with particular regard to Criteria 3 of the JT) where appropriate, and revised zoning proposals have been brought forward in some instances. Furthermore, a significant number of sites which appear to be within flood risk areas have been through the Development Management Justification Tests, whereby Site-Specific Flood Risk Assessments were carried out in accordance with the guidelines.

In response to the request for clarification regarding which settlements have been targeted for growth, Table 2.8 of the CDP sets out the growth that the Plan provides for over the plan period. The Core Strategy provides for continuity of supply and choice.

Chief Executive's Recommendation

See updated Justification Tests in Appendix E of the CE Report.

Sustainable Urban Drainage Systems (SuDS) and Nature Based Solutions (NBS).

The OPW welcomes the policies and objectives set out in Chapter 6 and 12 of the written statement regarding SuDS and the promotion and encouragement of SuDS and NBS to flood risk and surface water management. In particular, the OPW welcomes the discussion in section 4.3.1 of the SFRA of the different types of SuDS suitable for specific development types.

Reference might be made to *the "Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Water Sensitive Urban Design – Best Practice Interim Guidance Document (2021)"*.

As set out in the Guidelines, and listed in section 3.5 of the SFRA, among the outputs of an SFRA recommended by the Guidelines is that an SFRA identified where integrated and area-based provisions of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions. In addition to the outputs listed in section 3.5 of the SFRA, the Guidelines also recommend that an SFRA provide guidance on the likely applicability of different SuDS techniques for managing surface water runoff at key development sites.

Chief Executives Response

Agreed. A series of amendments are proposed to the Plan to reflect the most up to date guidance. See response to OPR Observation No. 4 and Part 4 of this Report.

Chief Executive's Recommendation

See response to OPR Observation No. 4.

Consideration of Climate Change Impacts

The OPW welcomes the discussion on Climate Change in the Draft Plan. In particular, the assessment of the climate change impact in each settlement and as set out in section 6.3 of the SFRA, the use of climate change flood extents mapping to apply the Guidelines

sequential approach for appraising sites and make proactive land use decisions to avoid potential future flood risk issues with land zonings is welcomed.

Chief Executives Response

Noted.

Chief Executive's Recommendation

No Change.

Arterial Drainage Schemes and Drainage Districts.

The submission states that no commentary has been provided on Arterial Drainage Schemes or Drainage Districts. States that consideration should be given to zoning land for development to ensure that access requirements are preserved for the maintenance of Arterial Drainage Schemes and Drainage Districts. States that applications for development on land identified as benefiting land may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas. The location of Arterial Drainage Schemes and Drainage Districts may be identified on www.floodinfo.ie.

Chief Executives Response

Noted. The final SFRA Report can be updated to include commentary on Arterial Drainage Schemes or Drainage Districts within County Kildare including the River Barrow, River Greese and River Boyne. Access to land is an operational issue and beyond the scope of the Plan.

Chief Executive's Recommendation

No change to Draft Plan. Final SFRA will be amended to include commentary on Arterial Drainage Schemes or Drainage Districts within County Kildare including the River Barrow, River Greese and River Boyne.

Construction, Replacement or Alteration of Bridges and Culverts over Watercourses

Action TM A18 is to "*investigate the feasibility for a new pedestrian bridge crossing the River Liffey in the vicinity of Alexandra Bridge in Clane*". It should be noted that there are restrictions on the construction, replacement or alteration of bridges and culverts over any watercourse, and that consent from the Commissioners is required under Section 50 of the Arterial Drainage Act 1945.

Chief Executives Response

The submission is noted. The consent process is beyond the scope of the Plan.

Chief Executive's Recommendation

No change to the Draft Plan.

Editing Issues

Two Flood Zone Maps have been included labelled as Allen, one of which appears to be the Athgarvan Map.

Section 6.7 of the written statement refers to "DECLG Circular P12/2014". This should read PL2/2014.

The Source-Pathway-Receptor model diagram in Figure 3.1 of the SFRA appears to have had the definition of flood risk from Section 3.2.3 of the SFRA. This has obscured the diagram.

Section 3.1 of the SFRA refers to the availability of the Guidelines at www.opw.ie. The correct location for the Guidelines is <https://www.gov.ie/en/publication/7db50-the-planning-system-and-flood-risk-management-guidelines-for-planning-authoritis-nov09/>

Chief Executives Response

Noted. The labelling on the Flood Zone Map will be corrected for the Final SFRA Report.

Noted. Typographic error will be corrected in the main written statement as a Chief Executive's proposed amendment.

Noted. Figure 3.1 has a label 'Flood Risk = Likelihood of flooding x Consequences of flooding', which obscures the definition of Source-Pathway-Receptor. This graphical error will be corrected for the Final SFRA Report.

Noted. This reference will be corrected in the final SFRA Report.

Chief Executive's Recommendation

Amend labelling error on Flood Zone Map for Athgarvan to state 'Athgarvan' and not 'Allen'.

Amend Section 6.7 of the Draft Plan:

[DECLG Circular PL42/2014](#)

Amend Figure 3.1 of the SFRA to show the definitions of Source-Pathway -Receptor.

Amend the final SFRA Report to state that the Guidelines are available at: <https://www.gov.ie/en/publication/7db50-the-planning-system-and-flood-risk-management-guidelines-for-planning-authoritis-nov09/>

Ballitore

The submission states that the Justification Test for Ballitore states that the lands are already developed. The OPW notes that the lands zoned for highly vulnerable *B – Existing Residential Infill* in Flood Zones A and B appear to be undeveloped. States that consideration might be given to assigning a water compatible zoning to these lands.

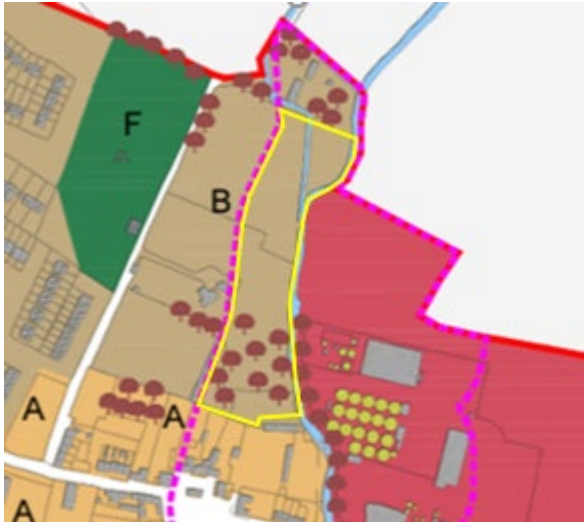
Chief Executive's Response

It is considered appropriate to amend the zoning objective of land identified as 'Existing/Infill Residential' in the Draft Plan to 'F: Open Space' to comply with Flood Risk Guidelines. An Updated Justification Test is also included in Appendix E of this report.

Chief Executive's Recommendation

Amend Map Ref. V2-3.3a as follows:

Change the zoning objective of lands outlined in yellow (below) from 'B: Existing Residential' to 'F: Open Space'.



Ballymore Eustace

The submission states that lands zoned highly *vulnerable B – Existing Residential Infill*, and *U – Utilities & Services* which although reflecting current usage as a water compatible hydro plant, can allow for highly vulnerable development and overlap with Flood Zones A and B. States that no commentary has been included to show that these zonings have been assessed against the criteria of the Plan Making Justification Test. Highly vulnerable development is not appropriate in Flood Zones A or B unless all criteria of a Plan Making Justification Test, undertaken by the planning authority, have been satisfied.

Chief Executive’s Response

Noted. An updated Justification Test has been prepared for Ballymore Eustace, included in Appendix E of this report.

Chief Executive’s Recommendation

Include updated Justification Test for Ballymore Eustace in final SFRA.

Blessington Environs

The Justification Test for Blessington Environs for highly vulnerable *B – Existing Residential* has answered no to criterion 2(iii) “Is within or adjoining the core of an established or designated urban settlement”. All criteria in the Plan Making Justification Test must be satisfied in order for a zoning to be considered justified.

Chief Executive’s Response

An updated justification test has been carried out for Blessington Environs and is contained in Appendix E of this report.

Chief Executive’s Recommendation

Include updated Justification Test for Blessington Environs in final SFRA.

Caragh

Lands have been zoned *I - Agriculture*, defined in the guidelines as less vulnerable, which overlaps with Flood Zone A. States that no commentary has been included to show that this zoning has been assessed against the criteria of the Plan Making Justification Test. Less vulnerable development is not appropriate in Flood Zone A unless all criteria of a Plan Making Justification Test, undertaken by the planning authority, have been satisfied.

Chief Executive's Response

Noted. The Plan Making Justification Test, included in Appendix E, has been updated.

Chief Executive's Recommendation

Include the new updated Justification Test for Caragh in final SFRA.

Castledermot

Lands zoned E – Community & Education which can allow highly vulnerable development, less vulnerable Q – *Enterprise & Employment* and I – *Agriculture* have been zoned in Flood Zones A and B. No commentary has been included to show that these zonings have been assessed against the criteria of the Plan Making Justification Test. Highly vulnerable development is not appropriate in Flood Zones A or B, and less vulnerable development is not appropriate in Flood Zone A unless all criteria of a Plan Making Justification Test, undertaken by the Planning Authority, have been satisfied.

Chief Executive's Response

Noted. The Plan Making Justification Test, included in Appendix E, has been updated to account for flood risk to the existing zonings for 'Community & Education' (E), and 'Agriculture' (I) as these zonings cannot be avoided or substituted. There was no flood risk identified to any 'Enterprise & Employment' (Q) within the planning boundary.

Chief Executive's Recommendation:

Include the new updated Justification Test for Castledermot in final SFRA.

Johnstown

The Justification Test for Johnstown states that for criterion 2(iii) that "*All identified sites are close to or adjoin the village centre*". The lands at Westown zoned highly vulnerable C – *New Residential* are on the periphery of the settlement, and thus do not satisfy this requirement.

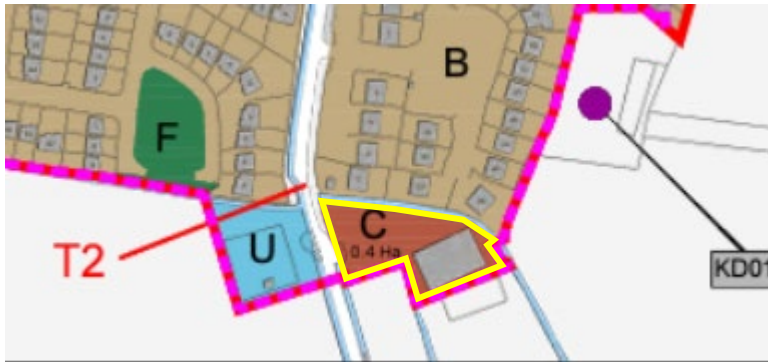
Chief Executive's Response

Agreed. It is proposed to change the zoning of this land from 'C: New Residential' to 'Q: Enterprise & Employment' which is appropriate for less vulnerable uses.

Chief Executive's Recommendation

Amend Land Use Zoning Map for Johnstown V2 3-8 as follows:

Change the zoning status of lands outlined in yellow from 'C: New Residential' to 'Q: Enterprise and Employment'.



Kildangan

The submission states that the Justification Test for the highly vulnerable B – Existing Residential Infill zoned lands in Kildangan states that: *“A large portion of the lands identified are already developed. Moving development which is already underway would lead to sprawling of the village”*. Large areas of this land within Flood Zones A and B, between the Castleparks and Paddocks estates appear however to be undeveloped. States that consideration might be given to assigning a water compatible zoning to these lands.

Chief Executive’s Response

Agreed. It is recommended to change the zoning of some lands between Castleparks and the Paddocks Estate from Existing Residential to Open Space.

Chief Executive’s Recommendation

Amend zoning Map for Kildangan Ref. V2- 3.10 as follows:

Change the zoning of land outlined in yellow below from ‘B: Existing Residential’ to ‘F: Open Space’.



Kilkea

The submission states that the flood risk assessment in section 7.1.5 of the SFRA states that *“There is very little flood risk identified in this area to the existing urban development and there is no Justification Test required”*. States that there is however a large area zoned Existing Settlement which allows highly vulnerable development, which overlaps with Flood Zones A and B. States that highly vulnerable development is not appropriate in Flood Zones

A and B, and less vulnerable development is not appropriate in Flood Zone A unless all criteria of a Plan Making Justification Test, undertaken by the planning authority, have been satisfied.

Chief Executive’s Response

Noted. An updated Justification test has been prepared for Kilkea included in Appendix E of this report.

Chief Executive’s Recommendation

Include updated Justification Test for Kilkea in final SFRA.

Kill

Lands zoned V – *Equestrian*, which while generally allowing for less vulnerable usage can allow highly vulnerable development such as Hotels or Hostels, overlap with Flood Zones A and B to the south of the settlement. No commentary has been included to show that this zoning has been assessed against the criteria of the Plan Making Justification Test. Highly vulnerable development is not appropriate in Flood Zone A unless all criteria of a Plan Making Justification Test, undertaken by the planning authority have been satisfied.

Chief Executive’s Response

Noted. An updated Justification Test has been prepared for Kill, included in Appendix E of this report. It is also proposed to remove ‘Hotel’ from the zoning matrix, as this was a typographical error.

Chief Executive’s Recommendation

Amend Table 2.4 Small Towns- Land Use Zoning Matrix as follows:

Land Use	V: Equestrian
Guest House/ Hotel/ Hostel	✗ N

Include updated Justification Test for Kill in final SFRA.

Maganey/Levitstown

Lands zoned highly vulnerable Existing Settlement have been zoned in Flood Zones A and B at the west bank of the Greese watercourse. No commentary has been included to show that this zoning has been assessed against the criteria of the Plan Making Justification Test. Highly vulnerable development is not appropriate in Flood Zones A or B unless all criteria of a Plan Making Justification Test, undertaken by the planning authority have been satisfied.

Chief Executive’s Response

Noted. An updated Justification Test has been prepared for Maganey/Levitstown, included in Appendix E of this report.

Chief Executive’s Recommendation

Include updated Justification Test for Maganey/Levitstown in final SFRA.

Prosperous

The submission states that undeveloped lands zoned highly vulnerable *C – New Residential* and *SS – Serviced Sites* have been zoned in Flood Zones A and B. No commentary has been included to show that these zoning have been assessed against the criteria of the Plan Making Justification Test. Highly vulnerable development is not appropriate in Flood Zones A or B unless all criteria of a Plan Making Justification Test, undertaken by the Planning Authority, have been satisfied.

Chief Executive’s Response

Noted. A Justification Test has been prepared for Prosperous included in Appendix E of this report.

Chief Executive’s Recommendation

Include updated Justification Test for Prosperous in final SFRA.

Rathangan

The submission states that the undeveloped lands zoned *A – Town Centre* which can allow highly vulnerable development, and less vulnerable *I – Agriculture* have been zoned in Flood Zone A along the Slate watercourse. States that no commentary has been included to show that these zonings have been assessed against the criteria of the Plan Making Justification Test. States that highly vulnerable development is not appropriate in Flood Zones A or B, and less vulnerable development is not appropriate in Flood Zone A unless all criteria of a Plan Making Justification Test, undertaken by the Planning Authority, have been satisfied.

Chief Executive’s Response

An updated Justification Test has been carried out for Rathangan and is attached in Appendix E of this report. Having reviewed the lands zoned ‘B: Existing Residential’ where it overlaps with Flood Zones A and B, it is proposed to amend the zoning of part of this area to ‘F: Open Space’.

Chief Executive’s Recommendation

Include the new updated Justification Test for Rathangan in final SFRA.

Amend Zoning Map V2-1.5A as follows: Change the zoning status of lands (outlined in yellow) identified as ‘B: Existing Residential’ to ‘F: Open Space’.



Staplestown

Submission states that lands zoned *Existing Settlement* and *Settlement Core*, both of which allow highly vulnerable development, have been zoned in Flood Zones A and B. No commentary has been included to show that these 'zonings' have been assessed against the criteria of the Plan Making Justification Test. Highly vulnerable development is not appropriate in Flood Zones A or B unless all criteria of a Plan Making Justification Test, undertaken by the Planning Authority, have been satisfied.

Chief Executive's Response

Staplestown is a Rural Settlement. Lands within the defined settlement boundaries of rural settlements do not constitute zoned land, which is stated in V2 3.1.3 of the Plan. Notwithstanding this, a Justification test has been prepared for Staplestown and this is included in Appendix E of this report.

Chief Executive's Recommendation

Include updated Justification Test for Staplestown in final SFRA.

Suncroft

Submission states that lands zoned highly vulnerable '*B – Existing Residential Infill*' overlap with Flood Zones A and B in the Askinraw Lane/Eascanrath Brook areas. States that no commentary has been included to show that this zoning has been assessed against the criteria of the Plan Making Justification Test. Highly vulnerable development is not appropriate in Flood Zones A or B unless all criteria of a Plan Making Justification Test, undertaken by the Planning Authority, have been satisfied.

Chief Executive's Response

Noted. An updated Justification Test has been prepared for Suncroft, included in Appendix E of this report.

Chief Executive's Recommendation

Include updated Justification Test for Suncroft in the final SFRA.

Timolin

The submission states that lands zoned '*A–Village Centre*' which can allow highly vulnerable development have been zoned in Flood Zones A and B. This zoning has not been referenced in the Justification Test for Timolin. There is a discrepancy in the mapping, whereby the clipping in the Justification Test shows this area in Flood Zone C, while the Flood Zone mapping shows this area in NIFM Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zones A or B unless all criteria of a Plan Making Justification Test, undertaken by the Planning Authority, have been satisfied.

Chief Executive's Response

Noted. AN updated Justification Test has been prepared for Timolin, included in Appendix E of this report.

Chief Executive's Recommendation

Include updated Justification Test for Timolin in the final SFRA.

PART 3 SUBMISSIONS: STAKEHOLDERS & MEMBERS OF THE PUBLIC

The following section considers the issues raised in the submissions as they appear in the County Development Plan, i.e. Chapter by chapter, volume by volume.

A list of those who made a submission to the Plan is included in Appendix C of this report.

3.1 Volume 1 of Draft County Development Plan

CHAPTER 1 – INTRODUCTION & STRATEGIC CONTEXT			
Sub No.	Name	Summary of Issues Raised	Chief Executive’s Responses & Recommendations
VISION & GUIDING PRINCIPLES			
395	Dept. Environment, Climate & Communications (to be read in conjunction with GSI submission, same number, submitted together)	<p>The Department welcomes the manner in which climate action is addressed. It requests that the Climate Action Plan 2021 is referenced including the specific action and targets in the Draft Plan.</p> <p>The Department would welcome the opportunity for direct bilateral engagement on the proposed implementation of the objectives set out in the Draft Plan.</p>	<p>Chief Executive’s Response The submission correctly states that the Government’s Climate Action Plan was updated in 2021. All references to the Climate Action Plan 2019 will be updated to the 2021 Plan, where appropriate.</p> <p>Chief Executive’s Recommendation Update all references to the Climate Action Plan 2021 in the draft Plan.</p>
558	Irish Wind Energy Association	Wind Energy Ireland welcomes the inclusion of the climate action key principle as set out in Section 1.4.3 and the climate change and sustainability goals set out in Sections 1.5 and 1.6 as being to the forefront in the formulation of the draft CDP. Also welcomes the key principles as set out in 1.8.1(ii) and (viii).	<p>Chief Executive’s Response Welcomes the positive comments made by Wind Energy Ireland.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan</p>
413.	Kildare Public Participation Network	Submission from the Kildare Public Participation Network (Kildare PPN) outlines its role and states it has 841 member groups in the community and voluntary, social inclusion and environmental pillars in Kildare and notes that its primary purpose is to enable Kildare PPN member groups to input into	<p>Chief Executive’s Response It is noted that the draft Plan includes objective CSO 1.18 which provides the Council with the option of aligning the Kildare County Development Plan 2023-2029, with the up-to-date population from the forthcoming Census, where there are verified material population changes to those set</p>

	<p>and have their voices heard within the formal decision-making structures of Kildare County Council. States that the submission was compiled through various consultation methods with the membership of Kildare PPN.</p> <p><u>Chapter 1: Introduction and Strategic Context</u> As the Census Preliminary Population Publication is due to be published in June 2022 and the detailed Census 2022 product list and timetable scheduled for the second half of 2022 (Census 2022: Dissemination Strategy) a provision should be made to update the Profile of Kildare with the 2022 data and allow certain amendments throughout the County Development Plan if required, contingent on the 2022 Census Data.</p> <p><u>Sustainable Development Goals</u> Kildare PPN propose that information is included in the Plan where the UN Sustainable Development Goals (SDGs) align with the National Planning Framework’s National Strategic Outcomes (NSOs).</p> <p><u>Strategic Vision</u> Submission proposes amending the vision, (new text in purple, deleted text crossed-out), as follows: To build on the strengths of the county in order to improve the quality of life of all residents, through the creation of high-quality job opportunities, by the provision of high-quality residential development supported by adequate community infrastructure, through the provision of a high quality sustainable transport network, by healthy placemaking and transformational regeneration, by supporting the transition to a low carbon climate resilient</p>	<p>out in Table 2.8 of the draft Plan, by way of a statutory variation pursuant to Section 13 of the Planning and Development Act 2000 (as amended). The comments in relation to the Strategic Vision are accepted. It is not agreed to include the proposed objective as there are numerous policies and objectives in the Draft Plan that address all of the issues raised (Chapter 12 in particular refers). It is considered reasonable however to amend Section 1.8.1 Overarching Guiding Principles as per the recommendation below.</p> <p>It is noted that Section 1.6 of the draft Plan states that ‘there is significant alignment between the UN SDGs and the National Planning Framework’s National Strategic Outcomes (NSOs) in areas such as climate action, clean energy, sustainable cities and communities, economic growth, reduced inequalities and innovation and infrastructure, as well as education and health.’</p> <p>A number of strategic objectives have already been included in the Draft Plan to take account of the wide ranging challenges and opportunities that the policies and objectives of the Draft Plan present. However, it is considered appropriate to include an additional overarching guiding principle specifically in relation to biodiversity as below.</p> <p>Chief Executive’s Recommendation Amend the text in Section 1.8, as follows: The ‘Strategic Vision’ for the County, as outlined at the start of this chapter, is ‘To build on the strengths of the county in order to improve the quality of life of all residents, through the creation of high-quality job opportunities, by the provision of high-quality residential development supported by adequate high quality community infrastructure, through the provision of a high-quality</p>
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		<p>environment, by embracing inclusiveness, and to by enhancing our natural and to by enhancing our built environment, and enshrining the importance of conserving, restoring and protecting Kildare’s biodiversity for future generations.</p> <p>Proposes additional objective (in purple), as follows: Ensure that the future growth and spatial development of County Kildare does not further undermine Kildare’s protected habitats and species. Engage with NPWS and other relevant stakeholders to urgently progress management plans for Natura 2000 sites and other protected sites in the County. Engage with all relevant stakeholders, including NPWS and national experts in flora and fauna, including the NGO sectors (for example, BSBI County Recorders) to identify and protect high nature value habitats and sites for threatened species in County Kildare. Tangibly commit to meaningfully tackling Biodiversity Loss in County Kildare by providing additional resources for the employment of an additional suitably qualified staff member dedicated to the conservation and protection of Kildare’s habitats and species, compiling an inventory of High Nature Value sites and protected species, community education and engagement on meaningful biodiversity actions, and ensuring that funding for biodiversity is directed to meaningful outcomes</p>	<p>sustainable transport network, by healthy placemaking and transformational regeneration, by. The vision for County Kildare also supports ing the transition to a low carbon climate resilient environment, by embracing inclusiveness, and by enhancing our natural and built environment and enshrining the importance of conserving, restoring and protecting Kildare’s biodiversity for future generations.’</p> <p>Add an additional key principle in Section 1.8.1 ‘Overarching Guiding Principles’ as follows; (xi) To promote co-ordinated spatial planning to conserve and enhance the biodiversity of our protected habitats and species including landscape and heritage protection.</p>
405	Kildare Climate Action Linkage Group	The submission requests the following amendments to the Strategic Vision of the Plan:	Chief Executive’s Response

		To build on the strengths of the county in order to improve the quality of life of all residents, through the creation of high-quality job opportunities, by the provision of high-quality residential development supported by adequate high quality community infrastructure, through the provision of a high-quality sustainable transport network, by healthy placemaking and transformational regeneration, by supporting endeavouring to achieve a swift the transition to a low carbon climate resilient environment, by embracing inclusiveness and by enhancing our natural and built environment and ensuring the conservation and protection of Kildare's high nature value habitats and indigenous species for future generations.	Given the declared Biodiversity crisis, it is considered reasonable and appropriate to strengthen the Strategic Vision of the Plan in this regard. Chief Executive's Recommendation See recommendation to submission no. 413 in relation to proposed amendments to the text in Section 1.8
468	Ann Behan	Reference is made to the strategic vision of the plan, and it is submitted that the wording 'enhancing our natural environment' is a very subjective statement. An explicit statement of intent to conserve and protect Kildare's native habitats and species should be acknowledged in the vision of this plan.	Chief Executive's Response See response to submission no. 413 in relation to proposed amendments to the text in Section 1.8 Chief Executive's Recommendation See recommendation to submission no. 413 in relation to proposed amendments to the text in Section 1.8
470	Irish Peatland Conservation Council	The submission states this section should also describe the habitats and landscape character of County Kildare. County Kildare once had 24,317ha of peatland but due to the industrial extraction and economic development of the County this has been reduced to 2981ha (Peatlands and Climate Change Action Plan 2030, IPCC, 2021) of peatland that is in a conservation worthy condition. Including this within the plan highlights that peatland should be regarded as an important natural feature and that	Chief Executive's Response Habitats and Landscape Character of Kildare are described in Chapters 6, 9, 12, and 13. The importance of peatlands as an important natural feature with benefits in terms of biodiversity, carbon storage/protection and water regulation is also addressed in Chapters 6, 9, 12, and 13. Two Actions in the draft plan recognise the importance and support the development of the National Peatlands Park including EC A7 in Chapter 7 'Energy & Communications'

	<p>the benefits in terms of biodiversity, carbon storage/protection and water regulation are at the forefront of the County's climate change and biodiversity emergency reversal agenda.</p> <p>This submission states that the establishment of a National Peatlands Park in County Kildare will bolster conservation efforts, reduce GHG emissions, draw visitors to the county utilising the Greenways and Blueways which are currently being developed and provide an environmental tone linking businesses and amenities which fortify the planning and development agenda.</p> <p>Section 1.4.2 should highlight that by developing a National Peatlands Park the Government's National Planning Framework will be supported and the National Strategic Outcomes will be recognised. A National Peatland Park would be a focal point for integrating all NSOs within the County of Kildare.</p> <p>In Section 1.4.3 include the following text; The development of a National Peatlands Park will support all three key aims of the RSES.</p> <p>The submission states that Peatlands once accounted for 14.3% of the landscape of County Kildare but the majority of Irish peatlands have been converted to other uses which are emitting greenhouse gases and contributing to climate change. The climate crisis means that land managers and individuals need to work together from all sectors to not only restore the carbon sequestration function in peatlands but to protect</p>	<p>and BI A22 in Chapter 12 'Biodiversity and Green Infrastructure'.</p> <p>A number of strategic objectives have already been included in the Draft Plan to take account of the wide-ranging challenges and opportunities that the policies and objectives of the Draft Plan present. However, it is considered appropriate to include an additional overarching guiding principle specifically in relation to biodiversity as below.</p> <p>Chief Executive's Recommendation Add an additional key principle in Section 1.8.1 'Overarching Guiding Principles' as follows: (xi) To promote co-ordinated spatial planning to conserve and enhance the biodiversity of our protected habitats and species including landscape and heritage protection'.</p>
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	<p>the carbon stocks in peatland and prevent further degradation.</p> <p>Many of the guiding principles will be supported by the development of a National Peatland Park and this should be highlighted (purple text)</p> <p>(i) To develop a county that is resilient to climate change, plans for and adapts to climate change and food risk, facilitates a low carbon future, supports energy efficiency and conservation and enables the decarbonisation of our lifestyles and economy. <i>This principle is supported by the creation of a National Peatlands Park.</i></p> <p>(vii) To recognise the role of the rural countryside in supporting the rural economy and its role as a key resource for <u>education</u>, agriculture, equine, bloodstock, forestry, energy production, tourism, recreation, mineral extraction and rural based enterprises, <i>such as the creation of a National Peatlands Park.</i></p> <p>(viii) To support, facilitate and promote the sustainable development of renewable energy sources in the county <i>without hindering conservation at a landscape scale.</i> (All developments, including renewable, need to be sensitive to the environment and biodiversity and should not hinder conservation at a landscape scale which Ireland is currently lacking).</p> <p>(ix) To protect local assets by preserving the quality of the landscape, open space, recreational resources, natural, architectural, archaeological and cultural heritage and the material assets of the</p>	
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		<p>county. This will be supported by the creation of a National Peatlands Park.</p> <p>This strategy outlines 5 Strategic Objectives for the Plan, which include:</p> <ol style="list-style-type: none"> 1. Strengthen the resilience of our retail sector to rebuild stronger and greener 2. Facilitate and support the retail offering's expansion and sustainment in County Kildare. 3. Measures to revitalise town centres. 4. Explore new opportunities in the circular economy for our retail businesses 5. Enable retailers to adopt online business models. 6. Provide branding, identity and linkage opportunities by creating a National Peatlands Park brand incorporating the peatland landscape character into the economic and retail sector. 	
552.	Department of Housing, Local Government and Heritage	The Department recommends the inclusion of an overarching guiding principle to conserve, protect and enhance biodiversity during the plan period. in accordance with Regional Strategic Outcome 11 of the Regional Spatial & Economic Strategy (RSES) for the Eastern and Midland Region (EMRA) to 'promote co-ordinated spatial planning to conserve and enhance the biodiversity of our protected habitats and species including landscape and heritage protection'.	<p>Chief Executive's Response</p> <p>Agreed. See response to submission no. 413 above also.</p> <p>Chief Executive's Recommendation</p> <p>Add an additional key principle in Section 1.8.1 'Overarching Guiding Principles' as follows: (xi) To promote co-ordinated spatial planning to conserve and enhance the biodiversity of our protected habitats and species including landscape and heritage protection'.</p>
382 482	Ruth Murphy	The Strategic Vision and Overall aim of the Plan need to be revised to acknowledge and address the biodiversity crisis in Kildare	<p>Chief Executive's Response</p> <p>Agreed.</p>

<p>553</p> <p>497</p> <p>458</p> <p>331</p> <p>361</p>	<p>Kilcock 4 Climate Change</p> <p>Rosemary Flanagan</p> <p>Niamh Young</p> <p>Martin Wisley</p> <p>Fionnuala Corcoran</p> <p>Jackie Rasmus</p>		<p>Chief Executive’s Recommendation</p> <p>Add an additional key principle in Section 1.8.1 ‘Overarching Guiding Principles’ as follows:</p> <p>(xi) To promote co-ordinated spatial planning to conserve and enhance the biodiversity of our protected habitats and species including landscape and heritage protection’.</p>
<p>147</p>	<p>National Peatlands Park Group</p>	<p>In Section 1.8.1 ‘Overarching Guiding Principles’ it is suggested that a new guiding principle would be added to protect and enhance natural assets to improve environmental and conservation outcomes and to contribute to biodiversity recovery. The draft Plan reflects the requirement for Ireland to designate 30% of its land and marine areas for conservation and biodiversity but it is not explicitly stated in chapter 1.</p> <p>In some cases, actions do not match the aims and objectives. It would be helpful if all the actions were assembled with indicative times and responsibility for each action. This will make the task of measuring and evaluating implementation easier as set out in Ch 16.</p>	<p>Chief Executive’s Response</p> <p>In relation to Section 1.8.1, it is agreed that an additional principle should be added to include reference to enhancing biodiversity. Objective LR T1 already refers to the 30% target of territory for nature in accordance with the EU Biodiversity Strategy 2030.</p> <p>Appendix 12 includes all objectives, actions and targets from the Draft Plan; identifies the appropriate stakeholders in each case; and sets out when it is anticipated to achieve each objective, action and target. Timeframes are also provided as follows:</p> <ul style="list-style-type: none"> • Short Term 1-2 years • Medium Term 3.- 6years • Long Term - beyond plan • On-going

			<p>Chief Executive’s Recommendation Add an additional key principle in Section 1.8.1 ‘Overarching Guiding Principles’ as per recommendation in Submission no. 413 above.</p>
405	Kildare Climate Action Linkage Group	<p>The submission highlights the following statement in the Draft Plan: <i>A development plan shall, as far as practicable, be consistent with the Planning and Development Act 2000 (as amended), national plans, policies and strategies which relate to the proper planning and sustainable development of land.</i></p> <p>It is suggested that Kildare County Council outlines how “as far as is practicable” is defined and what criteria will be used to ascertain what is practicable.</p> <p>It is also suggested that the Climate Act and the forthcoming Carbon budgets be referenced in Section 1.4.</p>	<p>Chief Executive’s Response</p> <p>It is considered that the Draft Plan has placed an emphasis on climate change and biodiversity through policies, objectives, actions, and targets in all chapters. A full chapter is dedicated to Biodiversity and Green Infrastructure.</p> <p>It is not appropriate to define every term in the Plan. “As far as practicable” in this instance is recognition that in some cases it may not be possible for the Plan to be consistent with the referenced documents.</p> <p>Section 1.4 provides an overview of the policy context and does not specifically name all the Acts to which regard has been had in the Plan. Section 7.2 of the Plan however references The Climate Action and Low Carbon Development Acts 2015 to 2021.</p> <p>Regarding carbon budgets, it is an action (EC A1) of the Plan to prepare a Climate Action Plan for Kildare within 1 year of the adoption of the Development Plan. While it would be outside the scope of the Development Plan to consider carbon budgets such budgets would be more typically associated with a Climate Action Plan.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>

405	Kildare Climate Action Linkage Group	<p>The submission suggests the following revision of a statement in Section 1.4.1</p> <p>Promotion of compliance Compliance with environmental standards and objectives established for bodies of surface waters and groundwater.</p>	<p>Chief Executive’s Response</p> <p>The Draft Plan is a land use plan. In preparing the development plan, planning authorities must exercise caution not to inappropriately stray into the operation of other statutory codes and regulatory regimes that relate to the development sector, which are outside the remit of a county or city development plan.</p> <p>Chief Executive’s Recommendation</p> <p>No change to the Draft Plan.</p>
405	Kildare Climate Action Linkage Group	<p>It is suggested that the CDP references the forthcoming Kildare Climate Action Plan and outline how the CDP will be impacted and influenced by the new Climate Action Plan upon its completion.</p>	<p>Chief Executive’s Response</p> <p>It is not appropriate to reference a document which has not been prepared as yet. However, there is an action to prepare, within 1 year of the adoption of the CDP, a Climate Action Plan for Kildare to provide a baseline analysis for the county and the inclusion of measurable targets on renewable energy and climate change mitigation and adaptation (EC A1 refers). The targets, when published, may be included in the Plan by way of a statutory variation pursuant to Section 13 of the Planning and Development Act 2000 (as amended).</p> <p>Chief Executive’s Recommendation</p> <p>No change to the Draft Plan.</p>
405	Kildare Climate Action Linkage Group	<p>It is suggested that:</p> <ul style="list-style-type: none"> • The CDP provides more detail on where the UN Sustainable Development Goals (SDGs) align with the National Planning Framework’s National Strategic Outcomes (NSOs), and what measurable metrics KCC will use to measure SDG progress as part of the CDP delivery. • The CDP must ensure that SDGs are applied through the lens of the climate and 	<p>Chief Executive’s Response</p> <p>It is noted that Section 1.6 of the draft Plan states that ‘there is significant alignment between the UN SDGs and the National Planning Framework’s National Strategic Outcomes (NSOs) in areas such as climate action, clean energy, sustainable cities and communities, economic growth, reduced inequalities and innovation and infrastructure, as well as education and health.’</p>

		biodiversity crises, and that SDG 8 (Decent Work and Economic Growth) will not be prioritised over others.	<p>The policies, objectives, actions, and targets of the Plan have been identified while having regard to the Sustainable Development Goals (SDGs). Appendix 12 of the Draft Plan outlines guiding principles which are in line with the sustainable development goals and each objective/ action/ target is measured against these principles. Furthermore, a stakeholder(s) is/are assigned responsibility for realising the various objectives, actions and targets over a clearly defined short, medium or long term or on an ongoing basis.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
405	Kildare Climate Action Linkage Group	It is submitted that it is unclear what the specific objectives of the Small Towns and Villages Strategy are underpinned by.	<p>Chief Executive's Response</p> <p>It is considered necessary to amend Section 1.7.2 of the Plan to state what the zoning maps and specific objectives of the Small Towns and Villages Strategy are underpinned by.</p> <p>Chief Executive's Recommendation Amend Section 1.7.2 as follows: <i>The Small Towns and Villages Strategy (STVS) provides a coherent planning framework for the small towns, villages, and rural settlements across the county. The Strategy includes land use zonings maps and specific objectives which are underpinned by the strategic vision and the overarching guiding principles of this Plan.</i></p>
468	Ann Behan	The Plan should not support unsustainable economic growth, the CDP must halt some of the unsustainable practices that have continued and place climate change and biodiversity as its central tenets with clear measurable objectives and accountable reporting, with communities at its core.	<p>Chief Executive's Response</p> <p>The Plan must address a balanced approach to economic development (among other types of development) and the protection and enhancement of the environment. There are numerous policies, objectives and actions included in the Draft Plan in relation to same. The Plan has placed an emphasis on climate change and biodiversity particularly</p>

		<p>The words ‘as far as practicable’ are quoted from the first sentence in section 1.4 and it is asked if the Council can outline how “as far as practicable’ is defined and what criteria will be used to ascertain what is practicable? It is also asked if the Climate Act and forthcoming carbon budgets should be referenced here?</p> <p>The fourth bullet point in section 1.4.1 is referenced and it is submitted the word compliance be underlined.</p>	<p>with a full chapter dedicated to Biodiversity and Green Infrastructure.</p> <p>“As far as practicable” is recognition that in some cases it may not be possible for the Plan to be consistent with the referenced documents, especially as some plans may be inconsistent with each other. The Climate Act is referenced in Chapter 7, while it is an action of the Council to prepare a Climate Action Plan for Kildare within 1 year of the adoption of the Development Plan Action (EC A1). Regard will be had to carbon budgets as part of the preparation of the Sustainable Energy Climate Action Plan for County Kildare which is currently being prepared.</p> <p>It is not necessary to underline the word compliance for emphasis. The list provided in Section 1.4.1 relate to mandatory objectives that must be included in the Development Plan.</p> <p>Chief Executive’s Recommendation No change to Draft Plan.</p>
468	Ann Behan	<p>It is requested that the forthcoming Kildare Climate Action Plan be referenced in section 1.5, and outline how the CDP will include this on its completion?</p>	<p>Chief Executive’s Response It is considered appropriate to reference the forthcoming Sustainable Energy Climate Action Plan (SECAP) in Section 1.5 (see below).</p> <p>Consultants have now been retained to determine the emissions baseline for County Kildare, a large part of this work now being completed. However, the SECAP cannot be finalised until the Ministerial guidelines relating to both the new climate action plans and constituent Decarbonising Zones have been published.</p> <p>Upon the completion of the SECAP and particularly where there are targets that could be transposed into the County</p>

			<p>Development Plan, a statutory variation pursuant to Section 13 of the Planning and Development Act 2000 (as amended) may be undertaken which could be tied into CSO 1.18 (Chapter 2) in relation to the possible need to update the Plan to align with Census data also.</p> <p>Chief Executive’s Recommendation Amend Section 1.5 to add a final paragraph as follows; The Council is currently preparing a Sustainable Energy Climate Action Plan (SECAP) which will include targets to reach the county’s climate change goals over the short, medium and longer term. When published, the targets identified in the SECAP may be incorporated into the County Development Plan by way of a statutory variation pursuant to Section 13 of the Planning and Development Act 2000 (as amended).</p>
ADJOINING LOCAL PLANNING AUTHORITY AREAS			
515	Meath County Council	<p>Submission from Meath County Council states that the Planning Authority is generally supportive of the policies and objectives outlined in the Draft Plan. Submission notes that the current Meath County Development Plan 2021-2027 came into effect on 3 November 2021.</p> <p><u>Maynooth Environs</u> Submission notes that Maynooth is located within the Dublin Metropolitan Area (DMA) and is designated in the RSES as a Key Town with the assets and capacity to grow in a sustainable manner.</p> <p>Refers to Maynooth Environs in County Meath which is located 1.5km to the northeast of the town</p>	<p>Chief Executive’s Response</p> <p>The contents of the submission relating to the town of Maynooth and its environs are noted. The request regarding including a specific reference to undertaking a joint local area plan for Maynooth is accepted. It should be noted that Section 4.4.3 of the draft Plan acknowledges the need to prepare a joint local area plan for Maynooth with Meath County Council. As per the requirement of RPO 4.35 to prepare ‘a cross boundary Joint Local Area Plan (LAP)’ for Maynooth, it is considered appropriate to refer to such a plan as the ‘Maynooth and Environs Joint Local Area Plan.’</p> <p>It is noted that the preparation of a Strategic Land Use, Employment and Transportation Study of northeast Kildare as provided by objective RE O14 shall be carried out as an</p>

	<p>centre. States that the lands within Maynooth Environs comprise 139 hectares and are largely undeveloped. Notes that whilst these lands have been zoned as part of the preparation of the Meath County Development Plan 2021-2027 there is now a need to prepare a Joint Urban Area Plan with Kildare. Submits that an important part of the delivery of this Joint Plan will be the inclusion of provisions to allow for the development of the Maynooth Outer Orbital Route (MOOR), as well as facilitating development to the north of Maynooth. States that the development of the MOOR is developer-led and will therefore have to be developed in conjunction and commensurate with development.</p> <p><u>Maynooth Joint Local Area Plan</u> Notes that as per RPO 4.35 of the RSES the Development Plan of Meath County Council includes objective CS OBJ 11 which states the following: “To prepare, as a priority, a Joint Vision and Local Area Plan for Maynooth in partnership with Kildare County Council within the lifetime of this Plan in accordance with the requirements of Regional Policy Objective 4.35 of the RSES for the Eastern and Midland Region. As part of the preparation of this Plan, a detailed infrastructure assessment, consistent with the methodology for a Tiered Approach to Zoning under Appendix 3 of the NPF will be undertaken.”</p> <p>Submits that the inclusion of a RPO in the RSES requiring the preparation of a Joint Local Area Plan indicates the importance of Maynooth as a Key</p>	<p>individual body of work separate to the preparation of the joint local area plan.</p> <p>Chief Executive’s Recommendation Insert a new objective after objective CSO 1.9: Prepare a Joint Local Area Plan for Maynooth and Environs in conjunction with Meath County Council.</p> <p>The insertion of this proposed objective may result in consequential amendments being made to the draft Plan.</p>
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		<p>Town in the region which signifies its importance along the North-West Corridor of the region and its role in the DMA.</p> <p>Notes objective CSO 1.9 of the draft Plan regarding the review and to prepare on an ongoing basis a portfolio of Local Area Plans (LAPs) for the mandatory LAP settlements which includes Maynooth. Requests that the objective includes a specific reference to this LAP being prepared in conjunction with Meath County Council as a Joint Urban Area Plan as per the RSES. Submits that all such future references to Maynooth should refer to a JUAP and not an LAP. States that such an approach would be consistent with the text included in RPO 4.35 of the RSES as well as being reflective of CS OBJ 11 of the Meath County Development Plan 2021-2027.</p> <p>Welcomes the provisions of Footnote 8 contained in Table 2.8 of the draft Plan, which provides for the precise allocation of additional population for Maynooth of up to 10,000 persons from redistribution of Dublin City and Suburbs to be addressed at the LAP stage, on foot of more detailed assessments and audits. Notes that Maynooth is only one of three such settlements for which additional population growth can be provided and that it is the only such settlement in counties Kildare and Meath. Submits that having reviewed the draft Plan and the EMRA submission to same, it is noted that amendments to the core strategy table may be required. States that should changes be required to the core strategy table; it is requested that the Council engage with Meath</p>	
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		<p>County Council prior to making any changes that may affect the population allocations for Maynooth.</p> <p>Submission welcomes the inclusion of CSO 1.15 which seeks to review the existing employment lands as part of the LAP process, including the one for Maynooth. Further welcomes CSO 1.18 and notes that the population projections may be reviewed following publication of the census figures, including for Maynooth.</p> <p>Submission also welcomes specific objectives which have been included in the Housing Chapter including HO O3, HO O36 and HO O37.</p> <p>Notes the provisions in the draft Plan provides for Infrastructure Assessments for the higher tier settlements, such as Maynooth, to be undertaken as part of the LAP process. Notes a similar provision is outlined by RE O14 relating to a Strategic Land Use, Employment and Transportation Study of northeast Kildare to be undertaken. Submission suggests that the work for this settlement could be undertaken as part of the preparation of the Joint Urban Area Plan.</p> <p>Submission welcomes objectives RE O15 – RE O18, particularly RE O16 which provides for the development of the Maynooth Outer Orbital Route. Further supports the inclusion of RE O109 which seeks to examine the feasibility of providing a tourist information centre in Maynooth, submits that this could be further expanded upon as part of the Joint Urban Area Plan.</p>	
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515	Meath County Council	<p><u>Kilcock Environs</u> Submission refers to the Kilcock Environs to the north-east of Kilcock Town Centre which provides an expansion area for this Metropolitan settlement. States that Rye Water River separates the Environs lands from the town centre. Submits that development of the town of Kilcock in County Kildare has been facilitated by excellent multi-modal transport infrastructure. States that the attractive environment of the historic core of the town makes the town environs an attractive location for investment and development.</p> <p><u>Kilcock</u> Notes that under objective CSO 1.9 a Local Area Plan (LAP) will be prepared for the town of Kilcock. States that Meath County Council have designated Kilcock as a Self-Sustaining Town, which is consistent with the approach from Kildare County Council. Refers to objective RE O27 which encourages the creation of jobs in Self-Sustaining Town's including Kilcock with a particular focus on certain industries. Notes that KIL SP 1 contained in the Meath County Development Plan 2021-2027 states that it is the policy of Meath County Council 'To co-operate with Kildare County Council in the sustainable development of the Kilcock Environs in a comprehensive supporting manner which will integrate with the existing built-up area of Kilcock town in County Kildare'. Welcomes the opportunity to engage with the Council in the preparation of a LAP for Kilcock. Submission states that Meath County Council is also open to the potential for the development of a Joint LAP for Kilcock.</p>	<p>Chief Executive's Response</p> <p>The contents of the submission relating to the planning and development of the town of Kilcock along with its environs is noted. Kildare County Council commits to engaging constructively with Meath County Council as part of the preparation of any new Local Area Plan for Kilcock.</p> <hr/> <p>Chief Executive's Recommendation</p> <p>See recommendation to Submission No. 515 above.</p>
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JUST TRANSITION			
432	West Kildare SMART Rural Alliance (SRA)	Include reference in Chapter 1 to Kildare County Council's Just Transition Plan 2022 noting Kildare County Council's representation on the EMRA which is managing the next round of EU Just Transition Funds for the Great Midlands Region.	<p>Chief Executive's Response</p> <p>It is an objective of the Draft Plan, as expressed in EC O56 in Chapter 7, to 'Support the implementation of the Local Just Transition plan for West Kildare which identifies actions to support and advance sustainable, social, economic, environmental development in the transition to a low carbon future in the West Kildare Region'. It is not considered necessary to duplicate this reference in Chapter 1 also.</p> <p>Chief Executive's Recommendation</p> <p>No changes to the Draft Plan.</p>
181	Lullymore Heritage & Discovery Park CLG	Include reference in Chapter 1 to the Local Just Transition Plan for West Kildare 2022.	
GENERAL PRESENTATION & CONTENTS OF DRAFT PLAN & GIS			
485	Royal Institute of the Architects of Ireland	<p>Reference is made to the input of various RIAI task forces such as housing, sustainability, urban design, and universal design in the compilation of this submission.</p> <p>Within the submission 6 issues of principle are outlined. These include a vision statement, an executive summary, presentation of the development plan, a holistic approach with the community at the heart of stakeholder engagement, identifying the roles of the architect in the development plan process and resourcing the implementation of the development plan.</p>	<p>Chief Executive's Response</p> <p>Amendments to the Development Plan Guidelines for Planning Authorities (published by the Department of Housing, Local Government and Heritage) cannot be made through the Kildare County Development Plan process. The consultation period for those guidelines closed in October 2021. Notwithstanding same however the Draft Plan outlines the strategic vision for the county in section 1.8. A range of overarching guiding principles are also set out under this section. Public views were considered in relation to the vision for the County, both during the pre-draft and draft public consultation stages of the Draft Plan.</p>

	<p>It is recommended that the Development Plan Guidelines for Planning Authorities should incorporate its own vision statement, this will inform and reinforce the importance of each Local Authority developing their own vision statement. The updating of plans frequently leads to the addition of more detail, resulting in reduced community engagement and participation. Inclusion of a vision statement and executive summary may help the Planning Authority to align interpretation and intent in a clear, unambiguous manner. The vision should be coming from the citizens as much as the 'experts' writing the plan. It is further stated that the Plan as a mechanism for public participation and policing the planning process has been somewhat undermined by the SHD process. Public confidence in the Plan process must be regained to get re-engagement and participation.</p> <p>It is submitted that the executive summary of the Development Plan Guidelines for Planning Authorities should identify the overriding principles of the guidelines. The basis for this should include effective consultation and participation process, greater focus on the existing built fabric, sustainability and climate change, the importance of quality architecture and design-led approach and designing communities for health and well-being.</p> <p>Reference is made to section 2.2 of the Draft Development Plan Guidelines for Planning Authorities and concern is raised to there being no mention of an Architect within the core development plan. The skill sets an architect can bring to the plan making process are outlined, and</p>	<p>The sentiments in relation to an executive summary are noted. However, it is considered that the table of contents in the Draft Plan provide sufficient detail to allow readers to navigate the plan. Provision of an executive summary would add further repetitive detail to an already lengthy document.</p> <p>In relation to the skill sets of architects being used in the development plan process, it should be noted that a variety of departments in the local authority have had input into the plan. This includes architects from the relevant sections and the council's architectural conservation officer. Notwithstanding the above, issues in relation to resourcing are outside the scope of the Draft Plan.</p> <p>Chief Executive's Recommendation No change to the Draft Plan</p>
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		it is submitted that an architectural conservation officer should also be available to the development plan team.	
403	Cairn PLC	<p>The submission was prepared by John Spain Associates, Planning Consultants on behalf of Cairn PLC and focuses on healthy place making and sustainable mobility for the development of key towns Naas and Maynooth and towns with good transportation links such as Leixlip.</p> <p>Reference is made to the quantum of housing delivered by Cairn generally and within Kildare at locations in Naas, Maynooth, and Leixlip. The content of the Draft Plan is broadly supported. Cairn PLC seeks to work with the Planning Authority in respect of the development management aspects of the Plan.</p> <p>It is submitted that specifying text as an 'objective' means there is no flexibility in the application of an objective, as a planning authority may not materially contravene an objective of the plan, without engaging in material contravention procedures. This presents very significant risks of judicial review decisions which do not go through the material contravention procedure. Many of the objectives in the Plan would be more appropriately identified as development management standards or guidelines.</p>	<p>Chief Executive's Response</p> <p>The specific objectives deemed to be more suitable in the Development Management standards are not identified. Section 10(2) of the Planning and development Act 2000 (as amended) sets out a number of development objectives that must be included in a Development Plan. It is therefore considered reasonable to include the various objectives as proposed throughout the Draft Plan as they relate to the various chapters of the Plan, the purpose of which is to further detail the precise manner in which the over-arching policy statements would take effect. The actions and targets that have been identified in the Draft Plan, as appropriate, give further clarity to the manner in which objectives would be realised. All objectives, actions and targets in the Draft Plan have been identified against the relevant stakeholder(s) with responsibility for the delivery of each one. Timelines for the delivery of same have also been identified over the short term (1-2 years), medium term (3-6 years), longer term (6+ years) and ongoing. This information is presented in Appendix 12 (Monitoring and Implementation Framework) for ease of reference.</p> <p>Chief Executive's Recommendation No change to the Draft Plan</p>
331	Fionnuala Corcoran	The submission states that the CDP is too long, difficult to read and navigate, inaccessible the way it was broken into different chapters.	<p>Chief Executive's Response</p> <p>Land use plans are, by their nature lengthy documents and there are a significant number of issues that must be addressed in County Development Plans which are the blueprint for all development across a county over a 6-year</p>

			<p>period. The Plan is informed by a wealth of evidence-based documents also and the 12 Appendices that accompany the Draft Plan should be noted in this regard. Due to the nature of the issues addressed in the Plan similar issues may be addressed in more than one chapter.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan</p>
565	Department of Education & Skills (DES)	In order to strengthen the zoning provision on existing school sites and to aid future planning, the Department requests, if possible, that all existing school sites, and all future education sites, are zoned and mapped on the Co. Council's GIS system.	<p>Chief Executive's Response</p> <p>All zoning maps for the urban settlements in County Kildare, which indicate sites zoned 'Community and Education' are available online. Whilst additional mapping requirements are an operational matter and beyond the scope of the CDP, this can be discussed and agreed at ongoing meetings between KCC and the DES regarding future school provision.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan</p>
364	Ursula King	The submission states the layout of the Draft Development Plan was difficult to navigate and it is excessively long with much duplication. There are too many objectives which are vague and unactionable. Various chapter and appendices freeze when opened online and the glossy portal was off-putting and slow to navigate.	<p>Chief Executive's Response</p> <p>The nature of a land use plan is such that it must address a wide range of issues as set out in the Planning and Development Act 2000 (as amended). The nature of these issues is such that they frequently relate to a number of different chapters within the Plan and so can appear more than once depending on the context. The detailed contents page guides the reader to the area of the Plan of most interest to them with respect to the hard copies of the Draft Plan. In relation to the digital version of the Plan, the Council, for the first time, introduced a Virtual Consultation</p>

			<p>Room experience which was available to the public for the duration of the 10 week public consultation period, the sole purpose of which was to make the navigation of the Draft Plan as clear and as user friendly as possible. In relation to the 1,364 objectives of the Draft Plan Appendix 12 (Monitoring and Implementation Framework) lists all of the objectives, actions and targets of the Plan and identifies the relevant stakeholder(s) in each instance with responsibility for realising each one over an identified period of time (up to 2 years, 3-6 years, longer than 6 years and ongoing). The reader is advised to note that the Planning staff are available to assist the public should they be experiencing difficulties with accessing any part of the Draft Plan.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan</p>
472	Keep Ireland Open	<p>The submission makes the following suggestions regarding the formatting and layout of the Plan:</p> <ul style="list-style-type: none"> • Contents Page should include Sub-Sections. • Index should be provided as recommended in the Development Plan Guidelines (5.15), • Page numbers where topics are primarily dealt with should be bolded. • Development Management Standards should be dealt with at the end of each chapter as this would make the plan more user friendly. • Policies, chapters, and sections in Chapter 15 should be cross referenced. • Layout would be improved by sub-numbering or sub-lettering lists of points and paragraphs. The present layout creates difficulties when referring to particular points. 	<p>Chief Executive's Response</p> <p>Noted. The matters raised relate to editing issues and will be considered prior to the final publication of the adopted plan.</p> <p>Chief Executive's Recommendation No change to the Draft Plan</p>

		<ul style="list-style-type: none"> Chapter/section numbers should be placed on each page. Draft has no page numbers. Presumably the adopted Plan will include page numbers. 	
472	Keep Ireland Open	<p>The submission contends provisions prefixed with contribute to. This should be removed.</p> <p>Include the Planning and Development Act 2000 Sec 9(4) requires that the Plan must have regard to plans in adjoining counties.</p> <p>Recommendation to co-ordinate the objectives in this plan with those in the adjoining counties, except where it is considered to be inappropriate or unfeasible and shall take into account any significant likely effects the implementation of the plan may have on the area of any adjoining county.</p> <p>The submission recommends that the Plan has regard to the outcomes of the Ministerial Directions which have been made against DLR. The submission contends the Plan fails to comply with/ have regard to/ take into account the following:</p> <ul style="list-style-type: none"> Planning & Development Acts Plans in adjoining counties DoECLG Guidelines Heritage Act 1995 National Heritage Plan Eastern & Dublin RSES Development Plan Guidelines <p>The submission recommends an additional objective to strive to secure the financial resources to implement the policies and objectives of the</p>	<p>Chief Executive’s Response</p> <p>County Kildare is part of the Eastern and Midlands Region with the neighbouring counties of Wicklow, South Dublin, Meath, Offaly and Laois and is governed by a shared Regional Spatial and Economic Strategy (RSES). The Draft Plan aligns with the RSES. KCC has consulted with all neighbouring counties, including Carlow County Council which is within the Southern Region Assembly, in relation to this Draft County Plan. There are numerous policies and objectives within the plan that refer to cross-county initiatives and co-ordination (e.g. National Peatlands Park, Barrow Blueway, Joint Local Area Plans etc.).</p> <p>The Chief Executive strongly disagrees that the Plan fails to comply with its statutory obligations, as provided for in the Planning and Development Act 2000 (as amended). In preparing the Draft Plan, regard has been had to numerous documents including those listed above, which are specified throughout the Plan. Numerous policies, objectives, actions and targets of the Draft Plan have been informed by such documents.</p> <p>While securing resources is an operational matter for the Council, beyond the remit of the Plan it is considered appropriate to include such a reference in particular cases where the realisation of policies, objectives, actions and targets is dependent on funding or other resources.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan</p>

		Plan. The submission recommends as resources permit be removed from all policies, objectives and actions as many policies, objectives and actions have resource implications and it is invidious to single out particular ones.	
443	Clane Community Council	<p>The weblink (http://www.kildarecoco.ie/planningenquiry) to the toolkit should be updated to that of the current webpage. http://webgeo.kildarecoco.ie/planningenquiry.</p> <p>The publication of the link might take account of possible changes to the web address during the lifetime of the Plan</p>	<p>Chief Executive's Response Comments are noted</p> <p>Chief Executive's Recommendation The GIS systems will be updated when the Draft Plan is finally adopted and appropriate web links put in place.</p>
405	Kildare Climate Action Linkage Group	<p>The submission references the following sections of the Draft Development Plan Guidelines for Planning Authorities:</p> <ul style="list-style-type: none"> • 10 guiding principles for quality in plan-making as outlined in Section 1.7 of the guidelines. • Section 2.7.2 which states that it should be a standard that all local authorities make their statutory plan maps available online as interactive webmaps and that the local authority must provide digital mapping to the Department as soon as is practicable, to align with the plan coming into force 6 weeks after it is made. <p>With reference to the above, it is contended that the Plan:</p> <ul style="list-style-type: none"> • Is an excessively long, multi-volume document comprising many hundreds of pages. • Does not have concise and accessible core development strategy. 	<p>Chief Executive's Response All comments raised have been noted. The Council will be updating the Council GIS system to align with the adopted CDP as soon as practicable after the adoption of same.</p> <p>There are a significant number of issues that must be addressed in a Development Plan which are set out in the Planning and Development Act 2000 (as amended). In addition to same, the Council must consider all issues raised from a number of sources including but not limited to the submissions received at the pre-draft and draft stages of the Plan, key objectives in both the NPF, the RSES, a wide range of Section 28 Ministerial Guidance documents. All of the above (and more) has resulted in what is considered to be a comprehensive policy document to steer the future development of the county while balancing the needs of the county from an economic, physical and social point of view with other significant factors including climate change and biodiversity. It is not accepted that the Plan does not have a concise core development strategy (which is set out in Chapter 2), nor is</p>

		<ul style="list-style-type: none"> • Does not set out clear policies for the protection of the natural environment that are widely understood by all. • Does not provide for the long-term protection, rehabilitation, and where necessary sustainable use of natural resources. • Will not play a significant role in establishing more sustainable patterns of development which tackle the sources of climate change. • Does not have policies and objectives which are measurable, with information on progress and outcomes available to inform subsequent plan formulation. • Does not focus and prioritise policies and objectives <p>It is requested that the Council reorder the Plan, clearly outlining core strategic objectives and detailing any achievable objectives over the lifetime of this plan in a concise and focused way. Aspirational statements must be distinguished as such and should not be listed as 'objectives'. Reporting details must be focused, starting with items to be reported on annually, through to items which have to be reported on after 6 years.</p>	<p>it accepted that the Plan does not set out clear policies for the protection of the environment that are easily understood. There are easily understood policies, objectives, actions and targets throughout the Plan in relation to same. A monitoring and implementation framework is also included in Chapter 17 and Appendix 12 for more information on where responsibility lies for realising the various objectives, actions and targets of the Plan, whether they be over the short, medium or longer term. The Council is statutorily obliged to prepare a progress report on the CDP 2 years after the adoption of same.</p>
<p>Chief Executive's Recommendation No change to the Draft Plan.</p>			
<p>GENERAL</p>			
26	Butterfly Conservation Ireland (BCI)	The submission highlights that the establishment of a new National Peatlands Park would support a number of areas in Chapter 1	<p>Chief Executive's Response The submission is noted.</p>
			<p>Chief Executive's Recommendation No changes to the Draft Plan.</p>

280	Stephen James Byrne	The OPR has not ensured compliance in the area of SEA, AAs and other relevant EU Directives.	<p>Chief Executive’s Response It should be noted that the OPR is not the competent authority with respect to AA/SEA.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
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CHAPTER 2 – CORE STRATEGY & SETTLEMENT STRATEGY			
Sub No.	Name	Summary of Issues Raised	Chief Executive’s Responses & Recommendations
Core Strategy and Table 2.8			
405	Kildare Climate Action Linkage Group	<p>It is submitted that the title (and the content) of chapter 2 is confusing. The submission questions the following:</p> <ul style="list-style-type: none"> • Is there a “Core Strategy” for the Development plan and a separate “Settlement Strategy”? • Is the “2.1 Overall Aim” the core strategy of the Development Plan? • If this is the case, then the title of this chapter should be something along the lines of “Overall Core Strategy of Kildare Development Plan” 	<p>Chief Executive’s Response</p> <p>The comments raised are not accepted. The Core Strategy and Settlement Strategy are interlinked (Chapter 2), the latter must be derived from the former which sets the scene for the future development of the county over the lifetime of the Plan and beyond.</p> <p>Section 2.1 sets out the aim for Chapter 2 though, given the nature of Chapter 2, this does relate to all aspects of the Draft Plan.</p> <p>Chief Executive’s Recommendation</p> <p>No change to the Draft Plan.</p>
405	Kildare Climate Action Linkage Group	<p>The submission suggests the following changes to Section 2.1: To provide for the delivery of an additional 9,144 housing units to accommodate an additional 25,146 people by the end of the Plan period, through the delivery of sustainable, compact settlements supported by a commensurate level of physical, and green infrastructure to mitigate against climate change, and to endeavour to prevent any further loss of Kildare’s biodiversity.</p> <p>It is also requested that the Plan provide a definition of what sustainability means.</p>	<p>Chief Executive’s Response</p> <p>It is not considered necessary to include a definition for sustainability. Sustainability and sustainable practices are implicit in all policies, objectives, actions, and targets of the Draft Plan. However, it is agreed to Amend Section 2.1 (Overall Aim) to acknowledge the biodiversity crisis.</p> <p>Chief Executive’s Recommendation</p> <p>Amend Section 2.1 as follows: To provide for the delivery of an additional 9,144 housing units to accommodate an additional 25,146 people by the end of the Plan period, and to continue to</p>

			<p>create the environment to retain existing and attract new employers to locate in County Kildare through the delivery of sustainable, compact settlements supported by a commensurate level of physical, and social and green infrastructure to mitigate against climate change.</p> <p>Display the Aim for Chapter 2 similar to other chapters, i.e. within a 'box'.</p>
405	Kildare Climate Action Linkage Group	The submission highlights Table 2.3 and Table 2.4 (and Appendix 9). It is requested to update Step 4 of Table 2.4 to include units completed in 2021 (2027 units) and to provide a more up to date estimate.	<p>Chief Executive's Response Completed units in 2021 have been updated in Appendix 9. Table 2.4 was prepared prior to the release of Q4 data and includes housing completion estimates for 2021 and 2022.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
405	Kildare Climate Action Linkage Group	<p><u>Compact Growth and Climate Action</u> It is submitted that the Development Plan should outline how the embodied carbon of new planned developments have been accounted for and what steps will be taken to reduce the impact of emissions from new developments. The following examples are provided:</p> <ul style="list-style-type: none"> • Mandating the use of more sustainable building materials. • Promoting the redevelopment of brownfield and derelict sites ahead of greenfield sites. • Mandating a percentage C&D waste recovery on sites. 	<p>Chief Executive's Response There are many policies and objectives throughout the Plan which ensure that planning decisions consider climate and biodiversity as part of the decision-making process. Objectives HO O6, HO O9, and HO O10 in Chapter 3 encourage and promote development / regeneration of brownfield sites. The Council will also implement the provisions of the Derelict Sites Act and Urban Regeneration and Housing Act 2015 (as amended) which is recognised throughout the Draft Plan (Objectives RE O31, RE O32, Action RET A3, Sections 4.7, and 16.3.3 all refer).</p> <p>Objective RD O23 in section 9.7 supports the use of timber products as a renewable raw material.</p>

			<p>Section 15.10.2 in Chapter 15 outlines requirements for C&D waste including waste management plans.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
405	Kildare Climate Action Linkage Group	<p><u>Town and Village Renewal</u> Section 2.7, is referred to and it is asked how derelict properties will play a role in town and village renewal and contribute to growth outcomes? It is asked if the CDP can state a preference for bringing derelict sites back into use ahead of building new developments.</p>	<p>Chief Executive's Response See response to submission 468 in relation to derelict sites.</p> <p>Chief Executive's Recommendation See recommendation to submission 468 in relation to derelict sites.</p>
405	Kildare Climate Action Linkage Group	<p><u>Settlement Hierarchy Population and Housing Unit Targets</u> In Table 2.8, the projected Kildare population for 2021 is 235,387 (an increase of 5.75 % on 2016 census figures). It then appears that this percentage increase is blanketly applied across all towns. The submission questions the rationale behind this. Examples from the Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031 and the Housing Need and Demand Assessment & Housing Strategy are provided in the submission.</p>	<p>Chief Executive's Response See response to submission 468.</p> <p>Chief Executive's Recommendation See response to submission 468.</p>
405	Kildare Climate Action Linkage Group	<p><u>Target Residential Density</u> The submission requests the revision of paragraph 1 of Section 2.10.</p>	<p>Chief Executive's Response Agreed.</p> <p>Chief Executive's Recommendation Amend paragraph 1 of Section 2.10 as follows: The Sustainable Residential Development Guidelines generally encourages net densities of between 35-50 dwellings per hectare within larger towns with net</p>

			densities of between 30-35 dwellings per hectare considered acceptable in certain large town contexts and generally discourages net densities of less than 30 dwellings per hectare.
405	Kildare Climate Action Linkage Group	It is submitted that there is no 'Section 2.13' above paragraph 2 of Section 2.13 as stated in the Plan.	<p>Chief Executive's Response</p> <p>Accepted.</p> <p>Chief Executive's Recommendation</p> <p>Amend paragraph 2 of Section 2.13 as follows: Section 2.12³ above sets out the...</p>
405	Kildare Climate Action Linkage Group	<p><u>Employment in Kildare</u></p> <p>In developing employment opportunities throughout the county, the submission suggests:</p> <ul style="list-style-type: none"> • Planning decisions that enhance local employment must be screened for biodiversity and climate impacts. For example, if a distribution depot is to be built in Kildare, how is the impact of the increased necessary logistics accounted for? • The CDP should identify measures to be taken to attract climate positive employment in the county. • The CDP should outline criteria for defining 'sustainability' in terms of employment that considers climate and biodiversity outcomes, and not simply job numbers. 	<p>Chief Executive's Response</p> <p>See response to submission 468 Ann Behan.</p> <p>Chief Executive's Recommendation</p> <p>See recommendation to submission 468 Ann Behan.</p>
405	Kildare Climate Action Linkage Group	<p><u>Core Strategy and Settlement Strategy Objectives</u></p> <p>The submission references the National Biodiversity Action Plan 2017-2021, the Interim Review of the Implementation of the National Biodiversity Action Plan 2017-2021, an audit report by the National Biodiversity</p>	<p>Chief Executive's Response</p> <p>It is not agreed to include the proposed objectives as there are numerous policies and objectives in the Draft Plan that address all of the issues raised (Chapter 12 in particular refers).</p>

	<p>forum and Ireland’s 6th National Report to the UN Convention on Biological Diversity (2019).</p> <p>It is requested that Kildare County Council be part of the transformational change</p> <p>necessary to halt any further degradation of Kildare’s habitats and dependant species and to begin meaningful action on restoring Kildare’s habits for future generations and to take account of the following considerations:</p> <p>Resourcing – As part of this transformational change, it would be inconceivable for a single person to cover the huge remit.</p> <ul style="list-style-type: none"> • Public Education - If we are to be serious about engaging local communities in meaningful biodiversity actions, then this should be a well-informed action. • Inventory of Protected Sites - Requisite to this is the need for a publicly accessible inventory of protected sites, high nature value sites and sites for protected flora and fauna in Kildare. • Aarhus Convention – The three main pillars (“Access to environmental information”, “public participation in environmental decision-making” and “access to justice”) of the Convention are highlighted and states that the parties to the Convention are required to make the necessary provisions so that public authorities contribute to these rights to become effective. 	<p>The change proposed to CSO 1.13 is not accepted. National Policy Objective 20 of the NPF requires Local Authorities to ‘project the need for single housing in the countryside through the local authority’s overall Housing Need Demand Assessment (HNDA) tool and county development plan core strategy processes.’ The Core Strategy (Table 2.8, refers) provides for the housing target for ‘rural dwellers’ during the lifetime of the plan in accordance with the Housing Supply Target Guidelines.</p> <p>The request to amend CSO 1.17 is not accepted. It is considered the existing wording of the objective which refers to ‘specific apprenticeships in technology’ provides sufficient support to cover ‘renewable technologies and retrofitting apprenticeships.’</p> <p>The request to amend CSO 1.18 is not accepted. It will only become known whether results of Census 2022 for County Kildare will require a statutory variation to the Plan after the detailed Small Area Population Census results are fully published by the Central Statistics Office in 2023.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
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	<p>In light of the above, the submission proposes the following additional objective:</p> <p>Ensure that the future growth and spatial development of County Kildare does not further undermine Kildare’s protected habitats and species. Engage with NPWS and other relevant stakeholders to urgently progress management plans for Natura 2000 sites and other protected sites in the County. Engage with all relevant stakeholders, including NPWS and national experts in flora and fauna, including the NGO sectors (for example, BSBI County Recorders) to identify and protect high nature value habitats and sites for threatened species in County Kildare. Tangibly commit to meaningfully tackling Biodiversity Loss in County Kildare by providing additional resources for the employment of an additional suitably qualified staff member dedicated to the conservation and protection of Kildare’s habitats and species, compiling an inventory of High Nature Value sites and protected species, community education and engagement on meaningful biodiversity actions, and ensuring that funding for biodiversity is directed to meaningful outcomes.</p> <p>Additionally, the submission proposes amending the objectives below as follows:</p> <p>CSO 1.13 - Engage with public infrastructure providers including Irish Water, the Local Authority Waters Programme (LAWPRO), and local communities to provide serviced sites with appropriate infrastructure for people to build their own homes in designated towns and villages, subject to all relevant planning and environmental criteria as a sustainable alternative to one off housing. Develop Housing Need Demand</p>	
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		<p>Assessment (HNDA) tool for Kildare and project the need for single housing in the countryside by the end of 2023 in line with National Policy Objective 20, Planning Framework 2040.</p> <p>CSO 1.17 - Continue to work with the educational institutions throughout the county and Solas, in order to further enhance the already existing highly skilled labour force in Kildare and to encourage improvements in the labour force to include the development of specific apprenticeships in the technology, renewable technologies and retrofitting apprenticeships, tourism, youth and childcare sectors during the lifetime of the plan to enhance and develop the agility of the workforces in those sectors.</p> <p>CSO 1.18 - To consider aligning Align the Kildare County Development Plan 2023-2029, with the up-to-date population from the forthcoming Census, where there are verified material population differentials to those in Table 2.8 of the Plan, by way of a statutory variation pursuant to Section 13 of the Planning and Development Act 2000 (as amended).</p>	
385	County Kildare Chamber	<p><u>Core Strategy</u> County Kildare Chamber notes the county is split between three different developmental regions, Dublin Metropolitan Area, Core Region and Gateway Region. It is considered that the development plan should demonstrate consistency with projected growth for each area.</p> <p>Housing availability is the number one issue affecting business competitiveness in Kildare over the past 12 months.</p>	<p>Chief Executive's Response <u>Core Strategy</u> Housing supply targets as outlined in Table 2.8 of the Draft Plan align with the projections of the National Planning Framework (NPF) and the Regional Spatial Economic Strategy (RSES) for the East and Midlands region which includes County Kildare.</p> <p>Regarding the issue of additional allocation of housing stock to Maynooth and north Kildare, it should be noted that it is the intention of the Council to provide for a quantum of the MASP allocation (which can be</p>

	<p>It is reassuring to see the Council objective ensuring sufficient land is zoned at appropriate locations in line with the settlement strategy. However, given that current housing stock levels are inadequate, it is crucial that the level of housing supply target is correct for key growth areas such as Naas, Maynooth and the surrounds. There is concern that inadequate zoning of land for residential use in North Kildare will lead to a potential decrease in FDI and indigenous demand.</p> <p>The County Kildare Chamber believes the population averages used, in the National Planning Framework, to calculate the figures are too low for future need and this will negatively impact on the county's ability to attract new business and employers of size from setting up in Kildare. It is considered that a tiered system of zoning could be more appropriate in these instances, as there is currently no space for flexibility in the system.</p> <p>County Kildare Chamber believes larger county towns such as Naas should be harnessed as they are infrastructurally enabled already to deliver the required housing to alleviate the current housing crisis.</p> <p><u>Processing of Planning Applications</u> To accelerate the processing and determination of planning applications, the Chamber would welcome greater utilisation of conditions that agreement with the Planning Authority is obtained prior to development commencing being attached to grants of planning permission instead of prolonged requests for Further Information.</p>	<p>distributed over the period to 2031) to be attributed to Maynooth in the new local area plan, the precise number yet to be determined having regard to a range of evidence based assessments including, but not limited to, a Social Infrastructure Audit and Area Based Transport Assessment. It should be noted however, that if capacity/infrastructural constraints are identified in the town, which cannot be resolved over the life of the local area plan, then the figures for growth (particularly in relation to the NPO 68 allocation) will be reduced accordingly, to ensure the growth of the town does not exceed the capacity of its servicing and social infrastructure.</p> <p>The concerns in relation to the overall housing figures being too low for future need have been noted. Objective CSO. 1.18 of the Draft Plan provides the Council with the opportunity to align the County Development Plan with the emerging CSO updated information, when that becomes available at the settlement level, as necessary. Should changes be subsequently required to Table 2.8 (Core Strategy) in the CDP such changes will then translate to the various Local Area Plans thereafter. As the review of the CDP must take place within 2 years of the expiration of the CDP it was not possible to await the detailed Small Area Population results of the Census 2022 data in order to inform the Draft Plan as these are expected to be published towards the end of 2023.</p> <p>The comment that larger county towns such as Naas should be harnessed as they are infrastructurally enabled already to deliver the required housing to alleviate the current housing crisis is noted. Table 2.8</p>
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		<p>The Chamber is encouraged by the Councils ambition for developing on former infill and brownfield sites, promoting integration and well needed regeneration of areas within the county.</p> <p><u>Investment in the Planning function</u> It is imperative that in line with service demand and projected growth that Kildare County Council continues its investment in every aspect of the planning function, from personal to online service provision to ensure this does not become a limiting factor to planning and delivery of housing supply.</p>	<p>already identifies an increase in population for the town of Naas, which exceeds that of any other town in the County. However, Naas has seen a huge number of household completions occur over the last few years, and <u>there has not been a parallel increase in the level of social and community infrastructure to support either the existing or projected population. The feedback from the public about the lack of such infrastructure in Naas has been in evidence throughout the Draft Plan process, as well as the recently approved Local Area Plan. The Plan needs to provide a balance between housing and its supporting infrastructure which leads to a better quality of life.</u></p> <p><u>Processing of Planning Applications</u> The methodology used to process and determine planning applications is an operational matter.</p> <p><u>Investment in the Planning function</u> Matters in relation to investment in the planning department of Kildare County Council is not a function of the County Development Plan.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
529	Consortium of Housebuilders	<p>This submission is made on behalf of four housebuilders, Glenveagh Properties plc, Cairn Homes plc, O'Flynn Group and the Ballymore Group.</p> <p><u>Summary of Submission from Turley</u> The structure of the report submitted by Turley is broken down into 7 Sections and an Appendix:</p> <p><u>Section 1; Introduction and Scope</u></p>	<p>Chief Executive's Response <u>Section 1 and Section 2</u> It should be noted that the Core Strategy of the Draft Plan aligns with the NPF (2018), NPF Road Map (July 2018), the RSES (2019) and the Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities (Dec 2020). The Draft Plan includes Objective CSO 1.18 which provides the Council with the option of aligning the County Development Plan with the up-to-date population from</p>

	<p>The proposed housing supply target of approximately 9,144 homes to the end of 2028 and the planned provision for housing is insufficiently ambitious</p> <p><u>Section 2: Planning for housing growth in Kildare</u> The submission acknowledges that the housing demand figure has been drawn from the Housing Need & Demand Assessment (HNDA) which has been prepared in compliance with the relevant national guidance as published in April 2021.</p> <p>The Draft Plan proceeds to outline the settlement hierarchy at Table 2.8, proposing a distribution of the proposed target of 9,144 homes between the larger towns. This distribution is identical to the 2017-2023 Development Plan, and so fails to reflect the settlement hierarchy since set out in the Regional Spatial and Economic Strategy (RSES) which identified Maynooth and Naas as the two Key Towns in the County and supported the concentration of growth within these two towns and within the MASP area (Maynooth and Leixlip).</p> <p>The submission states that the limitations of the proposed approach to planning for new housing are apparent when compared with the current Plan. The 2017 – 2023 County Kildare Development Plan identified a need to provide 6,023 homes over the remaining three years of its plan period (2020, 2021 and 2022) and an additional 8,038 homes over the four remaining years to 2026. Also, the Kildare County Development Plan 2011-2017 established population and housing targets for the period 2006 to 2022, which</p>	<p>the Census 2022, where there are verified material population differentials to those in Table 2.8 of the Draft Plan, by way of a statutory variation pursuant to Section 13 of the Planning and Development Act 2000 (as amended). In this regard it should be noted that the Small Area Population data is expected to be published towards the end of 2023.</p> <p>For the avoidance of doubt, the housing targets contained in Table 2.8 of the Draft County Development Plan 2023-2029 are not based on 2016 census data, or an estimated population in 2021, but on Central Statistics Office (CSO) housing completion rates [in County Kildare] and the Section 28 Ministerial Guidelines on Housing Supply issued by the Government in December 2020. These targets are based on ESRI research which provides a robust, up-to-date and independently developed housing demand projection, to inform policy and investment with regard to housing at national and local levels. The ESRI data provides an integrated model of housing demand that takes into account demographic, economic and housing market factors, including inter-county migration, at individual local authority level. While it is unfortunate that the detailed Census 2022 figures (SAP [Small Area Population] level) are not available at this stage, the preliminary Census 2022 results from CSO has no direct implications on the housing targets set out in the Core Strategy in the Draft County Development Plan.</p> <p>A significant amount of research was undertaken by the Council (both Planning and Housing Departments) as well as by AIRO, Maynooth to input the most up to date, available information for the purposes of the HNDA Toolkit, produced by the Department of Housing, Local</p>
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	<p>identified a need to deliver over 3,000 homes a year in the County over the last 6 years.</p> <p><u>A positive plan-led approach in the Fingal Development Plan</u> This Draft Plan identified a need for 16,245 homes (2023 Q1 – 2029 Q1), equating to 2,708 homes per annum, which far exceeds the need for 1,717 homes per annum estimated, over an admittedly different period (2020-31) by the DHLGH. In justifying this variant need figure, the Draft Fingal Plan asserts that</p> <p>“This final calculation importantly accounts for all of the actual and estimated annual cumulative unmet demand from the period 2017 – 2023 and incorporates this demand surplus into the next Development Plan 2023-2029”</p> <p>The Draft Fingal Plan identifies around 1,115 ha of zoned land and suggests that this amount of land could accommodate circa 35,204 homes. It also identifies additional zoned lands for the inclusion of strategic reserve sites designed to ensure the potential to deliver additional housing beyond the 6 year life of the Plan. This suggests a significant degree of flexibility</p> <p><u>Section 3: A growing national housing crisis</u> The submission notes that there is a growing national housing crisis in Ireland.</p> <p>The NPF projection is specifically designed to conform with the NDP spatial strategy and reflect the NPF and RSES population targets to 2040. The modelling of projected household growth was undertaken in 2017. It</p>	<p>Government and Heritage in order to determine the most appropriate housing projections for County Kildare over the life of the Plan. It is accepted in the submission that ‘the housing demand figure as outlined in the Housing Need & Demand Assessment (HNDA) is in compliance with the relevant national guidance as published in April 2021. <u>In compiling the HNDA, the Council had ongoing discussions with the Department who validated the approach used including how unmet demand was addressed. The Plan projects delivery of more units per annum over the life of the Plan than were delivered annually over the life of the current Plan. Housing completions were also taken into account for calculation purposes.</u></p> <p>In relation to the Key towns and Leixlip, the footnote in table 2.8 provides clarification on the additional growth allocated to Maynooth. However, evidence base work will need to be undertaken to inform the emerging Maynooth LAP which will be a joint LAP with Meath County Council</p> <p>It should be noted that the W91 postcode, which includes Naas and surrounding areas, showed the highest number of household completions in the country in recent years. Due to the significant number of houses delivered in the Naas area and throughout the county, the level of social and community infrastructure has not been developed at the same pace. The Plan needs to provide a balance between housing and its supporting community infrastructure to ensure a better quality of life for existing and future residents / communities in the county.</p>
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	<p>is no longer appropriate for local authorities to restrict development rates to align with a national target that is no longer sufficient or providing the homes needed.</p> <p>While national strategy and the NPF recognise a housing crisis, they have failed to keep pace with the growing severity of this crisis and the increasing underlying demand</p> <p>The limitations of the national policy response forms an important prism through which to view the proposed restrictive approach within the Draft Plan</p> <p><u>Section 4: Evidence of higher local housing demand and need</u></p> <p>The submission notes that last year some 2,032 dwellings were completed in Co. Kildare, which is some 22% higher than the previous year, and the highest amount of completions in the last 10 years. This contrasts with the national figure, which has seen rates of delivery stagnate. This is also significantly higher than the 1,535 homes per annum, totalling 18,425 over twelve years from 2020 to 2031, which underpins the housing target in the Draft Plan. There is no evidence to suggest that there will be a reprieve in the need pressures for new housing in Co. Kildare. Rising house prices are a symptom of housing need pressures and they have risen significantly, particularly over the last 3 years. While the 2016 Census continues to provide the last official estimate of the population, the CSO is currently experimenting with the use of administrative data and published experimental estimates for 2020 late last year, after the HNDA was finalised. These suggest that the population of Kildare has grown by some 11% since the 2016 Census.</p>	<p>Regarding strategic reserve sites it is not considered appropriate to zone land beyond the 6-year life of the Plan as this approach would not be consistent with national and regional policy guidance. Apart from Clane, the settlement hierarchy, as outlined in Table 2.8 of the Draft Plan, is clearly in accordance with the hierarchy as set out in the Regional Spatial and Economic Strategy (RSES).</p> <p><u>Section 3:</u> It is accepted that there is a growing national housing crisis in Ireland and circumstances have changed since the modelling of projected household growth was undertaken in 2017.</p> <p>As a direct result of the coronavirus pandemic, Census 2021 was postponed to 2022. While a certain level of detail in relation to Census 2022 has now been published, it is considered appropriate to await the publication of the Small Area Population statistics for the county. Having regard to same however, it should be noted that Objective CSO. 1.18 of the Draft Plan provides the Council with the opportunity to align the County Development Plan with the emerging CSO updated information, when that becomes available, as necessary. It is expected that Small Area Population figures will be published towards the end of 2023.</p> <p>Should changes be subsequently required to Table 2.8 (Core Strategy) in the Kildare County Development Plan such changes will then translate to the various Local Area Plans thereafter. A review of the County Development Plan must take place within 2 years of the expiration of the CDP. Where there are verified material population differentials in relation to those in Table 2.8</p>
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	<p>The submission points out that five different scenarios are all considered in the HNDA. These are Convergence, Baseline, NPF 50:50 City, High Migration and Low Migration. The Draft Plan opts for the NPF Convergence scenario and in this regard the HNDA is clear to articulate that this scenario is ‘the recommended housing demand scenario to be used by planning authorities in order to plan for the provision of housing to meet projected levels of demand in accordance with the NPF strategy’. It does, however, also concede that ‘the guidelines state that deviation from this scenario must be evidence-based and consistent with these guidelines’. In the context of a national housing crisis that is evidently worsening, and the recent evidence of very strong demand for housing, the HNDA’s minimal efforts to take account of evidence of higher need are considered a significant failing. As a minimum the high migration scenario must be more representative of a potential future growth trend.</p> <p><u>Pent-up demand</u> The submission notes that arriving at the housing target in the HNDA, it is acknowledged that the Toolkit calculation includes an estimate of unmet housing need. It is considered that the 346 households categorised as being in unmet need, and therefore additional to projected population / household growth, is a woeful underrepresentation. The rise in household size in Kildare is a clear indication of a pent-up demand and a failure to provide the houses needed. The development strategy also orients itself to the provision of increased numbers of apartments as part of the mix of new homes. The outcome will therefore be a supply-</p>	<p>arising from the detailed Small Area Population statistics of Census 2022 (which are expected to be published towards the end of 2023). Objective CSO 1.18 makes provision for aligning the CDP with the updated Census information, where appropriate. To delay the draft Plan and its associated Core Strategy would result in consequent delays to the publication of the various statutory Local Area Plans, of which there are 12 in total within County Kildare.</p> <p><u>Section 4</u> It is accepted that demand for housing is currently very strong in Kildare, which manifests itself in rising house prices. It is also noted that the CSO published experimental population estimates for 2020 late last year, after the HNDA was finalised. The argument made in the submission that the Council should have gone with the ‘high migration scenario’ in the HNDA is also noted.</p> <p>When the HNDA was drafted it opted for the NPF Convergence scenario as this scenario is ‘the recommended housing demand scenario to be used by planning authorities in order to plan for the provision of housing to meet projected levels of demand in accordance with the NPF strategy’.</p> <p>The comments made in the submission about the level of ‘unmet need’ or ‘pent up demand’ is noted however KCC had no discretion with this figure which was set nationally. It is considered more appropriate to continue to rely on the Departments’ Toolkit Methodology with respect to the preparation of HNDA’s at this juncture. In compiling the HNDA, the Council had ongoing</p>
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	<p>led fall in household size, which if not matched with comparable numbers of new homes being provided means a further curtailing of the ability for households to find the homes they need. It is of note that the HNDAs acknowledges that the Council is able to substitute its own estimate of unmet need within the Toolkit calculation, the Council should acknowledge a much greater level of unmet need or pent-up demand.</p> <p><u>Economic drivers</u> The submission notes that the Draft Plan recognises the important role of employment land zoning to ensure a sustainable balance of jobs and housing. Given the scale of economic ambition and opportunity outlined within the Draft Plan, the importance of responding positively in the provision of new housing to accommodate new labour is vital.</p> <p><u>Section 5: The proposed supply response</u> The submission states that the Draft Plan is fundamentally flawed as it fails to respond appropriately to legislative requirements, including Sections 10 and 95 of the Planning and Development Act 2000 (as amended) and updated Ministerial Guidelines.</p> <p>The Draft Plan is currently lacking important information with respect to the 'Core Strategy. One of the key ingredients, being a Settlement Capacity Audit, has been omitted from the Plan/'Core strategy' with respect to the higher order settlements which raises significant issues in terms of the validity of the approach proposed</p>	<p><u>discussions with the Department who validated the approach used including how unmet demand was addressed.</u></p> <p>The submission comments about the importance of responding positively to the provision of new housing to accommodate economic growth is noted. However, as part of the HNDAs an economic overview was carried out which looked at labour force participation rates, employment, unemployment, and inward / outward commuting.</p> <p><u>Section 5:</u> The submission states that the Draft Plan is currently lacking important information with respect to the 'Core Strategy. One of the key ingredients, being a Settlement Capacity Audit, has been omitted from the Plan/'Core strategy' with respect to the higher order settlements which raises significant issues in terms of the validity of the approach proposed. The submission also comments that the Kildare LAPs and associated zonings are out of alignment with the current national and regional planning policy context.</p> <p>While acknowledging the submission wherein it states that all land use zoning objectives for the county should be included as part of the development plan, it is the position of the Planning Authority that such land use zoning proposals need to have a robust evidence-led rationale. In this regard, it is considered the Local Area Plan process would be the most appropriate to ensure that land use zonings for the larger settlements in the county takes place in a sustainable, sequential and phased manner, as per objective CSO 1.1 and CSO 1.4</p>
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	<p>The Draft Guidelines clearly state that ‘...land-use zoning should principally be undertaken as part of the development plan process in tandem with the preparation of the directly-related core and settlement strategies, informed by a Settlement Capacity Audit’.</p> <p>The Draft Plan’s proposed approach results in the loss of the ‘...clear practical advantages...’ associated with ‘...aligning the core strategy, settlement strategy and principal residential zoning functions in a single, integrated development plan process’</p> <p>The submission notes that the majority of the Kildare LAPs are out of alignment with the current national and regional planning policy context, and yet, the Kildare County Development Plan is relying on this suite of plans to allocate the residential zonings to achieve the housing target.</p> <p><u>Section 6: The consequences of failing to plan positively</u></p> <p>The submission notes that the HNDAs confirm that there is an affordability issue within the County. A further boosting of supply beyond current levels of provision is required to ensure that more households rather than less can access the housing market. The continued worsening of affordability is having the greatest impact on those households in most acute need.</p> <p>Lack of housing has the potential to negatively impact economic development and exacerbate current unsustainable commuting patterns.</p>	<p>of the Draft Plan. It is noted that the methodology for the development of Local Area Plans for settlements in the county is based on the preparation of a series of detailed assessments including an Infrastructural Assessments (Settlement Capacity Audit), a Social Infrastructure Audit, and an Area Based Transport Assessment (ABTA) to determine the suitability and capacity of specific sites to accommodate particular land use zoning objectives including for residential and employment activities. The Council’s approach to LAP plan making has been commended by the OPR, and the Council intends using the same methodology and improve as necessary / appropriate with respect to the preparation of all LAPs in the County. Accordingly, the zoning of higher order settlements in the Draft Plan is considered to be premature and potentially prejudicial to the outcome of the comprehensive evidence-based methodology which is central to the Council’s local area plan-making process. Also, Objective CSO 1.9 of the Draft Plan provides for the review and preparation on an ongoing basis of Local Area Plans in the county which will align with the Core Strategy Table of the County Development Plan</p> <p>The settlement hierarchy in the Draft Plan, apart from Clane, is consistent with the approach advocated in the RSES. It is the Planning Authority’s interpretation of the Legislation and Guidelines that a ‘settlement capacity audit’ is only required for higher order settlements when their position in the settlement hierarchy diverges from that outlined in the NPF and RSES.</p> <p>While the Draft CDP promotes the regeneration of the small town and village centres across County Kildare as</p>
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	<p>The alignment of the capital programme of Departments and institutions in their planning with the County Development Plan growth projections means that where demand outpaces these projections that communities will be adversely affected by a shortage of the infrastructure required to sustainably meet their needs.</p> <p><u>Section 7; Conclusion and recommendations</u> All the issues outlined have been summarised above.</p> <p><u>Appendix 1 Review of Development Plan Requirements</u> The submission outlines the various requirements of Sections 10 and 95 of the Planning Act and the recently issued 'Development Plans - Draft Guidelines for Planning Authorities'.</p> <p><u>Zoning in the Development Plan</u> The Draft Guidelines provide specific guidance with respect to the approach to land use zoning and recommend that '...in most cases, that land-use zoning decisions should not be deferred to subsequent local area plan processes' so as to '...avoid a scenario whereby the development plan core strategy may be subject to challenge and effectively undermined in a separate statutory process'.</p> <p>The Draft Guidelines advise that 'There are clear practical advantages to aligning the core strategy, settlement strategy and principal residential zoning functions in a single, integrated development plan process</p>	<p>mixed use areas through the identification of opportunity sites on the objective maps in Volume 2 of the Draft Plan, it also acknowledges that there may be issues around site amalgamation, access and other development standards such as flood risk and riparian set back in terms of providing any substantial residential uses within these areas. Although residential uses will be encouraged, the focus for these areas will be rekindling the rural economic, civic and amenity function of these centres. Having regard to the foregoing, the potential housing yield from these lands will be such that it will not significantly impact on the Core Strategy and housing delivery targets. Notwithstanding the above, the detail in relation to specific 'opportunity' sites in any settlement governed by the 12 Local Area Plans in County Kildare will be further analysed as the various Local Area Plans are being prepared, at which stage the potential yields that could arise from such sites taking into account a number of factors, including but not limited to, wastewater treatment capacity issues and planning histories associated with all sites within the LAP area, will be determined.</p> <p><u>Section 6</u> The consequences of worsening affordability are acknowledged. The Plan will seek to address these challenges, among others, through the policies and objectives of which have been informed by the HNDA.</p> <p>Due to the significant number of houses delivered throughout the county the level of social and community infrastructure has not yet caught up and up to now has not been developed at the same pace. The Plan aims to provide a balance between housing and its supporting infrastructure to ensure a better quality of life for</p>
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		<p><u>Office of Planning Regulator’s Directions to Kildare County Council</u> The OPR stated the following in its submission (dated 8 March 2021) to the Issues Paper for the Plan.</p> <p>The Plan did not make commensurate changes to the extent of residentially zoned land in the LAPs for the county’s towns.</p> <p>A critical issue for the forthcoming development plan is to ensure that the extent of land zoned for residential development in the county’s towns including settlements that have a statutory LAP is aligned with the population projections and housing need allocations set out in the forthcoming core strategy.</p> <p>A significant proportion of the county’s future homes arising from the housing supply targets, will need to be allocated to the designated key towns and larger settlements consistent with the RSES (including MASP).</p> <p>The planning authority should revisit the categorisation and positioning of settlements in the hierarchy</p> <p>The OPR would strongly advise that all land use zoning objectives for a planning authority’s functional area should be included as part of the development plan rather than delayed to the preparation of local area plans</p>	<p>existing and future residents / communities in the county. Note policies and objectives outlined in Chapter 10.</p> <p><u>Appendix</u> Section 5 (see above) addresses the issues raised around zoning in the Development Plan.</p> <p>Chief Executive’s Recommendation The reader is advised to refer to the response to the OPR submission in relation to the proposed amendments to Table 2.8.</p>
403	Cairn PLC	<p>One of the primary purposes of the new Core Strategy should be to re-allocate growth to the designated growth centres based on the RSES designations and to direct growth into the key towns of Maynooth and</p>	<p>Chief Executive’s Response Objective CSO. 1.18 of the Draft Plan provides the Council with the opportunity to align the County Development Plan with the emerging CSO updated</p>

	<p>Naas, and towns in the metropolitan area with rail infrastructure such as Leixlip. This approach is consistent with the Housing Supply Target Methodology, published in December 2020. These towns can promote compact growth and sustainable mobility (all have good and improving transport links). They are also of a sufficient size and scale to provide the necessary supporting services and infrastructure for a new community. Key towns and other locations that are strategic from a county perspective should be prioritised and to do this it will be necessary to carefully manage the level of development land that may come forward in more dispersed locations.</p> <p>It is submitted that the allocations in Table 3.3 of the current CDP 2017-2023 do not fully reflect the RSES and the strategic intent to direct growth into designated key towns.</p> <p>Details of the DART+ programme is outlined, and it is submitted that Maynooth and Leixlip will benefit substantially from it. Development of appropriate densities and expanded residential areas will underpin and deliver a return to the exchequer on this significant public infrastructure investment.</p> <p>Strong population growth in recent years has played a role in driving demand far in excess of supply in the County. The latest population estimate for 2020 shows Kildare being home to 247,413 residents. This is 11,500 more than expected by ESRI projections which underpin the proposed housing target. Failure to match these demographic drivers through the provision of new housing will result in worsening affordability and a constraining of new households from realising their</p>	<p>information, when that becomes available, preferably at a 'Small Area Population' level, as necessary. Should changes be subsequently required to Table 2.8 (Core Strategy) in the Kildare County Development Plan such changes would then translate to the various Local Area Plans thereafter. However, it should be noted that the HNDA was informed by the most up to date available information which included quarterly CSO statistics with respect to house completions in Kildare and in compiling the HNDA, KCC had ongoing discussions with the Department of Housing, Local Government and Heritage who validated KCC's approach including with respect to how unmet need was addressed. It should also be noted that the HNDA incorporates the Convergence Scenario for household projections which includes existing unmet housing need.</p> <p>Compact growth is encouraged throughout the Plan. See section 3.9 and objective HO O9. Table 3.1 also outlines general density parameters, with allowance for up to 50 units per hectare on public transport corridors and between 30-50 units per hectare in towns with populations over 5,000. It is considered that a sufficient quantum of housing has been provided for Maynooth (noting the additional population of up to 10,000), Naas, and Leixlip in Table 2.8 and this is and will be reflected in the LAP's as they are reviewed.</p> <p>See Appendix 9, Core Strategy Methodology for rationale on allocation of growth outlined in Table 2.8.</p> <p>Chief Executive's Recommendation No change to Draft Plan.</p>
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		<p>needs and aspirations locally. While the 2016 census provides the latest official estimate of population, the CSO estimates for 2020 (after HNDA was finalised) suggest the population of Kildare has grown by 11% since 2016, double the growth rate of 6% in the five years prior to 2016.</p> <p>In this regard, Section 95 (1) of the Planning Act 2000 (as amended) is referenced where planning authorities are obliged “to ensure that sufficient and suitable land is zoned for residential use, or for a mixture of residential and other uses, to meet the requirements of the housing strategy and to ensure that a scarcity of such land does not occur at any time during the period of the development plan”.</p> <p>It is demonstrated that there has been a clear shortfall in housing delivery since 2016. This is illustrated in a graph outlining the quantum of house completions each year against the lower target of 25,000 in the NPF. It is considered that real housing demand before the COVID-19 outbreak was somewhere between 32,000 – 50,000 units per year. As the wording of the Act doesn’t confer an absolutist approach to the consistency between the core strategy and the regional development objectives set out in the NPF and RSES, it is submitted that the proposed new Core Strategy for the Plan would be consistent ‘as far as practicable’ by allocating increased growth to the key towns of Maynooth and Naas. It is suggested prioritisation of the delivery of housing and a sufficient supply of zoned land in Maynooth, Naas, and Leixlip would be for the common good.</p>	
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<p>403</p>	<p>Cairn PLC</p>	<p>The description of Leixlip as having a moderate employment base belies the considerable and sustained employment growth in the area. Leixlip has a significant employment base (Intel) and the former Hewlett Packard site and Collinstown site have been identified as strategic employment areas. While continued and enhanced employment areas are supported it is critical that sufficient core strategy population targets are allocated to Leixlip to ensure the envisaged increase in employment is matched by residential zoned land, in suitable areas of the town. It is submitted that there should not be an over-reliance on Phase 2 sites which do not have sufficient services for housing in the short term given the housing crisis, and that Tier 1 lands are prioritised in the review of the Leixlip LAP. In this regard, additional sentences are proposed at the end of CSO 1.9 to read “Individual Infrastructural Assessments will be carried out to apply the tiered approach to zoning provisions associated with their respective housing allocations. Identified sequentially located Tier 1 lands will be prioritised over Long-Term Strategic and Sustainable Development Sites (SSDS).”</p> <p>Reference is made to the Naas LAP, and it is submitted that the new LAP needs to reflect the up-to-date population growth and housing needs for Naas. Given the significant investment in public infrastructure the Planning Authority must ensure it is used to facilitate housing particularly when there is a shortage. In addition, the NPF states the job-to-resident ratio for Naas is 1.122 confirming its strong service and employment role, therefore potential exists to achieve equilibrium in this respect through additional residential development. Owing to land assembly and delivery, it</p>	<p>Chief Executive’s Response</p> <p>Objective CSO 1.9 is to review and prepare on an ongoing basis a portfolio of LAP’s which includes Leixlip and Naas. The Naas LAP 2021-2027 adopted last year is not due for review until 2027, while the Leixlip LAP is not due for review until 2023. Submissions will be invited on each plan during the public consultation process.</p> <p>Regarding Leixlip being described as having a moderate employment base, while acknowledging the significant employment provided by Intel, it is generally considered to be moderate along with other Self-Sustaining Growth Towns such as Newbridge, Kildare and Athy. It should be noted the settlement hierarchy in the Draft Plan is consistent with the approach advocated in the RSES.</p> <p>In relation to including LAP zoning objective maps in the CDP, it is the position of the Planning Authority that such land use zoning proposals need to have a robust evidence-led rationale. In this regard, it is considered the Local Area Plan process would be most appropriate to ensure that land use zonings for the larger settlements in the county takes place in a sustainable, sequential and phased manner, as per objective CSO 1.1 and CSO 1.4 of the Draft Plan. It is noted that the methodology for the development of Local Area Plans for settlements in the county is based on the preparation of a series of detailed assessments including an Infrastructural Assessment (Settlement Capacity Audit), a Social Infrastructure Audit and an Area Based Transport Assessment (ABTA) to determine the suitability and capacity of specific sites to accommodate particular land use zoning objectives</p>
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		<p>is recommended that the land supply should be extended to 9 years to allow for a range of sites to come to development.</p> <p>As part of the review of the Naas LAP, the Sustainable Planning, and Infrastructure Assessment (SPIA) should include all relevant sites with road access and service provision. The criteria used in any future SPIA should be broadened (compared with Naas criteria) and scoring should be more specific to differentiate sites. A set of criteria is outlined and recommended for use in the County Plan for guidance purposes for SPIA's in LAP's. A ranking from 1-5 should be given to individual sites. The criteria should include proximity to town centre, local retail facilities / social infrastructure, education, access to green routes (cycling and walking), infill opportunity, roads / transportation, water supply, wastewater, drainage, potential for flood risk, and sequential development.</p> <p>It is recommended that the zoning objective maps are included in the County Plan pending preparation of same to allow for an appropriate transition between the adoption of the Draft Plan and future review of the LAPs.</p>	<p>including for residential and employment activities. Accordingly, the zoning of higher order settlements in the Draft Plan is considered premature and potentially prejudicial to the outcome of the comprehensive evidence-based methodology which is central to the Council's local area plan-making process. Also, Objective CSO 1.9 of the Draft Plan provides for the review and preparation on an ongoing basis of Local Area Plans in the county which will align with the Core Strategy Table of the County Development Plan</p> <p>Chief Executive's Recommendation No change to Draft Plan.</p>
403	Cairn PLC	<p>Draft Development Plan Guidelines (DDPGs) confirm that it is not the intent of the planning system and the development plan process "to facilitate the hoarding and speculation of serviced development land". The guidelines also recognise that "there is a need for some degree of competition and choice in the residential development land market". It is submitted that the core strategy of the Plan would benefit greatly from taking</p>	<p>Chief Executive's Response The Housing Need and Demand Assessment (HNDA) was prepared to inform the Draft Plan and is included as Appendix 1 to the Draft Plan. The requirement for a HNDA is set out in the National Planning Framework, specifically NPO 37 and has been prepared in line with Circular 14/2021 HNDA and 'Guidance on the Preparation of a Housing Need and Demand</p>

		<p>into account the Draft Development Plan Guidelines 2021.</p> <p>The DDPGs also confirm that after identifying the site / land requirements to meet a housing supply target for a settlement, the Planning Authority may also identify additional sites/lands to “ensure sufficient choice for development potential is safeguarded”. In this regard there is an allowance for additional provision of zoned lands of 20-25% of the required quantum of zoned land and sites in settlements in any planning authority area as a whole for any six-year plan period.</p> <p>It is submitted that this provision should be undertaken on a settlement basis, to determine which zoned lands / sites, in excess of that required, match the agreed housing supply target. This should be determined by the Planning Authority. It is important that the Plan does not constrain the delivery of housing, and it is suggested the new Plan is delayed using the provision of the Act to ensure the adopted plan can take into account in its core strategy the ‘additional provision’ outlined in the DDPG’s.</p> <p>It is recommended that growth identified for lower order towns be reallocated to Naas and Leixlip in the new core strategy rather than allocating growth in unsustainable locations dispersed across the county.</p>	<p>Assessment’ (April 2021). A significant amount of research was undertaken by the Council (both Planning and Housing Departments) as well as by AIRO, Maynooth to input the most up to date, available information for the purposes of the HNDA Toolkit, produced by the Department of Housing, Local Government and Heritage in order to determine the most appropriate housing projections for County Kildare over the life of the Plan. The housing projections for County Kildare are therefore in line with national guidance and are considered appropriate to retain for the purposes of the Draft Plan. It should be noted also that the housing projection target per annum over the period of the emerging Plan equates to more than 50% more than the actual number of housing completions in County Kildare on average per annum over the last 11 years up to the end of 2021 (See Appendix 9 – Core Strategy Methodology).</p> <p>In relation to population, it is acknowledged that the most recent published information for County Kildare dates to 2016 however, Objective CSO. 1.18 of the Draft Plan provides the Council with the opportunity to align the County Development Plan with the emerging CSO updated information, when that becomes available, as necessary. In this regard it is acknowledged that the preliminary results for the county are currently available however it is considered more appropriate to consider the breakdown of the overall population for County Kildare when the ‘Small Area Population’ data is published c. 2023. Should changes be subsequently required to Table 2.8 (Core Strategy) in the Kildare County Development Plan such changes</p>
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			<p>would then translate to the various Local Area Plans thereafter.</p> <p>It is not considered appropriate to direct the growth of the 'local order towns' as suggested in the submission to Naas and Leixlip. To do so would not result in a balanced and sustainable pattern of development for the whole of the county which would be contrary to national guidance and the proper and sustainable development of the county.</p> <p>See Appendix 9, Core Strategy Methodology for rationale on allocation of growth outlined in Table 2.8.</p> <p>Chief Executive's Recommendation No change to Draft Plan.</p>
583	Ballymore Group	<p>The submission notes the legislation and regulatory constraints on the County Development Plan. It also notes the current climate in which this CDP is being formulated including the litigious nature of planning, the emergence from the Covid-19 pandemic and the Ukraine war.</p> <p>It states the central population growth assumptions on which the ESRI Research Note 111 is based are overly conservative and outline that more people are seeking to work from home increasing demand in areas like Kildare over Dublin. Also, those working from home require larger homes for offices. The on-going war in Ukraine may increase immigration. Therefore the submission questions 'business as usual' assumptions of household size and building on greenfield sites. The submission also questions whether the extent of</p>	<p>Chief Executive's Response</p> <p>The contents of the submission in relation to specific particulars of the HNDA are noted. The HNDA was informed by the most up to date available information which included quarterly CSO statistics with respect to house completions in Kildare and in compiling the HNDA, KCC had ongoing discussions with the Department of Housing, Local Government and Heritage who validated KCC's approach including with respect to how unmet need was addressed. It should also be noted that the HNDA incorporates the Convergence Scenario for household projections which includes existing unmet housing need. The housing projection target per annum over the period of the emerging Plan equates to more than 50% more than the actual number of housing completions in County Kildare on average per annum over the last 11 years up</p>

		<p>overcrowding in households has been taken account of and states an emphasis on regenerating of brownfield sites will lead to the demolition of more existing houses. For all these reasons they believe it would be a prudent approach to build an additional 25% headroom into the figures calculated in the HNDA.</p>	<p>to the end of 2021 (See Appendix 9 – Core Strategy Methodology).</p> <p>In relation to population, it is acknowledged that the most recent published information for County Kildare dates to 2016 however, Objective CSO. 1.18 of the Draft Plan provides the Council with the opportunity to align the County Development Plan with the emerging CSO updated information, when that becomes available, as necessary. Should changes be subsequently required to Table 2.8 (Core Strategy) in the Kildare County Development Plan such changes will then translate to the various Local Area Plans thereafter.</p> <p>The reference to the Ukrainian refugees is noted however, this figure is constantly evolving and until such time as the Department of Housing, Local Government and Heritage (the Department) provides all local authorities with clear guidance in relation to how to factor in the number of refugees into any revision of Table 2.8 (Settlement allocations), it is considered more appropriate to continue to rely on the Departments’ Toolkit Methodology with respect to the preparation of HNDA’s at this time. It is understood that the Department will be updating the HNDA toolkit following the publication of detailed population statistics from the CSO, which may also consider refugee numbers.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
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<p>583</p>	<p>Ballymore Group</p>	<p>The Draft Development Plan does not meet the obligations sought in Section 95 of the Act and Section 10(2)(a). Too small of an area of the county has been zoned and the Draft CDP relies too heavily on Local Area Plans to provide zoned land throughout the county. These LAPs have a legacy of being inconsistent with the Core Strategy of the CDP. Many have expired and it is unclear what the status is of their present zoning. The submission notes that many residential zoned sites in LAPs have remained undeveloped because of servicing issues yet the Core Strategy considers them Tier 1 lands giving a false sense of the potential of lands identified in the Core Strategy to deliver housing. These sites would be more properly zoned as Tier 2 lands.</p> <p>The Draft Development Plan does not meet the obligations sought in Section 10(1) and 10(1A). The submission states this is because the Core Strategy of the Draft CDP does not reflect the priority given to Naas, Maynooth and Leixlip in the RSES.</p> <p>The submission also outlines how RSES requires 9,000 persons to be accommodated in Maynooth and Leixlip yet the Draft CDP is significantly less ambitious than that. Furthermore, the target increase in Leixlip for the 2023-2029 period is significantly less than the current Leixlip LAP 2020-2023. It is noted both settlements will benefit from the DART West railway upgrade.</p> <p>Newbridge being allocated a higher percentage of growth than Leixlip is inconsistent with the settlement hierarchy provided by the RSES as it is neither a Key Town or within the MASP.</p>	<p>Chief Executive’s Response</p> <p>While acknowledging the submission wherein it states that too small of an area of the county has been zoned and the Draft CDP relies too heavily on Local Area Plans to provide zoned land throughout the county, it is the position of the Planning Authority that such land use zoning proposals need to have a robust evidence-led rationale. In this regard, it is considered the Local Area Plan process would be the most appropriate to ensure that land use zonings for settlements in the county take place in a sustainable, sequential and phased manner, as per objective CSO 1.1 and CSO 1.4 of the Draft Plan. It should be noted that the methodology for the development of Local Area Plans for settlements in the county is based on the preparation of a series of detailed assessments including an Infrastructural Assessment (Settlement Capacity Audit), a Social Infrastructure Audit, and an Area Based Transport Assessment (ABTA) to determine the suitability and capacity of specific sites to accommodate particular land use zoning objectives including for residential and employment activities. Accordingly, the zoning of higher order settlements in the Draft Plan is considered to be premature and potentially prejudicial to the outcome of the comprehensive evidence-based methodology which is central to the Council’s local area plan-making process. Also, Objective CSO 1.9 of the Draft Plan provides for the review and preparation on an ongoing basis of Local Area Plans in the county which will align with the Core Strategy Table of the County Development Plan. <u>KCC's approach to LAP plan making has been commended by the OPR and KCC</u></p>
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		<p>The Draft Development Plan Guidelines for Planning Authorities (Aug 21) are clear about the requirement for a countywide Settlement Capacity Audit. This does not appear to have been undertaken for this Draft CDP. Infrastructural constraints with public service providers must be presented and combatted.</p>	<p><u>intends using the same methodology (and to improve as necessary/appropriate) with respect to the preparation of all LAPs in the County. Until such time as LAPs are reviewed, the existing LAPs shall remain in effect.</u></p> <p>While the Draft CDP promotes the regeneration of the small town and village centres across County Kildare as mixed use areas through the identification of opportunity sites on the objective maps in Volume 2 of the Draft Plan, it also acknowledges that there may be issues around site amalgamation, access and other development standards such as flood risk and riparian set back in terms of providing any substantial residential uses within these areas. Although residential uses will be encouraged, the focus for these areas will be rekindling the rural economic, civic and amenity function of these centres. Having regard to the foregoing, the potential housing yield from these lands will be such that it will not significantly impact on the Core Strategy and housing delivery targets. Notwithstanding the above, the detail in relation to specific ‘opportunity’ sites in any settlement governed by the 12 Local Area Plans in County Kildare will be further analysed as the various Local Area Plans are being prepared, at which stage the potential yields that could arise from such sites taking into account a number of factors, including but not limited to, wastewater treatment capacity issues and planning histories associated with all sites within the LAP area, will be determined.</p> <p>The comment in the submission that the RSES requires 9,000 persons to be accommodated in Maynooth and Leixlip yet the Draft CDP is significantly less ambitious, is noted. Footnote No. 8 of Chapter 2 Core Strategy and Settlement Strategy provides for the following:</p>
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			<p>'Additional population allocation for Maynooth of up to 10,000 persons from redistribution of NPF City and Suburbs allocation (EMRA, July 2020). The precise allocation that will be attributed to Maynooth however will be determined at LAP stage on foot of detailed assessments and audits of available social and physical infrastructure.' Accordingly, it is considered that providing for a specific allocation of the additional population in the Draft Plan would be premature pending the preparation of detailed assessments to be carried out for the Maynooth Local Area Plan. Such assessments include an Infrastructural Assessment (Settlement Capacity Audit), a Social Infrastructure Audit, and an Area Based Transport Assessment (ABTA). It is noted that the preparation of a local area plan for Maynooth forms part of the Kildare Council work programme for 2022. It should also be noted that the preparation of a Maynooth and Environs Joint Local Area Plan will be prioritised during the life of the Plan in conjunction with Meath County Council thereby aligning with RSES objectives.</p> <p>The Core Strategy of the Draft Plan aligns with the NPF (2018), NPF Road Map (July 2018), the RSES (2019) and the Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities (Dec 2020). The current Leixlip LAP is a standalone LAP, the zoning objectives, policies and objectives of which will remain in place until such time as that LAP is amended/replaced.</p> <p>In relation to the submission's comments that many residential zoned sites in LAPs have remained undeveloped because of servicing issues, it should be noted that Volume 2 is accompanied by an assessment</p>
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			<p>which provides a weighting of potential sites for future development on the basis of sustainable planning and serviceability/infrastructural grounds. This assessment assists in the designation of lands as either Tier 1 lands or Tier 2 lands and identifies the likely development services required to support new development. The SPIA was integral in informing the future development strategy for the small towns and villages. Individual Local Area Plans will be prepared for higher order settlements, where individual Infrastructural Assessments will be carried out to apply the tiered approach to the zoning provisions associated with their respective housing allocations.</p> <p>In relation to Newbridge being allocated a higher percentage of growth than Leixlip, it should be noted that both towns are Self-Sustaining Growth towns. The proposed growth in Newbridge’s population as a percentage of its existing population is far less than that proposed for Leixlip. Leixlip’s location within the MASP is noted, however, as outlined above, the additional population from the redistribution of the NPF City and Suburbs allocation will be allocated to the ‘key town’ of Maynooth, where the precise allocation to be attributed to Maynooth will be determined at LAP stage.</p> <p>The settlement hierarchy in the Draft Plan, apart from Clane, is consistent with the approach advocated in the RSES.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
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<p>402</p>	<p>National Asset Management Agency</p>	<p><u>The Core Strategy and Zoning for Residential Use</u> The core strategy estimates a requirement for 9,144 housing units for the 6-year life of the County Plan (2023-2029). This is a significant reduction on the targeted allocation in the current 2017-2023 County Plan (as applied by the Regional Spatial and Economic Strategy (RSES)) which allocated 18,729 units to Kildare over the six-year period, an annual equivalent of 3,122. The current 6-year target, therefore, represents a 50% reduction.</p> <p><u>De-zoning land</u> In translating the population and household targets issued by central government into the zoning requirements of the settlement centres, it is important to understand the impact of potential land de-zonings on housing supply. To reduce the quantum of land zonings to reflect such a reduction would result in serviced land being unavailable for development which is not in the public interest, particularly at a time of surging demand and chronic under-supply of housing.</p> <p>De-zoning serviced land to meet precision in housing targets is wasteful of costly infrastructure and is counterintuitive in times of a housing crisis, particularly where sites are appropriate for development by virtue of proximity to established development and services and would also lead to an increase in residential land prices.</p> <p>The submission states that the Plan should treat these housing targets as a benchmark for monitoring to ensure compliance with national and regional figures, with the focus on identifying sites based on their</p>	<p>Chief Executive's Response <u>The Core Strategy and Zoning for Residential Use</u> The Core Strategy of the Draft Plan aligns with the NPF (2018), NPF Road Map (July 2018), the RSES (2019) and the Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities (December 2020), which it is statutorily required to do.</p> <p>The Draft Plan includes Objective CSO 1.18 which provides the Council with the option of aligning the County Development Plan, with the up-to-date population from the forthcoming Census, where there are verified material population differentials to those in Table 2.8 of the Draft Plan, by way of a statutory variation pursuant to Section 13 of the Planning and Development Act 2000 (as amended). In this regard it is expected that the Small Area Population statistics will be published towards the end of 2023.</p> <p><u>NAMA Security</u> The submissions' comments about NAMA's land bank are noted.</p> <p><u>Sequential Development</u> The Draft Plan has adhered to national and regional policy, which stipulates that settlements should be developed in a sequential manner, with suitable undeveloped lands closest to the centre being given preference for development in the first instance. Zoning shall extend outwards from the centre with a strong emphasis placed on encouraging infill and regeneration opportunities.</p> <p><u>Promoting Sustainable Mobility</u></p>
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	<p>characteristics and capability of supporting sustainable development rather than on meeting precise targets.</p> <p><u>NAMA Security</u> The submission states that NAMA's land bank is capable of supporting the achievement of National Strategic Outcomes of the NPF and the overarching objectives of Kildare County Council by facilitating healthy place-making; supporting sustainable mobility; enhancing amenity and heritage resources; providing access to education; supporting efficient use of infrastructure, providing economic opportunity; and creating conditions for climate change resilience.</p> <p><u>Promoting Sustainable Mobility</u> Priority needs to be given to sites that can deliver development close to public transport. Moving away from the private car to public transport and to cycling and walking is the cornerstone of sustainable mobility. Establishing a statutory context for lands adjoining public transport either by the preparation of master plans or framework plans ensures such sites are comprehensively developed and supports the business case for making significant public investment in sustainable infrastructure.</p> <p><u>Sequential Development</u> Serviced sites within and on the edge of the built-up edge of town centres can be prioritised and developed in advance of sites further away.</p> <p><u>Leixlip / Confey</u> The submission notes that in Confey/Leixlip, 5.7 ha are located alongside the rail station – Maynooth to Dublin line and form part of a wider development site. The</p>	<p>The submissions comments about promoting sustainable mobility are noted. The Draft Plan fully supports and facilitates the requirement that the design of future developments occurs in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use.</p> <p><u>Celbridge (Donaghcumper and Ballyoulster)</u> The contents of the submission are noted. Whilst both sites may be seen to feature positive locational attributes, as outlined in the submission, it is noted that the lands identified are subject to a statutory Local Area Plan process, which does not form part of this Draft Plan. It is further noted that the methodology for the development of Local Area Plans for settlements in the county is based on the preparation of a series of detailed assessments including an Infrastructural Assessment (Settlement Capacity Audit), a Social Infrastructure Audit, and an Area Based Transport Assessment (ABTA) to determine the suitability and capacity of specific sites to accommodate particular land use zoning objectives, including for residential, commercial and employment activities. Accordingly, the insertion of supporting text identifying and promoting the development potential of land proximate to the town cores of self-sustaining towns such as Celbridge is considered to be premature and potentially prejudicial to the outcome of the comprehensive evidence-based methodology which is central to the Council's local area plan-making process.</p> <p><u>Leixlip / Confey</u> Kildare County Council acknowledges that the rail service to Confey will be considerably enhanced over</p>
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	<p>service to Confey will be considerably enhanced over the coming years when the western line is upgraded to Dart status. The efficient use of these lands that will be serviced with costly infrastructure complies with the fundamental principles of compact urban form and sustainable mobility. The Development Plan needs to advance the preparation of a Masterplan and associated Transportation Studies which will expedite the delivery of housing. Map submitted which identified the above lands.</p> <p><u>Celbridge</u> In Celbridge, lands at Donaghcumper House and Ballyoulster are located at the edge of the town centre core and are sequentially appropriate to accommodate the next stage of development in the town.</p> <p><u>Donaghcumper</u> The Donaghcumper House lands comprise a substantial landbank (28 ha). The Donaghcumper House lands were previously considered by the Department of Housing, Planning & Local Government in a submission made to the Local Authority in June 2017 as, “allowing [sic] for the expansion of its town centre and a logical growth proposal for the core of the town’. The CEO as part of the LAP review in 2017 also considered that, “The lands are considered to offer an excellent opportunity for town centre expansion in Celbridge.’ The CDP review should include objectives which seek to identify and promote the development potential of land proximate to the town cores of self-sustaining towns such as Celbridge.</p> <p><u>Ballyoulster</u></p>	<p>the coming years when the western line is upgraded to Dart status. The requirement for a Masterplan to guide and manage the phased development of the lands is also supported by an Action (UD A2) of the Draft Plan which provides for the development of a masterplan in Confey in co-operation with relevant stakeholders. In this regard, it is the intention of the Council to progress the masterplan for Confey over the short to medium term.</p> <p><u>Newbridge - Kellsborough</u> The contents of the submission are noted. Whilst the site may be seen to feature positive locational attributes, it is noted that the lands identified are subject to a statutory Local Area Plan process, which does not form part of this Draft Plan. The Draft Kildare County Development Plan does not include any land use zonings for Newbridge as Newbridge has its own statutory Local Area Plan. The matter of zoning / re-zoning can be considered as part of the review of the Newbridge Local Area Plan, preliminary work for which is already underway.</p> <p><u>Designation of Newbridge in the Core Strategy</u> The comments regarding the designation of Newbridge in the ‘core strategy’ are noted. However, national and regional policies only identify Naas and Maynooth as ‘Key Towns’. The Draft Plan is required to align with the above policies.</p> <p><u>De-zoning lands</u> The comments about de-zoning are noted. The Draft Plan aligns with the National Planning Framework (NPF), which requires the Plan to adopt a Tiered Approach to Zoning. With specific reference to</p>
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	<p>The Ballyoulster key development area provides for a mixed residential and community neighbourhood comprising 42 ha. A planning application will be lodged for a first phase of development on these lands in June 2022. Sites capable of providing the appropriate balance of socio-economic and physical infrastructure support healthy place-making. The development will fully accord with the 10th NSO of the NPF which is to provide access to quality education and childcare facilities. Map submitted which identified the subject lands at Ballyoulster and Donaghcumper.</p> <p><u>Newbridge - Kellsborough</u> At Kellsborough House in Newbridge, NAMA's security of some 18 ha is centrally located and surrounded by residential and mixed development and is proximate to a public transport link. Map submitted which identified the subject lands.</p> <p><u>Designation of Newbridge in the Core Strategy;</u> The focus of growth in the current core strategy is directed towards Naas and Maynooth, the designation of Newbridge as a self-sustaining growth town, aligning it with Kildare and Athy, does not reflect the true potential of Newbridge as a major population and socio economic hub, given it has a population which is currently greater than both Maynooth and Naas.</p> <p><u>Draft Development Plan Guidelines</u> The Guidelines provide for circumstances where a planning authority may zone residential sites in addition to those required to meet housing supply targets to ensure sufficient choice.</p>	<p>Appendix 3, the NPF sets out a two-tier approach to land zoning as follows: Tier 1: Serviced Zoned Land and Tier 2 Serviceable Zoned Land.</p> <p>It an objective of the Draft Plan (CSO 1.4) to ensure that sufficient zoned and adequately serviced lands are available to meet the planned population and housing growth of settlements throughout the county in line with the Core Strategy and the Settlement Hierarchy.</p> <p>Objective HO O2 in Chapter 3 is also clear when it states 'Ensure that sufficient land is zoned at appropriate locations in compliance with the Core Strategy and Settlement Strategy of the Development Plan, in order to meet the likely future housing demands identified in the Housing Strategy and HNDA.'</p> <p><u>Draft Development Plan Guidelines</u> The Draft Plan has had regard to the recently published Draft Development Plan Guidelines, however as outlined above, the lands identified in the submission are all subject to Local Area Plans. It is an objective of the Council under CSO 1.9 to review and prepare on an ongoing basis a portfolio of Local Area Plans (LAPs) for the mandatory LAP settlements of Naas, Maynooth, Newbridge, Leixlip, Kildare, Athy, Celbridge, Kilcock, Monasterevin, Sallins, in accordance with the objectives of the County Development Plan and all relevant Section 28 Ministerial Guidelines.'</p> <p>The insertion of supporting text specifically relating to the designation of certain sites in the Draft Plan is considered to be premature and potentially prejudicial to the outcome of the comprehensive evidence-based</p>
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457	Glenveagh Properties Limited	<p>Submission from McCutcheon Halley Chartered Planning Consultants on behalf of Glenveagh Properties.</p> <p>The submission notes that the main points of this submission are as follows:</p> <ul style="list-style-type: none"> • Core Strategy; and • Development Management Standards on Open Space Provision, Dwelling Design and Car Parking Provision. <p>Submits that in order to provide for the future population of Kildare it is considered that the HNDA model needs to be amended to consider:</p> <ul style="list-style-type: none"> ▪ Recent population projections released by the CSO; ▪ Bring the average household size in line with the targeted State average for 2040; and ▪ Consider the impact of vacancy rates on available housing supply. 	<p>Chief Executive’s Response <u>Population growth</u></p> <p>It should be noted that the Core Strategy of the Draft Plan aligns with the NPF (2018), NPF Roadmap (July 2018), the RSES (2019) and the Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities (Dec 2020). Objective CSO 1.18 provides the Council with the option of aligning the County Development Plan, with the up-to-date population from the forthcoming Census, where there are verified material population differentials to those in Table 2.8 of the Draft Plan, by way of a statutory variation pursuant to Section 13 of the Planning and Development Act 2000 (as amended). In this regard it should be noted that the Small Area Statistics data is expected to be published towards the end of 2023.</p> <p>A significant amount of research was undertaken by the Council (both Planning and Housing Departments) as well as by AIRO, Maynooth to input the most up-to-date, available information for the purposes of the HNDA</p>

	<p>Submits that each of these points is considered in detail below and together illustrate the need to amend the housing target at the end of the Plan from 9,144 to 17,607 units in order to provide the minimum amount of housing necessary to cater for Kildare’s population over the lifetime of the Plan.</p> <p><u>Population Growth</u> Refers to Table 2.2 ‘Transitional Population Projections’, Chapter 2 of the Draft Plan as provided in the NPF Roadmap and the RSES. States that these population projections are based on the NPF targets for a revised spatial distribution of population growth and are therefore considered policy based rather than demand based projections for the County. Submits that the CSO Regional Population Projections 2017-2036 outline a range of growth scenarios between 2016 to 2036 that are based on trends and varied assumptions in terms of migration, migration flows and fertility as detailed in Table 2.1 in Figure 2. Based on the estimated population of 5,011,500 in 2021, the State’s population has experienced a rate of growth of circa 75,000 persons per annum in the period from 2016 to 2021.</p> <p>States that when the Regional Population projections are applied to Kildare County to 2031, almost every scenario projects a higher population than that projected by the NPF Roadmap and Regional Population projections being lower than the actual growth is an indication that growth in Kildare County is likely higher again. States that it is probable that the population in Kildare County at 2031 will, at a minimum, be closer to 280,000 to 290,000 as opposed</p>	<p>Toolkit, produced by the Department of Housing, Local Government and Heritage in order to determine the most appropriate housing projections for County Kildare over the life of the Plan.</p> <p>Apart from Clane, the settlement hierarchy, as outlined in Table 2.8 of the Draft Plan, is clearly in accordance with the hierarchy as set out in the Regional Spatial and Economic Strategy (RSES).</p> <p><u>Household Size and Vacancy Rates</u> The comments made in the submission about the contribution that household size and vacancy rates make to housing demand are noted.</p> <p>It is noted that the CSO published experimental population estimates for 2020 in late 2021, after the HNDA was finalised. When the HNDA was drafted it opted for the NPF Convergence scenario as this scenario is ‘the recommended housing demand scenario to be used by planning authorities in order to plan for the provision of housing to meet projected levels of demand in accordance with the NPF strategy’.</p> <p>The comments made in the submission about household size and vacancy rates is noted. However, it is considered more appropriate to continue to rely on the Departments’ Toolkit Methodology with respect to the preparation of HNDA’s at this juncture. It is understood that the Department will be updating the HNDA toolkit following the publication of the preliminary population statistics from the CSO.</p>
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	<p>to the 259,000-266,000 population projected by the NPF Roadmap.</p> <p>States that this additional population pressure, coupled with the HNDA approach to calculation of household size and vacancy rates, is resulting in a considerable under-estimate of the housing need for the period of the Development Plan and that this under provision will have long term repercussions in providing affordable family homes in the County.</p> <p><u>Household Size.</u></p> <p>The submission states that prior to 2011, household sizes were falling across the country. This was reversed in 2016 due to lack of supply. The HNDA takes the starting household size for Kildare as 3.0 in 2016, projecting it to fall to 2.77 by 2031 which fails to acknowledge the impact of the lack of supply on the 2016 figures. States that reliance on this assumption permeates through the Draft Plan contributing to an under provision of new housing that will have long terms implications in housing supply in the County extending beyond the timeframe of the new Development Plan if not addressed.</p> <p>States that Table 15 of Appendix 1 projects that the household size in Kildare will only fall to 2.77 by 2031, which remains higher than the state average household size of 2.75 in 2016. States that this approach highlights that there is an issue with the total number of units to be provided during the lifetime of the Plan as the average household size is a clear indication of an unaffordable and constrained housing market, forcing delays with people forming their own households. Also, acknowledges that Kildare has a higher than</p>	<p>Chief Executive's Recommendation</p> <p>See response and recommendation to Submission No. 550 (Office of the Planning Regulator) with respect to Clane.</p>
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	<p>average percentage of residents within the younger age categories which also contributes to household size, which is indicative of a higher proportion of younger families but is also a predictor of increased pressure for new household formation in the short to medium term. Submits that the drop in headship rates in Kildare is greater than the state average (0.27 in Kildare, compared with 0.30 for the state). States that this would indicate that supply and affordability were becoming even more constrained in Kildare. States that the HNDA of the Draft Plan should be revised to allow for the household size rate in County Kildare to fall to 2.5 by 2040 which is in line with the projection for the state.</p> <p><u>Vacancy Rates.</u> The submission states that in line with the HNDA Guidelines, the HNDA tool does not account for vacancy rates in their projections as the Census data is not considered to give a true reflection on vacancy. States that the 2016 vacancy rate in County Kildare was among the lowest in the state at 5.9%. These low vacancy rates are an indication of the level of pressure on the housing market and the lack of any flexibility in the system, putting upward pressure on housing costs.</p> <p>The submission states that the HNDA of the Draft Plan should be revised to include a frictional vacancy rate of 5.9% in the estimating of dwelling requirements for Kildare County to 2031.</p> <p>The submission concludes by recommending that the Draft Plan revise the projected total households and average household size over the HNDA period to 2031 in accordance with Table 2.3 and Table 2.4 of the</p>	
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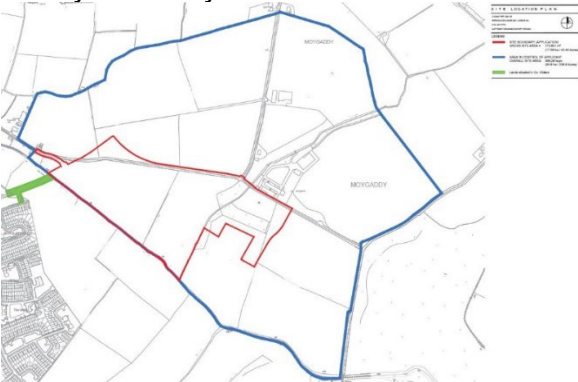
		submission. That the total number of units required during the lifetime of the Development Plan be amended from 9,144 units to 17,607 units. States that to accommodate this growth, additional lands will be required in the main county towns with an estimated uplift from 222ha to 449ha.	
Maynooth			
354.	Naoise O'Cearúil	Submission notes that Maynooth has been designated as a Key Town as part of the Regional Spatial Economic Strategy (RSES) for the Eastern Region along with Swords and Bray. States that this designation has led to Maynooth being allocated additional housing targets. Submits that for the town to develop in a sustainable way, consideration should be given to the extension of the town boundaries to the South incorporating parts of Ballygoran and Moneycooley, close to the R406. States that these areas should then be considered for zoning as part of the Maynooth Local Area Plan for the sustainable and equitable development of the Key Growth Town of Maynooth.	<p>Chief Executive's Response</p> <p>Any proposals to amend the boundary of the Maynooth Local Area Plan (LAP) area falls outside the scope and remit of this draft Plan and therefore cannot be taken into consideration at this stage. It should be noted that the preparation of a local area plan for Maynooth forms part of Kildare County Council's work programme for 2022. This plan will be evidence-based in nature with proposed zoning designations and associated plan boundaries being the subject of a series of detailed assessments including an Infrastructural Assessment (Settlement Capacity Audit), a Social Infrastructure Audit, and an Area Based Transport Assessment (ABTA) to determine the suitability and capacity of specific sites to accommodate particular land use activities within the plan area. Any revision to the boundaries and extent of plan area will also have cognisance to the settlement boundary of the town as defined by the CSO, along with the national and regional planning policy requirements relating to compact growth, settlement consolidation and sequential development.</p>

			<p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
434.	Maynooth Community Council	<p>Submission from Maynooth Community Council refers to the reference to the principle of sustainable development in Chapter 1 of the draft Plan and notes the population and housing allocation to the town in Table 2.8, which provides for 10.9% of the county total to be given to the town. States that this seems reasonable, but the issue comes with footnote 8 which notes the population allocation of 10,000 persons over and above the core strategy allocation as provided for under National Policy Objective (NPO) 68 of the National Planning Framework (NPF). States that this cannot be considered sustainable development and would lead to a disaster for the town.</p> <p>Argues for a two-pronged approach to development which would involve spreading the population to other suitable towns and speed-up the provision of infrastructure and services in Maynooth. Notes that Maynooth is also a university town and the growth plans of Maynooth University to increase its undergraduate numbers to 16,000 will lead to further stress on the already stressed infrastructure of the town.</p>	<p>Chief Executive’s Response The contents of the submission relating to the Core Strategy allocation and the allocation of additional population provided under NPO 68 are acknowledged. It should be noted that the figure is <i>up to</i> 10,000 additional persons in the town to 2031. This provision does not mandate the Council to take the entire allocation and it is noted that NPO 68 states it is subject to; any relocated growth being in the form of compact development, such as infill or a sustainable urban extension; any relocated growth being served by high-capacity public transport and/ or related to significant employment provision; and NPO 9 of NPF (relating to settlements identified for significant growth).</p> <p>Furthermore, it is noted that the Council’s programme for local area plans is based on the preparation of a series of evidence-based assessments including an Infrastructural Assessment (Settlement Capacity Audit), a Social Infrastructure Audit, and an Area Based Transport Assessment (ABTA) to determine the suitability and capacity of specific sites to accommodate particular land use zoning objectives. The expansion of Maynooth University will also be taken into consideration. If capacity/infrastructural constraints are identified in these assessments, which cannot be resolved over the life of the local area plan, then the figures for growth (particularly in relation to the NPO 68 allocation) will be reduced accordingly, to ensure the growth of the town does not exceed the capacity of its servicing and social infrastructure.</p>

			Chief Executive's Recommendation No change to the Draft Plan.
490.	Sherwood Homes Ltd.	<p>Submission by Tom Phillips + Associates on behalf of Sherwood Homes Limited, Ratoath, Co. Meath seeks the following amendments to be made to the draft Plan:</p> <ul style="list-style-type: none"> • The draft Plan to be updated to reflect the findings of Census 2022, rather than Census 2016 and that the draft Plan reflect the subsequent influx of Ukrainian Refugees that will result in a higher base population. • A time commitment be given in Objective CSO 1.9 (Local Area Plans) and in Objective CSO 1.15 (lands zoned for employment purposes) for the review and updating of the mandatory LAP for Maynooth, not least as the current LAP dates from 2013-2019. <p>Refers to the provisions of footnote 8 of Table 2.8 regarding the additional population allocation for Maynooth under NPO 68 of the NPF of up to 10,000 persons and states that as currently composed, the draft suggests that the updating of the Maynooth LAP could be deferred until 2028, the end of the new Development Plan. At that time, the LAP would be 15 years old, notwithstanding the increased planning role for Maynooth identified in the national and regional policy. Submission requests that a review of the Maynooth Local Area Plan 2022-2028 must be a priority for the Development Plan.</p>	<p>Chief Executive's Response</p> <p>The submission regarding making the Maynooth Local Area Plan a priority for the development plan is noted. In this regard, it is acknowledged that Regional Planning Objective RPO 4.35 of the RSES which requires a cross boundary Joint Local Area Plan (LAP) to '<i>be prepared by Kildare County Council and Meath County Council to provide a co-ordinated planning framework for the Maynooth area</i>'. This local area plan for Maynooth is included as part of the Council's work programme for 2022 and its preparation is being progressed. The request for a specific time commitment to be given in Objective CSO 1.9 and in Objective CSO 1.15 is not accepted. It is noted that the nature of the Joint Local Area Plan means that responsibility for its management including its timing and delivery is not solely within the remit of Kildare County Council and will be subject to a joint managerial approach in close collaboration with Meath County Council.</p> <p>Regarding the issue of additional allocation of population to Maynooth, it should be noted that it is the intention of the Council to provide for a quantum of this allocation (which can be distributed over the period to 2031) to be given to the town in the new local area plan. If capacity / infrastructural constraints are identified in the town, which cannot be resolved over the life of the local area plan, then the figures for growth (particularly in relation to the NPO 68 allocation) will be reduced accordingly, to ensure the growth of the town does not exceed the capacity of its servicing and social infrastructure.</p>

			<p>It is proposed to update parts of the Plan with the recently published data from the CSO relating to 2022 County Population (see Part 4 of this report). In relation to the issue concerning the 2016 Census, it should be noted that Objective CSO. 1.18 of the Draft Plan provides the Council with the opportunity to align the County Development Plan with the emerging CSO updated information, as necessary. In this regard it should be noted that the Small Area Population statistics are expected to be published towards the end of 2023. Should changes be subsequently required to Table 2.8 (Core Strategy) in the Kildare County Development Plan such changes will then translate to the various Local Area Plans thereafter. As the review of the County Development Plan must take place within 2 years of the expiration of the CDP it was not possible to await the results of the emerging Census 2022 data at settlement level.</p> <p>The reference to the Ukrainian refugees is noted however, this figure is constantly evolving and until such time as the Department of Housing, Local Government and Heritage (the Department) provides all local authorities with clear guidance in relation to how to factor in the number of refugees into any revision of Table 2.8 (Settlement allocations), it is considered more appropriate to continue to rely on the Departments' Toolkit Methodology with respect to the preparation of HNDA's at this time. It is understood that the Department will be updating the HNDA toolkit following the publication of detailed population statistics from the CSO, which may also consider refugee numbers.</p>
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			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
403	Cairn PLC	<p>The additional population of 10,000 on top of the core strategy allocation is welcomed for Maynooth. A new LAP for Maynooth should be prioritised to allocate the additional population. An additional policy is proposed for inclusion in the core strategy, titled CSO 1.19 "To ensure that the future growth and spatial development of Maynooth in the joint LAP with Meath County Council is undertaken in a sequential manner contiguous to the existing development boundary." Identifying additional lands in the north and eastern part of the town will contribute to achieving critical mass in the MASP area as set out in 2.12.</p>	<p>Chief Executive's Response It is agreed that a joint Local Area Plan for Maynooth and Environs should be prioritised and prepared in conjunction with Meath County Council.</p> <p>LAPs are informed by a series of evidence-based reports, such as Settlement Capacity Audits, Area Based Transport Assessments and Social Infrastructure Audits which all contribute towards a preferred development strategy, which will align with the core principles of compact and sequential growth.</p> <p>Chief Executive's Recommendation Insert a new objective after objective CSO 1.9 as follows: Prepare a Joint Local Area Plan for Maynooth and Environs in conjunction with Meath County Council.</p> <p>The insertion of this proposed objective may result in consequential amendments being made to the draft Plan.</p>
488.	Sky Castle Ltd.	<p>Submission by McCarthy Keville O'Sullivan Ltd. on behalf of Sky Castle Ltd. relates to lands located in Moygaddy, County Meath, which form part of the Maynooth Environs area. Submission outlines desire to collaborate with Meath and Kildare County Councils to facilitate the successful integration of services between</p>	<p>Chief Executive's Response The contents of the submission are noted. The request to include a provision in Chapter 2 of the draft Plan to prioritise the preparation of a joint Local Area Plan for the Maynooth and Environs area, in conjunction with Meath County Council is accepted. For further</p>

	<p>Maynooth and its Environs including the development of the Maynooth Outer Orbital Route (MOOR), the facilitation of the new Maynooth/Leixlip high pressure sewer line, and the delivery of a linear park along the River Rye and interaction along the Kildare/Meath county boundary.</p>  <p>Submits that the Council is also aware of their proposals to advance a biomedical and information technology campus and a separate medical campus that will include a primary care centre, nursing home, research facilities along with a public hospital.</p> <p><u>Joint Local Area Plan</u> Submission notes the publication of the National Planning Framework (NPF) – Project Ireland 2040 in 2018 and its contextual background. States that the NPF seeks to ensure that spatial, economic and employment needs are developed regionally and that towns are driven to be self-sustaining in a manner that plays to local strengths. Outlines the local strengths of the subject site including its zoned status under the Meath County Development Plan 2021-2027, its proximity to Maynooth, the realisation of infrastructural provision such as MOOR, along with its potential for</p>	<p>information on this refer to the Chief Executive’s Response to the submission to the draft Plan received from Meath County Council.</p> <p>It should be noted that aspects relating to the delivery of the Maynooth Outer Orbital Route (MOOR) will be considered as part of the Area Based Transport Assessment (ABTA), which is currently being prepared for the town and its environs.</p> <p>The ABTA will be subject to a second public consultation exercise which is envisaged to take place later in 2022. It is intended that the joint local area plan for Maynooth will integrate the key recommendations of the ABTA, including provisions relating to the development of the MOOR.</p> <p>Chief Executive’s Recommendation Insert a new objective after objective CSO 1.9 as follows: Prepare a Joint Local Area Plan for Maynooth and Environs in conjunction with Meath County Council.</p> <p>The insertion of this proposed objective may result in consequential amendments being made to the draft Plan.</p>
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		<p>the development for employment / mixed use and recreational purposes. Also notes the associated opportunities to promote pedestrian and cycle infrastructure.</p> <p>Notes that the subject site is identified in the Regional Spatial and Economic Strategy (RSES) and outlines provisions of the RSES which support the continued development of Maynooth, including RPO 4.33 and RPO 4.34. Refers to the provisions of RPO 4.35 relating to the development of a cross boundary joint local area plan for the town in conjunction with Meath County Council to provide a co-ordinated planning framework for the Maynooth area. Notes both RSES and the Office of the Planning Regulator (OPR) have highlighted the importance of prioritising the preparation of a joint local area plan with Meath County Council.</p> <p>Notes the provisions of the draft Plan relating to the development of the Key Town of Maynooth as an 'economic driver' and 'strategic employment location'. The submission requests that a bespoke policy objective prioritising the preparation of a cross boundary joint local area plan for the Maynooth area is inserted in the draft Plan, which would be consistent with the Meath County Development Plan and the correspondence issued to both authorities by the OPR, as follows:</p> <p>Chapter 2 - Core Strategy 'To prioritise the preparation of a Maynooth and Environs Joint Local Area Plan, in conjunction with Meath County Council.'</p>	
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	<p><u>Maynooth Transportation Strategy and development of the MOOR</u></p> <p>Submission welcomes the preparation of the Maynooth Transportation Strategy and notes that a submission was made on the Maynooth Transport Strategy by OCSC Consulting Engineers on behalf of Sky Castle Ltd as part of the first public consultation exercise. States this submission outlined the planned development of the subject lands should be considered as part of the future Maynooth Transport Strategy in the context of their intention to deliver new vehicular and pedestrian/cycle infrastructure in conjunction with the development of the MOOR.</p> <p>States that a further submission was made to Bus Connects regarding the upcoming proposals as part of the MOOR and requested that the network should be extended to include the Moygaddy lands.</p> <p>Outlines the purpose and background policy context regarding the MOOR and notes that it was a specific objective of Meath County Council’s Maynooth Environs Local Area Plan 2009-2015, of which the core zoning objectives have now been extended in the recent adoption of the Meath County Development Plan 2021-2027. Note that a Memorandum of Understanding is already in place between Meath and Kildare to allow for the development of this new cross boundary route.</p> <p>Notes that MKO has previously tabled a proposed scope of work to both local authorities on the Strategic Flood Risk Assessment and the Strategic Transport Impact Study Assessment reports, which are currently being prepared. Notes that both reports are required to</p>	
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		<p>inform; the design parameters for the new road bridge crossing proposed at Moyglare; the design parameters for the northern section of the MOOR; the integration of the MOOR into the existing infrastructure in Kildare; the upgrade of a section of the R157 road; and the design parameters of the new pedestrian/ cycle infrastructure proposed at the existing Kildare bridge and the new Moyglare bridge, along with associated infrastructure.</p> <p>Submission advises that it is their intention to also lodge separate and linked planning applications to the Council for the Bridge, Road, Pedestrian, Cycle and Wastewater infrastructure required to facilitate the integration of the Moygaddy lands into the existing infrastructure in County Kildare.</p> <p><u>Technical Note</u> The submission includes a Technical Note prepared by O'Connor Sutton Cronin Consulting Engineers which provides a contextual summary of the civil engineering and infrastructure services that will be delivered in association with the proposed development of the Maynooth Environs lands owned by Sky Castle Ltd. The services discussed include Potable Water and Wastewater Services, Surface Water / Drainage (and associated flood risk management), the Maynooth Outer Orbital Route (and associated pedestrian and cycling infrastructure) and upgrades of the local road network in Moygaddy.</p>	
Naas			
456	Brendan Colivet	This submission requests that any increase in housing/population targets for Naas are allocated to lands identified during the Naas LAP as the most	<p>Chief Executive's Response As detailed under Section 3.1.1. of the Naas Local Area Plan 2021-2027 the County Development Plan may</p>

		<p>appropriate for development, namely lands that are zoned New Residential and New Residential Phase 2 and that have been categorised as Tier 1 lands.</p> <p>The submission provides details in relation to the preparation of the recent Naas Plan in terms of the restricted population growth which required sites that were identified as Tier 1 in line with the SPIA to be reclassified as Phase 2 lands.</p>	<p>contain provisions, including revised population/housing targets for Naas which may be different from the housing targets that the plan is based upon. As stated in the Naas Plan, in the event that this occurs the Council commits to amending the Naas Plan through a statutory amendment under Section 20 of the Planning and Development Act 2000. Decisions on the zoning of land as New Residential will be subject to the necessary evidence-based approach during the plan preparation stage, such as an infrastructural assessment.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
Newbridge			
207	Deirdre Lane	Newbridge should replace Naas as a 'key town' having regard to its population being greater than Naas and it being the commercial heart of Kildare.	<p>Chief Executive's Response The Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy (RSES) 2019-2031 designated Newbridge a Self-Sustaining Growth Town. It is a statutory requirement for the core strategy of a County Development Plan to be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES).</p>
520	Newbridge Community Development	Newbridge should be a Key Town as it is the largest town in the county and requires better social/physical infrastructure for its growing population. The Latest census figures must be a consideration for any Newbridge Local Area Plan.	<p>National and Regional policies identify Naas as a 'Key Town' and Newbridge as a 'Self-Sustaining Growth Town'. The Planning Authority is required to align with national and regional policies through the policies and objectives of the County Development Plan. Objective CSO 1.3 of the Plan is to 'actively engage with the Eastern and Midlands Regional Assembly during the mid-term review of the Regional Spatial and Economic Strategy and to inform the consideration of how urban settlements are designated within the region'.</p>


			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
<p>Celbridge</p>			
410	Celbridge Community Council	<p>States that the icons used to represent the Settlement Types on the County Strategy and County Settlement Hierarchy maps misrepresent the large urban nature of Celbridge. Submits that the population growth targets in Table 2.8 coupled with the lack of an ambitious strategy for enhancing the provision of employment opportunities in Celbridge amounts to a continuation of a high level of population growth with a weak employment base.</p>	<p>Chief Executive's Response The icon which denotes Celbridge on Map Ref. V1 2.1 and Map Ref. V1 2.2 is purely for the purposes of identifying its designated status as a 'Self-Sustaining Town', as applied to Kilcock and Monasterevin, and not its geographical location or population size.</p> <p>The point relating to the population target and provision for employment opportunities for Celbridge is noted. As stated above, the Local Area Plan process is considered a more appropriate means by which to devise a bespoke and site-specific economic development strategy for the town in response to its unique development needs and attributes.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
410	Celbridge Community Council	<p><u>Growth Targets for Celbridge</u> The submission notes that it is unclear how Leixlip, Celbridge and Kilcock will achieve both the critical mass required with being in the MASP and measured growth with emphasis on economic growth. Submits that it would be beneficial to have similar growth projections for Leixlip, Celbridge and Kilcock as these are all within the MASP. States that the 10% housing and population target sought in Celbridge is not matched by an emphasis on economic growth for Celbridge in the draft Plan. Notes this target is only</p>	<p>Chief Executive's Response The contents of the submission in relation to the designation and economic development of settlements within the MASP are noted.</p> <p>As provided for in the draft Plan, the Council seeks to grow all settlements within the MASP area in a sustainable manner in order to achieve critical mass. However, it also recognises that these settlements (Celbridge, Maynooth, Leixlip and Kilcock) each differ in their development circumstances and characteristics. In</p>

		<p>0.2% lower than Leixlip despite Celbridge being lower than Leixlip on the Settlement Hierarchy.</p> <p>Further notes that Table 2.8 of the draft Plan includes 'MASP' in brackets after Maynooth and states that it would be beneficial to do the same for Leixlip, Celbridge and Kilcock due to their location in the Dublin Metropolitan Area (DMA)</p>	<p>the case of Celbridge, its designation as a Self-Sustaining Town is based on an in-depth socio-economic baseline analysis in which indicators such as social and physical infrastructure provision (and constraints), access to public transport and economic performance were reviewed. However, the housing and population growth target allocated to Celbridge also takes into consideration its overall size as the third largest town in the County and the important role the settlement has and will continue to play within the MASP area. It is further noted that due to their proximity and relatively good transport links, settlements within the MASP have developed synergies and interdependencies where some settlements such as Maynooth and Leixlip have developed as employment destinations that attract resident workers residing in settlements like Kilcock and Celbridge.</p> <p>The insertion of 'MASP' in brackets after Maynooth in Table 2.8 relates to the fact that as outlined in Footnote 8 Maynooth as a Metropolitan Key Town in the MASP has been allocated an additional population over and above that allocated core strategy of <u>up to</u> 10,000 persons from redistribution of National Planning Framework City and Suburbs allocation (EMRA, July 2020). No other settlement in the MASP area of County Kildare has been given a similar allocation.</p> <p>It is noted that Section 4.4 of the draft Plan outlines further details including specific supporting objectives with regard to economic development within each individual MASP settlement. It should be noted that the purpose of the County Development Plan is to provide for a strategic and overarching level of support for economic development within the county. Accordingly,</p>
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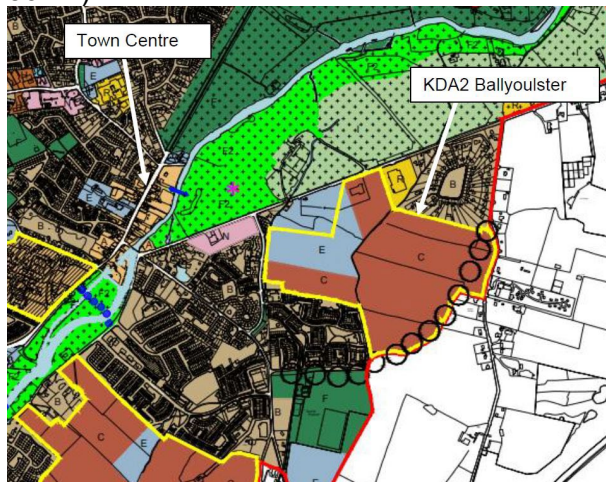
			<p>locally tailored, and site-specific economic development objectives based on the individual MASP settlements' unique development needs and characteristics will be brought forward as part of the review of their respective local area plans.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
499.	Kimberlite	<p>Submission by McCarthy Keville O'Sullivan Ltd. on behalf of Kimberlite relates to lands comprising approx. 77.2 hectares in Celbridge, east of the Newtown Road. Submission states that the submitted intends to proceed with the development of the zoned portion of these lands as soon as possible. Notes the landowner controls a holding which directly links the town with the Hazelhatch train station.</p> <p>Submission states that Celbridge represents an opportunity to deliver housing units to meet the target population growth in the county over the Development Plan period and asserts that based on its attributes, it warrants consideration as a key town in County Kildare and its population growth allocation should reflect this. Submits that the residential land use zoning strategy that has been pursued in Celbridge over the lifetime of the current development plan has not delivered the requisite number of residential units and a fundamental review is required to be undertaken in the upcoming review of the Celbridge Local Area Plan (LAP). Refers to the provisions of the Regional Spatial and Economic Strategy (RSES) 2019-2031 including the Metropolitan Area Strategic Plan (MASP) and notes that Celbridge is located within the MASP area. Notes the vision and accompanying guiding principles, including the need to support a</p>	<p>Chief Executive's Response The contention that Celbridge '<i>warrants consideration as a key town in County Kildare</i>' is not accepted. It should be noted that all Key Towns have been designated by the Regional Spatial and Economic Strategy (RSES) 2019-2031. It is therefore not within the remit of the Council to identify any settlements in the county as Key Towns. The designation of Celbridge as a Self-Sustaining Town was based on an in-depth socio-economic baseline analysis in which indicators such as social and physical infrastructure provision (and constraints), access to public transport and economic performance were reviewed. As part of this analysis the Council commissioned the All-Ireland Research Observatory (AIRO) to do a study on the "self-sustainability" of settlements. This found that Celbridge had a jobs ratio of just 0.25, indicating a weak employment base and a high level of commuting by residents to other settlements for work, where for example the research found that 55% of all resident workers are employed in Dublin. Accordingly, it was considered that the circumstances of Celbridge best match the criteria for Self-Sustaining Towns, as provided for in the RSES, which describes such settlements as '<i>towns with high levels of population growth and a weak employment base which are reliant</i></p>

	<p>steady supply of sites and to accelerate housing supply. States that the MASP is identified as being a location that will need to accommodate significant population growth and that this growth needs to be directed to appropriate locations including Celbridge.</p> <p>Refers to the provisions of the Kildare County Development Plan 2017-2023 (KCDP) which states that one of the key challenges for the county is <i>'directing population growth to the main urban centres with maximum growth focused on the Metropolitan towns of Maynooth, Celbridge, Leixlip and Kilcock'</i>. Notes that the RSES comments in many cases, self-sustaining towns <i>'... have varying economies and sectors and the Strategy will support their sustainable growth'</i>.</p> <p>States that the current Development Plan has an overall target to deliver 3,250 new residential units in the town of Celbridge. This was calculated by delivering 10% of the overall 2023 Housing Unit Target of 32,497 for the county. Submits that a desktop study indicates that 777 residential units have been granted planning permission in Celbridge since the adoption of the LAP. States that this represents a shortfall of a total of 2,473 residential units in terms of the target identified in the Core Strategy.</p> <p>Submission includes a map and a table outlining results from desktop survey discussed above. Submits that an analysis of these lands should be noted in the context of the overall residential land use zoning strategy for the settlement of Celbridge in the upcoming LAP. Submits that considering the deficit of housing</p>	<p><i>on other areas for employment and/or services and which require targeted 'catch up' investment to become more self-sustaining.'</i></p> <p>It should be noted that under the Kildare County Development Plan 2017-2023 (as varied) the target for new residential units in Celbridge is 603 new units between 2020 and 2023. The reduced figure (from the Development Plan published in 2017) was on foot of Variation No. 1 to the Development Plan which was adopted by the Council in June 2020. The purpose of the Variation was to incorporate the provisions of the NPF (2018), the NPF Implementation Roadmap (July 2018) and the RSES (2019) as they relate to County Kildare. This included revised population and housing allocations for the county.</p> <p>The request to increase the residential allocation for Celbridge is not accepted. In this regard, it is noted that the housing allocation in the town of (941) as proposed in the draft Plan is greater than that allocated to 'Tier Two' Self-sustaining Growth Towns in the county, such as Athy (439) and Kildare Town (430). This is considered to be reflective of Celbridge's locational importance within the Dublin Metropolitan Area and the requirement outlined in the draft Plan to achieve critical mass within the MASP area.</p> <p>The request to review all the land use zonings as part of the review of the Celbridge Local Area Plan is noted. The current LAP for the town does not expire until September 2023. In preparing local area plans and reviewing zoning designations, the Council employs a methodology which is based on the preparation of a series of evidence-led analysis including an</p>
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	<p>identified, the current residential land use zoning strategy will not deliver future housing targets.</p> <p>Submission refers to the provisions of the draft Plan relating to Celbridge and notes the population target of an increase of 2,515 people along with 30 ha of zoned land in Celbridge from 2023-2028 and that the 30 Hectares of land identified are intended to deliver approx. 914 residential units.</p> <p>Considers that the residential land use allocation to be relatively low given the importance of the town as a potential growth settlement. Notes the locational and developmental attributes of the town including the presence of the M4 motorway, the Dublin-Cork Railway line, the regional road network and the proposed Dart expansion project. Submits that Celbridge is a well-serviced town, providing the residents with high-quality amenities, as well as retail, healthcare, educational and childcare services. Notes the towns proximity to various employment sites in the MASP.</p> <p>Notes that Celbridge is a Tier 3 settlement in the settlement hierarchy sitting below the Tier 1 settlements of Maynooth and Naas the Tier 2 settlements of Newbridge, Leixlip, Kildare Town and Athy. Submits that Celbridge's importance in the settlement hierarchy of Kildare is much more aligned with that of a Key Town based on population figures.</p> <p>Considers that Celbridge exhibits all of the characteristics of a Tier 1 Key Town, and it should share a growth allocation with towns of a similar scale that are currently in that category and in Category 2. States that Naas and Newbridge both have housing</p>	<p>Infrastructural Assessment (Settlement Capacity Audit), a Social Infrastructure Audit, and an Area Based Transport Assessment (ABTA) to determine the suitability and capacity of specific sites to accommodate particular land use activities.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
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		<p>targets significantly larger than Celbridge despite being towns of a similar size and importance in the County.</p> <p>Concludes by stating that the population growth and land use zoning allocation for Celbridge should be increased to be commensurate with its size and importance to the county and similar to those of Naas and Newbridge.</p> 	
<p>437.</p>	<p>Receiver for Maplewood Developments & Barina Construction Ltd</p>	<p><u>Celbridge (Ballyoulster)</u> Submission by John Spain Associates on behalf of Kieran Curtin, Receiver over certain assets of Maplewood Developments Limited and Barina Construction Ltd. relates to lands at Ballyoulster, Celbridge. The lands comprise of circa 36 ha relating to Maplewood Developments Limited and 4 ha relating to Barina Construction Limited.</p>	<p>Chief Executive’s Response The request that the draft Plan and Table 2.8, which sets out the Population and Housing Unit Targets, allows for the 25% ‘additional provision’ in relation to the residential land use zoning requirement for relevant settlements, including Celbridge, is noted. While acknowledging the provisions of the draft Guidelines on Development Plans relating to additional provision, the Council has adopted a bespoke approach which will</p>

States that under the Celbridge Local Area Plan (LAP) (2017-2023) the subject site is part zoned 'C: New Residential' and part zoned 'E: Community and Educational'. Notes that the LAP provides for the development of a new residential neighbourhood, including primary and post primary schools, and a local park. States that an application is being currently progressed for Phase 1 residential development with remaining phases of development to come forward in separate applications. States that the lands reserved for the provision of schools will be delivered by the Department of Education. Notes the provisions of the draft Plan's Core Strategy relating to Celbridge (i.e. 914 no. units and a residential zoned land requirement of 30 ha).



Submission considers that Celbridge is a suitable location where the reallocation of population growth from smaller settlements should be directed, particularly given the existing / planned infrastructure

provide for the potential of additional provision on a case-by-case basis within the main settlements of the county as part of the local area plan process (as was the case with the Athy and Naas LAPs). This will consider the specific development circumstances of each settlement and factor in issues including extant permissions and the potential residential development yield from sites zoned town centre and existing residential/infill. Such a position is considered to align with Section 4.4.3 of the draft guidelines which state that it is '*on a settlement basis, the precise extent to which zoned lands and sites in excess of that required to match the agreed housing supply target are provided, is to be determined by the planning authority*'.

Furthermore, it is noted that the Council's programme for LAPs is based on the preparation of a series of evidence-based assessments including an Infrastructural Assessment (Settlement Capacity Audit), a Social Infrastructure Audit, and an Area Based Transport Assessment (ABTA) to determine the suitability and capacity of specific sites to accommodate particular land use zoning objectives. In this regard and given the significant development constraints identified in a number of settlements in the county, it is considered that applying 'additional provision' to settlements in the County Development Plan would be premature and potentially prejudicial to the outcome of the comprehensive evidence-based methodology which is central to the Council's local area plan-making process.

The request to reconsider the settlement strategy with a view to increasing its unit target allocation in towns such as Celbridge and reducing the allocation to other more

	<p>for the town and the location of Celbridge within the Dublin Metropolitan Area (DMA). Outlines the planned delivery of key infrastructure such as the Dart+ project, the Hazelhatch Train Station Link Road, as well as local water supply/ wastewater network upgrades as part of Irish Water’s Capital Investment Plan.</p> <p>Notes that the RSES identifies Celbridge as a highly urbanised settlement within the wider Dublin Metropolitan Area (DMA). States the growth projections of the RSES in relation to the DMA and other provisions including compact growth and consolidation of settlements along with increased emphasis on integrated development along key public transport corridors (noting the role of Celbridge-Hazelhatch station in this regard).</p> <p>Notes that the Housing Supply Target Methodology for Development Planning Section 28 Guidelines (December 2020) which states that planning authorities need to demonstrate <i>and provide</i> ‘satisfactory policy safeguards, to ensure that their core strategy aligns with national and regional policy as set out in the NPF and relevant RSES. For example, seeking to provide disproportionate levels of new housing development in relatively small settlements with inadequate capacity to provide the necessary supporting services and infrastructure for a new community, and/or with limited public transport accessibility, would not be consistent with national and regional planning objectives.’</p> <p>The submission notes the lower tiers of the settlement hierarchy have limited infrastructure capacity and the designation of such a large number of very small settlements, with associated allocation of housing units,</p>	<p>rural settlements is not accepted. It is considered the settlement strategy takes a balanced approach which seeks to consolidate and sustainably develop all settlements, including rural settlements, in a manner which fully aligns with both national and regional policy. In this regard, it is noted that one of the stated National Strategic Outcomes of the NPF is strengthened rural economies and communities.</p> <p>With regard to the request to amend the text of objective CSO 1.9, it is considered appropriate to include a new objective pertaining to the preparation of Local Area Plans, to indicate that local transport plans, settlement capacity audits and social infrastructure audits will be prepared for each settlement to inform the LAP.</p>
		<p>Chief Executive’s Recommendation</p> <p>Insert new objective after CSO 1.18 as follows: To prepare a Local Transport Plan, Settlement Capacity Audit and Social Infrastructure Audit for each local area plan, in order to facilitate the integration of land use and transportation, to apply a tiered approach to zoning and to identify deficiencies in social infrastructure provision, all in order to provide a sustainable growth strategy for each town.</p>

	<p>in areas outside the DMA undermines national policy. Therefore submits that the housing targets in Table 2.8 of the draft Plan do not fully reflect national policy and the RSES, particularly in relation to Celbridge and requests that the draft Plan should prioritise growth into towns, such as Celbridge by increasing its unit target allocation and reducing the allocation to other more dispersed and less sustainable locations, i.e. outside the DMA.</p> <p>States that having reviewed the Core Strategy and Appendix 9 it is not clear how the Council has considered the Draft Development Plan Guidelines (2021) (DDPGs) in respect of zoning additional land, in addition to those required to meet the settlement housing supply target. Submits that the approach, as set out in the Section 28 guidelines, is to allow an element of headroom to meet population projections over the Plan period. States this has proved to be an essential part of ensuring adequate land supply, to reflect lands which are zoned, and which may not come forward for development during the Plan period.</p> <p>Notes that under Section 95 (1) of the Planning Act 2000 (as amended), planning authorities are obliged to ensure that sufficient and suitable land is zoned for residential uses. Refers to Section 4.4.3 of the DDPGs which states that <i>'in providing housing sites for development within settlements, it may be necessary to zone more serviced land and sites for residential (or a mixture of residential and other uses), than would equate to meeting precisely the projected housing demand for that settlement.'</i></p>	
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	<p>Notes the DDPGs allowance for 'Additional Provision', of zoned lands of 20-25% of the required quantum of zoned land and sites in settlements in any planning authority area as a whole for any six-year plan period to be brought forward on a settlement basis. Contends that consideration should be given to the length of time it typically takes from the zoning of land to the completion of housing, which it submits can take on average 12 years or more. States it would be entirely unrealistic to expect all residential zoned land to be developed with completed dwellings in a period of six years. Submits that strictly matching the extent of housing land to the housing need for a six-year period will exacerbate the already chronic shortage in housing.</p> <p>Submission acknowledges that the NPF and RSES require a more detailed assessment of the suitability of potentially zoned land for development, including the availability of infrastructure/services and states it is important to accurately assess the likely delivery levels and to provide a sustainable usable landbank beyond the identified housing targets.</p> <p>Having regard to the above, the submission requests that the draft Plan and Table 2.8, which sets out the Population and Housing Unit Targets, take account of the DDPGs and allow for the 25% 'additional provision' in relation to the residential land use zoning requirement for relevant settlements, including Celbridge and also consider increasing the unit target allocation for Celbridge, with a reduction in the allocation to other more dispersed and less sustainable locations, i.e. outside the Metropolitan Area, often with poor public transport and limited infrastructure capacity.</p>	
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	<p>Welcomes that Section 2.8.1 of the draft Plan acknowledges the application of a standardised tiered approach differentiating between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan as outlined in the NPF. Notes that the RSES also supports a sequential approach to development, whereby lands which are, or will be, most accessible by walking, cycling and public transport are prioritised.'</p> <p>The draft Plan states a Sustainable Planning and Infrastructural Assessment (SPIA) was carried out for small towns and villages in the county, and that individual LAP's will be prepared for higher order settlements, where individual infrastructure assessments will be carried out. However, it notes that this is not specifically recognised as part of the subsequent objectives, including CSO 1.9 which relates to the review and preparation of LAPs. Submits that the draft Plan should include specific objectives to promote and identify suitable lands in the subsequent review of the relevant LAPs.</p> <p>States the Council is required to prioritise land consistent with compact and sequential development in areas served or planned to be served by high quality public transport along with adequate services/facilities. Notes that the subject lands clearly fall under the Tier 1 classification due to their accessibility to the town centre and their spatially sequential nature. States that the additional capacity can be catered for, subject to the planned network upgrades which form part of Irish Water's planned programme of works. Accordingly, the</p>	
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		<p>submission requests that additional text (in purple) be inserted into objective CSO 1.9, as follows: CSO 1.9: Review and prepare on an ongoing basis a portfolio of Local Area Plans (LAPs) for the mandatory LAP settlements of Naas, Maynooth, Newbridge, Leixlip, Kildare, Athy, Celbridge, Kilcock, Monasterevin, Sallins, in accordance with the objectives of the County Development Plan and all relevant Section 28 Ministerial Guidelines. Individual Infrastructural Assessments will be carried out to apply the tiered approach to the zoning provisions associated with their respective housing allocations. Identified sequentially located Tier 1 lands will be prioritised over Long-Term Strategic and Sustainable Development Sites (SSDS).</p>	
Clane			
443	Clane Community Council	<p>Clane is outside of the Metropolitan Area and with limited sustainable access to the rail lines passing through the county. It should be noted that key infrastructure proposals for higher up the strategic hierarchy have not been forthcoming from the limited funds available to government and the competition for investment to align with national priorities.</p> <p>Additional information should explain and justify the proposed changes to the settlement hierarchy from the existing county development plan (varied in June 2020).</p> <p>There is significant over-zoning of residential capacity in Clane from prior to Variation No. 1, and recent</p>	<p>Chief Executive's Response</p> <p>The change in the designation of Clane from a Town to a Self-Sustaining Town was voted through by the Elected Members at a special meeting on the 24th February 2022. It remains the position of the Executive that having regard to Clane's high commuter levels, private car dependency and lack of access to 'high capacity' public transport links it would be more appropriately designated as a Town in the Settlement Hierarchy.</p> <p>See response to Submission no. 550 (Office of the Planning Regulator) with respect to the designation of Clane in the settlement hierarchy.</p>

		developments have been granted numbers of units in permissions that push it significantly above the serviceable growth rates set out in the varied core strategy.	<p>Chief Executive's Recommendation See recommendation in response to Submission no. 550 (Office of the Planning Regulator) with respect to the designation of Clane in the settlement hierarchy.</p>
410	Celbridge Community Council	<p><u>LAP for Clane</u> Submits that objective CSO 1.9 in Chapter 2 should add that Clane requires a Local Area Plan as it already exceeds the population of Sallins, Kilcock and Monasterevin.</p>	<p>Chief Executive's Response This was a typographical error in the Draft plan. Noted and agreed.</p> <p>Chief Executive's Recommendation Objection CSO 1.9 in Chapter 2 'Core Strategy' shall be amended, as follows: Review and prepare on an ongoing basis a portfolio of Local Area Plans (LAPs) for the mandatory LAP settlements (and environs, where appropriate) of Naas, Maynooth, Newbridge, Leixlip, Kildare, Athy, Celbridge, Kilcock, Monasterevin, Sallins, Clane and Kilcullen in accordance with the objectives of the County Development Plan and all relevant Section 28 Ministerial Guidelines.</p>
429	Westar Group	<p>Submission by Hughes Town Planning & Development Consultants on behalf of the Westar Group.</p> <p>The submission makes the following requests to Kildare County Council (KCC) in respect of the towns of Clane and Sallins:</p> <p>Request that KCC review the Housing and Population Targets for Clane included as part of the Draft Plan and provide for an increased allocation of population and housing for the town over the plan period, in</p>	<p>Chief Executive's Response In relation to the comments raised with respect to the HNDA, it should be noted that the HNDA was informed by the most up to date available information which included quarterly CSO statistics with respect to house completions in Kildare and in compiling the HNDA, KCC had ongoing discussions with the Department of Housing, Local Government and Heritage who validated KCC's approach including with respect to how unmet need was addressed. It should also be noted that the HNDA incorporates the Convergence Scenario for</p>

	<p>accordance with its designation as a Self-Sustaining Town.</p> <p><u>Housing and Population Targets for Clane in accordance with its designation as a Self-Sustaining Town.</u></p> <p>It is submitted that notwithstanding Clane’s designation within the Draft Plan as a Self-Sustaining Town, the allocated population and housing growth does not accord with this ranking, as Variation No. 1 of the Kildare CDP 2017-2023, indicates that the allocated growth for Clane from 2020-2023 is 2.4%, with a projected population growth to 945 no. persons in 2026 and a housing growth of 337 no. units to 2026. The submission notes that Variation No. 1 was prepared prior to the status upgrade for Clane from ‘Town’ to ‘Self-Sustaining Town’. Refers to the recently published Draft Plan, which indicates that the estimated population for Clane to 2021 is 7,702 no. persons, with an additional Population target over the plan period from 2023-2029 of 604 no. persons and a Housing Target of 219 no. additional dwellings over the same period.</p> <p>States that, as part of the Draft Plan, the housing and population growth allocation for Clane remains at 2.4% of the overall growth for the county, which simply does not accord with its designation as a Self-Sustaining Town. It is submitted that this level of growth is not appropriate to the towns ranking and should be revised and increased accordingly. Submits that Clane’s anticipated 2021 population of 7,720 is just 35 no. persons short of the projected population growth to 2023 as outlined in Variation No. 1 to the current plan of 7,685 no. persons.</p>	<p>household projections which includes existing unmet housing need. The housing projection target per annum over the period of the emerging Plan equates to more than 50% more than the actual number of housing completions in County Kildare on average per annum over the last 11 years up to the end of 2021 (See Appendix 9 – Core Strategy Methodology).</p> <p>In relation to population, it is acknowledged that the most recent published information for County Kildare dates to 2016 however, Objective CSO. 1.18 of the Draft Plan provides the Council with the opportunity to align the County Development Plan with the emerging CSO updated information, when that becomes available, as necessary. Should changes be subsequently required to Table 2.8 (Core Strategy) in the Kildare County Development Plan such changes will then translate to the various Local Area Plans thereafter.</p> <p>The reference to the Ukrainian refugees is noted however, this figure is constantly evolving and until such time as the Department of Housing, Local Government and Heritage (the Department) provides all local authorities with clear guidance in relation to how to factor in the number of refugees into any revision of Table 2.8 (Settlement allocations), it is considered more appropriate to continue to rely on the Departments’ Toolkit Methodology with respect to the preparation of HNDA’s at this time. It is understood that the Department will be updating the HNDA toolkit following the publication of detailed population statistics from the CSO, which may also consider refugee numbers.</p>
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	<p>Submission states that the Westar Group has some concerns regarding the assessment methodology used in deciphering the housing target for Kildare and Clane over the plan period and notes some disparity between the total quantum of housing requirement outlined in the HNDA and Housing Strategy as included within Appendix 1 of the Draft Plan. States that the HNDA and Housing Strategy utilise a ‘worked example’ as outlined in the Draft document ‘Development Plans: Guidelines for Planning Authorities’, published in August 2021, which uses 2016 census figures as its basis and not the latest data as suggested in the Guidelines. States that the latest data should take account of the current housing need including, inter alia, housing for refugees.</p> <p>States that the 2021 Population estimate as provided within the Settlement Hierarchy (Table 2.8, Draft Plan) has been used as the baseline for the population targets from 2023-2028 and states that this is an estimate based on the percentage of growth experienced for the town over the last census period i.e. from 2011-2016. Submits that this is not considered to be the optimal means of calculating estimated population figures and therefore, the population figures should be revised on the basis of the preliminary census data which are due to be published by the CSO on June 24th 2022, which would provide a much more accurate depiction of the required housing allocation and projected population over the plan period.</p> <p>The submission refers to Objective CSO 1.18 of the Draft Plan, which states that the Council will ‘consider</p>	<p>In relation to Clane, see response to Recommendation No.2 of the OPR submission (no. 550)</p> <p>Chief Executive’s Recommendation See Chief Executive’s recommendation on foot of Recommendation No. 2 of OPR Submission (no. 550)</p>
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		<p>aligning the Kildare County Development Plan 2023-2029, with the up-to-date population from the forthcoming Census...’.</p> <p>It is noted that the submission includes a detailed analysis and critique of the Housing Targets and Population Projections at Section 5.1.1 of the submission.</p> <p><u>Clane Town</u> The submission provides a detailed analysis of the population growth of Clane and the County. States that the population of Clane is growing at a rate in excess of the average growth of the County, and this must be recognised in growth allocations for the County. States that the population target does not accord with the status of Clane as identified in the RSES.</p> <p>The submission welcomes that KCC, in the Draft Plan, has upgraded the status of Clane from a ‘Small Town’ to a ‘Self-Sustaining Town’ within the Settlement Hierarchy for the County. Notes that the Population and Housing Growth Targets have not been reviewed nor increased sufficiently in accordance with its upgraded designation. Refers to Section 4.3 of RSES which states that ‘Local Authorities, in the preparation of their core strategies should have due regard to the settlement typology of towns in the Region and carefully consider the phasing of development lands to ensure that towns grow at a sustainable level appropriate to their position in the hierarchy.’ Refers to RPO 4.2 of the RSES which states the following:</p> <p>RPO 4.2: Infrastructure investment and priorities shall be aligned with the spatial</p>	
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		<p>planning strategy of RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.</p> <p>The submission notes the following:</p> <ul style="list-style-type: none"> • that the Upper Liffey Valley Sewerage Scheme is very near completion bringing significant wastewater capacity to Clane and Sallins; • that there is no water supply issues in Clane; • no broadband issues; • the town is well served by public transport. <p>With regard to retail, the RSES recognises Clane as a Level 3 (Key Service Centre) in the Retail Hierarchy for the region. In addition, the submission states that Clane supports a number of local businesses and employment centres and provides details of such establishments and amenities.</p> <p>In terms of public transport, the submission states that the town is well served by public transport with daily bus connections to Dublin City Centre and UCD, as well as bus connections to nearby local towns. Submits that the above infrastructure, while in need of continued investment and local policy support, is evolving and has the capacity to support continued employment and additional population growth. The submission includes details of the number of daily bus connections to Dublin, UCD and local towns.</p>	
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		<p>The submission also states that whilst KCC are of the view that there is an adequate quantum of zoned lands available within Clane to accommodate the future demand, the residential yield of zoned lands far exceeds the allocated housing growth for the town over the plan period and this should be considered as part of the Draft Plan to enable the sustainable development of the town to proceed over the plan period, in line with the objectives of the NPF and the RSES.</p>	
Johnstown			
465	Johnstown Community Association	<p>It is submitted that the population levels noted in the Draft Plan for Johnstown are incorrect / dated and do not take account of the 150 houses built in the area over the last two years. This data needs to be updated.</p>	<p>Chief Executive’s Response Regarding population data, it is an objective of the Council to align the Development Plan with the up-to-date population from Census 2022, where there are verified material population differentials from Table 2.8 in the Plan, by way of a statutory variation (Objective CSO 1.18 refers). In this regard it should be noted that the Small Area Population statistics are expected to be published towards the end of 2023.</p> <p>It should also be noted that the Draft Plan has taken account of recent development in Johnstown following a survey of the village as part of the Plan making process in relation to zonings for the period of the emerging County Development Plan</p>
			<p>Chief Executive’s Recommendation No change to the Draft Plan.</p>


Sallins			
429	Westar Group	<p>The submission requests that KCC upgrade the status of Sallins from a 'Town' to a 'Self-Sustaining Town' as part of the final iteration of the Kildare County Development Plan 2023-2029 (CDP), in accordance with its identification within the Regional Spatial and Economic Strategy for the Eastern and Midland Regions (RSES). In line with this request, it is considered necessary to designate increased Housing and Population Targets for the town over the plan period.</p> <p>The submission encourages the Planning Authority to review the settlement hierarchy for the county as a whole in accordance with the policy content of the RSES. States that the RSES discusses Sallins under the category of Self-Sustaining Town, including Sallins as one of the towns which have recorded the highest growth rates in the country over the past 10 years with reference to a growth in population of approximately 54% between 2006 and 2016.</p> <p>Submits that, in considering the current and growing population of Sallins, its proximity to the national and regional road network together with its serviceability via public transport, particularly via the Sallins and Naas Train Station, it is contended that Sallins should be afforded the designation of a Self-Sustaining Town. States that this designation will allow for direct Local Authority policy to provide the required balancing effect, seeking consolidation and inclusion of policies in relation to improvements in services and employment provision, as set out in the RSES. States that the proposed upgrade of Sallins would also further justify</p>	<p>Chief Executive's Response</p> <p>The requested amendments in the submission relating to Sallins are noted.</p> <p>The submission refers to the status of Sallins as a Self-Sustaining town in the Regional Spatial and Economic Strategy (RSES) and, therefore, requests that Kildare County Council upgrade the status of Sallins from a 'Town' to a 'Self-Sustaining Town' as part of the final iteration of the Kildare County Development Plan 2023-2029 along with an increased Housing and Population Target for the town over the plan period.</p> <p>It is noted that Table 4.2 of RSES sets out a settlement typology for towns in the region, based not just on scale but also considering the role and function of those settlements. In that regard, Development Plans should identify an appropriate settlement hierarchy and growth rates within their core strategies, based on their unique assets and growth potential within the county context whilst having regard to Table 4.2 of RSES.</p> <p>The designation of Sallins as a 'Town' in the Draft Plan is based on an in-depth socio-economic baseline analysis in which indicators such as social and physical infrastructure provision (and constraints), access to public transport and economic performance were reviewed. As part of this analysis the Council commissioned the All Ireland Research Observatory (AIRO) to do a study on the "self-sustainability" of settlements. This found that Sallins had a jobs ratio of just 0.15, indicating a weak employment base and a high level of commuting by residents to other</p>

		<p>the earmarked future investment in the delivery of Dart services to Sallins which is both an objective of KCC and the NTA.</p> <p>The submission sets out the relevant national and regional policy context of the submission, which includes the NPF; NDP; Housing for All – A new Housing Plan for Ireland; RSES; Kildare County Development Plan 2017-2023; Clane Local Area Plan 2017-2023 (LAP) and provides the land use zoning map for the LAP, which indicates the location of Key Development Areas (KDAs); and the Draft Kildare County Development Plan 2023-2029, which includes Table 2.8 ‘<i>Settlement Hierarchy – Population and Housing Unit Targets Q1-2023 to Q2-2028</i>’ and a number of the ‘Core Strategy and Settlement Strategy’ objectives of the Draft Plan including Objective CSO 1.18. The submission states that notwithstanding the inclusion of Objective CSO 1.8, it is considered that as part of the review of the Draft Plan and the potential Material Amendments to come, the Planning Authority should give due consideration to the preliminary census results which are due to be published in June 2022, in turn allowing for more accurate housing and population projections.</p>	<p>settlements for work. Accordingly, it was considered that the circumstances of Sallins best match the criteria for ‘Town’, as provided for in the RSES, which describes such settlements as ‘towns and villages with local service and employment function’, which are to be defined by development plans (Table 4.2 of RSES refers).</p> <p>Accordingly, the Draft Plan designates Sallins as a ‘Town’ in the Core Strategy based on an evaluation of population growth trends and housing demand.</p> <p>The request to consider increased population and housing targets for Sallins and wider Kildare, in tandem with the provision of additional zoning to accommodate residential development within the town is not accepted, as it is considered that the Core Strategy of the draft Plan aligns with the NPF (2018), NPF Road Map (July 2018), the RSES (2019) and the Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities (December 2020). The Draft Plan includes Objective CSO 1.18 which provides the Council with the option of aligning the County Development Plan, with the up-to-date population from the forthcoming Census, where there are verified material population differentials to those in Table 2.8 of the draft Plan, by way of a statutory variation pursuant to Section 13 of the Planning and Development Act 2000 (as amended). In this regard it should be noted that the Small Area Population statistics are expected to be published towards the end of 2023.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
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Naas to Newbridge Strategic Economic and Employment Zone			
410	Celbridge Community Council	<p>Submission states that the section in the Core Strategy relating to Naas to Newbridge Strategic Economic and Employment Zone is not related to the rest of the chapter which focuses on (housing/population) growth.</p> <p>Notes that in Section 2.15.2 Metropolitan Area Strategic Plan, is treated at the same level as Key Towns, Self-Sustaining Growth Towns, Self-Sustaining Towns, and Towns. States that this conflates the two separate themes as some towns under each Settlement Type classification are outside the Dublin MASP and some are within it, the definitions would benefit from sub-division depending on whether the towns are in the Dublin MASP or not. Submission provides examples of how this can be organised differently.</p> <p>Submits that the draft Plan's definition of what is meant for a town to be classified as a certain settlement type lacks clarity. The definitions are overly focused on economic growth when the Core Strategy should encompass both economic and population growth. Submits that the Plan must be explicit about what it means for each town to be self-sustaining in an individualised way per town as generalised sentences are not useful.</p>	<p>Chief Executive's Response</p> <p>It is not accepted that the section in the Core Strategy relating to the Naas to Newbridge Strategic Economic and Employment Zone is not related to the rest of Chapter 2. The Introductory paragraphs set out that the Core Strategy is a critical component of the Draft Plan, the primary purpose of which is to provide an evidence-based rationale for the quantum of land proposed to be zoned specifically for housing, population and employment or mixed-use to accommodate and align with the projected demand. Given the geographical location of Kildare, being well served by road and rail infrastructure and in close proximity to Dublin city, Dublin port and Dublin airport as well as a significant labour force, the importance of County Kildare as an existing and potential employment location cannot be underestimated. There are almost 1100ha of undeveloped employment lands in County Kildare and Chapter 2 identifies four key ways in which employment can be further promoted and facilitated. It is an objective of this Plan to review the existing quantum of employment related land use zonings every two years following the adoption of the Plan in order to determine if further lands are required to be zoned for employment purposes. It is accepted however that the aim of Chapter 2 could be widened to reference the importance of employment as a key component of the overall Core Strategy.</p> <p>The Draft Plans' definitions for 'Self-Sustaining Growth Towns', 'Self-Sustaining Towns' and 'Towns' are set out in Table 4.2 (Settlement Hierarchy) of the</p>

			<p>Regional Spatial and Economic Strategy wherein population, employment and infrastructure are all considered in order to inform the order of settlements within the hierarchy of the Draft Plan. The function of the Settlement Hierarchy is to place settlements throughout the county within the hierarchy according to the RSES definitions as referenced above which may include settlements outside of and within the MASP area within the same category. No change shall be proposed in this regard. As part of the preparation of the statutory Local Area Plans for the county, the placing of the various settlements in the hierarchy in the emerging County Development Plan will be further elaborated upon through a more in depth analysis of the components relating to housing, employment, physical and social infrastructure available in the various settlements.</p> <p>The comments in relation to the location of the Metropolitan Area Strategic Plan section are however noted. It is considered more appropriate to move Section 2.15.2 (Metropolitan Area Strategic Plan) to before Section 2.15.1 (Key Towns).</p> <p>Chief Executive's Recommendation Amend the Aim of Chapter 2 to read as follows; To provide for the delivery of an additional 9,144 housing units to accommodate an additional 25,146 people by the end of the Plan period, and to continue to create the environment to retain existing and attract new employers to locate in County Kildare through the delivery of sustainable, compact settlements supported by a commensurate level of</p>
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			<p>physical, and social and green infrastructure to mitigate against climate change.</p> <p>Move Section 2.15.2 (Metropolitan Area Strategic Plan) to before Section 2.15.1 (Key Towns).</p> <p>See response to Submission No. 550 (Office of the Planning Regulator) in relation to the placing of Clane in the Settlement Hierarchy.</p>
589	Sheelagh Minihane and John Minihane	<p>The submission notes the recently adopted Naas Local Area Plan 2021 - 2027 zoned lands H: Industry and Warehousing at the Newhall interchange, but it was noted most of these lands are already developed. Similarly, the submission notes the Draft Development Plan zones lands Industry/Warehousing at Ladytown in the Environs Plan, but all of this land has already been built upon. Furthermore, the submission notes the Newbridge Local Area Plan 2013 - 2019 zoned a significant area east of the town Industry/Warehousing, the majority of which has been built upon.</p> <p>The submission welcomes Action RE A3 and feels the Draft Development Plan is the ideal place to develop a strategy for lands between Naas and Newbridge, not a Local Area Plan which are outdated and look at towns in isolation. The submission suggests a study area bounded by the R445 dual carriageway to the north and stretching from the Newhall Interchange to the north and Newbridge town to the south.</p> <p>The extract below illustrates the suggested study area for this strategy.</p>	<p>Chief Executive's Response</p> <p>Action RE A3 in Chapter 4 'Resilient Economy and Job Creation' states</p> <p style="text-align: center;">RE A3: Develop a strategy for the lands between the settlements of Naas and Newbridge, to consolidate existing development whilst also preventing the coalescence of these settlements.</p> <p>This strategy is a long-term goal of the planning department, but the statutory County Development Plan and the Local Area Plan for Newbridge must first take precedence. Once these statutory plans are adopted, such a strategy will examine how these lands between Naas and Newbridge should develop and accommodate employment uses.</p> <p>It is not the intention of this policy to create a long band of Industrial/Warehouse developments linking Naas and Newbridge, but instead maintain a buffer between these two settlements by consolidating existing business parks at the edges of Naas and Newbridge and in Ladytown.</p>

			<p>Furthermore, it must also be noted the review of the Newbridge Local Area Plan will allow for a revisit of the red line boundary and zoning objectives in the existing Newbridge Local Area Plan 2013 – 2019. This LAP will take into consideration that this location is within a Strategic Economic and Employment Zone which is outlined in Section 2.15 of Chapter 2 ‘Core Strategy’ of the Draft Development Plan. This Section states the following regarding the long-term vision for this location.</p> <p>The long-term vision for this area between Naas and Newbridge is for two dynamic and vibrant town centres linked by a strong economic corridor focused on the eastern side of the R445. Each town will offer a wide range of retail, commercial, leisure, social and cultural enterprises and civic amenities (civic squares/public realm interventions) and a vibrant evening economy sustaining a strong residential base that will be served by a future DART service (electrification of the rail line from Sallins to Newbridge).</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
<p>CSO Objectives</p>			
<p>405</p>	<p>Kildare Climate Action Linkage Group</p>	<p><u>Rural Settlements in the Countryside</u></p> <p>The submission references NPO 20 which is the requirement to project the need for single housing in the countryside informed by the local authority’s Housing Need Demand Assessment (HNDA) tool and CDP core strategy process.</p>	<p>Chief Executive’s Response See Chief Executive’s response to submission 468 Ann Behan.</p> <p>Chief Executive’s Recommendation See recommendation to submission 468 Ann Behan.</p>

		<p>The submission requests specific reference to the Kildare HNDA tool in Chapter 2 and to clarify the following in Chapter 2:</p> <ul style="list-style-type: none"> • Has the HNDA tool been developed for Kildare? • What is the projected need for single housing in the countryside? • How do the number of units in Table 2.8 break down to single housing stock? 	
413.	Kildare Public Participation Network	<p>Submission proposes amending the Chapter Aim (new text in purple, deleted text crossed-out), as follows: To provide for the delivery of an additional 9,144 housing units to accommodate an additional 25,146 people by the end of the Plan period, through the delivery of sustainable, compact settlements supported by a commensurate level of physical, and social and green infrastructure to mitigate against climate change.</p> <p>Submission proposes amending the objectives below (new text in purple, deleted text crossed-out), as follows: CSO 1.13: Engage with public infrastructure providers including Irish Water and local communities to provide serviced sites with appropriate infrastructure for people to build their own homes in designated towns and villages, subject to all relevant planning and environmental criteria as a sustainable alternative to one off housing. <i>Develop Housing Need Demand Assessment (HNDA) tool for Kildare and project the need for single housing in the countryside by the end of 2023 in line with National Policy Objective 20, Planning Framework 2040.</i></p>	<p>Chief Executive’s Response It is agreed to Amend Section 2.1 (Overall Aim) to include the reference to green infrastructure which aligns with the latter part of this particular aim in relation to Climate Change.</p> <p>The change proposed to CSO 1.13 is not accepted. National Policy Objective 20 of the NPF requires Local Authorities to ‘project the need for single housing in the countryside through the local authority’s overall Housing Need Demand Assessment (HNDA) tool and county development plan core strategy processes.’ The HNDA (Appendix 1, refers) forms part of the Draft Plan and the need for single housing in the countryside has been assessed. The Core Strategy (Table 2.8, refers) provides for the housing target for ‘rural dwellers’ during the lifetime of the plan in accordance with the Housing Supply Target Guidelines.</p> <p>The request to amend CSO 1.17 is not accepted. It is considered the existing wording of the objective which refers to ‘<i>specific apprenticeships in the technology</i>’ provides sufficient support to cover</p>

		<p>CSO 1.17: Continue to work with the educational institutions throughout the county and Solas, in order to further enhance the already existing highly skilled labour force in Kildare and to encourage improvements in the labour force to include the development of specific apprenticeships in the technology, renewable technologies and retrofitting apprenticeships, tourism, youth and childcare sectors during the lifetime of the plan to enhance and develop the agility of the workforces in those sectors.</p> <p>CSO 1.18: To consider aligning Align the Kildare County Development Plan 2023-2029, with the up-to-date population from the forthcoming Census, where there are verified material population differentials to those in Table 2.8 of the Plan, by way of a statutory variation pursuant to Section 13 of the Planning and Development Act 2000 (as amended).</p>	<p><i>‘renewable technologies and retrofitting apprenticeships.’</i></p> <p>The request to amend CSO 1.18 is not accepted. The Small Area Population statistics for Kildare are expected to be published towards the end of 2023 at which time a decision may be taken, having regard to the published data, to vary the CDP.</p> <p>Chief Executive’s Recommendation Amend Section 2.1 Overall Aim, as follows: To provide for the delivery of an additional 9,144 housing units to accommodate an additional 25,146 people by the end of the Plan period, and to continue to create the environment to retain existing and attract new employers to locate in County Kildare through the delivery of sustainable, compact settlements supported by a commensurate level of physical, and social and green infrastructure to mitigate against climate change.</p>
468	Ann Behan	<p>The overall aim of chapter 2, section 2.1 is referenced, and it submitted that the text be amended to include the words ‘and green’ before infrastructure to mitigate against climate change.</p> <p>Reference is made to section 2.5.1 and 72% of the county’s population living on 5% of the county’s land total. It is submitted that this reinforces the importance of maintaining open spaces in Kildare for human wellbeing and as a counterbalance to development and habitation pressures on nature and on our environment.</p>	<p>Chief Executive’s Response See response to submission 413 above.</p> <p>Chief Executive’s Recommendation See recommendation to submission 413 above.</p>

468	Ann Behan	<p>Regarding compact growth and climate action (section 2.6) it is asked if the plan can outline how the embodied carbon of new planned developments has been accounted for and how steps will be undertaken to reduce the impact of emissions from new development. It is also asked how the plan ensures a climate and biodiversity first lens to planning decisions. Some examples are given such as mandating the use of more sustainable building materials, promoting the redevelopment of brownfield and derelict sites ahead of greenfield sites, and mandating a percentage of C&D waste recovery on sites.</p>	<p>Chief Executive’s Response There are many policies and objectives throughout the plan which ensure that planning decisions consider climate and biodiversity as part of the decision-making process. It must be noted however that the function of the Draft Plan is to at all times balance economic, housing, social and other needs of a growing population alongside a number of factors including but not limited to climate change and biodiversity.</p> <p>Objectives HO O6, HO O9, and HO O10 in Chapter 3 encourage and promote development / regeneration of brownfield sites. The Council will also implement the provisions of the Derelict Sites Act and Urban Regeneration and Housing Act 2015 (as amended) which is recognised throughout the Draft Plan (Objective RE O31, RE O32, RET A3, and Section 4.7, and 16.3.3, refer).</p> <p>Objective RD O23 in Section 9.7 supports the use of timber products as a renewable raw material.</p> <p>Section 15.10.2 in Chapter 15 outlines requirements for C&D waste including waste management plans.</p>
			<p>Chief Executive’s Recommendation No change to Draft Plan.</p>
468	Ann Behan	<p>Section 2.7, is referred to and it is asked how derelict properties will play a role in town and village renewal and contribute to growth outcomes? It is asked if the CDP can state a preference for bringing derelict sites back into use ahead of building new developments.</p>	<p>Chief Executive’s Response Objective HO O13 in Section 3.9 should be noted which is to “support and promote the renovation and re-use of obsolete, vacant, and derelict homes, through the following measures:</p>

			<ul style="list-style-type: none"> (i) Encourage the redevelopment and reuse, including energy retrofitting, of the existing housing stock. (ii) Support Government programmes and incentives to bring empty homes into use through various means, including potential expansion of the Town and Village Renewal Scheme as referred to in the Government’s Rural Development Policy 2021-2025. (iii) Maximise the effective use of local authority housing stock and minimise local authority housing stock vacancy, including through effective refurbishment and retrofitting of older stock where appropriate. (iv) Promote the conversion of vacant properties into new social and affordable homes through schemes including the Repair and Leasing Scheme and the Buy and Renew Scheme. Kildare County Council will endeavour to promote these schemes and encourage owners of vacant properties to avail of these schemes, directly or in co-operation with Approved Housing Bodies. <p>The Council will implement the provisions of the Derelict Sites Act and Urban Regeneration and Housing Act 2015 (as amended) which is recognised throughout the Draft Plan (Objective RE O31, RE O32, RET A3, and Section 4.7, and 16.3.3, refer).</p> <p>In addition, it should be noted that the extent of zonings on peripheral greenfield development sites will need to be critically evaluated regarding their</p>
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			<p>compatibility with the renewal and regeneration policies and objectives set out in the NPF.</p> <p>Chief Executive's Recommendation No change to Draft Plan.</p>
468	Ann Behan	<p>Table 2.8 is referred to and the projected population for Kildare in 2021, which shows an increase of 5.75% on 2016 figures. It appears that this percentage increase is blanketly applied across all towns. What is the rationale for this? Links and quotations from the Eastern & Midland RSES and the HNDA for Kildare are included which indicate higher levels of growth. It also asked how the number of units in table 2.8 break down to single housing stock? (i.e., target to 2028 for Rural Settlement, Rural Dwellers, Blessington Environs).</p>	<p>Chief Executive's Response The rationale / methodology for the Core Strategy is set out in Appendix 9 – Core Strategy Methodology. The detail in relation to the HNDA, specifically in relation to the purpose of same and the identified housing need arising from the HNDA are set out in Appendix 1. It should be further noted that it is an objective (CSO 1.18) to consider aligning the Kildare County Development Plan 2023-2029, with the up-to-date population from Census 2022, where there are verified material population differentials to those in Table 2.8. In this regard it should be noted that the Small Area Population statistics are expected to be published towards the end of 2023.</p> <p>Chief Executive's Recommendation No change to Draft Plan.</p>
468	Ann Behan	<p>The pressure for single homes in rural Kildare is noted, with 892 dwellings permitted in the Kildare countryside from 2016 to 2020, an average of 178 per year. While some of these may be urban one-offs, it is understood the planning system does not differentiate between urban one-offs and rural one-off houses. However, the HNDA notes that this will potentially be upgraded in the future.</p>	<p>Chief Executive's Response The fourth paragraph of Section 2.5.3 in Chapter 2 refers to the HNDA which forms Appendix 1 of the Plan. Section 4.1.3 of the HNDA outlines recent trends in relation to the quantum of permitted one-off houses. The HNDA toolkit has been prepared by the Department of Housing, Local Government and Heritage. The Department has liaised with Kildare County Council during the preparation of the HNDA and endorse the methodology and approach</p>

		<p>NPO 20 is referenced which is the requirement to “project the need for single housing in the countryside through the local authority’s overall HNDA tool and county development plan core strategy processes”. It is submitted that as Chapter 2 makes no specific reference to the Kildare HNDA, this should be addressed for clarity.</p> <p>It is asked if the HNDA tool has been developed for Kildare? What is the projected need for single housing in the countryside?</p>	<p>undertaken by the Council in relation to same which is in compliance with the Department’s toolkit. Table 2.8 sets out the projected target for single houses in Kildare during the life of the Plan.</p> <p>Chief Executive’s Recommendation No change to Draft Plan.</p>
468	Ann Behan	<p>A series of questions are asked regarding section 2.14 Employment in Kildare. They include, will planning decisions that enhance local employment be screened for biodiversity and climate impacts? E.g., should a distribution depot be built in Kildare, and how is the impact of the increased necessary logistics accounted for? What measures are being taken to attract climate positive employment in the county? And what criteria are being used?</p>	<p>Chief Executive’s Response The Draft Plan includes Policy RE P12 in Chapter 4, which is to “ensure that economic and enterprise related development is provided in a manner which facilitates a reduction in greenhouse gas emissions and accelerates the transition towards a sustainable, low carbon and circular economy”. Objectives RE O71, RE O72, and RE O73 also support this policy.</p> <p>Section 15.9.2 and 15.9.3 in Chapter 15, outline requirements for employment uses which include provision for biodiversity and climate impact.</p> <p>Chief Executive’s Recommendation No change to Draft Plan.</p>
468	Ann Behan	<p>The 18 core strategy objectives are referred to, while some are welcomed concern is raised that the biodiversity crisis has not been acknowledged in these core objectives.</p> <p>It is further submitted that throughout the 1930 objectives there is limited reference to the NPWS and</p>	<p>Chief Executive’s Response It is considered that the policies, objectives, and actions outlined in Chapter 12 – Biodiversity and Green Infrastructure adequately address protected habitats and species in Kildare. Objective BI O9 within Section 12.6 supports ‘the establishment of conservation measures and preparation and</p>

	<p>Planning (Heritage). The importance of biodiversity is noted with reference to the National Biodiversity Action Plan, and the Council is requested to be part of the transformational change necessary to halt any further degradation of Kildare’s habitats and dependent species and to begin meaningful action on restoring Kildare’s habitats for future generations. It is submitted the Council needs to address issues such as resourcing, public education, and provision of an inventory of protected sites.</p> <p>Considering the above a further objective is proposed to be inserted into the core strategy objectives to “ensure that the future growth and spatial development of County Kildare does not further undermine Kildare’s protected habitats and species. Engage with NPWS and other relevant stakeholders to urgently progress management plans for Natura 2000 sites and other protected sites in the County. Engage with all relevant stakeholders, including NPWS and national experts in flora and fauna, including the NGO sectors (for example, BSBI County Recorders) to identify and protect high nature value habitats and sites for threatened species in County Kildare. Tangibly commit to meaningfully tackling Biodiversity Loss in County Kildare by providing additional resources for the employment of an additional suitably qualified staff member dedicated to the conservation and protection of Kildare’s habitats and species, compiling an inventory of High Nature Value sites and protected species, community education and engagement on meaningful biodiversity actions, and ensuring that funding for biodiversity is directed to meaningful outcomes”.</p>	<p>implementation of management plans for the conservation of NHA sites by the NPWS”. It is an action of the Council to “develop Management Plans for County Biodiversity Sites where appropriate’ (Action BI A8 refers).</p> <p>Regarding the request in relation to provision of additional resources, such matters are outside the scope of the County Development Plan which is primarily a land use plan.</p> <p>Chief Executive’s Recommendation No change to Draft Plan.</p>
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468	Ann Behan	Additional text is proposed for inclusion at the end of CSO 1.13, which is “Develop Housing Need Demand Assessment (HNDA) tool for Kildare and project the need for single housing in the countryside by the end of 2023 in line with NPO 20 of the NPF, 2040.	<p>Chief Executive’s Response The change proposed to CSO 1.13 are not accepted. National Policy Objective 20 of the NPF requires Local Authorities to ‘project the need for single housing in the countryside through the local authority’s overall Housing Need Demand Assessment (HNDA) tool and county development plan core strategy processes.’ The HNDA (Appendix 1, refers) forms part of the Draft Plan and the need for single housing in the countryside has been assessed. The Core Strategy (Table 2.8, refers) provides for the housing target for ‘rural dwellers’ during the lifetime of the plan in accordance with the Housing Supply Target Guidelines.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
468	Ann Behan	<p>Additional text is also proposed for CSO 1.17, which is to include the wording “<i>renewable technologies and retrofitting apprenticeships</i>” before “tourism, youth, and childcare sectors during the lifetime of the plan”</p> <p>An amendment is proposed to objective CSO 1.18, which is to use the word “<i>align</i>” instead of “<i>to consider aligning</i>” the Kildare CDP 2023-2029 with the up-to-date population from the forthcoming Census.</p>	<p>Chief Executive’s Response See responses to submission 413.</p> <p>Chief Executive’s Recommendation See recommendations to submission 413.</p>
410	Celbridge Community Council	Submits that the following objective from the Meath County Development Plan 2021-2027 should be considered to be included in the draft Plan: Objective CS OBJ 1: <i>To secure the implementation of the Core Strategy and Settlement Strategy, in so far as practicable, by directing growth towards designated</i>	<p>Chief Executive’s Response The request to include the objective from the Meath County Development Plan is not accepted. It is considered that objective CSO 1.1 in the draft Plan provides a sufficient level of clarity and support to ensure that future growth and spatial development</p>

		<p>settlements, subject to the availability of infrastructure and services.</p> <p>States that the draft Plan fails to define much of a strategy beyond what the Regional Spatial and Economic Strategy says in relation to Key Towns and Strategic Development Areas in the MASP. The draft Plan 2023 needs concrete objectives that would have real impact for Self-Sustaining Towns.</p>	<p>of the county is in accordance with the Core Strategy.</p> <p>The contention that the draft Plan fails to define much of a strategy for the Key Towns and the MASP beyond what is said in the RSES is not accepted. The draft Plan provides for a range of strategic and overarching objectives across multiple chapters including RE O14, RE 15, RE 19, and TM O35.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
375	Land Development Agency	<p>The LDA state that their focus is securing the most effective use of public lands where appropriate and to support a stable, sustainable supply of land for housing into the future.</p> <p>The LDA is working to enable and unlock land to provide more affordable housing nationwide with a key focus on delivering compact urban and sustainable growth through optimising relevant public lands.</p> <p>The LDA lodged an SHD application in April 2022 at Devoy Barracks, Naas and they welcome the inclusion of HO O42 which relates to supporting the LDA in the provision of social and affordable housing.</p> <p><u>Compact Growth and Active Land Management</u> The LDA requests an amendment to Objective CSO 1.5 to ensure the important delivery of state-owned lands within strategic areas, as follows:</p> <p>Promote compact growth and the renewal of towns and villages through the development of underutilised town</p>	<p>Chief Executive's Response</p> <p>The proposed change to CSO 1.5 is noted however both the NPF and the RSES prioritise the development of under-used land and buildings within the existing built-up urban footprint, without a specific reference to state owned land. The zoning of land requires a complete analysis of the capacity of an area to accommodate new development in terms of suitably sited lands and infrastructure, such as roads, footpaths, foul drainage, water supply and surface water drainage.</p> <p>Land ownership is not a factor in determining the most appropriate land to be developed. Therefore, the requested change to CSO 1.5 is not considered acceptable.</p> <p>The comments in relation to strengthening active land management measures in the Draft Plan is noted. It is considered that this is required however not in the context of Policy HO P4, but rather as an amendment to CSO 1.5.</p>

		<p>centres and brownfield sites, state-owned land, maintaining a 'live' baseline dataset and to monitor the delivery of population growth on existing zoned and serviced lands to achieve the sustainable compact growth targets of 30% of all new housing within the existing urban footprint of settlements.</p> <p>The submission states that the Draft Plan identifies active land management as a vehicle to bring vacant and underutilised lands in urban areas into beneficial use. It is recommended that the commitment to active land management and working with State Agencies such as the LDA to bring forward the delivery of housing is strengthened. The LDA in the context of active land management proposes an amendment to HO P4 as follows:</p> <p>Ensure that sufficient zoned land continues to be available at appropriate locations to fulfil the housing requirements of the county and to promote the delivery of residential development through active land management measures and a co-ordinated planned approach in cooperation with state agencies such as the LDA.</p>	<p>Chief Executive's Recommendation Amend CSO 1.5 as follows: Promote compact growth and the renewal of towns and villages through the development of underutilised town centres and brownfield sites, and where appropriate, pursue through active land management measures a co-ordinated planned approach to developing appropriately zoned lands at key locations, including regeneration areas, vacant sites and under-utilised areas in cooperation with state agencies, while also maintaining a 'live' baseline dataset and to monitor the delivery of population growth on existing zoned and serviced lands to achieve the sustainable compact growth targets of 30% of all new housing within the existing urban footprint of settlements.</p>
470	IPCC	<p>The submission contends the actions go hand in hand with the re-appreciation and rehabilitation of peatland and its ecosystem services. The creation of a National Peatlands Park will further improve the integration of low carbon living and strengthen the climate change mitigation actions by providing tourism opportunities, educational outreach and amenity.</p> <p>It is suggested that CSO 1.2 should include:</p>	<p>Chief Executive's Response</p> <p>Two Actions in this draft plan recognise the importance and support the development of the National Peatlands Park including EC A7 in Chapter 7 'Energy & Communications' and BI A22 in Chapter 12 'Biodiversity and Green Infrastructure'.</p> <p>Agreed to amend CSO 1.7 to reflect the importance of environmental education.</p>

		<p>‘..... gas emissions reductions. The creation of a National Peatlands Park will further enable the county to climate change proof the landscape while providing for biodiversity and greenhouse gas emissions reductions’.</p> <p>It is suggested that CSO 1.7 should include: ‘.... accommodating employment, environmental education, community, architectural heritage. The integration of the county's peatlands into a National Peatlands Park will also promote their ecosystem benefits, protect and store carbon and provide for biodiversity while highlighting sustainable living.</p> <p>It is suggested that CSO 1.8 should include: Support the implementation of Kildare’s Climate Change Adaptation Plan in conjunction with all relevant stakeholders including the creation of a National Peatlands Park to support all climate change adaptations, biodiversity recovery, Sustainable Development Goals and the National Planning Framework.</p>	<p>Chief Executive’s Recommendation</p> <p>Amend CSO 1.7 as follows: Promote and facilitate the development of sustainable and socially integrated communities through land use planning a plan-led approach that is informed by settlement capacity audits and social infrastructure audits, by providing for land uses zoning designations capable of accommodating employment, environmental education, community, leisure, recreational and cultural facilities having regard to the quality of the receiving environment, and any landscape character, and the archaeological and architectural heritage sensitivities.</p>
410	Celbridge Community Council	<p>States that the objective CSO 1.5 relating to compact growth and the renewal of towns and villages appears to be loosely based on the Town Centre First policy but would benefit from re-wording or, alternatively new objectives should be added. Submits that objectives should commit to the preservation of built and natural heritage, promote development on brownfield sites and the sensitive development of historic areas and enable each town to chart its own future through a tailored Town Centre First Plan.</p>	<p>Chief Executive’s Response</p> <p>The purpose of objective CSO 1.5 is to provide an overarching level of support for town and village renewal and for the compact growth of settlements in keeping with the provisions of the National Planning Framework (2018) and the Regional Spatial and Economic Strategy 2019-2031. It should be noted that Section 14.5 of the draft Plan comprehensively deals with the renewal and regeneration of the county’s settlements. This includes the incorporation of the Town Centre First Policy into the Plan (Section 14.5.6) and the</p>

		<p>Submits that objective CSO 1.7 should be updated to read (additional text in purple), as follows: Promote and facilitate the development of sustainable and socially integrated communities through land use planning that is informed by social infrastructure audits and environmental constraints, by providing for land uses capable of accommodating employment, community, leisure, recreational and cultural facilities having regard to the quality of the environment, landscape character and the archaeological and architectural heritage.</p> <p>Requests that objective CSO 1.11 needs to be replaced with stronger and more committal wording.</p> <p>States that objective CSO 1.12 is poorly written and should be broken into sections and re-written.</p>	<p>provision of a detailed objective (UD O6) to support the implementation of the Town Centre First approach within Kildare's settlements.</p> <p>The request to insert additional working into objective CSO 1.7 is accepted (though amended).</p> <p>The request in relation to the CSO 1.11 is accepted.</p> <p>The request in relation to CSO 1.12 is accepted.</p> <p>Chief Executive's Recommendation Amend objective CSO 1.7, as follows: Promote and facilitate the development of sustainable and socially integrated communities through land use planning a plan-led approach that is informed by settlement capacity audits and social infrastructure audits, by providing for land uses zoning designations capable of accommodating employment, environmental education, community, leisure, recreational and cultural facilities having regard to the quality of the receiving environment, and any landscape character, and the archaeological and architectural heritage sensitivities.</p> <p>Amend objective CSO 1.11, as follows: Leverage funding from all available sources including the Urban Regeneration and Development Fund (URDF) and the Rural Regeneration and Development Fund (RRDF) to help secure the equitable delivery of key projects that will contribute to town and village renewal Continue to implement the Council's programme of regeneration and</p>
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			<p>renewal projects and actively seek funding from relevant agencies and Government sources including the Rural/Urban Regeneration and Development Fund (RRDF/URDF) in order to ensure the equitable delivery of projects across County Kildare, particularly in more densely populated areas in the north of the county. and to e Endeavour to ensure key that such project plans proposals are, where possible, fully prepared in advance of funding announcements.</p> <p>Amend objective CSO 1.12 as follows: Require that the design of future developments occurs in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creates complies with the 10-minute settlement principle though the creation of a safe, attractive, permeable, and universally accessible environment for pedestrians and cyclists all, where measurably adequate transport links are in place, or will be situated, close to new developments and, insofar as possible, to existing developments which would benefit from them. which maximises the potential for active modes of travel along with accessibility to both present and planned public transport options.</p>
276.	County Kildare Access Network	Submission requests that objective CSO1.12 be amended, as follows:	<p>Chief Executive’s Response Noted and agreed.</p>

		<p>Deletion of 'pedestrians and cyclists' and replacement with 'for all'</p>	<p>Chief Executive's Recommendation Amend objective CSO 1.12, as follows: Require that the design of future developments occurs in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creates complies with the 10-minute settlement principle through the creation of a safe, attractive, permeable, and universally accessible environment for pedestrians and cyclists all, where measurably adequate transport links are in place, or will be situated, close to new developments and, insofar as possible, to existing developments which would benefit from them. which maximises the potential for active modes of travel along with accessibility to both present and planned public transport options.</p>
<p>576</p>	<p>County Kildare Leader Partnership (CKLP)</p>	<p>Add new objective as follows: "To explore the potential for a Training Centre for County Kildare to provide dedicated facilities for vocational training and apprenticeships".</p>	<p>Chief Executive's Response CSO 1.17 of the Draft Plan states as follows: 'Continue to work with the educational institutions throughout the county and Solas, in order to further enhance the already existing highly skilled labour force in Kildare and to encourage improvements in the labour force to include the development of specific apprenticeships in the technology, tourism, youth and childcare sectors during the lifetime of the plan to enhance and develop the agility of the workforces in those sectors.' It is considered that CSO 1.17 of the Draft Plan adequately addresses the submission.</p>

			Chief Executive's Recommendation No change to the Draft Plan.
221.	Office of Public Works (OPW) Heritage Services Unit	Submission refers to the provisions of the draft Core Strategy in relation to achieving critical mass in the Metropolitan Area Strategic Plan (MASP) area and in the Key Towns of Naas and Maynooth. It is acknowledged that objectives (AH 022 and AH 023) in relation to the preservation of views may be challenged by this proposed development strategy. In this regard, the OPW request early consultation in the review process for the following local area plans (LAPs): Maynooth, Celbridge and Leixlip.	Chief Executive's Response Noted.
			Chief Executive's Recommendation No change to the Draft Plan.
472	Keep Ireland Open	The submission recommends that the plan must conform to the RSES for the Eastern Region. The submission recommends additional objective to ensure that the development plan is consistent with the strategy of the NTA.	Chief Executive's Response The preparation of the Plan has regard to national, regional and local policy documents, in particular, the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy for the Eastern Midland Region (RSES). See response to submission from EMRA in this regard (Submission no. 47). Section 5.2.9 Draft Transport Strategy for the Greater Dublin Area, 2022-2042 refers. See also response to submission from NTA in this regard (Submission no. 498).
			Chief Executive's Recommendation No change to the draft Plan.

CHAPTER 3 – HOUSING			
Sub No.	Name	Summary of Issues Raised	Chief Executive's Responses & Recommendations
RURAL HOUSING			
552.	Department of Housing, Local Government and Heritage	<p><u>Siting and Design of Rural Housing</u> Require that all applications demonstrate the ability to provide safe vehicular access to the site where the necessity to remove extensive stretches of native hedgerow and trees or can demonstrate existing hedgerow is not native and provide a landscape design to reinstate a hedgerow to outline proposals for replacement of same or comparative.</p> <p>Regarding Objective HO O50: The Department recommends that 'extensive stretches of native hedgerow' be defined in metres. The department recommend the removal of or can demonstrate existing hedgerow is not native and provide a landscape design to reinstate a hedgerow to outline proposals for replacement of same or comparative.</p> <p>The Department recommends that consideration should be given to the protection of bat species, all of which are listed on Annex IV of the Habitats Directive, to ensure that the strict protection afforded to these species is met in the Restoration/Refurbishment of Traditional Structures</p>	<p>Chief Executive's Response All recommendations agreed though it is not considered appropriate to define the extent of hedgerow considered appropriate to remove in terms of metres as this will vary on a case by case basis. The note associated with Objective HO O50 is considered particularly relevant in this regard wherein it states that 'the need for the removal of extensive roadside hedgerow may indicate that the site is unsuitable for development'.</p> <p>Chief Executive's Recommendation Amend Objective HO O50: Require that all applications to demonstrate the ability to provide safe vehicular access to the site where without the necessity to remove extensive stretches of native hedgerow and trees. All applications will be considered on a case by case basis, having regard to, the quality of the hedgerow, species composition, site context and proposed mitigation measures or can demonstrate existing hedgerow is not native and provide a landscape design to reinstate a hedgerow to outline proposals for replacement of same or comparative. Note; The need for the removal of extensive roadside hedgerow may indicate that the site is unsuitable for development.</p> <p>New Objective after HO O50 Recognise the biodiversity and ecosystem services value of established hedgerows within rural settings and where</p>

			<p>hedgerow must be moved to achieve minimum sight lines, a corresponding length of hedgerow of similar species composition (native and of local provenance) shall be planted along the new boundary, while allowing occasional hedgerow trees to develop.</p> <p>New Policy in Section 3.13.5 Restoration/Refurbishment of Traditional Structures Consider the presence of bat species, all of which are listed on Annex IV of the Habitats Directive in the restoration/refurbishment of traditional structures and to ensure applications relating to the restoration and re-use of vernacular structures and houses in the countryside are accompanied by a bat survey report, as required and appropriate.</p>
405	Kildare Climate Action Linkage Group	<p>It is submitted that Objective HO O50 does not seem to be grammatically correct and does not provide a clear meaning. It is suggested that any requirement to reinstate a hedgerow should stipulate that only native species of trees or shrubs of native origin and provenance should be used.</p> <p>Similarly, HO P29 should state native hedgerow species of native provenance and origin.</p>	<p>Chief Executive's Response It is agreed that HO O50 needs to be rephrased. However, while there are many policies within the plan encouraging the planting of native species it is not always appropriate to do so in all settings. Many non-native tree species can also have benefits for pollinators.</p> <p>Chief Executive's Recommendation See recommendation to submission 552 above.</p>
468	Ann Behan	<p>It is strongly suggested that any requirement to reinstate a hedgerow should stipulate that only native species of trees or shrubs of native origin and provenance be used. HO P29 should state "native hedgerow species of native provenance and origin".</p>	<p>Chief Executive's Response See response to submission 405 above.</p> <p>Chief Executive's Recommendation See recommendation to submission 405 above.</p>

405	Kildare Climate Action Linkage Group	<p>The submission recommends that the following policies are added as guidance documents:</p> <ul style="list-style-type: none"> • Sustainable Rural Housing Guidelines (2005) • Derelict Sites Act, 1990 (as amended by the Planning and Development Act, 2000) • Urban Regeneration and Housing Act 2015 	<p>Chief Executive's Response In relation to the changes proposed under Section 3.3 these are not accepted. Section 3.3 relates to the policy context for planning applications in towns, villages, and settlements. The assessment of a planning application does not have regard to either of the Acts cited in the submission. However, the Council will implement the provisions of the Derelict Sites Act and Urban Regeneration and Housing Act 2015 (as amended) which is recognised throughout the Draft Plan (Objective RE O31, RE O32, RET A3, and Section 4.7, and 16.3.3, refer).</p> <p>Similarly, in respect of the Rural Housing Guidelines, these guidelines do not relate to development in urban settlements but rather the provision of single housing in the countryside.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
468	Ann Behan	<p>Reference is made to section 3.2 and engaging in active land management to promote regeneration including utilising the Vacant Sites Register, and other future vehicles, including the Zoned Land Tax. In this regard it is submitted that the Sustainable Rural Housing Guidelines (2005), Derelict Sites Act, 1990 (as amended by the P&D Act, 2000) and Urban Regeneration and Housing Act 2015 should be inserted into the list of policies governing chapter 3 in section 3.3.</p>	<p>Chief Executive's Response See response to submission 405 above.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
468	Ann Behan	<p>It is submitted that there are no actions in relation to objective HO O13. Three actions are recommended which include an action to develop a staged plan to populated and actively manage the Vacant Sites Register (VSR) over the lifetime of the plan, to</p>	<p>Chief Executive's Response With regards the suggested additional actions, it should be noted the draft Plan already supports the implementation of the provisions of both the Derelict Sites Act 1990 (as amended) and Urban Regeneration and Housing Act 2015</p>

		actively enforce the Urban Regeneration and Housing Act 2015 using the VSR, and to actively enforce the Derelict Sites Act, 1990 (as amended by the P&D Act, 2000) using the VSR.	(as amended). These are recognised throughout the Plan. (Objective RE O31, RE O32, RET A3, and Section 4.7, and 16.3.3, refer). It is not considered necessary to include specific actions in relation to same.
			Chief Executive's Recommendation No change to the Draft Plan.
68	Padraig Sheehan	<p><u>Rural Residential Density</u> Section 3.14 of the Draft Plan, if implemented will result in the following – one third of the land area of Kildare being barred from further development, prevent further development in Rural Nodes or other long-established settlements, prevent development in most areas close to towns, result in a more widespread and diffuse pattern of development.</p> <p>Two alternatives are proposed – Proposal 1; Remove / suspend Section 3.14 until a detailed study is available to the elected members / public, which outlines the impact section 3.14 would have on rural housing – Proposal 2; That Section 3.14 and associated Appendix 11 be amended to provide for increased one-off housing density (up to 35sqkm) in the exceptional situations of Rural Nodes, Peri-Urban areas, crossroads and long established residential clusters.</p> <p><u>Summary of Appendix 1</u> Section 3.14 is not evidence based and does not make reference to any published data on existing densities within Kildare. The raw data from Census 2016 is evaluated to decipher rural housing density in Kildare. An analysis of the figures shows that the effect of a proposed limit on density, applying an</p>	<p>Chief Executive's Response <u>Single Rural Dwelling Density;</u> Under the current Plan assessing a rural areas' capacity to facilitate additional housing is not always clear for a prospective applicant to decipher, hence the need for additional quantitative guidance in this regard.</p> <p>It is not considered appropriate to remove/suspend Section 3.14 as the guidelines provide a quantitative assessment of factors including, but not limited to piecemeal and haphazard development. As clearly stated in Section 3.14 it is not intended to be a rigid tool and there may be instances where the existing pattern of development may facilitate some consolidation of one-off housing due to e.g. the prevailing pattern in the area and local topographical conditions. Exceptions will also be made for backland sites to farmers and others whose livelihood depend on the land and who can justify a need to live at their landholding.</p> <p>The four identified areas where exceptions for higher Single Rural Dwelling Densities would apply are noted and the merits of each proposed exception are discussed separately below.</p> <p><u>Rural Nodes</u> The existing rural nodes as outlined in the current Plan were surveyed in 2021. The surveys assessed the extent of</p>

	<p>average limit of 20 / km² would ensure that 28% of the total County land area would be sterilised.</p> <p><u>Summary of Appendix 2</u> Changes are proposed to Section 3.14 and associated Appendix 11, which would allow 4 types of areas where exceptions for higher Single Rural Dwelling Densities would apply. These 4 types of exceptions relate to (a) rural nodes; (b) peri-urban areas; (c) crossroads / junctions and (d) long established clusters. It is envisaged that no Single Rural Dwelling Density restrictions would apply within rural nodes and less restrictive densities would apply in the aforementioned (b), (c) and (d) areas.</p> <p>Changes required to remove ambiguities and inconsistencies; Objective HO O56 should be re-worded and be consistent with section 3.14, which states ‘Generally, such one-off housing would be facilitated only in very exceptional circumstances, where there is a significant need demonstrated, for example, those actively engaged in agricultural or in an occupation heavily dependent on the land.’</p> <p>Remove the note below Objective HO O56 as this note duplicates part of the wording in Appendix 11 but omits a paragraph in Appendix 11 with further instructions on defining the relevant area. It would avoid confusion to have the notes on defining relevant areas only in Appendix 11 and refer to them by paragraph number in the main text.</p>	<p>physical, social and community infrastructure within each rural node. Following the aforementioned surveys it was proposed that 14 rural nodes remain in the Draft Plan.</p> <p><u>Peri-urban areas</u> The focus of the Draft Plan is to strengthen towns, villages and rural settlements. The Draft Plan provides clear alternatives to one-off dwellings in unserved areas. These alternatives include the identification of lands for serviced sites in various small towns, villages and rural settlements (see Volume 2). It is intended that these serviced sites will provide local people with the opportunity to build their own dwelling in serviced settlements close to their family home. To permit higher densities for rural dwellings in peri-urban areas would contravene the aforementioned objective and lead to unsustainable patterns of development.</p> <p><u>Crossroads / junctions</u> It is not considered that crossroads / junctions should receive greater flexibility in terms of complying with Section 3.14 and Appendix 11. The purpose of having specific Rural Residential Density (RRD) guidance is to avoid the rural character of an area being gradually eroded. The fact that a proposed site is located at a crossroads / junction should not prevent it from retaining its rural characteristics.</p> <p><u>Long established clusters</u> Long-established clusters with existing physical, social and community infrastructure have been identified as rural nodes under the current Draft Plan. Also, the Draft Plan under Objective HO P14 does facilitate ‘gap sites’ subject to compliance with a number of criteria. However, to facilitate additional rural housing in areas that already have clusters of development and where limited social, physical and community infrastructure exist would be unsustainable and</p>
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			<p>contrary to national policy to prevent the character of rural areas being eroded.</p> <p><u>Changes required to remove ambiguities and inconsistencies in the text of Appendix 11 and Chapter 3</u></p> <p>It is not considered that Objective HO O56 is inconsistent with section 3.14 of the Draft Plan. Section 3.14 outlines the criteria within which objective HO O56 should be assessed. No change is considered necessary or appropriate to the wording of either.</p> <p>The submission is correct in asserting that the note below Objective HO O56 omits a paragraph in Appendix 11, which provides guidance on defining relevant areas. It will be proposed to add text to the end of the Note that appears under Objective HO O56 to include guidance with respect to calculations related to clearly defined urban areas.</p> <p>Chief Executive's Recommendation Insert the following after the Note below Objective HO O56 of section 3.14 of Chapter 3: <i>A clearly defined urban area may be omitted from the calculations (applying a pro-rata density on the balance of area within the square kilometre buffer), however, where extensive sprawl and ribbon development extends from an urban centre or village, then these units – if they fall within the circle – may be used in the calculation of the rural residential density. If the circle/area passes through the curtilage of a residential site, then it is included within the calculation.</i></p>
515	Meath County Council	<u>Rural Settlement Strategy</u> Submission notes the policies and objectives contained within Chapter 3 relating to the Rural	<p>Chief Executive's Response The contents of the submission relating to the rural settlement strategy is noted.</p>

		<p>Settlement Strategy. Notes that the Council has prepared this approach in the absence of the new ministerial guidelines in relation to Rural Housing. Further notes that a serviced sites approach proposed in the Plan, is a similar approach to that outlined in SH OBJ 12 of the Meath County Development Plan 2021-2027. Outlines support for ongoing engagement on this matter to ensure a consistent approach on both sides of the administrative boundary between the two local authorities.</p>	<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
436	Melanie Young	<p><u>Rural Settlement Strategy</u> The submission objects to the draft Development Plan which reduces the number of people allowed to build one-off housing on their own family land. It is submitted that there should be a doubling up of numbers.</p> <p>Where there is a long lineage of family that resided on the land for generations, siblings and children part thereof should be entitled to build on said land if desired, especially during a housing crisis.</p>	<p>Chief Executive's Response The Draft Plan does not rule out building houses in the countryside. However, there are qualifying criteria that must be met by prospective applicants to demonstrate their ability to comply with the local need criteria which are set out in Table 3.4 and Section 13.3 of the Draft Plan. For those who meet the qualifying criteria there are other considerations such as siting and design and rural density that may result in qualifying applicants being unsuccessful. Furthermore, the Draft Plan has also proposed a number of locations for 'serviced sites' throughout Kildare, and particularly in the smaller settlements in order to provide a sustainable alternative to one off housing in the open countryside. Objective HO O54 (Chapter 3) reflects the need for prospective applicants for such sites to comply in full with the local need criteria as set out in Table 3.4 of the Plan in this regard.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

56	Aine Quinn	<p><u>Sustainable Rural Housing</u> We have received 3 refusals for a house despite having a local need.</p> <p>The new Development Plan will prevent local people who grew up in rural communities from living in these areas. There is also a significant housing shortage in Clane.</p>	<p>Chief Executive's Response It is outside the scope of this report to comment on individual planning applications.</p> <p>It is not accepted that the Draft Plan will prevent local people who grew up in rural communities from living in these areas. Section 3.13.3 of the dCDP is clear in its assertion that rural generated housing demand will be facilitated subject to the protection of key economic, environmental, natural and heritage assets. The dCDP gives clear guidance on who can demonstrate an 'economic' and 'social' need to build a house in a rural area.</p> <p>It is accepted that there is a significant housing shortage throughout the county, however in relation to Clane a number of large housing developments have been permitted in recent years.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
57	Conor McCaffrey	<p>People should be able to build in the rural areas where they grew up. The proposed amendments will create further pressure on the housing market.</p>	<p>Chief Executive's Response It is considered that the Draft Plan facilitates local people who grew up in rural communities from living in these areas, subject to all other normal planning and environmental considerations. Section 3.13.3 of the Draft Plan clearly states that rural generated housing demand will be facilitated subject to the protection of key economic, environmental, natural and heritage assets. The Plan gives clear guidance in relation to demonstrating an 'economic' and 'social' need to build a house in a rural area.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

54	John K	<p>Rural Residential Density The new density guidance as outlined in section 3.14 of the Draft Plan and Appendix 11 of the Appendices is much more restrictive than what is permissible under the current CDP.</p> <p>Under ribbon development guidelines, 5 houses along a 250m stretch of road frontage would result in 20 houses per km and 25 houses per 1250m but the new rule would only allow 15 houses (unless very well screened).</p> <p>The new guidance will force people to look for sites in the open country, which would be unaffordable for many rural dwellers who can only afford to build on family-owned land near their original home.</p>	<p>Chief Executive's Response The intention of the new guidance is to provide an assessment of a range of factors including, but not limited to piecemeal and haphazard development. Under the current Plan assessing a rural areas' capacity to facilitate additional housing is not always clear for a prospective applicant to decipher hence the need for additional guidance in this regard.</p> <p>Objective RH12 of the current Plan defines ribbon development as five or more houses along a 250 metre stretch of road frontage. There is no presumption under the Plan that this would equate to 20 houses per km or 25 houses per 1250m. The current Plan identifies factors such as existing development in the area, degree of haphazard or piecemeal development in the area and extent of ribbon development in the area when assessing the capacity of an area to absorb additional rural housing.</p> <p>It is considered that the proposed rural density guidance will assist prospective applicants, agents and planners when assessing a rural areas' capacity to accommodate additional rural housing.</p> <p>It should also be noted that the Draft Plan provides alternatives to one off rural housing which include serviced sites in various small towns, villages and settlements which would provide local people with the opportunity to build their own dwelling in serviced settlements close to their family home (refer to Volume 2 of the Draft Plan).</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
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538	Senator Mark Wall	<p>The submission requests the following to be considered as part of the final plan:</p> <ul style="list-style-type: none"> Cluster type developments will be considered in rural areas on family land holdings for applicants who are family members and comply with the social or economic element of the rural housing policy. The cluster shall be designed in such a way that is appropriate to the rural context and shall be set back into the landscape from the public road. Clusters shall not exceed five houses and will be subject to normal, planning, siting, design and local need considerations. Where there is a likelihood of more than one applicant seeking planning permission over a period of time, the Council will engage with the landowner to provide for an appropriate site layout capable of accommodating a recessed cluster. Amend 3.14 Rural Housing Density to read: To include that back land development will be considered for all applicants who are building on a family landholding and who comply with the social or economic element of rural housing 	<p>Chief Executive's Response</p> <p>Section 3.13.3 of the Plan states that cluster type developments may be considered in rural areas on family farm holdings for applicants who are family members and comply with the social or economic element of the rural housing policy. It is however considered appropriate to amend this statement to quantify the number of housing that may be considered in a cluster type development.</p> <p>Section 3.3 of the Rural House Design Guide (Appendix 4) states that designers and applicants should follow a general rule of thumb whereby the larger a dwelling the further it should be set back from the road. Appropriate screening should also be incorporated. Furthermore, it states that applicants should avoid using road frontage sites, carved out of larger fields where buildings dominate the view and inappropriate suburban gardens, roadside boundary walls, and gates are introduced into the landscape.</p> <p>In relation to backland development, it is considered that Objective HO P16 adequately addresses the request.</p> <p>Chief Executive's Recommendation</p> <p>Amend Section 3.13.3 (the last paragraph before Table 3.4) as follows:</p> <p>Cluster type developments of five houses or less may be considered in rural areas on family farm holdings for applicants who are family members and comply with the social or economic element of the rural housing policy.</p>
55	Rosemary Byrne	<p>The Single Rural Dwelling Density (SRDD) as outlined in the Draft Plan is very restrictive and will facilitate less than half of what is permissible under the old 'Ribbon Development' rule.</p>	<p>Chief Executive's Response</p> <p><u>Single Rural Dwelling Density</u></p> <p>The intention of the new guidance as outlined in Chapter 3 and Appendix 11 is to provide an assessment of a range of factors including, but not limited to piecemeal and</p>

		<p>Other significant changes are that you need to own 15 hectares to be classed as a farmer and you need to have lived in Kildare for 16 years (was 12 years before), which are both deemed overly restrictive.</p>	<p>haphazard development. Under the current Plan assessing a rural areas' capacity to facilitate additional housing is not always clear for a prospective applicant to decipher hence the need for additional guidance in this regard.</p> <p>It is considered that the proposed rural density guidance will not necessarily be more restrictive than the current CDP but will provide a clearer quantitative framework when assessing a rural areas' capacity to accommodate additional rural housing.</p> <p><u>Ribbon Development:</u> Objective RH12 of the current Plan defines ribbon development as five or more houses alongside 250 metres of road frontage, which has not been made any more restrictive under HO P13 of the Draft Plan, which aligns with Appendix 4 of the Sustainable Rural Housing Guidelines for Planning Authorities (2005), with respect to ribbon development.</p> <p>It should also be noted that the Draft Plan provides alternatives to one-off dwellings which include the identification of lands for serviced sites in various small towns, villages and settlements. Such sites will provide local people with the opportunity to build their own dwelling in serviced settlements close to their family home (refer to Volume 2 of the Draft Plan).</p> <p><u>Compliance with the Rural Housing Requirements</u> In relation to the requirement to own 15 hectares to be classed as a farmer, it should be noted that a 'farmer' is not defined under the current CDP. The insertion of a clear definition of what constitutes a farmer will not necessarily be more restrictive than the current CDP but will provide clearer</p>
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			<p>guidance and greater transparency when assessing an applicant's need for rural housing.</p> <p>The proposal under the current CDP to increase the requirement for an applicant to reside in a rural area to 16 years (from 12 years) is considered reasonable and an appropriate timeframe for an applicant to demonstrate a clear connection to the rural area where they intend to build.</p>
			<p>Chief Executive's Recommendation No change to Draft Plan.</p>
59	Owen Counihan	Objects to the new rural ribbon development guidelines. The Draft Plan should not make it harder for rural people to live in the locality where they grew up.	<p>Chief Executive's Response Objective RH12 of the current Plan defines ribbon development as five or more houses alongside 250 metres of road frontage, which has not been made any more restrictive under HO P13 of the Draft Plan, where ribbon development is defined as 5 or more houses along 250 metres on one side of any road which aligns with Appendix 4 of the Sustainable Rural Housing Guidelines for Planning Authorities (2005), with respect to ribbon development.</p> <p>It is not accepted that the Draft Plan will make it more difficult for rural people to live in the locality where they grew up. Section 3.13.3 of the Draft Plan clearly states that rural generated housing demand will be facilitated subject to the protection of key economic, environmental, natural and heritage assets. The Draft Plan gives clear guidance with respect to demonstrating an 'economic' and 'social' need to building a house in a rural area, which must be balanced with a range of factors, including, but not limited to haphazard development and the density of development. In this regard, Appendix 11 of the Draft Plan clearly sets out the criteria for determining planning applications for rural housing.</p>

			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
78	Conor O'Reilly	<p>The submission states that more houses are needed and less restrictions. It is contended that the Draft Plan is nonsense and should stop imposing on people's freedom.</p>	<p>Chief Executive's Response The contents of the submission are noted. The Draft Plan aims to facilitate housing at appropriate locations to cater for the existing population in the county and the projected growth to 2029 including a number of proposed serviced sites. As further detail is not provided in relation to relevant areas of the Draft Plan no changes are recommended.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
148	Irene Hogarty	<p>Makes it impossible to obtain planning permission for one-off houses on family land.</p> <p>Objects to proposals to restrict houses to 15 per square kilometre, own at least 15 hectares to be classed as a farmer and the need to have lived in Kildare for 16 years.</p>	<p>Chief Executive's Response <u>Single Rural Dwelling Density</u> It is considered that the proposed rural density guidance will not necessarily be more restrictive than the current CDP but will provide a clearer quantitative framework when assessing a rural areas' capacity to accommodate additional rural housing.</p> <p>The intention of the new guidance as outlined in Chapter 3 and Appendix 11 is to provide an assessment of a range of factors including, but not limited to piecemeal and haphazard development. Under the current Plan assessing a rural areas' capacity to facilitate additional housing is not always clear for a prospective applicant to decipher hence the need for additional guidance in this regard.</p> <p><u>Compliance with the Rural Housing Requirements</u> In relation to the requirement to own 15 hectares to be classed as a farmer, it should be noted that a 'farmer' is not defined under the current CDP. The insertion of a clear definition of what constitutes a farmer will not necessarily be</p>

			<p>more restrictive than the current CDP but will provide clearer guidance and greater transparency when assessing an applicants need for rural housing.</p> <p>The proposal under the current CDP to increase the requirement for an applicant to reside in a rural area to 16 years (from 12 years) is considered reasonable and an appropriate timeframe for an applicant to demonstrate a clear connection to the rural area where they intend to build.</p> <p>It is the intention of the Draft Plan that rural generated housing demand will be facilitated having regard, inter alia, to an applicant's genuine local and housing need, together with the protection of key economic, environmental, natural and heritage assets. The definition of 'Economic' and 'Social' need in the context of the rural housing policy, as set out in section 3.13.3, does not make it impossible to obtain planning permission for one-off houses on family land.</p> <p>It should also be noted that the Draft Plan provides alternatives to one-off dwellings which include the identification of lands for serviced sites in various small towns, villages, and rural settlements. Such sites will provide local people with the opportunity to build their own dwelling in serviced settlements close to their family home (refer to Volume 2 of the Draft Plan).</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
149	Laura Byrne	Native Kildare people will not be able to build a house in their own county however big developers will throw up substandard houses and charge extortionate prices.	<p>Chief Executive's Response It is the intention of the Draft Plan that rural generated housing demand will be facilitated having regard, inter alia, to an applicant's genuine local and housing need, together with the protection of key economic, environmental, natural</p>

152	Catriona Carton	Native Kildare people will not be able to build a house in their own county unless they have 15 hectares, however big developers will throw up substandard houses and charge unrealistic prices.	<p>and heritage assets. The definition of 'Economic' and 'Social' need in the context of the rural housing policy, as set out in section 3.13.3, does not make it impossible to obtain planning permission for one-off houses for natives of rural Kildare who have a genuine need to live in a rural area.</p> <p>It should also be noted that the Draft Plan provides alternatives to one-off dwellings which include the identification of lands for serviced sites in various small towns, villages, and rural settlements. Such sites will provide local people with the opportunity to build their own dwelling in serviced settlements close to their family home (refer to Volume 2 of the Draft Plan).</p> <p>Chapter 15 (Development Management Standards) outlines specific control measures to ensure that new development is of high quality and relates to the character, scale, layout, and form of the area in question which all developers must have regard to when putting forward proposals for all housing schemes.</p> <p>The price of houses is not something that can be addressed through the County Development Plan process.</p>
<p>Chief Executive's Recommendation No change to Draft Plan.</p>			
153	Ronan Maguire	There are many derelict houses, unfinished house constructions, fire damaged houses, ruins and brownfield sites. These areas are an eyesore to the people of Kildare and a scar on the landscape. It would be much safer and easier on the eye to have these sites utilised and made available for rural housing	<p>Chief Executive's Response Section 3.13.5 of the Draft Plan includes specific policies that relate to the restoration of derelict structures across the rural countryside. It is intended that these policies would encourage the sensitive restoration of the existing rural building stock as an alternative to one-off dwellings.</p>

			<p>Chief Executive's Recommendation No change to Draft Plan.</p>
190	Catherine D	<p>Very concerned about Section 3.14 in the Draft plan in relation to rural housing. A new limit proposed on the number of houses will apply to a traditional area, just the same as it will apply to areas with large mansions built by speculators during the Celtic Tiger period. Houses built before 1972 (50 years ago) should not be counted when counting the number of houses in a 1 km squared area.</p>	<p>Chief Executive's Response Single Rural Dwelling Density - The intention of the new guidance as outlined in Chapter 3 and Appendix 11 is to provide an assessment of a range of factors including, but not limited to piecemeal and haphazard development. Under the current Plan assessing a rural areas' capacity to facilitate additional housing is not always clear for a prospective applicant to decipher, hence the need for additional guidance in this regard.</p> <p>It is considered that the proposed rural density guidance will not necessarily be more restrictive than the current CDP but will provide a clearer quantitative framework when assessing a rural areas' capacity to accommodate additional rural housing.</p> <p>The function of Kildare County Councils' 'Single Rural Dwelling Density' Toolkit (Appendix 11) is to sensitively consider the capacity of the receiving environment to absorb further development. It would not be in accordance with the principles of proper planning and sustainable development to only consider dwellings built after a certain date. All dwellings regardless of when they were constructed, impact to some degree on their receiving environment with respect to, but not limited to, the impact of dwellings on water services and groundwater quality, the promotion of the use of the private car particularly where areas are not well served by public transport, the lack of or inadequate access to schools, retail facilities and community infrastructure. Such factors, among others, are relevant with respect to all dwellings in rural areas, regardless of when dwellings were constructed.</p>

			<p>Chief Executive's Recommendation No change to Draft Plan.</p>
175	Sandra Nugent	The submission hopes that the County Development Plan does not get approved due to the current housing crisis. It is suggested that the Council is ruling out new builds on family land and that people are afraid of being refused permission. Reference is made to limited availability of affordable housing in the market, particularly in the Monasterevin area.	<p>Chief Executive's Response The Draft Plan does not rule out building houses in the countryside. However, there are qualifying criteria that must be met by prospective applicants to demonstrate their ability to comply with the local need criteria which are set out in Table 3.4 and Section 13.3 of the Draft Plan. For those who meet the qualifying criteria there are other considerations such as siting and design and rural density that may result in qualifying applicants being unsuccessful.</p> <p>The zoning of land for the provision of housing in Monasterevin will be considered as part of the review of the Monasterevin Local Area Plan.</p> <p>It is considered however that the Draft Plan has provided sufficient zoned land in other nearby smaller towns and villages to cater for the growing population.</p> <p>Chief Executive's Recommendation No change to Draft Plan.</p>
231	Lorraine McNamara	The submission asks the Council to complete further analysis on each of the rural areas as to the average farm sizes. In Eadestown, farms are, for the most part not very large so for farmers who farm less than 15ha, this would mean that their children, successors etc will never have an opportunity to build/live on the land that they have farmed with their parents for most of their lives.	<p>Chief Executive's Response In relation to the requirement to own 15 hectares to be classed as a farmer, it should be noted that a 'farmer' is not defined under the current CDP. The insertion of a clear definition of what constitutes a farmer will not necessarily be more restrictive than the current CDP but will provide clearer guidance and greater transparency when assessing an applicant's need for rural housing. To change the definition of what constitutes a 'farmer' based on the average size of a farm within that rural locality is not realistic. The figure of 15</p>

		<p>In Eadestown, the proposed rules regarding one off housing will mean technically no new housing or very limited houses will be allowed to be built, which will have serious impacts on the viability of the community.</p> <p>Increasing housing densities in large towns like Naas is premature, as they do not have the community services (schools, creches, etc.) to accommodate these developments. A large amount of Naas children are going to school in neighbouring rural schools.</p>	<p>hectares is an estimate of what currently constitutes a viable economic landholding.</p> <p>It is not accepted that the Draft Plan will prevent local people who grew up in rural communities from living in these areas. Section 3.13.3 of the dCDP is clear in its assertion that rural generated housing demand will be facilitated subject to the protection of key economic, environmental, natural and heritage assets. The dCDP gives clear guidance on who can demonstrate an 'economic' and 'social' need to build a house in a rural area and it should be noted that this criterion is not limited to those defined as a farmer of the land or son, daughter, niece or nephew of the farmer who it is intended will take over the operation of the family farm.</p> <p>The intention of the new density guidance in rural areas is to provide an assessment of a range of factors including, but not limited to piecemeal and haphazard development. Under the current Plan assessing a rural areas' capacity to facilitate additional housing is not always clear for a prospective applicant to decipher hence the need for additional guidance in this regard.</p> <p>It should also be noted that the Draft Plan provides alternatives to one off rural housing which includes serviced sites in various small towns, villages and rural settlements which would provide local people with the opportunity to build their own dwelling in serviced settlements close to their family home. (refer to Volume 2 of the Draft Plan). National and Regional policies identify Naas as a 'key town' where higher residential densities should be applied. In terms of deficiency of school places within Naas, it is an objective within Chapter 10 (Community Infrastructure & Creative Places) of the Draft Plan to, inter alia, 'continue to</p>
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			<p>identify school capacities through Social Infrastructure Audits undertaken as part of the local area plan process.'</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
266	Irish Farmers Association	<p>The submission welcomes objective HO O45 which increases the minimum term of occupancy to 10 years from 7 years. However, some reservations are made in relation to objective HO O56 which would be problematic in many instances as it refers to an absolute density of 25 houses per sq./km. While policy HO P26 is also deemed to be problematic for agricultural / rural housing development where the only access is via a regional road.</p> <p>In relation to section 3.13 and table 3.4, it is contended that the 15ha is too specific as there are several operators who do not own land but still have significant farm operations. In such cases they would fall into part (ii), but it is not clear if they need to own land. There is also a problem with the 7 years prior ownership, this may not be an issue in most cases however, if a person was required to move due to a CPO, they would not be able to provide themselves with a house for 7 years.</p> <p>Regarding the social requirements it is contended that 16 years prescribed in table 3.4 is unnecessarily long and the emphasis should be on establishing genuine cases from those which are not.</p>	<p>Chief Executive's Response It is considered that the proposed rural density guidance will not necessarily be more restrictive than the current CDP but will provide a clearer quantitative framework when assessing a rural areas' capacity to accommodate additional rural housing. The intention of the new guidance as outlined in Chapter 3 and Appendix 11 is to provide an assessment of a range of factors including, but not limited to piecemeal and haphazard development. Under the current Plan assessing a rural areas' capacity to facilitate additional housing is not always clear for a prospective applicant to decipher hence the need for additional guidance in this regard.</p> <p>Regarding HO P26, it should be noted that some exceptions are outlined under Section 5.8, (Regional Roads) of the Draft Plan within objective TM O87, which includes applicants that meet the local need criteria, are building on the family landholding and cannot provide access onto a nearby county road. In this instance they will be permitted to maximise the potential of existing entrances, with an onus to demonstrate that there are no other accesses or suitable sites within the family landholding. A further exception is where it is proposed to demolish an existing dwelling and replace with new, and the existing entrance is onto a regional road.</p> <p>In relation to the requirement to own 15 hectares to be classed as a farmer, it should be noted that a 'farmer' is not defined under the current CDP. The insertion of a clear</p>

			<p>definition of what constitutes a farmer will not necessarily be more restrictive than the current CDP but will provide clearer guidance and greater transparency when assessing an applicants' need for rural housing.</p> <p>It is clearly stated that leasing agricultural land to supplement lands within an applicant's ownership for farming, may be considered for the purposes of calculating the minimum land area of 15ha. This implies that the applicant must own some land while leasing the remainder to make up 15ha.</p> <p>Regarding the 7-year ownership requirement and the movement of farm enterprises due to CPOs it is acknowledged that such cases will be limited, and it should be noted the Draft Plan cannot address all such instances. However, in such circumstances applicants can provide details which will be assessed on a case-by-case basis.</p> <p>The proposal under the current CDP to increase the requirement for an applicant to reside in a rural area to 16 years (from 12 years) is considered reasonable and an appropriate timeframe for an applicant to demonstrate a clear connection to the rural area where they intend to build.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
314	Lyndsey Sweeney	The new plan requires a farmer to have 15 hectares (c.40 acres) thus discriminating against small part-time farmers. If you qualify as a farmer (have 15ha) then you are also exempt from the limit of 25maximum houses per km.	<p>Chief Executive's Response The intention of the new guidance as outlined in Chapter 3 and Appendix 11 is to provide an assessment of a range of factors including, but not limited to piecemeal and haphazard development. Under the current Plan assessing a rural areas' capacity to facilitate additional housing is not</p>

		<p>The new rules on Density are very restrictive and will discriminate against the less well off in favour of the wealthy who have limited connections to the rural area. If building a house on family land is ruled out due to so called “high density”, then you would be forced to look to buy a site from a large farmer. The option of buying a site for a rural house is not a viable option for most in Co. Kildare.</p>	<p>always clear for a prospective applicant to decipher hence the need for additional guidance in this regard.</p> <p>It is considered that the proposed rural density guidance will not necessarily be more restrictive than the current CDP but will provide a clearer quantitative framework when assessing a rural areas’ capacity to accommodate additional rural housing. It is also considered reasonable that exceptions may be made to active farmers and others who are applying for planning permission on their own land, whose livelihood depends on the land and who can justify a need to live on their landholding</p> <p>It should be noted that the Draft Plan provides alternatives to one-off dwellings which include the identification of lands for serviced sites in various small towns, villages, and settlements. Such sites will provide local people with the opportunity to build their own dwelling in serviced settlements close to their family home (refer to Volume 2 of the Draft Plan).</p> <p>In relation to the requirement to own 15 hectares to be classed as a farmer, it should be noted that a ‘farmer’ is not defined under the current CDP. The insertion of a clear definition of what constitutes a farmer will not necessarily be more restrictive than the current CDP but will provide clearer guidance and greater transparency when assessing an applicant’s need for rural housing.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
297	Paul Barry	<p>The submission notes that with the pending knowledge of the Government action on the Flemish Decree, Kildare County Council could be more</p>	<p>Chief Executive’s Response It is not possible for the Council to ascertain what may be published by the Government in the future. The Draft CDP</p>

		<p>ambitious and proactive in their plans for one-off housing. The publishing of the Government plans later this year (2022) will almost immediately render the development plan misaligned.</p> <p>To ensure a greener focussed plan, new build for applicants seeking to construct one-off housing must be NZEB during both the construction phase, and over the buildings' lifetime.</p> <p>There should be more flexibility in terms of people who might want to move rurally from one county to another or move from an urban centre to the countryside but find that they are blocked by locals-only rules.</p>	<p>reflects all current guidance, including in relation to rural housing, which aligns with national and regional policies as outlined under the National Planning Framework, Our Rural Future, Ireland's Rural Development Policy 2021-2025' and the Regional Spatial Economic Strategy. All these documents support the need to plan for sustainable communities and to make provision for housing in the countryside for those who demonstrate a need to live in our rural areas.</p> <p>In relation to one-off housing being NZEB, it should be noted that Objective HO O49 of Chapter 3 is clear in its requirement that all 'new dwellings incorporate principles of sustainability and green principles in terms of design, services and amenities. Appendix 4 (Rural House Design Guide) also provides clear guidance to applicants for one-off housing in terms of constructing sustainable, energy efficient homes.</p> <p>In terms of providing more flexibility for people who might wish to live in rural areas the Council is restricted to permitting one-off housing to those who demonstrate a need to live in our rural areas. It should be noted that the Draft Plan provides alternatives to one-off dwellings which include the identification of lands for serviced sites in various small towns, villages, and settlements. Such sites will provide local people with the opportunity to build their own dwelling in serviced settlements close to their family home (refer to Volume 2 of the Draft Plan).</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
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324	Sinead Malone	<p>The new development plan is trying to stop all one-off housing in all areas of Kildare. Locals are being forced out of towns that they have lived and grown up in due to extortionate house prices and cannot get planning for one off houses on their own land due to out-dated 'ribbon development' and 'local need' policies.</p> <p>The Council has granted 500 units to be built in the Clane area with insufficient physical and social infrastructure.</p>	<p>Chief Executive's Response</p> <p>It is the intention of the Draft Plan that rural generated housing demand will be facilitated having regard, inter alia, to an applicant's genuine local and housing need, together with the protection of key economic, environmental, natural and heritage assets. The definition of 'Economic' and 'Social' need in the context of the rural housing policy, as set out in section 3.13.3, does not make it impossible to obtain planning permission for one-off houses for natives of rural Kildare who have a genuine need to live in a rural area. Objective RH12 of the current Plan defines ribbon development as five or more houses alongside 250 metres of road frontage, which has not been made any more restrictive under HO P13 of the Draft Plan, which aligns with Appendix 4 of the Sustainable Rural Housing Guidelines for Planning Authorities (2005), with respect to ribbon development.</p> <p>It should be noted that the vast majority of houses permitted in Clane over the last number of years have been granted by ABP under the SHD process and not by Kildare County Council. However, it is acknowledged that the lack of community facilities in Clane is a concern. It should be noted that as part of any review of the Clane Local Area Plan that a Social infrastructure Assessment (SIA) will be undertaken, which will look at the level of existing service provision in Clane relative to the existing and projected population and identify any specific shortfalls that need to be addressed.</p> <p>Furthermore, a number of objectives and actions have been included in Chapter 10 of the Draft Plan, which relate specifically to addressing deficiencies in school places, GPs and childcare facilities.</p> <p>The price of houses is not something that can be addressed through the County Development Plan process.</p>
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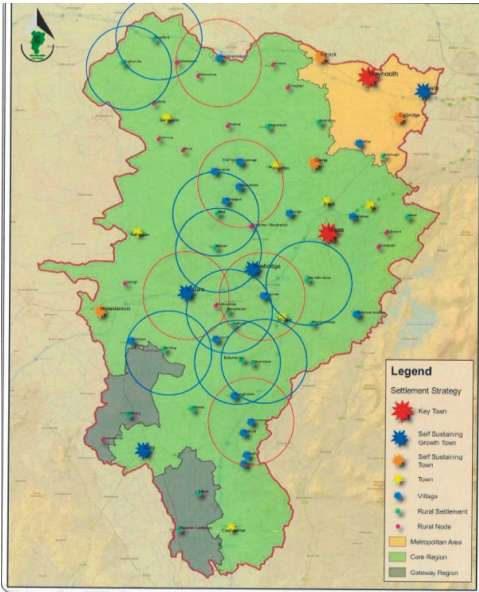
			<p>The Draft Plan also provides alternatives to one off rural housing which include serviced sites in various small towns, villages and settlements which would provide local people with the opportunity to build their own dwelling in serviced settlements close to their family home (refer to Volume 2 of the Draft Plan).</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
326	Ciaran Boyle	<p>The new development plan is trying to stop all one-off housing in all areas of Kildare. The Council has granted 500 units to be built in the Clane area with insufficient physical and social infrastructure. The development plan is not in the best interest of sustainable development and if anything is driving the cost of housing up.</p>	<p>Chief Executive's Response It is the intention of the Draft Plan that rural generated housing demand will be facilitated having regard, inter alia, to an applicant's genuine local and housing need, together with the protection of key economic, environmental, natural and heritage assets. The definition of 'Economic' and 'Social' need in the context of the rural housing policy, as set out in section 3.13.3, does not make it impossible to obtain planning permission for one-off houses for natives of rural Kildare who have a genuine need to live in a rural area. It should be noted that the vast majority of houses permitted in Clane over the last number of years have been granted by ABP under the SHD process and not by Kildare County Council. However, it is acknowledged that the lack of community facilities in Clane is a concern. It should be noted that as part of any review of the Clane Local Area Plan that a Social infrastructure Assessment (SIA) will be undertaken, which will look at the level of existing service provision in Clane relative to the existing and projected population and identify any specific shortfalls that need to be addressed.</p> <p>Furthermore, a number of objectives and actions have been included in Chapter 10 of the Draft Plan, which relate</p>

			<p>specifically to addressing deficiencies in school places, GPs and childcare facilities.</p> <p>The price of houses is not something that can be addressed through the County Development Plan process.</p> <p>It should also be noted that the Draft Plan provides alternatives to one off rural housing which include serviced sites in various small towns, villages and settlements which would provide local people with the opportunity to build their own dwelling in serviced settlements close to their family home. (refer to Volume 2 of the Draft Plan).</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
337	Sabina Reddy	The submission proposes the right to will/gift sites to build houses in a rural area to family members only.	<p>Chief Executive's Response The issue of gifting or the willing of a property or estate is not an issue for a land use plan. The Rural Housing Planning Guidelines do not restrict sustainable rural housing to family members only and therefore to ensure compliance with the Ministerial Guidelines the Draft Plan has provided details of the Rural Housing Need Assessment Criteria for applicants (Table 3.4, refers).</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
396	Gavin Lawlor	<p>The submission highlights that Policy HO P4 and Objective HO O2 clearly states that the Council will ensure that sufficient land is available to meet the housing demand.</p> <p>Research completed by Tom Phillips and Associates (TPA) in 2021 is referenced which has shown that</p>	<p>Chief Executive's Response The population growth and new housing distribution set out in the plan are based on the Kildare allocation in the NPF/RSES and the more recent Housing Supply Target Methodology Guidelines from the DoHLGH and the methodology set out therein.</p>

		<p>c.40-60% of greenfield zoned lands are not brought forward for development and that a maximum average of 50% of permissions granted have been developed over each development plan period (ie over a 6 year period). In this regard, over the life of a development plan approximately 30% of the lands zoned for residential development can be expected to deliver built houses within the life of the Plan. As such, zoning only for what you need (without any headroom), guarantees you will not reach your target.</p> <p>It is submitted that the 'housing requirements' determined by the HNDA should be treated as a minimum requirement for the zoning of lands and not a maximum.</p> <p>Equally, the quantum of zoned lands as set out in the settlements in Volume 2 should be re-assessed having regard to the need to ensure that the minimum quantum of housing which has been determined for each of these settlements is delivered within the life of the plan.</p>	<p>As a direct result of the coronavirus pandemic, Census 2022 was postponed and therefore the most up to date population analysis is Census 2016. While the CDP references the 2011-2016 intercensal period in term of recent growth these do not determine future growth projections.</p> <p>The calculation of the housing target is based on actual housing delivery and the unmet housing demand in the county. The methodology used to determine the housing target to the end of the Plan period is set out in Table 2.4 and its accompanying footnotes.</p> <p>One of the main National Strategic Outcomes (NSO) in the NPF prioritises the concept of 'Compact Growth' and to avoid the further sprawl of urban development, which is a top priority of this Plan. The regeneration of existing building stock and/or use of underutilised/brownfield sites within existing urban centres is the optimum location for future growth followed by consideration of sites outwards from the core in a sequential manner. As per the NPF, RPO 3.2 (RSES) requires local authorities in preparing their core strategies to set out measures to achieve compact urban development targets of at least 30% of all new homes within or contiguous to the built-up urban areas. This entails delivering a greater proportion of residential development within existing built-up areas of settlements and moving away from a reliance on greenfield development to meet our development needs.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
396	Gavin Lawlor	The submission requests Section 3.14 to be deleted and that if further controls are needed on rural housing over and above the policies already in place	<p>Chief Executive's Response It is not considered appropriate to delete Section 3.14. The intention of the new guidance is to provide an assessment of</p>

		<p>then rural housing should be directed to areas which already have high rural densities and clusters of rural housing.</p> <p>If as indicated in Section 3.14 rural housing is limited to a density of 25 units per square kilometre, then applicants who have a genuine rural housing need will be forced to develop rural houses in areas with lower rural densities.</p> <p>Equally, given the fact that rural housing is less sustainable when it is spread out more, focusing new rural houses in less densely populated rural areas will also serve to be less sustainable.</p>	<p>a range of factors including, but not limited to piecemeal and haphazard development. Under the current Plan assessing a rural areas' capacity to facilitate additional housing is not always clear for a prospective applicant to decipher hence the need for additional guidance in this regard.</p> <p>It is considered that the proposed rural density guidance will assist prospective applicants, agents and planners when assessing a rural areas' capacity to accommodate additional rural housing.</p> <p>It should also be noted that the Draft Plan provides alternatives to one off rural housing which include serviced sites in various small towns, villages and settlements which would provide local people with the opportunity to build their own dwelling in serviced settlements close to their family home subject to all other normal planning and environmental considerations (refer to Volume 2 of the Draft Plan).</p>
		<p>Chief Executive's Recommendation No change to the Draft Plan.</p>	
592	Brian Connolly	<p>The submission relates to the Serviced Sites initiative set out in the dCDP in that it proposes amendments to the Serviced Sites initiative to have additional lands included in this designation and to have the restrictions on those who qualify for the occupation of residential units in these serviced sites as set out in HO 054 of Section 3.13.7 of the Draft Plan significantly amended.</p> <p>The submission refers to the policy provisions of Section 3.13.7 of the Draft Plan in relation to the provision of a sustainable alternative to one-off housing in the County Kildare countryside. It also</p>	<p>Chief Executive's Response The submission requests an amendment to the restrictions in relation to those who qualify for 'Serviced Sites' as set out in HO 054 of section 3.13.7. Serviced Sites are intended to be an alternative for people who have a genuine housing need requirement to live in a rural area. To permit persons who do not comply with the local need criteria as set out in Table 3.4 would seriously impact the ability of persons who have a housing need requirement from acquiring a Serviced Site. Also, objective V GO 1 of Volume 2 states 'Rural Settlements shall cater primarily for local demands. Local demand for rural settlements is defined as persons residing for a period of 5 years within a 10km radius of the site.'</p>

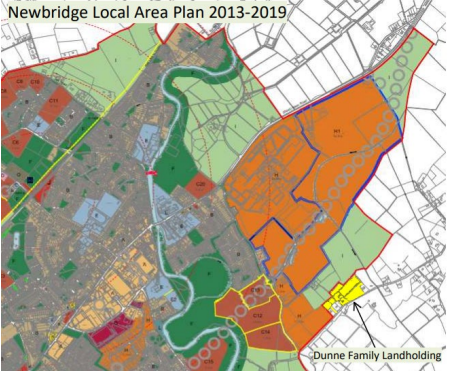
	<p>sets out the proposed action (HO A8) to prepare a KCC 'Serviced Sites Scheme Policy Document' within six months of the adoption of the County Development Plan.</p> <p>It further refers to Table 3.1 of Volume 1 which sets out the general densities for the various settlement types. The density for villages is 15-20 units/hectare and for rural settlement expansions it is 15 units/hectare.</p> <p>The submission states that the introduction of the 'Serviced Sites' Initiative detailed in the draft Plan is to be welcomed. However, it states that if it is to be a successful alternative to one-off rural housing, the quantum of land designated for this initiative (24 hectares) is clearly insufficient in light of the number of unsuccessful planning applications for one-off rural houses in Kildare in recent years. The fact that only 5 of the 17 villages and 9 of the 19 rural settlements have lands within this designation, coupled with the restrictions on who qualifies for housing on these sites as set out in Objective HO O54 and Table 3.4 of the draft Plan, limits those who qualify to those who have grown up within 5 km of the relevant settlements chosen. As such, the proposals set out in the draft Plan do not provide a sustainable alternative to one-off rural housing in the open countryside for most of the county.</p> <p>An accompanying map shows a 5km radius highlighted around the 5 villages and the 9 rural settlements that have the Serviced Sites designation in the draft Plan. The 5km radius is a reference to Zone 2 Category B(i) of Table 3.4 of Volume 1, titled</p>	<p>'Primarily for local demand' shall be defined as being in excess of 50% of the overall development. It is considered that V GO1 provides alternatives to persons who have linkages to a rural area but who may not comply with the local need criteria as set out in Table 3.4.</p> <p>In relation to insufficient lands being identified / zoned in the Draft Plan for 'Serviced Sites', it should be noted that an additional 12ha of land has been zoned for 'Serviced Sites' in the small towns of Kill, Prosperous and Rathangan.</p> <p>The submission refers to the number of applications for rural one-off dwellings that have been refused in 2021 and so far in 2022. It should be noted that an application for a one-off house in a rural area does not imply that the applicant has a genuine housing need or connection to a rural area. The number of refusals is not therefore an accurate barometer of genuine housing need requirements in rural areas.</p> <p>Identifying specific sites at this juncture will more greatly inform the elected members when it comes to the adoption of the 'Serviced Sites Initiative Scheme' and is not considered premature.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
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		<p>the - <i>Schedule of Local Need Criteria in accordance with the NPF (NPO 19).</i></p> <p>The submitter states that this submission is intended to offer a realistic alternative to those who do not qualify under the current Rural Housing Policy yet aspire to live in a rural-type development where they would have been born and reared.</p> 	
590	Paul Carroll	<p><u>Summary of Appendix from Brian Connolly Associates</u></p> <p>It is proposed to have the restrictions on those who qualify for the occupation of 'serviced sites' as set out in HO O54 of section 3.13.7 significantly amended.</p>	<p>Chief Executive's Response</p> <p>The submission requests an amendment to the restrictions in relation to those who qualify for 'Serviced Sites' as set out in HO O54 of section 3.13.7. Serviced Sites are intended to be an alternative for people who have a genuine housing need requirement to live in a rural area. To permit persons who do not comply with the local need criteria as set out in Table 3.4 would seriously impact the ability of persons who</p>

	<p>The rural housing policy and specifically the Serviced Sites initiative is informed by National and regional policies. The draft plan proposes to establish a 'County Kildare Serviced Sites Initiative' that will attract new residents to live in villages and rural settlements.</p> <p>It is proposed to provide a total of 24 hectares for the 'Serviced Sites Initiative'. The maximum density of these lands is 10 / hectare (HO O55). This will provide for 240 units county wide over the period of the plan, which averages at 40 units / annum. In 2021, 161 applications for one-off rural houses were refused and in the period January – April a further 39 applications have been refused.</p> <p>If the 'serviced sites' initiative is to be successful there will need to be a greater quantum of land designated in the villages and settlements. The imposition of restrictions as set out in HO O54 of the draft Plan requires that applicants for dwelling units in these serviced sites must comply with the local criteria as set out in Table 3.4 of the draft Plan i.e must have grown up within 5km of the relevant settlement / village. The attached map demonstrates that those who have grown up in a large portion of Kildare would be excluded from benefitting from this zoning / designation.</p> <p>HO P23 states that no development will be considered on serviced sites until the KCC 'Serviced Sites Initiative Scheme' has been agreed (adopted) by the elected members. It could be argued that identifying specific sites in advance of the Scheme being prepared is premature.</p>	<p>have a housing need requirement from acquiring a Serviced Site. Also, objective V GO 1 of Volume 2 states 'Rural Settlements shall cater primarily for local demands. Local demand for rural settlements is defined as persons residing for a period of 5 years within a 10km radius of the site. 'Primarily for local demand' shall be defined as being in excess of 50% of the overall development. It is considered that V GO1 provides alternatives to persons who have linkages to a rural area but who may not comply with the local need criteria as set out in Table 3.4.</p> <p>In relation to insufficient lands being identified / zoned in the Draft Plan for 'Serviced Sites', it should be noted that an additional 12ha of land has been zoned for 'Serviced Sites' in the small towns of Kill, Prosperous and Rathangan.</p> <p>The submission refers to the number of applications for rural one-off dwellings that have been refused in 2021 and so far in 2022. It should be noted that an application for a one-off house in a rural area does not imply that the applicant has a genuine housing need or connection to a rural area. The number of refusals is not therefore an accurate barometer of genuine housing need requirements in rural areas.</p> <p>Identifying specific sites at this juncture will more greatly inform the elected members when it comes to the adoption of the 'Serviced Sites Initiative Scheme' and is not considered premature.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
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		See also map submitted as part of submission 592 which also accompanied this submission.	
594	Gavin O'Connor	<p><u>Summary of Appendix from Brian Connolly Associates</u></p> <p>It is proposed to have the restrictions on those who qualify for the occupation of 'serviced sites' as set out in HO O54 of section 3.13.7 significantly amended.</p> <p>The rural housing policy and specifically the Serviced Sites initiative is informed by National and regional policies. The draft plan proposes to establish a 'County Kildare Serviced Sites Initiative' that will attract new residents to live in villages and rural settlements.</p> <p>It is proposed to provide a total of 24 hectares for the 'Serviced Sites Initiative'. The maximum density of these lands is 10 / hectare (HO O55). This will provide for 240 units county wide over the period of the plan, which averages at 40 units / annum. In 2021, 161 applications for one-off rural houses were refused and in the period January – April a further 39 applications have been refused.</p> <p>If the 'serviced sites' initiative is to be successful there will need to be a greater quantum of land designated in the villages and settlements.</p> <p>The imposition of restrictions as set out in HO O54 of the draft Plan requires that applicants for dwelling units in these serviced sites must comply with the local criteria as set out in Table 3.4 of the draft Plan</p>	<p>Chief Executive's Response</p> <p>The submission requests an amendment to the restrictions in relation to those who qualify for 'Serviced Sites' as set out in HO O54 of section 3.13.7. Serviced Sites are intended to be an alternative for people who have a genuine housing need requirement to live in a rural area. To permit persons who do not comply with the local need criteria as set out in Table 3.4 would seriously impact the ability of persons who have a housing need requirement from acquiring a Serviced Site. Also, objective V GO 1 of Volume 2 states 'Rural Settlements shall cater primarily for local demands. Local demand for rural settlements is defined as persons residing for a period of 5 years within a 10km radius of the site. 'Primarily for local demand' shall be defined as being in excess of 50% of the overall development. It is considered that V GO1 provides alternatives to persons who have linkages to a rural area but who may not comply with the local need criteria as set out in Table 3.4.</p> <p>In relation to insufficient lands being identified / zoned in the Draft Plan for 'Serviced Sites', it should be noted that an additional 12ha of land has been zoned for 'Serviced Sites' in the small towns of Kill, Prosperous and Rathangan.</p> <p>The submission refers to the number of applications for rural one-off dwellings that have been refused in 2021 and so far in 2022. It should be noted that an application for a one-off house in a rural area does not imply that the applicant has a genuine housing need or connection to a rural area. The number of refusals is not therefore an accurate barometer of genuine housing need requirements in rural areas.</p>

		<p>i.e must have grown up within 5km of the relevant settlement / village. The attached map demonstrates that those who have grown up in a large portion of Kildare would be excluded from benefitting from this zoning / designation.</p> <p>HO P23 states that no development will be considered on serviced sites until the KCC 'Serviced Sites Initiative Scheme' has been agreed (adopted) by the elected members. It could be argued that identifying specific sites in advance of the Scheme being prepared is premature.</p> <p>See also map submitted as part of submission 592 which also accompanied this submission.</p>	<p>Identifying specific sites at this juncture will more greatly inform the elected members when it comes to the adoption of the 'Serviced Sites Initiative Scheme' and is not considered premature.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
595	John Noone	<p><u>Summary of Appendix from Brian Connolly Associates</u></p> <p>The rural housing policy and specifically the Serviced Sites initiative is informed by National and regional policies. The draft plan proposes to establish a 'County Kildare Serviced Sites Initiative' that will attract new residents to live in villages and rural settlements.</p> <p>It is proposed to provide a total of 24 hectares for the 'Serviced Sites Initiative'. The maximum density of these lands is 10 / hectare (HO O55). This will provide for 240 units county wide over the period of the plan, which averages at 40 units / annum. In 2021, 161 applications for one-off rural houses were refused and in the period January – April a further 39 applications have been refused.</p>	<p>Chief Executive's Response</p> <p>In relation to insufficient lands being identified / zoned in the Draft Plan for 'Serviced Sites', it should be noted that an additional 12ha of land has been zoned for 'Serviced Sites' in the small towns of Kill, Prosperous and Rathangan.</p> <p>The submission refers to the number of applications for rural one-off dwellings that have been refused in 2021 and so far in 2022. It should be noted that an application for a one-off house in a rural area does not imply that the applicant has a genuine housing need or connection to a rural area. The number of refusals is not therefore an accurate barometer of genuine housing need requirements in rural areas.</p> <p>Identifying specific sites at this juncture will more greatly inform the elected members when it comes to the adoption of the 'Serviced Sites Initiative Scheme' and is not considered premature.</p>

		<p>If the 'serviced sites' initiative is to be successful there will need to be a greater quantum of land designated in the villages and settlements.</p> <p>HO P23 states that no development will be considered on serviced sites until the KCC 'Serviced Sites Initiative Scheme' has been agreed (adopted) by the elected members. It could be argued that identifying specific sites in advance of the Scheme being prepared is premature.</p> <p>This submission is intended to offer an alternative to those who do not qualify under the current Rural Housing Policy.</p> <p>See also map submitted as part of submission 592 which also accompanied this submission.</p>	<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
<p>399</p>	<p>Michael Dunne (sub also cross referenced in Vol 2 – Local Area Plan related)</p>	<p>Permission has been sought to build a recessed rural cluster for family members on the family landholding for a number of years. The landholding is bound on two sides by the Newbridge Local Area Plan Boundary (see map below).</p>  <p>The map shows the Newbridge Local Area Plan 2013-2019 with various colored zones. A specific area is highlighted in yellow and labeled 'Dunne Family Landholding'. The map also shows the 'Newbridge Local Area Plan Boundary'.</p>	<p>Chief Executive's Response In relation to the subject landholding being in close proximity to the Newbridge town boundary, Newbridge has its own statutory Local Area Plan that includes land use zonings for Newbridge and it is outside the scope of the Draft Plan to consider any amendments to such land use zonings at this time. An opportunity will be afforded to all interested parties to make written submissions with respect to the Newbridge Local Area Plan when that Plan goes on public display. In that regard preliminary work for the Newbridge Local Area Plan has now commenced.</p> <p><u>Cluster Type Developments</u> In relation to cluster type developments in rural areas, the reader is advised to note that the text has been amended under the Draft Plan to encourage a greater flexibility of approach when it comes to assessing cluster type</p>

	<p>Add a policy HO PXX to KCDP 2023-2029 to include the following taken from RH 13 in KCDP 2013-2019 to read:</p> <p>‘Cluster type developments will be considered in rural areas on family land holdings for applicants who are family members and comply with the social or economic element of the rural housing policy. The cluster shall be designed in such a way that is appropriate to the rural context and shall be set back into the landscape from the public road. Clusters shall not exceed five houses and will be subject to normal planning, siting, design and local need considerations. Where there is a likelihood of more than one applicant seeking planning permission over a period of time, the Council will engage with the landowner to provide for an appropriate site layout capable of accommodating a recessed cluster.’</p> <p>Instead of:</p> <p>‘Cluster type developments may be considered in rural areas on family farm holdings for applicants who are family members and comply with the social or economic element of the rural housing policy.’</p> <p>Amend HO P15 in KCDP 2023-2029 to read: (taken from RH 11 in KCDP 2017-2023 with additional clarification):</p> <p>‘Preserve and protect the open character of transitional lands outside of settlements in order to prevent linear sprawl near towns, villages, and settlements and to maintain a clear demarcation and distinction between urban areas and the countryside. This will not apply to persons building on family land</p>	<p>developments in rural areas. Clear guidance regarding clustering in rural areas is also provided in Appendix 4 (Rural House Design Guide) of the Draft Plan.</p> <p><u>HO P15</u></p> <p>HO P15 of the Draft Plan is clear in its requirement to protect the character of transitional lands particularly the approach roads to towns and villages and areas immediately outside of settlement boundaries. Linear sprawl near towns, villages and settlements has increased over the last number of years. It is considered that providing exceptions to persons building on family land has been detrimental to maintaining a clear demarcation and distinction between urban areas and the countryside and protecting the integrity of the agricultural uses in these areas.</p> <p><u>HO P12, HO P13, HO P14</u></p> <p>Objective RH12 of the current Plan defines ribbon development as five or more houses alongside 250 metres of road frontage, which has not been made any more restrictive under HO P13 of the Draft Plan, which aligns with Appendix 4 of the Sustainable Rural Housing Guidelines for Planning Authorities (2005), with respect to ribbon development. The primary difference between HO P14 of the Draft Plan and RH 12 of the current Plan appears to be the proviso in the current Plan that ‘special regard will be given to the circumstances of immediate family members of a landowner on single infill sites’ against the draft Plan, which states a “gap site” will only be considered in circumstances where ‘The applicant can demonstrate an Economic or a Social Need (as outlined in Table 3.4).’ It is considered that an applicant’s relationship to the landowner should not give them preferential treatment over applicants</p>
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	<p>where another family site is not available to them. Where the family landholding is (a) outside of settlement, and (b) where it is on the edge of settlement, and (c) where the land which adjoins it on two (or more) sides is zoned for development, then houses for family members on the family landholding will not be deemed to contribute to linear sprawl, nor will houses for family members on the family landholding be deemed to adversely affect the preservation and protection of the open character of the countryside.'</p> <p>instead of: 'Preserve and protect the open character of transitional lands particularly the approach roads to towns and villages and areas immediately outside of settlement boundaries in order to prevent linear sprawl near towns, villages, and settlements and to maintain a clear demarcation and distinction between urban areas and the countryside and to protect the integrity of the agricultural uses in these areas.'</p> <p>Amend HO P12, HO P13, HO P14 KCDP 2023-2029 to include as policy the following (taken from RH 12 in KCDP 2017-2023) 'Discourage ribbon development (defined as five or more houses alongside 250 metres of road frontage) 4. The Council will assess whether a given proposal will exacerbate such ribbon development, having regard to the following:</p> <ul style="list-style-type: none"> (i) The type of rural area and circumstances of the applicant; (ii) The degree to which the proposal might be considered infill development; 	<p>who can demonstrate an Economic or a Social Need (as outlined in Table 3.4),</p> <p><u>Footnote number 3 at bottom of page headed 3.13.3</u> Table 3.4 Schedule of Local Need Criteria, as outlined in the Draft Plan and the definition of what constitutes Urban Generated Housing are two separate things. To define Urban Generated Housing as an application made for a dwelling by persons not covered in Table 3.4 Schedule of Local Need Criteria in accordance with the NPF (NPO 19) is not feasible.</p> <p><u>Rural Housing Requirements</u> National and regional policies stipulate that applicants for dwellings in rural areas must demonstrate a genuine housing need. It is therefore necessary to include this proviso in addition to the requirement that applicants must demonstrate a social and / or economic need to live in rural County Kildare.</p> <p><u>Rural Housing Density</u> Backland development is considered undesirable in rural areas and shall only be permitted in exceptional circumstances. It is considered the exceptions identified in the draft Plan are occasions where applicants have a real requirement to reside at that specific location due to their livelihood. It is not considered these exceptions should be expanded upon.</p> <p><u>Rural Housing Density</u> One-off housing, which exceeds 25 units per square kilometre is considered undesirable in rural areas and shall only be permitted in exceptional circumstances. It is considered the exceptions identified in the draft Plan relate to occasions where applicants have a real requirement to</p>
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	<p>(iii) The degree to which existing ribbon development would coalesce as a result of the proposed development;</p> <p>(iv) Local circumstances, including the planning history of the area and development pressures.</p> <p>(v) Notwithstanding the above, special regard will be given to the circumstances of immediate family members of a landowner on single infill sites in a line of existing dwellings with 5 or more houses along a 250 metres of road frontage.'</p> <p>Amend KCDP 2023-2029 Footnote number 3 at bottom of page headed 3.13.3 Compliance with the Rural Housing Requirements to read: 'Urban Generated Housing is, for the purposes of this CDPD, housing pressure generated by proposals, or by an application made for a dwelling by persons not covered in Table 3.4 Schedule of Local Need Criteria in accordance with the NPF (NPO 19)'</p> <p>instead of 'Urban Generated Housing is, for the purposes of this KCDP, housing pressure generated by proposals, or an application made for a dwelling in a rural area by persons originating and/or working in urban areas.'</p> <p>Amend the sentence in the first paragraph of 3.13.3 Compliance with the Rural Housing Requirements in KCDP to read: 'In the interim, Kildare Draft Development Plan must establish a policy to facilitate those who can</p>	<p>reside at that specific location due to their livelihood. It is not considered these exceptions should be expanded upon.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
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		<p>demonstrate a social or economic need to live in rural County Kildare’</p> <p>instead of ‘In the interim, Kildare Draft Development Plan must establish a policy to facilitate those who can demonstrate a genuine housing need and a social and/or economic need to live in rural County Kildare’</p> <p>Amend 3.14 Rural Housing Density to read: ...</p> <p>‘backland development will be prohibited (and ribbon development controlled) – though exceptions will be made for (1) an applicant who is actively engaged in agriculture, (2) an applicant who is actively engaged in an occupation that is heavily dependent on the land, (3) an applicant who is building on their family landholding and who complies with the social element of the rural housing policy as set out in Table 3.4.’</p> <p>instead of: ‘...backland development will be prohibited (and ribbon development controlled) – though exceptions will be made for backland sites to active farmers and others who are applying for planning permission on their own land and whose livelihood depends on the land and who can justify a need to live at their landholding, i.e., animal husbandry’</p> <p>Amend HO 056 to read: ‘Carefully manage Rural Dwelling Densities to between 15 and 25 units per square kilometre and ensure that the density of one-off housing does not exceed 25 units per square kilometre, unless (1) the</p>	
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		<p>applicant is actively engaged in agriculture, or unless (2) the applicant is actively engaged in an occupation that is heavily dependent on the land, or unless (3) the applicant is building on their family landholding and complies with the social element of the rural housing policy as set out in Table 3.4.'</p> <p>Instead of: 'Carefully manage Rural Dwelling Densities to between 15 and 25 units per square kilometre and ensure that the density of one-off housing does not exceed 25 units per square kilometre, unless the applicant is actively engaged in agriculture, or an occupation that is heavily dependent on the land and building on their own landholding.'</p> <p>Amend 3.14 Rural Housing Density to read: 'Generally, such one-off housing would be facilitated only in very exceptional circumstances, where there is a significant need demonstrated, for example, where (1) an applicant is actively engaged in agriculture, or where (2) an applicant is actively engaged in an occupation that is heavily dependent on the land, or where (3) an applicant is building on their family landholding and complies with the social element of the rural housing policy as set out in Table 3.4.'</p> <p>instead of: 'Generally, such one-off housing would be facilitated only in very exceptional circumstances, where there is a significant need demonstrated, for example, those actively engaged in agricultural or in an occupation heavily dependent on the land.'</p>	
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501	Fiona O'Loughlin	The submission expresses concerns that the rural housing policy is becoming increasingly restrictive, and there should be regard to family clusters being allowed, and an increase in serviced sites.	<p>Chief Executive's Response</p> <p>The Draft Plan does not rule out building houses in the countryside. However, there are qualifying criteria that must be met by prospective applicants to demonstrate their ability to comply with the local need criteria which are set out in Table 3.4 and Section 13.3 of the Draft Plan. For those who meet the qualifying criteria there are other considerations such as siting and design, environmental considerations and rural density that may result in qualifying applicants being unsuccessful.</p> <p><u>Family clusters</u></p> <p>In relation to cluster type developments in rural areas, the text has been amended under the Draft Plan to encourage a greater flexibility of approach when it comes to assessing same. Clear guidance regarding clustering in rural areas is also provided in Appendix 4 (Rural House Design Guide) of the Draft Plan.</p> <p><u>Serviced Sites</u></p> <p>The Draft Plan has also proposed a number of locations for 'serviced sites' throughout Kildare, and particularly in the smaller settlements in order to provide a sustainable alternative to one off housing in the open countryside. Objective HO O54 (Chapter 3) reflects the need for prospective applicants for such sites to comply in full with the local need criteria as set out in Table 3.4 of the Plan in this regard.</p> <p>Chief Executive's Recommendation</p> <p>No change to the Draft Plan.</p>
351	Eco Advocacy	In relation to rural housing, the submission refers to the Local Need Assessment Criteria and submits that the reference to a landholding of 25 acres is too	<p>Chief Executive's Response</p> <p>It is noted that the submission refers to 25 acres as being the threshold referred to in Category A of Table 3.4</p>

		<p>arbitrary and does not take account of intensive rural enterprises which will not require anything like 25 acres of ground. Therefore, it is recommended that this arbitrary restriction be reviewed with a view to accommodating the type of industry alluded to above.</p>	<p>'Schedule of Local Need in accordance with the NPF (NPO 19)' in Section 3.13.3 of the Draft Plan.</p> <p>In relation to the requirement to own 15 hectares to be classed as a farmer, it should be noted that there are two applicant categories in Table 3.4 'Schedule of Local Need Criteria in accordance with the NPF (NPO 19)', namely, Category A – Economic and Category B – Social. For the purposes of demonstrating compliance with the rural housing requirements, an applicant is required to comply with either Category A or B.</p> <p>With reference to the subject of the submission, it is noted that Category A(ii) states that the owner/operator of a farming/horticultural/forestry/bloodstock/animal husbandry business must be engaged in that farming activity on a daily basis, as their main employment on an area less than 15ha. It is noted that same must be demonstrated through the submission of documentary evidence to include confirmation that the farming/agricultural activity forms a significant part of the applicant's livelihood.</p> <p>Therefore, the provisions of Category A(ii) as set out in Table 3.4 of the Draft Plan does take account of intensive rural enterprises which will not require 25 acres of ground, as referenced in the submission.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
510	Sean O'Fearghail T.D.	<p>In the paragraph on Zone 2 – Stronger Rural Areas, in relation to the idea that the facilitation of rural generated housing applications will be dependent on the viability of smaller towns and rural settlements.</p>	<p>Chief Executive's Response It is the intention of the Draft Plan that rural generated housing demand will be facilitated having regard, inter alia, to an applicant's genuine local and housing need, together</p>

		<p>This is a contradictory position for the Council to adopt and is one which will prove unimplementable. i.e. qualifying rural applicants with own land available will be advised to purchase expensive sites or houses in rural towns and villages thereby placing them in an impossible situation.</p> <p>Within Table 3.4 Schedule of Local Needs Criteria – Category A Economic – Two terms are used to describe a farmers’ activity i.e. their ‘main employment’ or a significant part of the applicant’s livelihood. This phraseology will inevitably lead to confusion. It is proposed that ‘main’ be deleted and significant part be included as main criteria.</p>	<p>with the protection of key economic, environmental, natural and heritage assets.</p> <p>It is intended that the Draft Plan will provide viable alternatives to one-off dwellings through the identification of lands for serviced sites in various small towns, villages, and rural settlements. Such sites will provide local people with the opportunity to build their own dwelling in serviced settlements close to their family home (refer to Volume 2 of the Draft Plan). Objective HO O54 (Chapter 3) reflects the need for prospective applicants for such sites to comply in full with the local need criteria as set out in Table 3.4 of the Plan</p> <p>To change the word ‘main’ for ‘significant’ in Table 3.4 as suggested is not considered appropriate. ‘Main’ indicates that farming comprises the majority part of a persons’ occupation. The use of the word ‘significant’ is considered to be overly subjective and could relate to level of importance of farming as an occupation just as it could to the amount of time spent farming which are two different things.</p> <p>Chief Executive’s Recommendation No change to Draft Plan.</p>
510	Sean O’Fearghail T.D.	<p>The overwhelming direction of this plan is towards excessive density. This density when taken together with the Draft Plan’s HNDA figures indicating a massive drop in home ownership together with an increase in social and supported housing accommodation will have a profound impact on the demography of County Kildare.</p>	<p>Chief Executive’s Response A key objective of the NPF and RSES is to increase the density of development in all built-up areas, in order to achieve the indicated population targets in a compact and sustainable manner. The Draft Plan is statutorily obliged to comply with these national and regional documents.</p> <p>The HNDA does indicate a drop in home ownership and an increase in social and affordable housing. It is recognised</p>

			<p>that there is an ongoing housing and affordability crisis in the county. Setting policy on housing affordability lies outside the scope of the Local Authority though a number of policies, objectives and actions have been included in the Draft Plan, which have been informed by the HNDA, an evidence based assessment of housing needs for County Kildare. The Government's Housing for All (2021) programme is also supported in the Draft Plan.</p>
			<p>Chief Executive's Recommendation No change to Draft Plan.</p>
413.	Kildare Public Participation Network	<p><u>3.13 Sustainable Rural Housing</u> Submission refers to the provisions of objective HO O50 relating to the removal/reinstatement of native hedgerows and recommends that this objective be amended to more comprehensive and strongly recommend that any requirement to reinstate a hedgerow should in all cases stipulate that only native species of trees or shrubs of native origin and provenance be used.</p>	<p>Chief Executive's Response While there are many policies within the plan encouraging the planting of native species it is not always appropriate to do so in all settings. Many non-native tree species can also have benefits for pollinators.</p>
			<p>Chief Executive's Recommendation No change to Draft Plan.</p>
560	Cllr. Suzanne Doyle	<p>The submission recommends that the following text be added to Objective HO O49: "Recognising the current housing crisis and in deference to the Flemish Decree, that Kildare County Council will extend an amnesty on occupancy clauses on all derelict/unfinished houses within the rural countryside that were built with a planning permission dated prior to 2015."</p>	<p>Chief Executive's Response The Department of Housing, Local Government and Heritage have indicated that new Rural Housing Guidelines are being prepared to address rural housing issues and to take account of the Flemish Decree, the NPF and broader settlement context. In the interim, Kildare Draft Development Plan must establish a policy to facilitate those who can demonstrate a genuine housing need and a social and/or economic need to live in rural County Kildare. Urban generated rural housing will not be considered.</p>

			<p>It is noted that Objective HO O49 refers to the requirement that new dwellings incorporate principles of sustainability and green principles in terms of design...as set out in Section 15.4 of Chapter 15 (Development Management Standards) and the Rural Housing Design Guide contained in Appendix 4.</p> <p>The submission relates to the planning enforcement of a condition attached to a grant of planning permission and is outside the scope of this land use plan.</p>
			<p>Chief Executive's Recommendation No change to Draft Plan.</p>
560	Cllr. Suzanne Doyle	<p>The submission recommends that Policy HO P20 be amended to include the following text: "(vi) Allow for a 30% increase in footprint without the need to demonstrate local need criteria."</p> <p>It is stated that many of these old cottages are simply two rooms that do not reasonably offer enough space to accommodate a modern family, particularly with working from home requirements.</p>	<p>Chief Executive's Response It is noted that the Council will support the retention and sensitive refurbishment of vernacular buildings within the county and Policies HO P17, HO P18, HO P19 and HO P20 refer. In relation to the points made in the submission, a person wishing to build a dwelling or refurbish a traditional structure in rural County Kildare must comply with the terms of Table 3.4 'Schedule of Local Need Criteria in accordance with the NPF (NPO 19)' irrespective of the size of the footprint of the proposed works. Allowing a 30% increase in footprint without the need to demonstrate local need would lead to uncertainty. The aim of the provisions and guidance contained in Section 3.13 'Sustainable Rural Housing' of the Draft Plan is to provide a clearer quantitative framework when assessing a rural areas' capacity to accommodate additional rural housing.</p>
			<p>Chief Executive's Recommendation No change to Draft Plan.</p>

560	Cllr. Suzanne Doyle	The submission recommends the removal of Objective HO O56 in relation to single rural houses with densities of over 25 per kilometre.	<p>Chief Executive's Response In Objective HO O56 it is an objective of the Council to carefully manage Single Rural Dwelling densities to between 15 and 25 units per square kilometre and ensure that the density of one-off housing does not exceed 245 units per square kilometre, unless the applicant is actively engaged in agriculture, or an occupation that is heavily dependent on the land and building on their own landholding.</p> <p>It is considered that the proposed rural density guidance will not necessarily be more restrictive than the current CDP but will provide a clearer quantitative framework when assessing a rural areas' capacity to accommodate additional rural housing. The intention of the new guidance as outlined in Chapter 3 and Appendix 11 is to provide an assessment of a range of factors including, but not limited to piecemeal and haphazard development. Under the current Plan assessing a rural areas' capacity to facilitate additional housing is not always clear for a prospective applicant to decipher hence the need for additional guidance in this regard.</p> <p>Section 3.14 of Chapter 3 should also be noted and reads as follows; It is not intended to be a rigid tool and there may be instances where the existing pattern of development may facilitate some consolidation of one-off housing.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
468	Ann Behan	Many of the objectives in relation to Section 3.13 'Sustainable Rural Housing' are welcomed. It is	<p>Chief Executive's Response Noted and agreed.</p>

		submitted that HO O50 is not grammatically correct and does not provide a clear meaning.	<p>Chief Executive's Recommendation Amend HO O50 as follows: Require that all applications to demonstrate the ability to provide safe vehicular access to the site where without the necessity to remove extensive stretches of native hedgerow and trees. All applications will be considered on a case-by-case basis, having regard to, the quality of the hedgerow, species composition, site context and proposed mitigation measures or can demonstrate existing hedgerow is not native and provide a landscape design to reinstate a hedgerow to outline proposals for replacement of same or comparative. Note: The need for the removal of extensive roadside hedgerow may indicate that the site is unsuitable for development.</p>
HOUSING – GENERAL			
405	Kildare Climate Action Linkage Group	<p><u>Regeneration, Compact Growth and Densification</u> Submission refers to Objective HO O13 and recommends the insertion of the following actions in Section 3.9.</p> <p>Additional Action 1 - Develop a staged plan to populate and actively manage the Vacant Sites Register (VSR) over the lifetime of this plan.</p> <p>Additional Action 2 - Actively enforce the Urban Regeneration and Housing Act 2015 using the VSR.</p> <p>Additional Action 3 - Actively enforce the Derelict Sites Act, 1990 (as amended by the Planning and Development Act, 2000) using the VSR.</p>	<p>Chief Executive's Response Additional Action 1 is not accepted given the Zoned Land Tax initiative that will replace the Vacant Sites Register. In relation to the proposed additional actions 2 & 3 these are not accepted. However, the Council will implement the provisions of the Derelict Sites Act and Urban Regeneration and Housing Act 2015 (as amended) which is recognised throughout the Draft Plan (Objective RE O31, RE O32, RET A3, and Section 4.7, and 16.3.3, refer).</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

390	Philip O'Reilly	<p><u>Building Heights</u> The submission states that there should be better objectives regarding appropriate limits to the heights and sizes of development to prevent vertical and lateral urban sprawl.</p>	<p>Chief Executive's Response As per the Ministerial Guidelines relating to Urban Development and Building Heights (2018) land use plans shall not provide for blanket numerical limitations on building heights (SPPR 1, refers). In the context of urban sprawl one of the overarching guiding principles of the Draft Plan is to ensure compact growth in terms of the future development of Kildare. This is in line with national Strategic Objectives contained in the National Planning Framework.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
385.	County Kildare Chamber	<p><u>Infill and Brownfield Housing</u> The Chamber would like to see the Development Plan be more imaginative in its approach to the provision of additional housing units and their potential for associated townscape and public realm improvements. There is little emphasis on encouraging derelict and brownfield sites being brought back into use, reusing and reimagining empty structures, renovating long-vacant commercial units for residential accommodation, living over-the-shop scheme, Live-Work units and the subdivision of large dwellings into multiple units</p> <p>The Chamber welcomes the serviced sites initiative, age friendly housing complexes, the cautious development of small towns and villages and the proposed rural housing policy.</p>	<p>Chief Executive's Response <u>Infill and Brownfield Housing</u> In relation to the Development Plan not being imaginative in its approach to the provision of additional housing units and little emphasis being placed on encouraging derelict and brownfield sites being brought back into use, reusing and reimagining empty structures, renovating long-vacant commercial units for residential accommodation, living over-the-shop scheme, live-work units and the subdivision of large dwellings into multiple units. Section 3.9 (Regeneration, Compact Growth and Densification) contains policies and objectives, which address many of the above concerns. Also, it is an action of the Council under UD A5 of Chapter 14 to continue to tackle residential vacancy within town centres through various identified initiatives. It is considered that the policies, objectives and actions in the Draft Plan as outlined above satisfactorily address the issues raised.</p> <p><u>Serviced Site Initiative</u></p>

			<p>The comments made in the submission regarding the serviced sites initiative, age friendly housing and the rural housing policy are noted and welcomed.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
555	Irish Solar Energy Association	<p><u>Solar Panels</u> Section 3.5 should incorporate a requirement that all social housing have solar panels installed as per Climate Action Plan Action 64.</p> <p>Objective HO O49 should include a requirement that all new builds have solar panels installed as per Part L of the Building Regulations, Climate Action Plan 2019 Action 64, and RePower EU obligations.</p> <p>All public buildings should have solar panels installed in line with Climate Action Plan Actions 62 & 65.</p>	<p>Chief Executive's Response In accordance with the Draft Development Guidelines (2021), when preparing development plans, planning authorities must exercise caution not to inappropriately stray into the operation of other statutory codes and regulatory regimes that relate to the development sector, but are outside the remit of a county or city development plan. While Section 7.6 sets out the Council's policy and objectives with respect to solar energy, to require the installation of solar panels in any instance is a matter that is outside the remit of the Draft Development Plan, which is primarily a land use plan.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
507	Brian McArdle	<p><u>Mix of Dwelling Types</u> The submission states that new developments should be a mix of housing types – low to mid-rise apartment blocks with ground floor for elderly or people with disabilities and upper floors for singles and couples, duplexes for smaller families and houses for larger families.</p>	<p>Chief Executive's Response The Draft Plan sets out to ensure that new residential development provides a wide variety of housing types that reflect and cater for the diverse housing needs of the county's population.</p> <p>Policy HO P7 encourages the establishment of sustainable residential communities by ensuring a wide variety of housing typologies and tenures is provided throughout the county.</p>

			<p>It is an objective of the Council that new residential developments provide for a wide variety of housing types sizes and tenures; specify target housing mixes, as appropriate for certain sites and settlements as part of the Local Area Plan process; require the submission of a 'Statement of Housing Mix' with all applications for 10 or more residential units; and require that all new residential developments in excess of 5 residential units provide for a minimum of 20% universally designed units in accordance with the requirements of 'Building for Everyone: A Universal Design Approach' published by the National Disability Centre for Excellence in Universal Design (HO O16). It is noted that further detail in respect of unit mix is set out in Chapter 16: Development Management Standards. It is considered that the policies and objectives contained in Chapter 3 of the Draft Plan adequately address the issues raised in the submission.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
358	Deirdre Lane	<p><u>Tiny Homes</u> KCC should legislate for the inclusion of Tiny Homes of various designs in the county as they are sustainable, energy efficient, non-intrusive and affordable. There are great examples around the world.</p>	<p>Chief Executive's Response This type of development is largely not considered appropriate and would be out of keeping with national guidance such as the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009), Urban Development and Building Height Guidelines, DHLGH (2018) and the Design Standards for New Apartments - Guidelines for Planning Authorities (March 2018). These guidelines have informed the minimum standards for residential development in Chapter 15 'Development Management Standards'.</p> <p>However, exceptions may be made as outlined in Section 3.11 in Chapter 3 'Housing'. Some exceptions in which</p>

			<p>minimum space standards may be relaxed include specialist housing for the elderly, people with disabilities, the homeless, Travellers, those in need of emergency accommodation including those fleeing domestic violence, who may be accommodated in a manner that is suitable to the various specific needs.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
507	Brian McArdle	<p><u>Vacant and Derelict Sites</u> The submission proposes the taxation or the compulsory purchase of derelict sites or vacant units.</p>	<p>Chief Executive's Response It is noted that there are mechanisms under the Planning and Development Act 2000 (as amended) to deal with derelict sites, vacant sites and the compulsory purchase of derelict and vacant sites, which are outside the scope of this land use Plan.</p> <p>In addition, it is noted that the establishment of the Zoned Land Tax (ZLT) in 2023, will further assist in efforts to appropriately develop regeneration sites.</p> <p>From a land use perspective, a key objective of the NPF and RSES is to increase the density of development in all built-up areas, in order to achieve the indicated population targets in a compact and sustainable manner. Therefore, a key objective of the Draft Plan will be the use of under-utilised land and buildings, including, inter alia, vacant and under-occupied buildings.</p> <p>In that regard, Objective HO O13 supports and promotes the renovation and re-use of obsolete, vacant and derelict homes, through the following measures: Encourage the redevelopment and reuse, including energy retrofitting, of the existing housing stock; support Government programmes and incentives to bring empty homes into use</p>

			<p>through various means, including potential expansion of the Town and Village Renewal Scheme as referred to in the Government's Rural Development Policy 2021-2025; to maximise the effective use of local authority housing stock and minimise local authority housing stock vacancy, including through effective refurbishment and retrofitting of older stock where appropriate; and promote the conversion of vacant properties into new social and affordable homes through schemes including the Repair and Leasing Scheme and the Buy and Renew Scheme. Kildare County Council will endeavour to promote these schemes and will encourage owners of vacant properties to avail of these schemes, directly or in co-operation with Approved Housing Bodies.</p> <p>It is considered that the policies and objectives contained in Chapter 3 of the Draft Plan adequately address the issues raised in the submission.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
434.	Maynooth Community Council	<p><u>Maynooth – Student Accommodation</u> Supports the objectives in Chapter 3 to prevent urban sprawl and support compact growth. Submits that the 10-minute town concept is something that's achievable in Maynooth. Notes that Section 3.11 has some excellent objectives around social inclusion. Submits that in line with HO O36 to provide student accommodation in Maynooth and on campus where possible rather than resorting to HO O37 which provides accommodation in neighbouring towns increasing the need for students to commute in large numbers and diluting the student experience.</p>	<p>Chief Executive's Response It should be noted that the local area plan for Maynooth, which forms part of the Council's work programme for 2022, will examine and respond to the issue of student accommodation provision for the town in greater detail.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>

522	Brendan Colivet	<p>This submission refers specifically to multi-generational housing.</p> <ul style="list-style-type: none"> • The Kildare Age Friendly Programme (2010) is a useful starting point on this issue. It aims to support people of all ages to actively participate in community activities, to live safely and securely in their own homes, to stay connected to people, to remain healthy and active in their communities and to be treated with respect regardless of age. • There is an ongoing case study into a Multigenerational/Integrated Community Development in Co. Kildare, which may result in Integrated Liveable Communities. • Liveability is defined as containing 8 domains: Housing, Outdoor Space and Buildings, Transportation, Communication & Information, Civic participation and Employment, Respect and Social Inclusion, Health Services and Community Supports and Social Participation. • The Men's Shed Movement in Kildare was identified in a global study as one of the 16 best global examples of the 8 domains of liveability. • KCC should examine the potential of new housing models such as multi-generational integrated community development to ensure older people stay socially connected in their community and to provide social care. • The Plan should include a policy objective that KCC will consider the changing 	<p>Chief Executive's Response</p> <p>Section 3.11.1 of the Plan provides a range of objectives (HO O21, HO O22, HO O23, HO O25) in support of multigenerational housing and includes the following statement: 'Older people require housing that is appropriate and responsive to more complex needs, enabling them to enjoy more active, healthy and socially connected lives and to age healthily and safely within their community.'</p> <p>In relation to planning for the predicted growth of an ageing population, Objective HO O16 requires the submission of a 'Statement of Housing Mix' with all applications for 10 or more residential units. The mix of house types proposed in an area should be influenced by a range of factors including the need to provide a choice of housing, suitable to all age groups and persons at different stages of the life cycle; the existing social mix in the area; the need to cater for specialist groups such as the elderly and the saleability of different types of housing.</p> <p>In addition, the Plan includes an action (HO A2) to undertake an evidence-based qualitative assessment to establish the demand for age-specific housing options, including 'right-sizing' within County Kildare.</p> <p>With regards to identifying appropriate sites, it is an objective (HO O22) of the Council to integrate housing options for elderly persons with mainstream housing through the designation of specific land uses at appropriate and optimised strategic locations in mandatory Local Area Plans in County Kildare.</p>
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		<p>demographics in the County and plan for the predicted growth of an ageing population.</p> <ul style="list-style-type: none"> The Plan should include a policy objective that KCC will identify appropriate urban and rural sites to satisfy and sustain the need for community integration and enhancement schemes. 	<p>Based on the above, it is considered that Chapter 3 of the Plan adequately addresses the issues raised in this submission.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
560	Cllr. Suzanne Doyle	<p><u>Part V Provisions</u> The submission recommends that Policy HO P9 be amended to include the following text: (c) Where Part V provision on planning applications is being accepted off site, that the units offered be located within the same settlement and preferably within the catchment area of the same primary school.</p>	<p>Chief Executive's Response HO P9 refers to the Council's policy in relation to the implementation of the provisions of Part V of the Planning and Development Act 2000 (as amended) that governs the State's policy on the provision of social and affordable housing throughout the state.</p> <p>The Housing Section of the Council has advised that the provision of Social Housing through the implementation of Part V of the Planning and Development Act 2000 (as amended) is a key pillar of Kildare County Council's housing strategy and in particular the provision of housing relative to the various requirements across the county, both in terms of housing type and geographic demand. Key to this strategy is the ability to match this geographic and housing type demand with the unit type that comes available to the Council by way of Part V provision.</p> <p>The Council endeavours to always ensure that all Part V units are provided and allocated within the confines of the subject development. As detailed above however, the Council is required to match Part V house types with geographical housing demand and, in some instances, the Local Authority is not in control of the housing type that comes available to it through this process. For example, a development might consist of all 4-bed dwellings when the demand in that particular area is for 1-bed and 2-bed units;</p>

			<p>similarly, the development might consist of 2-bed apartments when the demand in the area is for 3-bed units.</p> <p>In order to ensure that an appropriate supply of social housing is maintained through Part V provision, it is important that the Housing Section is therefore afforded a level of flexibility for when the unit types proposed in a particular development are not suitable to the social housing needs and demand in the location of the development. In these instances, off-site provision will better address the social housing needs in the county.</p> <p>Noting this, the submission to HO P9, and proposed amendment, will dilute this flexibility and could potentially have implications for matching housing supply to the needs of those on the Local Authority's social housing list.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
SPECIALIST HOUSING			
448	Pat O Mahony	<p><u>Housing for Older People</u> This submission requests that a specific land use zoning is applied to land use plans for retirement villages.</p> <p>The Draft Plan does not include sufficient practical proposals to address the challenge of an ageing population. Commitments to supporting, encouraging and facilitating the provision of appropriate housing for older people do not ensure that something will happen.</p>	<p>Chief Executive's Response The comments of the submission are noted. In respect of HO O22 which does require that mandatory local area plans designate specific land uses to accommodate the needs of older people, it is considered that this should refer to Specific Local Objectives (SLO). Thereby at local area plan level key opportunity sites for the provision of housing for elderly such as retirement villages can be identified, where appropriate.</p> <p>In relation to Newbridge this local area plan is on the Council's work programme for 2022/2023 for which</p>

	<p>Research has shown that there is an interest in retirement villages, they are every bit as essential as pre-schools. HO P7 and HO O16 are not sufficient.</p> <p>It is not just sheltered housing that needs to be located close to public transport, community facilities, retail and other amenities, all housing for older people should be.</p> <p>For the elderly to 'downsize' the smaller home needs to be appropriately designed. Research in Australia shows that most older people move to retirement villages for security.</p> <p>The submission states that what is required is to proactively zone both brown and greenfield sites at the centre of communities and close to all amenities exclusively for elder-friendly housing developments – retirement villages.</p> <p>Every village should have a retirement village suited to its needs and zoning is essential to this happening.</p> <p>Objectives (HO 021 – HO 026) and actions (HO A1 – HO A2) are desirable and laudable in their own right but will not necessarily facilitate the building of retirement villages. With regard to HO O22 how will this be facilitated unless there is a specific zoning provision in LAPs.</p> <p>The submission states that there would be merit in establishing Retirement Village Advocacy Groups (RVAGs) in every community to work with the planning personnel in KCC to develop specific plans</p>	<p>preliminary work has commenced. The possibility of applying a SLO against the sites identified in the submission can be considered during the plan preparation process.</p> <p>Chief Executive's Recommendation Amend HO O22 as follows: Require Support the provision of alternative accommodation, such as age appropriate homes, independent and assisted living units, day-care facilities, nursing homes and specialised care units (e.g. dementia specific units) to meet the needs of older people and to facilitate the provision of a range of housing options for elderly older persons in central, convenient and easily accessible locations, integrating such housing with mainstream housing through the designation application of a location specific objective (Specific Local Objectives (SLO)) specific land uses at appropriate and optimised strategic locations particularly on Council owned land in mandatory Local Area Plans in County Kildare.</p>
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		<p>for retirement complexes/villages in each community. The establishment of these groups might be done, in the first instance, in conjunction with PROBUS or Rotary but their establishment might be expected to take off relatively quickly, if properly promoted.</p> <p>The submission outlines three sites in Newbridge that could be used for a retirement village: Patrician Brothers' Monastery, the large field opposite Duffy's garage on the Dublin Road, the publicly owned site in Market Square.</p>	
405	Kildare Climate Action Linkage Group	<p><u>Older People</u> Objectives HO O21 - HO O26 are welcomed.</p> <p>It is submitted that a similar actionable commitment as HO O42 should be made to integrate the Property Interest Register and Land Development Agency (LDA) maps, and to work in partnership with the LDA to identify state owned sites in urban centres to provide housing for older people, within walking distance of shops and services and public transport along the lines of McAuley Place, Naas.</p> <p>The submission provides statistics for people living with dementia in Ireland and references the Royal Town Planning Institute practice advice 'Dementia and Town Planning – Creating better environments for people living with dementia' updated September 2020. In addition, the submission highlights that insufficient investment in digital training for older people means that they are being left behind in the digital revolution and the submitter would like to see a firm commitment by KCC to respond to this.</p>	<p>Chief Executive's Response With regards planning for Dementia/Alzheimer friendly environments, Objective HO O22 supports the provision of specialised care units (e.g. dementia specific units) and Objective HO O25 supports and promotes the delivery of specialist accommodation appropriate to the specific needs and wishes of older people.</p> <p>Section 3.11.1 refers to housing for older people and Objective HO O21 to HO O26 support the provision of same. Objective HO O42 also relates to the Council working in partnership with the Land Development Agency (LDA) for social and affordable housing. Therefore, it is considered that the proposed new objective is already addressed sufficiently in the draft Plan.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

		<p>The submission proposes the following new objectives:</p> <ul style="list-style-type: none"> • Additional Objective - Integrate the Property Interest Register and, where feasible, work in partnership with the Land Development Agency (LDA) to target sites within walking distance of shops and services and public transport for the provision of housing for older people in County Kildare. • Additional Objective - That KCC will configure and integrate planning for Dementia/Alzheimer friendly environments into their plans. 	
560	Cllr. Suzanne Doyle	<p><u>Housing for Older People</u> The submission recommends that the following text be added to Objective HO A3 of Section 3.11.2 of the Draft Plan, “Promote the use of innovative solutions that positively address the needs of Kildare’s aging population.”</p>	<p>Chief Executive’s Response In Action HO A3, the Council will “Ensure that all Kildare County Council new build housing stock is in compliance with Part M of the Building Regulations.” It is noted that although the submission refers to Kildare’s aging population, Action HO A3 is contained in Section 3.11.2 that refers to ‘People with Disabilities’.</p> <p>It is a strategic principle of the development plan to develop a network of sustainable neighbourhoods which have a range of facilities, a choice of tenure and universally designed adaptable house types, promote social inclusion and integration of all minority communities. The Council recognises that there are a number of groups with specific design and planning needs that must be considered in the planning and design of the built environment and in the location of social and community facilities.</p> <p>In particular, the Council accepts that older people require housing that is appropriate and responsive to more complex</p>

			<p>needs, enabling them to enjoy more active, healthy and socially connected lives and to age healthily and safely within their community.</p> <p>It is noted that the 'Housing Options for Our Aging Population Policy Statement', jointly published in 2020 by the Department of Housing, Planning and Local Government and the Department of Health recognises the contribution that the McAuley Place development that is located in Naas town centre that provides self-contained apartments for older people as a national exemplar model of housing for older people. Kildare County Council will seek to identify further opportunities for such developments in each MD throughout the County for the Council (and other appropriate bodies) to expand this supported housing market.</p> <p>In that regard, the Draft Plan contains a number of objectives and actions to support and promote such development at Section 3.11.1 that includes, inter alia, the following:</p> <p>HO O23 - supports the provision of specific purpose-built accommodation</p> <p>HO O22 - requires the provision of alternative accommodation, such as age-appropriate homes, independent and assisted living units, day-care facilities, nursing homes specialised care units (e.g. dementia specific units);</p> <p>HO O24 - promotes the co-location of facilities (including child-care facilities and facilities for the elderly) at sustainable locations where they can avail of existing and planned social and community infrastructure;</p> <p>HO O26 – Engage and develop strategies with the Approved Housing Bodies with responsibility for housing for</p>
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			<p>older people to develop accommodation in town centres more suited to those with reduced mobility.</p> <p>Section 3.11.1 specifies two actions that seek to identify further opportunities to expand the McAuley Place model of development (HO A1) and undertake an evidence-based qualitative assessment to establish the demand for age-specific housing options, including 'right-sizing' within County Kildare. It is considered that Section 3.11.1 of the Draft Plan adequately addresses the issues raised in the submission.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
501	Fiona O'Loughlin	<p><u>Housing for the elderly</u> The submission states that the Plan should look at inter-generational housing and the requirements for step down housing prior to nursing homes as outlined by Pat O'Mahony in his book "rethinking housing options for senior citizens"</p>	<p>Chief Executive's Response Section 3.11.1 of the Plan provides a range of objectives (HO O21, HO O22, HO O23, HO O25) in support of multigenerational housing and includes the following statement: 'Older people require housing that is appropriate and responsive to more complex needs, enabling them to enjoy more active, healthy and socially connected lives and to age healthily and safely within their community.'</p> <p>In relation to providing step down housing prior to nursing homes, Action HO A1 of Chapter 3 should be noted in this regard which reads as follows: It is an action of the Council to promote McAuley Place, Naas, as a national exemplar model of housing for older people and will seek to identify further opportunities in towns in each MD throughout the County for the Council (and other appropriate bodies) to expand this supported housing market.</p>

			<p>In addition, the Plan includes a further action (HO A2) to undertake an evidence-based qualitative assessment to establish the demand for age-specific housing options, including 'right-sizing' within County Kildare.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
405	Kildare Climate Action Linkage Group	<p><u>Community-Led Housing (CLH)</u> It is noted that the Plan makes no reference to Community-Led Housing (CLH). CLH is an umbrella term, encompassing a wide range of approaches, including cooperative housing, co-housing, Community Land Trusts (CLTs), and self-help housing.</p> <p>It is submitted that the Self Organised Architecture (SOA) organisation have released publications on this topic which contributed to the formulation of the Affordable Housing Act 2021. With this recent addition to the Affordable Housing Act, KCC can take the lead in implementing community-led solutions that can positively alleviate the housing crisis across this county. Contributing to efforts to achieve SDG 1, 3, 10, 11 and 17.</p>	<p>Chief Executive's Response The Aim of Chapter 3 (Housing) is to show how the Plan intends to accommodate the full range of current and future housing needs of all members of society throughout the county while giving clear guidance on making provision for specialised housing requirements and providing for the needs of communities in order to deliver sustainable residential communities across the county. This Aim is then transposed into a number of policies and objectives throughout Chapter 3. It is not considered necessary to identify the various means by which housing may be delivered. Appendix 1 (Housing Need Demand Assessment) sets out the full and comprehensive evidence base that has informed Chapter 3 of the Draft Plan.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
405	Kildare Climate Action Linkage Group	<p>Taking account of the student accommodation and rental properties targets, the submission questions how KCC plan to manage and incentivise domestic energy efficient measures to be taken in non-owner-occupied properties?</p>	<p>Chief Executive's Response Section 7.12.4 of chapter 7 contains objectives, actions, and targets in relation to energy efficiency in buildings with an overarching policy (EC P14) which is to "require high levels of energy conservation, energy efficiency and the use of sustainable and renewable energy sources in new and existing buildings". One of the targets (EC T3) is to "retrofit all existing council housing stock before 2030".</p>

			Chief Executive's Recommendation No change to the Draft Plan.
468	Ann Behan	In relation to targets for student accommodation and rental properties, how does the Council plan to manage and incentivise domestic energy efficient measures to be taken in non-owner-occupied properties?	Chief Executive's Response See response to submission 405 above.
			Chief Executive's Recommendation No change to the Draft Plan.
520	Newbridge Community Development	<u>Travellers</u> There is a need for additional supports for Travellers in the area. At Kildare Traveller Action we support 1200 Travellers in Kildare and West Wicklow. Some funding and other supports for outdoor projects like Traveller womens' and men's sheds would be a great initiative, advocating for sustainability and the promotion of healthy minds and bodies.	Chief Executive's Response Section 3.11.4 in Chapter 3 'Housing' outlines a number of objectives to support Travellers throughout the county.
			Chief Executive's Recommendation No change to the Draft Plan.
557	University College Dublin – Lyons Farm	<p><u>Summary of Appendix from Tom Philips & Associates</u></p> <p>Section 3.11.6 (Third Level Students) of the Draft Development Plan incorrectly states inter alia that: "Maynooth University is the only third level institution in County Kildare and it has a total enrolment of 13,700 students." UCD also has a major presence in Kildare.</p> <p>The submission requests that the following text and objective be inserted into Chapter 3.</p> <p><u>Amend section 3.11.6 (Third Level Students)</u> Students are an increasingly important part of the housing landscape in Kildare, particularly in Maynooth. According to Census 2016, 20,559</p>	<p>Chief Executive's Response</p> <p>The UCD Lyons Farm gets students from the School of Agriculture and Food Science and the School of Veterinary Medicine in University College Dublin These students will spend time at the UCD Lyons Farm across the four years of their undergraduate degree programmes, however their principal base remains at the UCD campus in Belfield. It is not considered that the third level institution at the UCD Lyons Farm has any significant impact on housing in the North Kildare area.</p> <p>The submission is correct in stating that Maynooth University is not the only third level institution in County Kildare. However, it is considered, the principal university within Co. Kildare.</p>

		<p>residents of County Kildare reported their principle economic status as students (12.2% of all those aged 15 and over). Also recorded by Census 2026 was that 25.3% of the population of Maynooth town over the age of 15 are students, compared to an average of c. 11% for the other towns within the vicinity, including Leixlip and Kilcock which are connected to Maynooth via a rail line and also compared to the state average of 11.4%. Maynooth University and University College Dublin are the third level institution in County Kildare. The former has a total of enrolment of 13,700 students: the latter 32,500.</p> <p>HO O37A; Support increased supply of student accommodation in Maynooth, Kilcock, Leixlip and Celbridge to meet the anticipated student accommodation demand generated by Maynooth University and University College Dublin.</p> <p>Applications for change of use from student housing to any other form of housing will be resisted without adequate demonstration that an over-provision of student housing exists.</p>	<p>Chief Executive's Recommendation Amend the text of section 3.11.6 Students are an increasingly important part of the housing landscape in Kildare, particularly in Maynooth. According to Census 2016, 20,559 residents of County Kildare reported their principle economic status as students (12.2% of all those aged 15 and over). Also recorded by Census 2026 was that 25.3% of the population of Maynooth town over the age of 15 are students, compared to an average of c. 11% for the other towns within the vicinity, including Leixlip and Kilcock which are connected to Maynooth via a rail line and also compared to the state average of 11.4%. Maynooth University is the only principal third level institution in County Kildare and it has a total enrolment of 13,700 students.</p>
207.	Deirdre Lane	<p>Will the CDP create an inclusive affordable housing strategy for artisan makers to afford to live and those with lesser incomes.</p> <p>The Kildare County Development Plan should support new and innovative social finance initiatives to give power to local communities</p>	<p>Chief Executive's Response In relation to creating an inclusive affordable housing strategy for artisan makers to afford to live and those with lesser incomes, Chapter 3 provides a range of supporting policies and objectives to promote the right quantity of appropriate housing in the right locations that are accessible and affordable for all residents of the county through the implementation and delivery of the Housing Strategy and Housing Need & Demand Assessment (HNDA).</p>

		<p>Provide housing for older people, within walking distance of shops and services and public transport along the lines of McAuley Place, Naas.</p>	<p>In relation to providing housing for older people, within walking distance of shops and services and public transport along the lines of McAuley Place, Naas, Action HO A1 of Chapter 3 should be noted in this regard which reads as follows:</p> <p>It is an action of the Council to promote McAuley Place, Naas, as a national exemplar model of housing for older people and will seek to identify further opportunities in towns in each MD throughout the County for the Council (and other appropriate bodies) to expand this supported housing market.</p> <p>Having regard to the proposal that the Kildare County Development Plan should support new and innovative social finance initiatives to give power to local communities, it should be noted that the County Development Plan is a land use plan and it is therefore outside of the scope of the Draft Plan to include the requested objective. It is suggested that any such objective would be more appropriately addressed through the Local Economic and Community Plan (LECP). The LECP identifies objectives and actions for strengthening economic and community development in the county. The LECP 2016-2021 is currently being reviewed and the public's views and suggestions will be invited as part of the review process. The Draft Plan supports the LECP and any subsequent replacement under policy SC P1 in Chapter 10 'Community Infrastructure and Creative Places'.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
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413.	Kildare Public Participation Network	<p>3.11.1 Older People Proposes additional objective (in purple), as follows: New objective: <i>Integrate the Property Interest Register and, where feasible, work in partnership with the Land Development Agency (LDA) to target sites within walking distance of shops and services and public transport for the provision of housing for older people in County Kildare.</i></p>	<p>Chief Executive's Response Section 3.11.1 refers to the housing for older people and Objective HO O21 to HO O26 support the provision of same. In particular, HO O25 supports and promotes the delivery of specialist accommodation appropriate to the specific needs and wishes of older people in co-operation with the voluntary sector, AHBs, the HSE, and other relevant bodies. Objective HO O42 also relates to the Council working in partnership with the Land Development Agency (LDA) for social and affordable housing. Therefore, it is considered that the proposed new objective is already addressed sufficiently in the draft Plan.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
468	Ann Behan	<p>Regarding Section 3.11.1 Older People, the Council is commended on objectives HO O21 to HO O26. However, it is requested that a further objective should be added to "<i>Integrate the Property Interest Register and, where feasible, work in partnership with the Land Development Agency (LDA) to target sites within walking distance of shops, services, and public transport for the provision of housing for older people in Kildare</i>".</p>	
534	Irish Traveller Movement	<p>Irish Traveller Movement are one of the three national Traveller organisations who are members of the National Traveller Accommodation Consultative Committee and the Traveller Accommodation Expert Review programme board.</p> <p><u>Background to Traveller Accommodation Crisis</u> A recent report by the Ombudsman for Children's Office 'No End in Site' highlighted the deplorable conditions in which Traveller children are living. A further European Social Rights Institute report published in September 2021, 'Monitoring Adequate Housing in Ireland also highlighted the inadequate conditions that Travellers are living in and their significant overrepresentation in the homeless figures.</p>	<p>Chief Executive's Response <u>Checklist for the development plan</u> Clear objectives are contained in the Draft Plan under objectives HO O31 and HO O32 which support the delivery and implement the targets of the Kildare County Council Traveller Accommodation Programme 2019-2024.</p> <p>Objective HO O34 is clear in its requirement that the Council recognise the separate identity, culture, tradition and history of the Travelling people.</p> <p>Objective HO O33 states that it is an objective of the Council to ensure that Traveller accommodation is in proximity to key services including education, community health, recreation and public transport facilities and to support those communities in accessing Council services. Policy SC P7</p>

	<p>The Office of the Planning Regulator’s Case Study Paper, ‘Traveller Accommodation and the Local Development Plan’ sets out a checklist to ensure that the needs of Travellers are identified and met during the lifespan of the Plan.</p> <p><u>Checklist for the development plan</u> Include objectives to ensure that the housing strategy and HNDA prioritise a satisfactory standard of accommodation that meets the specific needs of the Travelling Community.</p> <ul style="list-style-type: none"> • Include mapping of known and proposed Traveller accommodation. • Ensure clear linkages between development plans and TAPs to ensure actionable outcomes and adequate funding to implement policy. • Provide recognition of the cultural requirements of members of the Travelling community regarding accommodation. • Prioritise community integration, access to services and supporting cultural infrastructure associated with Traveller culture. • Reflect from the TAP, fair and effective policies for the management of existing Traveller-special accommodation subject to demand for accommodation from extended families, taking into account suitability of locations, health and safety considerations and the overall pattern of development in the area. • Have consistency in terms of the use of language and definitions used by local 	<p>also states ‘Ensure Traveller accommodation is in proximity to key services including education, community, health, childcare, recreation and public transport facilities.’</p> <p>It is considered that the language used in the Draft Plan to describe Travellers’ accommodation is clear and consistent.</p> <p>In relation to site selection and suitability for Travellers, objective HO O32 of the Draft Plan states that the Council shall ‘implement the delivery targets of the Kildare County Council Traveller Accommodation Programme 2019-2024 (and any superseding programmes agreed by the Council) and to meet the delivery targets as a minimum, including to identify and develop sites for Traveller specific housing and to provide accommodation appropriate to the identified needs of members of the Traveller community.’</p> <p><u>Further Recommendations for County Development Plan</u> As outlined above, the range and type of housing required for Travellers and the land use aspects of the TAP are incorporated into the Draft Plan under objectives HO O31 and HO O32.</p> <p>Some of the projects committed to under the 2019-2024 Traveller Accommodation Programme have been discontinued due to a change in the housing needs of the families (e.g. Tankardsgarden). An update on existing and future needs will be provided as part of the forthcoming review of the Traveller Accommodation Plan. It is therefore considered that a generic objective, such as HO O32, which seeks to Implement the delivery targets of the Kildare County Council Traveller Accommodation Programme 2019-2024 (and any superseding programmes agreed by the Council) is more appropriate at this juncture.</p>
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		<p>authorities to describe Traveller accommodation to ensure uniformity.</p> <ul style="list-style-type: none"> • Build upon the TAP process and demonstrate that the development plan has been appropriately guided and informed in relation to matters such as site selection and suitability, to enable the provision of adequate facilities and services for Traveller accommodation. The reflection of a properly informed and consultatively developed TAP into statutory development plans will ultimately ensure clear and agreed development plan policies and an effective and robust context for decision making on specific accommodation proposals <p><u>Further Recommendations for County Development Plan</u></p> <p>National-level planning guidelines require that the range and type of housing required, and the land use aspects of the TAP are incorporated into the Development Plan. The Guidelines also state that this should take the form of objectives that clearly set out the approach of the Development Plan in addressing the accommodation needs of the Traveller community and an indication of the specific locations of known Traveller accommodation projects. To support the identification of additional locations for such projects, zoning policies should also be drawn up in a flexible manner to reflect the urgent need to secure additional Traveller accommodation over the lifetime of the plan.' (Section 4.56 of Development Plans: Planning Guidelines for Planning Authorities, 2007).</p>	<p>In relation to the identification, mapping and zoning of land for Traveller specific accommodation, including transient accommodation, it is the position of the Planning Authority that such land use zoning proposals need to have a robust evidence-led rationale. It is also noted that the proposals for additional Traveller Specific Accommodation Units as identified in the Traveller Accommodation Programme (2019-2024) are to be located in the towns of Athy, Newbridge, Naas and Celbridge all of which are subject to statutory Local Area Plans. In this regard, it is considered the Local Area Plan process would be the most appropriate approach to take to ensure that the identification of Traveller specific accommodation takes place in a sustainable, sequential and phased manner. It is noted that the methodology for the development of Local Area Plans for settlements in the county is based on the preparation of a series of detailed assessments including an Infrastructural Assessment (Settlement Capacity Audit), a Social Infrastructure Audit and an Area Based Transport Assessment (ABTA) to determine the suitability and capacity of specific sites to accommodate particular land use zoning objectives. Accordingly, the zoning of Traveller Specific Accommodation Units in the Draft Plan is premature and potentially prejudicial to the outcome of the comprehensive evidence-based methodology which is central to the Council's local area plan-making process.</p> <p>Regarding a system of monitoring and reviewing at regular intervals the provisions outlined in the Draft Plan as they relate to Traveller accommodation, Appendix 12 (Implementation and Monitoring Framework) accompanies the Draft Plan and sets out clear timeframes for the delivery of the various objectives, actions and targets in the Draft Plan as well as identifying the relevant stakeholder(s) to realise same. The 2-year progress report, which is a</p>
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		<p>Committed projects under the 2019-2024 Traveller Accommodation Programme should be listed as objectives in the Development Plan with clear timelines as per the Housing (Traveller Accommodation) Act 1998 PART III (27) (10), and sites should be identified and zoning of land for Traveller specific accommodation, including transient accommodation, should be mapped and illustrated in the plan, in line with the Planning and Development Act, (2000) as amended, particularly s10(2)(i).</p> <p>Given the lifespan of the development plan beyond the current Traveller Accommodation Plan, consideration should also be given for how sites will be identified for Traveller Special Accommodation in the next Traveller Accommodation Programme, including transient sites and how the assessment of preferred accommodation type will be made.</p> <p>A system of monitoring and reviewing at regular intervals the provisions outlined in the Development Plans as they relate to Traveller accommodation should be included in the Development Plan. These and the provisions of the current Traveller Accommodation Programme should be reviewed every six months with a presentation on progress to the Local Traveller Accommodation Consultative Committee. The inclusion of an ethnic identifier would improve the quality of data collection and monitoring of provision of accommodation for Travellers.</p>	<p>mandatory report required under the Planning Acts, will be made available to the public when prepared c. 2025 and shall assess the progress made in relation to various policies and objectives including those relating to Traveller accommodation. Also, the TAP is subject to a mid-term review (2022) and this will provide an update on existing and future needs of the Traveller population in terms of housing.</p> <p>The inclusion of an ethnic identifier is one of the recommendations of the recent Irish Human Rights & Equality Commission Equality Review on the provision of Traveller accommodation in Co. Kildare. An additional objective has been recommended for the Draft Plan, to 'support the implementation of the relevant recommendations of the Irish Human Rights & Equality Commission Equality Review.'</p> <p>In relation to identifying Traveller specific accommodation, which is well located and serviced in terms of social and physical infrastructure Policy HO P8 should be noted which states the following 'ensure that groups with specialist housing needs, such as the elderly, people with disabilities, the homeless, Travellers, those in need of emergency accommodation including those fleeing domestic violence, are accommodated in a way suitable to each of their specific needs.'</p> <p>The Traveller Accommodation Programme 2019-2024 and the County Kildare Traveller and Roma inclusion Strategy 2019-2023 both contain measures to address the accommodation needs of homeless Travellers. As outlined above, specific objectives within the Draft Plan support the delivery of the Kildare County Council Traveller Accommodation Programme 2019 - 2024 (and any superseding programmes agreed by the Council) and the</p>
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	<p>In accordance with Section 94 (2) of the P & D Act 2000 (as amended), the Development Plan should identify Traveller specific accommodation, which is well located and serviced in terms of social and physical infrastructure.</p> <p>All developments should be carried out with consultation at every stage of the process with prospective residents, local Traveller organisations and with the Local Traveller Accommodation Consultative Committee.</p> <p>The Development Plan should identify Travellers as a priority group in its plans to address homelessness and identify what tangible steps will be taken to reduce the overrepresentation of Travellers in homeless figures.</p> <p>The Development Plan should reference the Council's strategy to implement the relevant recommendations of the recent Irish Human Rights & Equality Commission Equality Review on the provision of Traveller accommodation in the area.</p> <p><u>Eliminating Energy Poverty in Traveller Specific Accommodation</u> Council should plan to review existing Traveller specific accommodation with a view to bringing it up to the current regulatory standards in terms of energy efficiency of the dwellings and in terms of access to sustainable energy sources. It should be ensured that there is access to the competitive energy provision market for Travellers living in Traveller-specific accommodation and that Travellers in Traveller specific accommodation have</p>	<p>County Kildare Traveller and Roma inclusion Strategy 2019-2023.</p> <p>It is intended that all key stakeholders will be consulted and play a key role in the delivery of specific Traveller type accommodation. Objective SC O40 states that the Council shall support the role of community organisations, groups and programmes in the delivery of facilities and services to members of the Travelling Community.</p> <p>It is accepted that the Development Plan should reference the Council's strategy to implement the relevant recommendations of the recent Irish Human Rights & Equality Commission Equality Review on the provision of Traveller accommodation in the area.</p> <p><u>Eliminating Energy Poverty in Traveller Specific Accommodation</u> Chapter 7 of the Draft Plan contains specific targets in relation to energy efficiency in buildings, which includes a target of 33% improvement in energy efficiency in all buildings in line with the requirements of the National Energy Efficiency Action Plan (NEEAP) and retrofit all existing council housing stock before 2030. Also, there is an objective to 'require all new development to be designed to take account of the impacts of climate change and that energy conservation, energy efficiency and energy renewable measures are incorporated in new and existing buildings through the appropriate design and location of new development, in accordance with relevant building regulations and guidelines.' Although not specific to Traveller accommodation it is considered these objectives and targets will play a vital role in bringing Traveller specific accommodation up to the current regulatory standards in terms of energy efficiency.</p>
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		<p>access to accurate, individual energy bills in order to monitor and control their own energy costs.</p> <p>All planned Traveller specific accommodation should seek to ensure that homes built have the highest level of building airtightness combined with effective ventilation systems. The Council must meet near zero energy building (NZEB) requirements under current regulatory requirements and demonstrate that energy used by the NZEB must be overwhelmingly from renewable sources.</p>	<p>Ensuring that there is access to the competitive energy provision market for Travellers living in Traveller-specific accommodation and that Travellers have access to accurate, individual energy bills to monitor and control their own energy costs is a matter for the relevant energy providers and is not an issue that can be addressed in a County Development Plan.</p> <p>Chief Executive's Recommendation Insert the following objective after HO O33. Support the implementation of the recommendations of the Irish Human Rights & Equality Commission Equality Review on the provision of Traveller accommodation in Co. Kildare.</p>
ACCESSIBILITY & 10-MINUTE TOWNS			
276.	County Kildare Access Network	<p><u>Ballymore Eustace: Age Friendly & Universally Accessible</u> Requests that action HO A6 be amended (additional text in purple) to read as follows: 'Promote Ballymore Eustace as a national exemplar model of an age-friendly, universally accessible, climate-friendly village and seek to facilitate and support this model for other settlements within County Kildare.'</p>	<p>Chief Executive's Response Noted and agreed.</p> <p>Chief Executive's Recommendation Amend HO A6 as follows: Promote Ballymore Eustace as a national exemplar model of an age friendly, universally accessible, climate-friendly village and seek to facilitate and support this model for other settlements within County Kildare.</p>
507	Brian McArdle	<p>The submission states that although the concept of the '10-minute settlement' is mentioned in Section 3.7 of the Draft Plan, it is not mentioned as a specific policy or objective in Chapter 3, which should be corrected. States that this would help ensure that even with developer-led delivery of housing, facilities and services will be created alongside homes.</p>	<p>Chief Executive's Response Various policies and objectives contained in Chapter 3 support the objectives to prevent urban sprawl and support compact growth.</p> <p>The 10-minute settlement is seen to represent the practical implementation of principles relating to people-centred</p>

			<p>urban design and healthy placemaking whilst also fully aligning with the requirements of compact growth.</p> <p>The '10-minute settlement' concept is a key aim of the Draft Plan and a number of provisions are integrated throughout various chapters to ensure its practical implementation in towns and villages of all scales across the county.</p> <p>In Policy HO P6, the Council promotes and supports residential consolidation and sustainable intensification and regeneration through the consideration of applications for infill development, backland development, re-use/adaptation of existing housing stock and the use of upper floors, subject to the provision of good quality accommodation.</p> <p>Objective HO O8 promotes where appropriate and sensitive to the characteristics of the receiving environment, increased residential density as part of the Council's development management function and in accordance with the Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities and the accompanying Urban Design Manual, DEHLG, May 2009.</p> <p>Objectives HO O9 and HO O10 of the Draft Plan, promote and support the delivery of compact and sustainable growth, the promotion of the transformation of key brownfield sites and the identification of regeneration areas as part of the Council's development management function to deliver residential development in towns and villages.</p> <p>It is considered that the provisions of Chapter 3 of the Draft Plan adequately address the issues raised in the submission.</p>
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			Chief Executive's Recommendation No change to the Draft Plan.
GENERAL			
61	Collette Coyne	The submission does not agree with the proposed Plan.	Chief Executive's Response The contents of the submission are noted. As further detail is not provided in relation to relevant areas of the Draft Plan no changes are recommended.
			Chief Executive's Recommendation No change to the Draft Plan.
507	Brian McArdle	The submission states that HO O49 (relating to green principles of design, services and amenities) is strongly welcomed.	Chief Executive's Response Noted.
			Chief Executive's Recommendation No change to the Draft Plan.
351	Eco Advocacy	<u>Sound Insulation in Buildings</u> The submission states that it should be the policy of the County Council that all buildings are adequately insulated to prevent sound from travelling beyond their living area so that others can peacefully enjoy their living space in comfort.	Chief Executive's Response The sound-proofing of dwellings to achieve reasonable levels of sound insulation is outside the remit of this land use plan but all such issues are addressed in Part E of the current Building Regulations (2014).
			Chief Executive's Recommendation No change to the Draft Plan.
413.	Kildare Public Participation Network	<u>Policy Context</u> Submission recommends the following policies are added as guidance documents (in purple): <ul style="list-style-type: none"> • Sustainable Rural Housing Guidelines (2005) 	Chief Executive's Response In relation to the changes proposed under Section 3.3 these are not accepted. Section 3.3 relates to the policy context for planning applications in towns, villages, and settlements. The assessment of a planning application does not have

		<ul style="list-style-type: none"> • Derelict Sites Act, 1990 (as amended by the Planning and Development Act, 2000) • Urban Regeneration and Housing Act 2015 <p>Submission refers to objective HO O13 and proposes the following additional provisions be included (in purple):</p> <ul style="list-style-type: none"> • Develop a staged plan to populated and actively manage the Vacant Sites Register (VSR) over the lifetime of this plan. • Actively enforce the Urban Regeneration and Housing Act 2015 using the VSR. Actively enforce the Derelict Sites Act, 1990 (as amended by the Planning and Development Act, 2000) using the VSR. 	<p>regard to either of the Acts cited in the submission. However, the Council will implement the provisions of the Derelict Sites Act 1990 (as amended) and Urban Regeneration and Housing Act 2015 (as amended) which is recognised throughout the Draft Plan (Objective RE O31, RE O32, RET A3, and Section 4.7, and 16.3.3, refer).</p> <p>Similarly, in respect of the Rural Housing Guidelines, these guidelines do not relate to development in urban settlements but rather the provision of single housing in the countryside.</p> <p>With regards the suggested additional text for Objective HO O13, the draft Plan already supports the implementation of the provisions of both the Derelict Sites Act 1990 (as amended) and Urban Regeneration and Housing Act 2015 (as amended).</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
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CHAPTER 4 – RESILIENT ECONOMY & JOB CREATION			
Sub No.	Name	Summary of Issues Raised	Chief Executive’s Responses & Recommendations
EMPLOYMENT			
385	County Kildare Chamber	<p><u>Economic Development and Employment:</u> The Chamber proposes lands along the M4 corridor could be looked at for commercial and industrial development, given their close proximity to the Capital, network and transport links and the educated workforce on its doorstep. The Chamber also notes that in significant sections between Kilcock and Maynooth there is no zoning for industry.</p>	<p>Chief Executive’s Response Action RE A1 of the Draft Plan states that the Council shall ‘undertake an evidence-based assessment, together with the LEO, Enterprise Ireland and the IDA, to inform the location of strategic employment sites throughout Kildare. This assessment shall ensure that sufficient land is zoned for economic activity through the Development Plan and Local Area Plans.’. Also, objective RE O14 of the Draft Plan states that the Council shall ‘undertake, within the first 2 years of the adoption of the Plan, a Strategic Land Use, Employment and Transportation Study of north-east Kildare including the Dublin Metropolitan area towns of Leixlip, (and Collinstown), Maynooth, Celbridge and Kilcock.’ Lands along the M4 corridor will be assessed as part of the above.</p> <p>The zoning of specific lands will be undertaken as part of the Local Area Plan processes for Maynooth, Kilcock, Celbridge and Leixlip. These Plans will be evidence-based in nature and will require the preparation of a series of detailed assessments including an Infrastructural Assessment and an Area Based Transport Assessment to determine the suitability and capacity of specific sites to accommodate particular land use activities. It is therefore considered that aside from the location as outlined in the RSES (MASP), it would be premature for the Development Plan to</p>

			<p>identify any lands within Maynooth, Kilcock, Leixlip and Celbridge as areas for employment expansion which would be more appropriately addressed through the review of the relevant Local Area Plans. Furthermore, having regard to the M4 Motorway, it is considered that any designation for employment expansion of this area in this Plan, in the absence of any in-depth analysis of the potential impacts of increased traffic on the capacity and safe operation of the associated junctions, would be contrary to national policy as set out in the Spatial Planning and National Road Guidelines for Planning Authorities (2012) and it would also be contrary to objective TM O54 of the Draft Plan.</p>
			<p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
421	Bord na Mona (BNM)	<p>Bord na Mona has grown sustainable business in recycling, renewable energy development and peatland rehabilitation and currently has approx. 380 employees in County Kildare. This illustrates the real benefits of transitioning to a low carbon economy.</p> <p>With respect to objectives RE O126 (facilitating a tourism resource using cutaway peatlands in conjunction with BNM) and RE O127 (supporting a National Peatlands Park), it is important to recognise that improving biodiversity and development of amenities are key aspects of the company’s vision, however Bord na Mona’s mandated climate action solutions, future climate action projects and renewable energy developments are a precursor to the development of amenity and to land use plans.</p>	<p>Chief Executive’s Response The Plan includes many objectives supporting climate action projects and renewable energy developments at appropriate locations, aligning with the core principles of the NPF and RSES. The plan also supports Bord na Mona as expressed in objectives EC O51 (in the preparation of a long term strategic plan for former industrial peatlands) and EC O52 & RE O77 (redevelopment of BNM headquarters at Newbridge).</p>
			<p>Chief Executive’s Recommendation No change to the Draft Plan.</p>

<p>276.</p>	<p>County Kildare Access Network</p>	<p>Requests that action RE 04 be amended to read as follows: 'Encourage and create an environment where persons with a disability can gain and maintain employment in the market place'.</p> <p>Requests the following additional objective: 'Local Enterprise Office will work with relevant stakeholders to implement County Kildare Access Strategy, Article 27 UNCRPD recognising the right of persons with disabilities to work on an equal basis with others and European Union Supported Employment Guidelines.'</p> <p>Requests change to objective RE O37, as follows: Promote the Shop Front & Accessibility Grant Scheme to: (a) Financially assist and support independent business owners to improve the appearance of their shop fronts/commercial properties. (b) Financially assist and support independent business owners to improve accessibility to their commercial properties. (c) Promote the use of Irish Language signage in the County through the Shop Front & Accessibility Grant Scheme.</p>	<p>Chief Executive's Response The additional text requested to be included into RE O4 relates to employment policy and practices which are considered to be outside the remit of this land use plan.</p> <p>With regard to the proposed additional objective, it should be noted that while the Local Enterprise Office has a strong working relationship with Kildare County Council, it constitutes a separate entity and therefore the Council has no powers to direct it to take any particular course of action.</p> <p>It is noted that the Shop Front Improvement, Accessibility and Age Friendly Grant Scheme places particular emphasis on works to enhance accessibility and/or add age friendly elements to commercial businesses. Accordingly, the suggested additional text to objective RE O37 is accepted.</p> <p>Chief Executive's Recommendation Amend objective RE O37, as follows: (a) Promote the Shop Front Improvement, & Accessibility and Age Friendly Grant Scheme to financially assist and support independent business owners to improve the appearance of their shop fronts/ commercial properties. (b) Financially assist and support independent business owners to improve accessibility to their commercial properties. (c) Promote the use of Irish Language signage in the County through the Shop Front & Accessibility Grant Scheme.</p>
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555	Irish Solar Energy Association	<p>Utility-scale renewable projects can provide similar economic value, skills base and community benefit for Co. Kildare as Data Centres. This aspect of the Draft Plan should also facilitate utility scale renewable projects.</p> <p>In relation to section 4.10 (Foreign Direct Investment) and specifically RE O53 it is noted in the submission that 'Private Wire' solar farms can contribute to the sustainability of large enterprises located in Co. Kildare. In the event that regulations in this space are changed the Council is encouraged to adopt a facilitative approach to private wire projects.</p>	<p>Chief Executive's Response It is considered that Section 4.17 (Green / Circular Bio-economy) provides sufficient support for renewable projects to ensure that climate action and sustainable development is central to the economic development of the County.</p> <p>In relation to the comments raised with respect to 'private wire' solar farms, see response to submission no. 555 where changes are proposed to Section 7.6 (Solar Energy).</p> <p>Chief Executive's Recommendation See recommendation to submission no. 555 where changes are proposed to Section 7.6 (Solar Energy).</p>
501	Fiona O'Loughlin	<p><u>Hubs</u> The submission notes that people are leaving bigger cities and choosing smaller cities and towns that provide a better work life balance, choosing hybrid forms of work and remote hubs to work from. This needs to be reflected in this plan.</p>	<p>Chief Executive's Response Section 4.8 of the Draft Plan provides a range of policies and objectives (RE P5, RE P6 and RE O47) which support the need for remote working in the interests of flexible work arrangements, be it from home or from a designated hub / co-working space.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
538	Senator Mark Wall	<p>The submission requests Kildare County Council to work with Bord na Mona to develop an enterprise centre on their lands at Kilberry, Athy to include a community facility.</p>	<p>Chief Executive's Response The plan supports Bord na Mona as expressed in objectives EC O51 in the preparation of a long-term strategic plan for former industrial peatlands.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

576	County Kildare Leader Partnership (CKLP)	<p>The submission from the County Kildare Leader Partnership (CKLP) provides an overview of the purpose and main mission of the organisation which is to facilitate individuals and communities to participate fully in social, economic and cultural activity by supporting a vibrant and inclusive society in County Kildare.</p> <p>The submission proposes the following amendments:</p> <p>Amend RE O33 as follows: (noted that RE O14 is referred to in the submission but the text and context of the submission is considered more applicable to RE O33).</p> <p>Promote the 2023 LEADER Programme, which supports rural and economic development and the 2021 Town and Village Renewal Scheme (or any successor to same), which prioritises tackling vacancy in towns and villages, remote working and supporting town centre living.</p> <p>Add new Objective RE O68 as follows: In conjunction with County Kildare Leader Partnership support the development of the Social Enterprise sector in the county.</p>	<p>Chief Executive's Response</p> <p>Having regard to this submission as a whole it is considered more appropriate to include an overarching Core Strategy objective in Chapter 2 as set out below.</p> <p>It is noted that Kildare County Council's Economic Strategy 'Kildare 2025 Economic Development Strategy' outlines a roadmap to attracting new investment, sustain existing industry and enterprises and ensure long-term and sustainable growth for Kildare. It defines eight key areas of focus and states that investment in place, investment in people and strengthening bidding capacity for funds will also play a key role in supporting and developing each of the key areas. Strategic emphasis has been placed on supporting and growing Kildare's social enterprise sector. The Policy aims to create an enabling environment for social enterprise to grow and contribute to Ireland's social and economic progress. It is noted that Action 1.12 of the document states that for Social (or for Impact) Enterprises and organisations operate in all the economic sectors and represent an important part of the economic and corporate landscape (more than 10% of all EU business). It states that the Council will</p> <ul style="list-style-type: none"> • Support social enterprise initiation and start-ups through targeted programmes and initiatives. • Provide tailored training for existing social Enterprises. <p>It will provide training and support in business planning, mentoring, leadership, governance, capacity building, financial planning and digital innovation to help improve business potential. The Stakeholders include Kildare</p>
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			<p>County Council & the Local Enterprise Office, LEADER Partnership and Social Entrepreneurs Ireland.</p> <p>It is considered that there are sufficient supports provided for Social Enterprise in the Kildare County Council’s Economic Strategy ‘Kildare 2025 Economic Development Strategy’.</p> <p>Chief Executive’s Recommendation To include a new objective in Chapter 2 (Core Strategy) to read as follows: Support the implementation of LEADER Programmes which aim to deliver a range of rural enterprise, social inclusion and community development initiatives in County Kildare.</p>
560	Cllr. Suzanne Doyle	<p>The submission recommends that Action RE A3 be amended to include the following text: Through an evidence-based analysis, seek to have the NDP and EMRA amend the RSES to acknowledge the Newbridge/Naas axis with a similar designation as Drogheda/Dundalk as a regional growth centre.</p> <p>The submission states that “When combining the current population of both towns the target of supporting a population base of 50,000 persons is not just realistic but certain, this designation will enable the settlements to attract necessary infrastructure to ensure that this inevitable growth happens in an optimal sustainable manner, specifically around increasing the working and living ratio, through the strategic employment generation development of the land bank between both towns.”</p>	<p>Chief Executive’s Response Action RE A3 in Chapter 4 ‘Resilient Economy and Job Creation’ states: Develop a strategy for the lands between the settlements of Naas and Newbridge, to consolidate existing development whilst also preventing the coalescence of these settlements.</p> <p>This Strategy is a long-term action of the plan. It is stated in Section 2.15 of the Plan that the development of this area will be underpinned by an urban design framework.</p> <p>The potential for Newbridge/Naas axis as a regional growth centre is noted. It is therefore considered appropriate to amend objective CSO 1.3 (which refers to EMRA’s mid-term review of the RSES) to refer specifically to regional growth centres within the</p>

			<p>County. For clarity, it is also recommended to include reference to the retail hierarchy in this review.</p>
			<p>Chief Executive’s Recommendation Amend CSO 1.3 (Chapter 2) as follows: To actively engage with the Eastern Midlands Regional Assembly during the mid-term review of the Regional Spatial and Economic Strategy and to inform the consideration of how urban settlements, regional growth centres and the retail hierarchy are designated within the region.</p>
<p>410</p>	<p>Celbridge Community Council</p>	<p><u>Economic Development Hierarchy</u> Submits that the Sectoral Opportunities in Table 4.1 – Economic Development Hierarchy Table seems arbitrary due to the grouping by level in the settlement hierarchy. Notes that this table should be organised depending on whether the settlement is in the MASP. States that though only listed for Self-Sustaining Growth Towns, there is no reason why ICT, professional services and logistics shouldn't also be sectoral opportunities for Celbridge and Kilcock in addition to those listed for Self-Sustaining Towns.</p> <p>Further submits that Objective RE O14 should be reworded to provide that it be undertaken within the first 2 years from the adoption of the Plan and be expressed as a pre-requisite for/input into the revised Local Area Plans. Noted an objective in the Celbridge LAP requiring a Transport Management Plan within 12 months of the Plan’s adoption was never undertaken.</p> <p>States that Section 4.4.6 Self-Sustaining Towns needs to include specific objectives for each town that demonstrate an understanding of the opportunities for</p>	<p>Chief Executive’s Response The comments relating to Table 4.4 are noted. It’s important to understand that the table is intended to outline the broad parameters in relation to the identification and promotion of the various sectoral strengths within each town. This does not preclude other types of industrial development from being proposed within individual settlements. It is acknowledged that in a highly developed market-oriented economy such as Ireland, future proposals for employment opportunities may come forward in settlements that may differ from the sectoral strengths identified in this Plan. Such proposals will be assessed on a case-by-case basis, subject to planning and environmental considerations.</p> <p>The comments and request relating to RE O14 is noted. The Council will endeavour to prioritise the preparation of this important study. However, acknowledging competing priorities and resource constraints, it is considered that completing the study within two years of the adoption of the Plan provides for a realistic timeframe. It should be noted that the preparation of</p>

		<p>each town as objective RE O27 is too vague. Submits that the Plan needs to demonstrate that there is a shared understanding regarding how these towns will develop and that Kildare County Council is prioritising the goal to make the towns more 'self-sustainable'.</p>	<p>local area plans in Kildare, including those within the MASP area, are subject to a range of detailed assessments including an Infrastructural Assessment (Settlement Capacity Audit), a Social Infrastructure Audit, and an Area Based Transport Assessment (ABTA) to determine the suitability and capacity of specific sites to accommodate particular land use zoning objectives.</p> <p>The comments in relation to section 4.46 are noted. Objective RE O27 is intended to provide an overarching level of support for economic development and employment opportunities for those settlements in the county which share similar developmental characteristics.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
410	Celbridge Community Council	<p><u>Economic Clusters</u> States that similar to the current 2017-2023 Development Plan, the concept of economic clusters is poorly explained in the draft Plan. Submits that the principle of economic clusters is supported by an extremely vague single objective (RE O29). Submits that there should be more specific objectives and actions.</p>	<p>Chief Executive's Response The comments relating to economic clusters are noted. It is accepted that the text in Section 4.5 could be revised and expanded upon. It is also considered that each designated economic cluster would benefit from a bespoke supporting objective.</p> <p>Chief Executive's Recommendation Amend Section 4.5 as follows: Economic clusters are also promoted as part of the overall economic strategy. Naas is clustered with Newbridge and Kilcullen while Maynooth is clustered with Leixlip, Celbridge and Kilcock. Clusters are to develop in a mutually dependent way, so that the amenities and economies of the whole cluster are greater than the sum of the individual parts.</p>

			<p>Economic clusters, according to the EU Commission, are defined as groups of firms, related economic actors and institutions located near each other and with sufficient scale to develop specialised expertise, services, resources, suppliers and skills. The potential for such clusters to become self-sustaining beacons for attracting further investment, industry, employment opportunities and institutional collaboration is acknowledged by the Council. Accordingly, the following two areas within County Kildare have been identified as economic clusters:</p> <ul style="list-style-type: none"> • The MASP (Metropolitan Area Strategic Plan) Economic Cluster in northeast Kildare, which includes the settlements of Maynooth, Leixlip, Celbridge and Kilcock. • The Sallins-Naas-Newbridge Cluster which also incorporates the proposed Naas to Newbridge Strategic Economic and Employment Zone. <p>The designation of these clusters is in keeping with the provisions of the Regional Spatial and Economic Strategy 2019-2031 and Kildare 2025 Economic Development Strategy. It also acknowledges the existing relationships and synergies that have developed between settlements and in particular, the role that certain towns within these clusters have developed as strategic destinations for employment and education. It is considered that the focusing of sectoral growth opportunities, along with targeted infrastructural development, within these designated clusters will enable the development of economies of scale, thereby securing critical mass. The successful development of these clusters will not only provide the county with a</p>
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			<p>competitive advantage but also help to safeguard its long-term economic wellbeing.</p> <p>Delete objective RE O29 in its entirety.</p> <p>Insert the following new objectives in Section 4.5 of the Plan:</p> <p>New objective: Promote and facilitate the development of the Metropolitan Area Strategic Plan (MASP) Economic Cluster, encompassing the towns of Maynooth, Leixlip, Celbridge and Kilcock, by supporting identified key sectoral opportunities, including the development of synergies between Maynooth University and employers in the area, along with the requisite targeted infrastructural investment, in accordance with the Regional Spatial and Economic Strategy 2019-2031.</p> <p>New objective: Promote and facilitate the development of the Sallins-Naas-Newbridge Economic Cluster, including the proposed Naas to Newbridge Strategic Economic and Employment Zone, by supporting identified key sectoral opportunities along with requisite targeted infrastructural investment, in accordance with the Regional Spatial and Economic Strategy 2019-2031.</p>
405	Kildare Climate Action Linkage Group	<p>The submission suggests the following:</p> <ul style="list-style-type: none"> • That the CDP outlines how future FDI investments be climate risk proofed to establish the likelihood of their long-term existence in a climate transition. • That the CDP establish climate criteria for planning decisions related to FDI investment. 	<p>Chief Executive’s Response</p> <p>The Draft CDP under Objective EC 044 requires all new development to be designed to take account of the impacts of climate change, and that energy conservation, energy efficiency and energy renewable measures are incorporated in new and existing buildings through the appropriate design and location of</p>

			<p>new development, in accordance with relevant building regulations and guidelines.</p> <p>In addition, Chapter 15 'Development Management' focuses on the general planning standards and design criteria that will be applied by the council to ensure that future development is in accordance with the policies and objectives of this Plan.</p> <p>Matters in relation to the climate risk proofing of FDI investments are considered to be outside the scope of the County Development Plan which is primarily a land use plan.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
468	Ann Behan	Section 4.10 is referred to and it is asked if future FDI investments will be climate risk proofed to establish the likelihood of their existence in a climate transition? And if any climate criteria will be established in planning decisions related to FDI investment?	<p>Chief Executive's Response See response to submission 405 above.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
405	Kildare Climate Action Linkage Group	<p>The submission suggests the following:</p> <ul style="list-style-type: none"> • That the CDP establish criteria related to positive biodiversity and climate outcomes when deciding levels of SME supports. • The CDP identifies how the LEO will ensure sustainable enterprise development that does not widen the emissions gap in the county. 	<p>Chief Executive's Response The matters raised in relation to the levels of SME support and how the Local Enterprise Office (LEO) will ensure sustainable enterprise development is considered to be outside of the scope of a County Development Plan. It should be noted that while Kildare County Council has a strong working relationship with LEO, it constitutes a separate entity and therefore the Council has no powers to direct it to take any specific course of action.</p>
			<p>Chief Executive's Recommendation</p>

			No change to the Draft Plan.
405	Kildare Climate Action Linkage Group	<p>The submission requests support for the creation of a local economy based on the Doughnut Economics model pioneered by Kate Raworth, which aims to balance the boundaries of a thriving society with those of a thriving planet.</p> <p>The submission references section 5.3 of the plan and recommends that the CDP move away from the 'Triple Bottom Line' approach and towards a 'Doughnut Economics' approach that recognises that the planet does not depend on the economy, however the economy is completely dependent on the natural world.</p>	<p>Chief Executive's Response The comments in relation to Doughnut Economics are noted. In this regard, it should be noted that climate friendly policies, objectives and actions are interwoven throughout the Draft Plan. While the Plan extends over a six-year time frame to 2029, its contents set out a long-term strategy that seek to place the county on a firm footing towards achieving the national goal of developing a net zero carbon economy by 2050.</p> <p>The role of the Local Enterprise Office is an operational matter (see comment above).</p>
468	Ann Behan	<p>The submission requests support for the creation of a local economy based on the Doughnut Economics model pioneered by Kate Raworth, which aims to balance the boundaries of a thriving society with those of a thriving planet.</p> <p>Section 4.11 is referred to and it is asked what criteria are used to decide levels of SME supports and if climate / biodiversity features? It is also asked how LEO will ensure sustainable enterprise development that does not widen the emissions gap?</p>	<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
405	Kildare Climate Action Linkage Group	It is submitted that RE O83 is welcome but lacks clarity and details no specific action.	<p>Chief Executive's Response The request is noted. Objective RE O83 (relating to the ability of communities to be self-sufficient in, inter alia; food production, energy savings and production, waste disposal) is intended to provide an overarching and strategic level of support.</p>
468	Ann Behan	RE O83 is also welcomed but lacks clarity and details no specific action.	

			Chief Executive's Recommendation No change to the Draft Plan.
405	Kildare Climate Action Linkage Group	<p>It is submitted that objectives are set out to increase overall sustainable and climate enterprises throughout the county. However, it is not clear if this is in addition to traditional industries or with an aim to displace? Clear targets and criteria should be set.</p> <p>Furthermore, it is submitted that it is not clear what criteria is being used to define 'sustainable' when it comes to the different sectors mentioned in this chapter. Does this mean jobs? Will there be a higher weighting given to climate and biodiversity criteria versus traditional economic criteria which does not reflect the current crises or planetary limits?</p> <p>A series of other questions are raised in relation to chapter 4, and climate proofing employment opportunities, such as how the council plan to support the implementation of carbon budgets while also growing industries contributing to higher emissions? It is also asked that an objective be included to mandate new and existing employers to set out sustainable travel policies for employees.</p>	<p style="background-color: #e1f5fe;">Chief Executive's Response</p> <p>The Plan includes a number of policies and objectives to support employment and climate resilience, including Objectives RE O72 and REO73 to name but two of these. It is not a function of the Plan to provide details of any possible displacement of existing industries and will depend on economic and market forces. The Plan must at all times balance supporting the economy, housing, social and physical infrastructure while being cognisant of the effects any of the above would have on the climate and the ability of the county to reach net zero carbon emissions by 2050. While the Plan has included a number of targets in this regard, more detail will be set out in the emerging Sustainable Energy Climate Action Plan (SECAP) which is currently being prepared. Carbon budgets is also a matter that would be more appropriately addressed in the SECAP.</p> <p>It is outside the remit of a County Development Plan to mandate new and existing employers to set out sustainable travel policies. There are many policies interwoven throughout the plan encouraging the use of sustainable modes of transport including locating employment close to public transport links and other sustainable transport infrastructure. See section 15.7 in Chapter 15.</p> <p style="background-color: #e1f5fe;">Chief Executive's Recommendation No change to the Draft Plan.</p>
468	Ann Behan		Chief Executive's Response

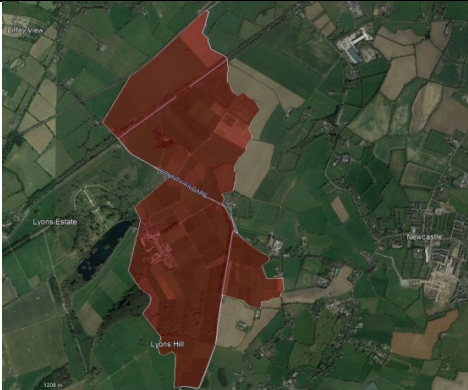
		<p>Reference is made to RE O70, and it is asked to clarify what criteria will be used to determine whether the use of sustainable renewable sources of energy is not possible? Water usage in data centres is a huge concern, the CDP should include measures to reduce water usage and recycle water where possible.</p> <p>A series of questions are raised in relation to Chapter 4 and climate proofing employment opportunities, such as how the Council plans to support the implementation of carbon budgets while also growing industries contributing to higher emissions? It is also asked that an objective be included to mandate new and existing employers to set out sustainable travel policies for employees.</p>	<p>In the interests of making the objective stronger it is recommended to amend the existing objective.</p> <p>In relation to the latter part of this submission see response to submission 405 above.</p> <p>Chief Executive's Recommendation Amend Objective EC O70 as follows: Require data centres to consider the use of sustainable renewable sources of energy to fuel their operations in whole in the first instance or in part where this is not possible and where it has been satisfactorily demonstrated not to be possible. include strong energy efficiency measures to reduce their carbon footprint in support of national targets towards a net zero carbon economy, through the use of sustainable sources of energy generation in the first instance and then the use of renewable sources of energy to power their operations, where on site demand cannot be met in this way, to provide evidence of engagement with power purchase agreements (PPA) in Ireland. All data centre developments shall provide evidence of sign up to the Climate Neutral Data Centre Pact.</p>
SEVESO			
15	Health and Safety Authority (HSA)	<p><u>Major accident hazard sites</u> The submission states that the Health and Safety Authority expects the planning guidelines to contain:</p> <ol style="list-style-type: none"> 1. An indication of planning policy in relation to major accident hazard sites notified under the regulations, which reflects the intentions of Article 13 of Directive 2012/18/EU. 	<p>Chief Executive's Response It is considered that Section 4.14 of the Plan adequately addresses points 1,3 & 4 of this submission.</p> <p>In relation to point no. 2 of the submission, it is not considered appropriate to amend both Section 4.14 and 15.12 to include the consultation distances as any increases to Seveso site boundaries, which could</p>

		<ol style="list-style-type: none"> 2. The Consultation distances and generic advice, where applicable, supplied by the Authority to Kildare County Council in relation to such sites. These distances to be indicated on the various maps included in the plan, as well as any more specific distances and advice supplied by the Authority. 3. A policy on the siting of major hazard establishments, taking account of Article 13 and the published policy of the Authority in relation to new developments, including developments in the vicinity of such developments. 4. Mention of Intel Ireland Limited and Irish Industrial Explosives Ltd. 5. Consistency when referencing the applicable Seveso legislation in the CDP. Within the Plan, the legislation is referred to as the Major Accidents Directive and the Seveso III Directive (2012/18/EU). 	<p>intensify the use of the overall site would result in a need to amend the HAS consultation boundary. Having regard to same therefore it is considered more appropriate not to identify the HSA boundary on a map but instead to refer all relevant planning applications to the HSA for comment on a case-by-case basis.</p> <p>Furthermore ,it is noted that the 'Guide to the COMAH Regulations 2015 (S.I. No. 209 of 2015)' states that the CCA will periodically review and update the consultation distance as necessary which would also necessitate the need for updates to the Development Plan maps.</p> <p>It is considered appropriate to amend Section 4.14 to address the inconsistencies as highlighted by point no. 5.</p> <p>Chief Executive's Recommendation Amend Section 4.14 as follows: The Chemicals Act (Control of Major Accident Hazards involving Dangerous Substances) Regulations 2015 implements the SEVESO III Directive (2012/18/EU). Two firms in County Kildare fall within the terms of the SEVESO III Directive (2012/18/EU).....</p> <p>...The industries that are currently covered are outlined in Table 4.2 below. The Health and Safety Authority (HSA) has been designated as the central competent authority for the enforcement of the SEVESO III Directive (2012/18/EU) and has established generic consultation distances for these facilities.</p>
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			<p>Add an extra column to the end of Table 4.2 (Industries affected by the Seveso III Directive) to be titled 'Consultation Distances' as follows;</p> <ul style="list-style-type: none"> • In relation to Irish Industrial Explosives, include the text '500 metres (subject to further consultation with the HSA)' • In relation to Intel Ireland Ltd, include the text '1,000 metres (subject to further consultation with the HSA)' <p>It is also noted that Johnston Logistics in South Dublin located in Rathcoole, is also a designated SEVESO III site.</p> <p>To amend Policy RE P9 as follows: Comply with the SEVESO III Directive (2012/18/EU)....</p> <p>To amend Policy RE P10 as follows: ...hazardous substances:</p> <ul style="list-style-type: none"> • The Major Accidents Directive (SEVESO III, 2012/18/EU). • SEVESO III Directive (2012/18/EU). • The consultation distances and HSA technical advice in relation to the industries affected by the SEVESO III Directive (2012/18/EU). • Potential adverse impacts on public health and safety. • HSA Technical advice.....
598	Friends of Harristown Commons	The submission is concerned with the biodiversity, archaeology, heritage and amenity value of Harristown	<p>Chief Executive's Response It is considered that the remainder of Section 4.14 adequately addresses the proposed text and reads as</p>

		<p>Commons. The submission provides an historical context for Harristown Demesne.</p> <p>Edit Section 4.14 (Prevention of Major accidents) text as follows: ...this plan seeks to ensure that:</p> <ul style="list-style-type: none"> Proposals for new industries and other developments at risk of causing major accidents. 	<p>follows; 'Proposals for the expansion of existing industries designated under the directive and other developments proposed near to existing SEVESO III Industries'</p> <p>As such it is not considered necessary or appropriate to include the proposed text.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
AGRICULTURE			
557	University College Dublin – Lyons Farm	<p><u>Summary of Appendix from Tom Philips & Associates</u></p> <p>The submission seeks that the Amended Kildare Development Plan 2023-2029 reflects the longstanding educational facilities at UCD Lyons Farm by the inclusion of key policy objectives that will support the development of future teaching and research facilities.</p> <p>That the Draft Plan recognises the significant status of UCD Lyons Farm as a third level educational facility on an equal footing with Maynooth University.</p> <p>That the progress made in branding the UCD Lyons Farm as a centre of excellence in the agricultural and knowledge-based economy be expanded upon by facilitating key linkages with enterprise, research, and technology sites.</p> <p>The UCD Lyons Farm lies within the administrative region of Kildare County Council and South Dublin County Council and has an overall area of c.261ha (see map below)</p>	<p>Chief Executive's Response</p> <p>The UCD Lyons Farm used by the School of Agriculture, Food Science and Veterinary Medicine for teaching and research activities is a long-established educational institution that dates from 1962.</p> <p>The insertion of objectives supporting the UCD Lyons Farm as a centre of excellence in the agricultural and knowledge-based economy would be beneficial to the county.</p> <p>However, it is considered that some of the objectives proposed are unnecessary and are already addressed by existing objectives within Chapter 4.</p> <p>Regarding the proposed objective RE O17A, it is considered a general objective that seeks to promote UCD Lyons Farm as a centre of excellence in the agricultural and knowledge-based economy is sufficient in this instance.</p>

		<p>The submission requests that the following objectives be inserted into Chapter 4.</p> <p>RE O17A; Further key linkages and partnerships with University College Dublin including the branding of the Lyons Farm as a centre of excellence in the agricultural and knowledge-based economy.</p> <p>RE O82A; Support the development of third level teaching and research facilities at the UCD Lyons Farm in Co. Kildare.</p> <p>RE O62A; Support and facilitate the development of the UCD Lyons Farm, which provides courses that support green and sustainable industries.</p> <p>RE O63A; Encourage third level education at UCD Lyons Farm through the provision of outreach / campus facilities for the accommodation of courses.</p> <p>RE O18A; Develop the key campus of UCD Lyons Farm as an attractor for Agricultural Sciences, Food Sciences, Veterinary Medicine and Research & Development employment. Kildare County Council will work with UCD and other agencies to ensure the delivery of key infrastructure to facilitate future development.</p> <p>RE O60A; Promote the development of an Agricultural Technology and Innovation Park within the UCD Lyons Farm, that will act as an anchor, supporting incubator, innovation and business development.</p>	<p>Regarding the proposed objective RE O82A, the insertion of the objective within section 4.12 (Knowledge Economy) is acceptable and would reinforce the crucial role that the UCD Lyons Farm plays in the agricultural and knowledge-based economy of Co. Kildare.</p> <p>Regarding the proposed objective RE O62A, it is considered that this is already covered by RE O62. To specifically identify the UCD Lyons Farm is not considered necessary.</p> <p>Regarding the proposed objective RE O63A, It is considered this is already covered by RE O63 and an objective specifically identifying UCD Lyons Farm is considered unnecessary.</p> <p>Regarding the proposed objective RE O18A, when deemed appropriate Kildare County Council will support and facilitate UCD and other agencies to ensure the delivery of key infrastructure to facilitate future development. The wording of this objective shall be amended to reflect this change in emphasis.</p> <p>Regarding the proposed objective RE O60A, It is considered that Objective RE O82, which 'Supports the development of an AgTech Connector Innovation Hub at the UCD Lyons Farm in Co. Kildare' is sufficient.</p> <p>Chief Executive's Recommendation Insert the following objective after Objective RE O65: Support UCD Lyons Farm as a centre of excellence and a third level teaching and agricultural research facility and to facilitate the delivery of key infrastructure, as</p>
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				appropriate subject to planning and environmental considerations.
193	Deirdrett Brett	The submission highlights the importance of ensuring the protection of prime agricultural land from inappropriate large scale energy developments.		<p>Chief Executive's Response The council recognises the economic value of agriculture and the need to future proof our food supply.</p>
24	Kathryna Phibbs	<p>The submission highlights the importance of ensuring the protection of prime agricultural land from inappropriate development in order to future proof our food supply.</p> <p>It is suggested that the Plan include an objective such as the following: Preserve prime agricultural land and top-quality land for the purpose of food production and prevent the loss of high quality agricultural productive land.</p>		<p>Chief Executive's Recommendation Amend RE O85 as follows: Protect agriculture and traditional rural enterprises from unplanned haphazard and/or incompatible urban development.</p>
195	Elizabeth Cullen	Consider developing a centre in Newbridge to undertake research into wool and the many uses it could be put to.		<p>Chief Executive's Response The draft plan includes Objective RE O23 to continue to support and develop the Self-Sustaining Growth Towns of Newbridge and Leixlip as an attractor but not limited to Biotechnology, ICT, professional services, High-tech manufacturing, and research employment which would serve as a basis for encouraging the type of centre</p>

			<p>proposed where there was an interest in developing such a centre.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
405	Kildare Climate Action Linkage Group	<p>The submission highlights the value of wool and that €100,000 was secured for a feasibility study aimed at developing Ireland's struggling Wool Industry in Budget 2021.</p> <p>It is requested that the Plan acknowledge that wool has a tangible value and is not simply a waste product. The submitter would also like to see KCC engaging with and supporting local farmers to develop their product in a sustainable way, by getting involved with the research currently happening here in Ireland.</p>	<p>Chief Executive's Response Noted, however the matters raised in relation to engagement with local farmers with respect to developing wool products is outside the remit of a Development Plan.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
351	Eco Advocacy	<p>The submission refers to agricultural land and recommends that a policy be added to the Draft Plan to state that it shall be the policy of the Council to favour the use of prime agricultural lands for that purpose; i.e. agricultural use in preference to other forms of development and to seek to only work aggregates from lands that have limited agricultural value and where the rock is available over ground; typically in mountainous and less populated areas of the county.</p>	<p>Chief Executive's Response The Draft Plan recognises the economic value and the need to protect agricultural land from inappropriate industrial, commercial or residential development (RE O85). However, it would not be considered appropriate or reasonable to only ever permit agricultural related uses on lands currently used for agricultural purposes.</p> <p>Given the scale of coverage in the county, and in the absence of relevant criteria, prime agricultural lands are not identified in the Draft Plan. However, the plan does include provisions to ensure protection of the countryside in section 3.13 – Sustainable Rural Housing and in section 9.3 – Rural Economy and Enterprise where commercial / industrial and some larger rural based enterprises are encouraged in towns and villages close to services and infrastructure rather</p>

			<p>than in the countryside unless there is dependence of an existing local resource of source material that is required for the activity or service.</p>
			<p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
<p>560</p>	<p>Cllr. Suzanne Doyle</p>	<p>The submission recommends that an Objective be added to support the development of agri-spin off industries that will create better efficiencies, address climate action goals and diversification of agri-sector.</p>	<p>Chief Executive’s Response The Council recognises the role of the agri-food sector in the County. The sector employs approximately 164,400 people representing 7.1% of total employment. Outside of Dublin and the mid-east region, the sector provides between 10% and 14% of employment. The sector plays an increasingly crucial role in the rural economy and in the development of the county in general.</p> <p>In RD P2 of Section 9.4.1, it is the policy of the Council to “Support the future and continued development of agriculture and the agri-food sector in County Kildare.”</p> <p>In Policy RD P1, it is the policy of the Council to “Support and promote rural enterprise and encourage appropriate expansion and diversification in areas such as sustainable agriculture, forestry, peatlands, food, crafts, renewable energy at suitable locations in the county, particularly where they contribute to a low carbon and resilient economy.”</p> <p>In Objective RD O9, it is an objective of the Council to “Encourage the development of environmentally sustainable agricultural practices, to ensure that development does not impinge on the visual amenity of the countryside and that the quality of the natural environment (watercourses, wildlife habitats and areas</p>

			<p>of ecological importance) is maintained and protected from the threat of pollution to support the achievement of climate targets.”</p> <p>In Objective RD O4, it is an objective of the Council to “Encourage and facilitate the sensitive re-use of vernacular houses or farm buildings for farm diversification, agri-tourism, and other appropriate rural-based development.”</p> <p>Objective RD O6 states “Encourage the conservation and promotion of biodiversity in all rural development activities whilst supporting the restoration, preservation, and enhancement of ecosystems dependent on agriculture and forestry.”</p> <p>Table 9.11 of the Draft Plan sets out a comprehensive list of the “Criteria for Assessment of One-off Enterprises in Rural Areas”.</p> <p>It is considered that the Section 9.3 of the Draft Plan adequately addresses the issue raised in the submission.</p>
			<p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
413.	Kildare Public Participation Network	<p><u>Agri-Food and Beverage Sector</u> The submission notes objective RE O83 and requests the development of specific actions on how Kildare County Council is going to implement this provision of the draft Plan.</p>	<p>Chief Executive’s Response The request is noted. Objective RE O83 (relating to the ability of communities to be self-sufficient in, inter alia; food production, energy savings and production, waste disposal) is intended to provide an overarching and strategic level of support. The provision of any specific actions with regard to same is considered to be outside the scope of this land use plan.</p>

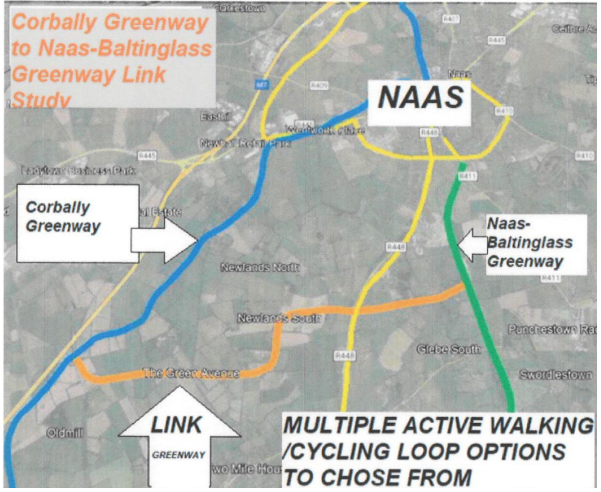
			Chief Executive's Recommendation No change to the Draft Plan.
EQUINE			
9	Greenway Delivery	<p>Designate an Equine Tourism Zone between Punchestown Racecourse and the Naas Baltinglass Greenway (including Killashee Equine Centre of Excellence).</p> <p><u>Summary of Appendix as below:</u> Designate an Equine Tourism Zone between Punchestown Racecourse and the Naas Baltinglass Greenway (including Killashee Equine Centre of Excellence). This is a quiet calm zone with an environment suitable for horses, eco-tourism, Greenway Cycle and Walking and with high Green Infrastructure and habitat value.</p>	<p>Chief Executive's Response Chapter 4 currently includes Policy RE O91, which states the following: 'Protect and nurture the environment which allows the equine industry to flourish in Co. Kildare and support the conserving and development of equine walking paths, bridle ways, tracks and trails.'</p> <p>The dCDP supports the protection of the equine industry and it is considered that the above objective adequately addresses the contents of this particular submission in this regard.</p>
			Chief Executive's Recommendation No change to the Draft Plan.
GREENWAYS			
358	Deirdre Lane Of Kildare Environmental Network County	<p><u>Reusing Turf Railway Tracks</u> The existing turf trains and tracks could be used as greenways, improving biodiversity and acting as a tourist draw bringing revenues to local rural economies. A map should be provided of the existing Bord Na Mona and ESB rail infrastructure and a 50-year vision formulated. It should be noted the EU is funding rail heritage work and KCC could avail of</p>	<p>Chief Executive's Response Objective RE O125 in Chapter 4 'Resilient Economy and Job Creation' supports the use of former bog railways to become greenways. It states the following: It is an objective of the Council to: a) Support and facilitate the development of Umeras Bog into a Peatlands Park.</p>


	Development Plan Submission	funding for such works. The Head Quarters of Bord na Móna should also have a visitor centre to exhibit social history.	<p>b) Develop the tourism potential of peatlands and in particular support the proposed Umeras Peatlands Park and existing Lullymore Heritage and Discovery Park as tourist and ecological amenities subject to proper planning, environmental protection and sustainable development.</p> <p>c) Explore what linkages could be created between raised boglands and fens and nearby blueways and greenways, whilst ensuring that the environment and nearby properties would not be negatively affected.</p> <p>d) Look at the feasibility of creating linkages between the proposed Umeras Peatlands Park and Monasterevin train station</p> <p>e) Look at the feasibility of creating linkages between Mouds Bog and the nearby town of Newbridge.</p> <p>Objective RE O126 in Chapter 4 also states that the Council will work with Bord na Móna to develop tourism opportunities.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
2	Greenway Delivery	<p>Designated Regional and Local Greenway Routes within Kildare must be given special protection against development that would adversely impact upon the development of these proposed Greenway Routes.</p> <p>Propose that the CDP should adopt the Government's Code of Practice for Greenway Development.</p> <p>Particular concern raised in relation to a proposed industrial solar farm at Swordlestown which, if granted, would result in the loss of 500m of the Naas to</p>	<p>Chief Executive's Response While Chapter 4 currently includes Policy RE P21 and Objective RE O134 in particular (as set out below), it is considered appropriate to include an additional objective supporting the Government's Code of Practice for Greenway development. Additional wording to RE O134 is also proposed to help fulfil its potential.</p> <p>RE P21 'Work with the National Transport Authority (in conjunction with relevant objectives in Chapter 5), Kildare Fáilte, Fáilte Ireland, Waterways Ireland and all</p>

		<p>Baltinglass Greenway. Early engagement with all landowners is key.</p> <p><u>Summary of Appendix as below:</u> Case Study: Swordlestown Industrial Solar Development (Planning Ref. 22/111), which is proposed to be constructed directly on top of the Naas to Baltinglass designated Regional Greenway Old Sallins to Tullow rail line is highlighted.</p> <p>Request that the CDP includes policies to ensure designated Greenways are effectively delivered and to facilitate Stakeholder Groups in this regard.</p>	<p>stakeholders to develop a co-ordinated approach to the selection, delivery and servicing of future greenways, blueways, trails and routes throughout the county and region.'</p> <p>RE O134 'Investigate the feasibility of developing a walkway/cycleway along the former Tullow railway line in County Kildare.' This objective is identified as a short-term objective (i.e. to be undertaken within 2 years of the adoption of the Plan) as set out in Appendix 12, Monitoring & Implementation Framework.</p> <p>Additionally, greenway routes are protected from adverse development under objective BI O47 of Chapter 12, which 'Ensure[s] that the design of new development does not cause fragmentation of the Green infrastructure network.'</p> <p>Chief Executive's Recommendation Include the following objective after RE O141: Support and promote the adoption of the Government's 'Code of Best Practice for National and Regional Greenways (published in December 2021)' for all Greenway developments within the county.</p> <p>Amend RE O134 as follows: Investigate the feasibility of developing a walkway/cycleway along the former Tullow railway line/ Naas-Baltinglass Greenway and, where considered feasible, to initiate the delivery of this project within the lifetime of the Plan in conjunction with all relevant landowners.</p> <p>See the proposed new objective in recommendation to Submission No. 9 in Chapter 5.</p>
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600	Shane Martin	<p>It is submitted that the Plan should clearly state how the local authority will preserve and protect the Greenway routes designated in the Plan. Early communication with the landowners is suggested.</p> <p>It is proposed that the local authority should not allow development to take place upon the designated Greenway route. Alternatively, the route may be able to move slightly to avoid a building, provided the Greenway can return to its original point.</p> <p>The proposal at Swordlestown (Planning Ref: 22111) is highlighted as a clear example of what could go wrong. It is submitted that if permitted the Naas to Baltinglass designated Regional Greenway would not be viable.</p>	<p>Chief Executive's Response See response to Submission No.2.</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 2.</p> <p>See the proposed new objective in recommendation to Submission No. 9 in Chapter 5.</p>
9	Greenway Delivery	<p>Adopt the 'Code of Best Practice for National and Regional Greenways' Department of Transport published on 17th December 2021 into the County Development Plan 2023-2029</p> <p>Prioritise the delivery timescales for the Naas to Baltinglass Greenway to short / medium term.</p> <p><u>Summary of Appendix as below:</u> Adopt the 'Code of Best Practice for National and Regional Greenways' Department of Transport published on 17th December 2021 into the County Development Plan 2023-2029. With particular emphasis on early engagement with the landowner.</p>	<p>Chief Executive's Response See response to Submission No.2.</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 2.</p> <p>See the proposed new objective in recommendation to Submission No. 9 in Chapter 5.</p>

28	Cathy Meade	<p><u>Protection of Greenway routes</u> <u>Summary of Appendix:</u> The proposed greenway starting from near the Naas lakes and along the old Tullow railway line would be a great addition.</p> <p>The greenway should be designated in a very sensitive manner in order to ensure minimum disruption to the area.</p> <p>There should be a policy objective inserted into the Development Plan prioritising the designated Greenway route and ensuring its delivery by 2030.</p> <p>A new policy objective should be inserted, which states that all designated Greenway routes should be protected and that planning permission for alternative developments will not be permitted along these routes.</p>	<p>Chief Executive's Response See response to Submission No.2.</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 2.</p> <p>See the proposed new objective in recommendation to Submission No. 9 in Chapter 5.</p>
166	Kathy Merrins	<p>Greenway link between Naas – Corbally Harbour Greenway and the Naas – Baltinglass Greenway (old Tullow Railway line)</p> <p>The submission states that the Naas to Baltinglass greenway will be a very welcome development and reduce car dependency in the area. In addition, visitors will come to enjoy the stunning landscape. The old railway line is the perfect conduit for the greenway design ensuring minimum hindrance on the local environment.</p> <p>The Governments Code of Practice for Greenway Development will significantly improve the delivery of designated Greenways in Kildare, and the Council should adopt this Code of Practice. There should be</p>	<p>Chief Executive's Response It should be noted that the Draft Plan has not identified a link between the proposed greenways as outlined in this submission. However, it should be noted that it is objective of the Council to lead and support the extension and interconnection of Greenways in consultation with relevant stakeholders (Objective LR O42 refers). Notwithstanding this however, there is merit in including the stated links in the Draft Plan and to investigate the feasibility of providing such links during the life of this Plan.</p> <p>In relation to adhering to the Code of Best Practice for National and Regional Greenways, Policy RE P21 in Chapter 4 should be noted which includes working with the National Transport Authority, Kildare Fáilte, Fáilte</p>

		<p>adherence to the Code of Practice for the proposed greenway link between the Naas – Corbally Harbour Greenway, and the Naas – Baltinglass Greenway.</p>	<p>Ireland, Waterways Ireland and all stakeholders to develop a co-ordinated approach to the selection, delivery and servicing of future greenways, throughout the county. However, it is considered reasonable to include a further objective to ensure adherence with this document.</p> <p>Chief Executive’s Recommendation See recommendation to Submission No. 2.</p> <p>See the proposed new objective in recommendation to Submission No. 9 in Chapter 5.</p>
<p>600</p>	<p>Shane Martin</p>	<p>The submission suggests that the Plan includes a policy to undertake a feasibility study with the view to constructing a new Greenway link between Naas/Corbally Canal and the Naas/Dunlavin Canal.</p>  <p>In addition, the submission includes a map extract of the Naas Local Area Plan and highlights the subject greenway route marked as number 3 on the map. An</p>	<p>Chief Executive’s Response It should be noted that the Draft Plan has not identified a link between the proposed greenways as outlined in this submission. However, it should be noted that it is an objective of the Council to lead and support the extension and interconnection of Greenways in consultation with relevant stakeholders (Objective LR O42 refers). Notwithstanding this however, there is merit in including the stated links in the Draft Plan and to investigate the feasibility of providing such links during the life of this Plan.</p> <p>Chief Executive’s Recommendation See recommendation to Submission No. 2.</p> <p>See the proposed new objective in recommendation to Submission No. 9 in Chapter 5.</p>

		<p>aerial photo is also provided which shows Phase 1 of the Greenway route with red arrows and the proposed connection between the proposed Greenway and the Pipers Hill housing estate and school campus with yellow arrows. (See maps below) It is submitted that the Plan should include policy to develop the first phase of the designated Greenway between Naas and the Pipers Hill Campus and Schools.</p> 	
328	Teresa Bourke	<p>The submitter states that the potential for the proposed greenway, which will cut through the Coughlanstown and Harristown lands, should be ring-fenced.</p>	<p>Chief Executive's Response There is an objective (RE O134) in the Draft Plan to Investigate the feasibility of developing a walkway/cycleway along the former Tullow railway line. Additional wording to this is proposed to help fulfil its potential.</p> <p>Chief Executive's Recommendation Regarding RE O134, see recommendation to Submission No. 2.</p> <p>See the proposed new objective in recommendation to Submission No. 9 in Chapter 5.</p>

194	Deirdrett Brett	<p><u>Greenway (Old Tullow Railway)</u></p> <p>This greenway would be a fantastic addition to the community, enabling children to cycle to school, and to meet friends while providing an alternative to driving to town for work. It could reduce traffic and help meet environmental goals. It is submitted that the plan should prioritise this greenway (under policy TM P2) and target delivery in the life of the plan. A policy should also be set to ensure it does not impact harmfully on local farms or ecology. It is also submitted that the plan should have a policy around the development of all greenways to ensure no development is permitted along the route of a greenway which may prevent its delivery.</p>	<p>Chief Executive's Response</p> <p>The Naas – Baltinglass Greenway relates to the former Tullow railway line in County Kildare. Objective RE O134 in Chapter 4, states the following 'Investigate the feasibility of developing a walkway/cycleway along the former Tullow railway line in County Kildare.' However, it is recommended that additional wording be added to this objective to deliver the project during the life of the plan.</p> <p>It should be further noted that it is a policy (RE P21) to work with NTA and other stakeholders to develop a co-ordinated approach to the selection, delivery, and servicing of future greenways.</p> <p>Regarding protection of farms and ecology, there is an objective (LR O38) within Chapter 13, to ensure the biodiversity value of all sites are considered and protected in the development of outdoor recreational facilities including greenways.</p> <p>Chief Executive's Recommendation</p> <p>Regarding RE O134, see recommendation to Submission No. 2.</p> <p>See the proposed new objective in recommendation to Submission No. 9 in Chapter 5.</p>
PLACEMAKING			
281	Donal Knight	<p>To encourage familiarity with the Irish language, all signage in public buildings should be bi-lingual with a common standard of font and equal emphasis given to both official languages. A good example is the signage</p>	<p>Chief Executive's Response</p> <p>Objective RE O37 (b) promotes the use of Irish language signage in the County through the Shop Front and Accessibility Grant Scheme. It is considered</p>

		currently at Naas town hall where development work is under way.	reasonable however to strengthen this objective having regard to this submission however it is considered outside of the scope of a land use plan to determine details with respect to font size etc.
			<p>Chief Executive's Recommendation Add part (xx) to the end of RE O37 to read as follows: (xx) Promote all signage both within and outside of all public buildings to be displayed in both the Irish and English languages.</p>
281	Donal Knight	Local area signage should also contain historical Irish names.	<p>Chief Executive's Response Noted and agreed.</p> <p>Chief Executive's Recommendation Amend RE O93 as follows: Support and facilitate the erection of standardised signage for tourism facilities and tourist attractions in Irish and English as part of national and regional initiatives...</p> <p>Amend RE O119 as follows: ...to include branded orientation signage and roadside signage in Irish and English.</p>
GREEN/ CIRCULAR BIO-ECONOMY			
413.	Kildare Public Participation Network	<p><u>Green / Circular Bio-economy</u> Submission suggests that as the Green / Circular economy relates to more than just biological resources the title of this section should be reworded to: <u>Green / Circular economy and Bio-economy</u></p> <p>Proposes the following additional objectives:</p>	<p>Chief Executive's Response The request to amend the title of section 4.17 is accepted.</p> <p>The request relating to including an objective supporting green and sustainable practices with businesses through various actions undertaken by the</p>

		<p>New objective: Further support and encourage green and sustainable practices with new and existing businesses within the County, including how to make their operations more sustainable, through mentoring, clinics and training with the Kildare Local Enterprise Office.</p> <p>New objective: Investigate the feasibility of establishing a circular economy hub for Kildare based off the business model of the Rediscovery Centre, the National Centre for the Circular Economy, in partnership with relevant stakeholders including the EPA.</p>	<p>Local Enterprise Office (LEO) is not accepted. It should be noted that while Kildare County Council has a strong working relationship with LEO, it constitutes a separate entity and therefore the Council has no powers to direct it to take any specific course of action.</p> <p>The request relating to the insertion of a new objective to investigate the feasibility of establishing a circular economy hub for Kildare is not accepted. Such a proposal does not feature in the Kildare 2025 Economic Development Strategy, nor does it form part of any work programme for the Council.</p> <p>Chief Executive’s Recommendation Amend the title of section 4.17 as follows: Green / Circular Economy and Bio-economy</p>
470	IPCC	<p>The submission contends that the development of the green and circular bioeconomy is a must if County Kildare is to reduce its peat usage in horticulture and agriculture which in turn will reduce pressure on peatland within the County.</p> <p>Green and brown wastes from industrial/landscaping and food sectors need to be incorporated into the circular economy to create sustainable peat replacements. The County Council also need to explore all the other industrial wastes and outputs and fund research into their suitability as to whether they can also be incorporated into the green and circular economy.</p> <p>Include the following text in Section 4.17: The green and circular economy agenda will also reduce the use of peat within horticulture and agriculture which will</p>	<p>Chief Executive’s Response Agreed. Supporting the circular economy is a priority for Kildare County Council.</p> <p>Chief Executive’s Recommendation Add the following text to Section 4.17: The Council will support the development of the bio-energy industry in the county (including bio-gas) where appropriate. The green and circular economy agenda will also reduce the use of peat within horticulture and agriculture which will reduce pressure on the environment and lower greenhouse gases, improving the situation for biodiversity and moving us in a direction of sustainable production.</p>

		reduce pressure on the environment and lower greenhouse gases, improving the situation for biodiversity and moving us in a direction of sustainable production.	
405	Kildare Climate Action Linkage Group	<p>The submission suggests rewording the title of this section to Green / Circular economy and Bio-economy. It is contended that the Green / Circular economy relates to more than just biological resources (e.g., fossil fuel and precious metal products).</p> <p>It is also requested that the word bio-based be deleted from the third paragraph of Section 4.17, as all products, materials and resources should be maintained in the circular economy for as long as possible.</p> <p>The efforts to develop the circular and bio-economy in Kildare is welcomed, but the submission questions what precautions will be taken to ensure mitigation against induced demand. For example, should a circular or bio-economy business be developed that is built on the utilisation of what is a current waste material, how will KCC ensure that the further development of this business will not lead to further demand for the waste raw material product?</p>	<p>Chief Executive's Response The request to amend the title of section 4.17 to Green / Circular economy and Bio-economy is accepted.</p> <p>It is considered appropriate to delete the 'bio-based' reference in the third paragraph of Section 4.17 as proposed.</p> <p>Objective IN O41 of the Plan encourages waste prevention, minimisation, re-use, recycling, and recovery as methods for managing waste. The provision of specific precautions in the Plan to ensure mitigation against induced demand for waste is considered to be outside of the scope of this land use plan.</p> <p>Chief Executive's Recommendation See recommendation to submission no. 413 above in relation to the title of section 4.17</p> <p>Amend the third paragraph of Section 4.17 as follows: ...The transition to a more circular economy and bio-economy, where the value of bio-based products, materials and resources is maintained in the economy for as long as possible...</p>
405	Kildare Climate Action Linkage Group	The submission requests the amendment of Policy RE P12 as follows:	<p>Chief Executive's Response While there are many policies within the plan encouraging the planting of native species, sourcing</p>

		<p>Additional native tree planting of native origin and provenance and landscaping on existing and proposed enterprise zones and development sites to aid with carbon sequestration.</p> <p>It is also submitted that RE O71-O80 is welcome but note that there are no specific actions detailed.</p>	<p>plants of native origin and provenance are considered not to be practical or appropriate in all cases.</p> <p>Objectives RE O71 – RE O80 (relating to the Green / Circular Bio-economy) are intended to provide an overarching and strategic level of support. It is considered that the objectives as drafted are sufficiently robust and it was not considered necessary to identify further specific actions against these objectives. Where it was considered appropriate to provide further clarity in relation to particular objectives in the Plan, actions have been included.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
405	Kildare Climate Action Linkage Group	<p>It is suggested that linear to circular economy hub pilots should be scaled up across the county. The Bord na Móna HQ in Newbridge is cited as an example of an innovation hub for employment and training in a shift from a linear to circular economy availing of AES waste material to fuel future economies.</p> <p>Furthermore, the submission suggests the following:</p> <ul style="list-style-type: none"> • That KCC establish and fund a Kildare Energy Agency in collaboration with experts in the area, including Bord Na Mona engineers as part of the prioritising of green energy plans for the new cultural quarter including KCC real estate. • That Green and Social Procurement be included in the plan costing and Life cycle analyses of KCC purchases. 	<p>Chief Executive’s Response Objective EC O52 supports Bord na Mona (and their company Powergen) with their redevelopment proposals for their headquarters at Newbridge, with a view to Kildare County Council promoting the area as a Green Energy Hub, which focuses on the higher order aspects of the renewable energy industry and a climate action training centre. Furthermore, Action EC A2 should be noted wherein it is an action of the Council to establish a Mid-East Energy Bureau in collaboration with Wicklow County Council, Meath County Council and the Sustainable Energy Authority of Ireland. Matters in relation to procurement, training and the implementation of nature and social prescription health models are considered to be outside the scope of a County Development Plan however such proposals may be further considered as part of the preparation of</p>

		<ul style="list-style-type: none"> • That KCC, as part of the plans to reduce waste, host a Circular Economy training and Innovation Hub, potentially located in Newbridge, in partnership with Bord na Mona and that concerned citizens, along with past and present employees of Bord Na Mona be included in this 'Just Recovery'. • Explore the potential that Newbridge and Maynooth (in conjunction with NUIM Green Campus) be pilot towns for the creation, research and implementation of Nature and Social prescription health models. 	<p>the Sustainable Energy Climate Action Plan, currently being prepared for County Kildare.</p> <p>Chief Executive's Recommendation No change to the Draft Plan</p>
468	Ann Behan	<p>Re-word heading of section 4.17 to read "<i>Green / Circular economy and Bio-economy</i>" as the green / circular economy relates to more than just biological resources (e.g., fossil fuel and precious metal products).</p> <p>The word bio-based should be deleted from the third paragraph in section 4.17 as all products, materials and resources should be maintained in the circular economy for as long as possible.</p> <p>Amend RE P12 to include wording "<i>of native origin and provenance</i>" after the words native tree planting.</p> <p>Objectives RE O71 to RE O80, under section 4.17 are welcomed. However, it is noted that no specific actions are detailed.</p> <p>It is suggested linear to circular economy hub pilots should be scaled up across the county. The Bord na Móna HQ in Newbridge is cited an example of an innovation hub for employment and training in a shift</p>	<p>Chief Executive's Response See response to submissions 405 & 413 above.</p> <p>Chief Executive's Recommendation See submissions 405 & 413 above.</p>

		from a linear to circular economy availing of AES waste material to fuel future economies.	
TOURISM			
501	Fiona O'Loughlin	<p><u>Tourism</u> Added protection for the Curragh and the development of a national peatlands park.</p> <p><u>Signage</u> There needs to be appropriate signage at the Curragh and Hill of Allen.</p> <p><u>Glamping / motorhomes</u> There should also be specially designated sites for glamping/motorhomes.</p> <p><u>Blueway</u> Rathangan, Robertstown. Monasterevin and Athy should be specially designated as Blueway destination towns in terms of developing appropriate industry</p> <p><u>Berths</u> An increase in serviced berths is needed to support our inland waterways tourism.</p>	<p>Chief Executive's Response</p> <p><u>Tourism</u> Objectives, policies, and actions seeking the development of a national peatlands park are proposed throughout the Plan.</p> <p>Under the Draft Plan, the Curragh is classified as an area of Unique Sensitivity with respect to the impact of development and is also identified as an Area of High Amenity.</p> <p>A Curragh Plains Draft Conservation Management Plan is also being prepared with a second phase of public consultation due to take place as soon as the Draft Plan has been prepared. The focus of the second consultation will be on wayfinding and branding.</p> <p><u>Signage</u> It is considered that objectives RE O119 and RE O93 in Chapter 4 'Resilient Economy and Job Creation' adequately address the requirement for appropriate signage at the Curragh and Hill of Allen.</p> <p><u>Glamping / motorhomes</u> The contents of the submission are noted. It is acknowledged that glamping facilities, subject to site-specific planning, design and environmental considerations should be an integral part of the overall</p>

			<p>tourist accommodation offer in Kildare and should be supported in the Plan.</p> <p><u>Blueway</u> Objectives RE O130 and RE O131 support the development of Monasterevin and Athy as Blueway arrival / destination towns. It is considered that an additional objective should be included to support the development of Rathangan and Robertstown as Blueway arrival / destination locations.</p> <p><u>Berths</u> It should be noted that while it is outside the scope of the Council to provide berthing/mooring facilities the Council can support Waterways Ireland with the provision of such facilities at appropriate locations.</p> <p>Chief Executive's Recommendation Replace RE O96 with the following objective: Support the diversification of the county's tourist accommodation offer, including the development of appropriately scaled camping/glamping and campervan accommodation and their associated infrastructure (including parking and toilet facilities) within/or proximate to existing settlements, established tourism assets and at an appropriate scale, subject to planning and environmental considerations, particularly where they support nearby settlements.</p> <p>Insert the following objective after RE O131: Support and facilitate the development of Rathangan and Robertstown as Blueway destination locations having regard to their natural and built heritage assets.</p>
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			<p>Include a new objective in Section 13.6 to read as follows: Support and facilitate Waterways Ireland and other relevant stakeholders with the provision of additional mooring and berthing facilities at appropriate locations throughout the County.</p>
209	James O'Dwyer	<p>The County Development Plan should support and embrace outdoor initiatives around glamping tourism which promote biodiversity.</p>	<p>Chief Executive's Response Agreed. In relation to glamping, see response to Submission No. 501.</p> <p>Chief Executive's Recommendation In relation to glamping, see recommendation to Submission No. 501.</p>
288	Sutton House Hospitality trading as Barberstown Castle	<p>The agent recommends the following new objective to support hotel and tourist accommodation: Support the provision of diversified types of tourist accommodation at established tourist accommodation facilities to diversify options for tourists including lodges, apartments, glamping etc, subject to such facilities remaining part of the main tourist facility and not being sold or leased separately.</p> <p>It also suggests objective RE O96 in Chapter 4 'Resilient Economy and Job Creation' be amended to read: Support additional tourist accommodation, particularly at established tourist accommodation facilities such as hotels in both urban and rural locations, and other types of tourism infrastructure such as motorhome parking and toilet facilities at appropriate, sustainable locations, where the vitality and vibrancy of nearby serviced centres is not compromised.</p>	<p>Chief Executive's Response Diversified types of tourist accommodation at established tourist accommodation facilities would have to be judged on a case-by-case basis subject to all types of accommodation being located in sustainable locations, where the vitality and vibrancy of nearby serviced centres is not compromised. Furthermore, the ownership of any such scheme would not be a valid consideration on which to judge any prospective planning application. It is therefore considered that this proposed new objective is not warranted.</p> <p>It is considered appropriate to replace RE O96 with a new objective that includes diverse accommodation offerings and associated facilities.</p> <p>Chief Executive's Recommendation In relation to RE O96, see recommendation to Submission No. 501.</p>

<p>227.</p>	<p>James O'Dwyer</p>	<p>The submission relates to the potential for glamping and cycling/adventure tourism in Kildare Town and discovering the many tourism attractions that Kildare has to offer. Notes the many outdoor tourist and biodiversity attractions that are located within 3 kms of Kildare Town.</p> <p>Submitter states that they are an employee in the peat industry for the past 25 years and had recently investigated the possibility of establishing a rural based glamping experience on their farm which is very close to the Irish national Stud, Curragh, Kildare Village, and other key tourism destinations.</p> <p>States that working through the Just Transition Plan they had developed a detailed business proposal and research of the project that gave a great assurance of its potential success. However, states that on engaging with Kildare County Council planning section, they discovered that there is no provision in policy to support such an enterprise. Requests that the CDP would include policies that support this concept.</p> <p>While noting that Kildare has great ambitions to develop the tourism sector in the County, it is stated that it is important to acknowledge the importance of having a broad range of accommodation offering similar to that in well-established tourism counties, such as Kerry and Galway. Notes the importance of bundling of attractions and accommodation within the one area.</p> <p>Notes that while Kildare is rich with many valuable visitor attractions including the Barrow Blueway, strategic and diverse ranges of affordable</p>	<p>Chief Executive's Response The contents of the submission are noted. It is acknowledged that glamping facilities, subject to site-specific planning, design and environmental considerations should be an integral part of the overall tourist accommodation offer in Kildare and should be supported by a policy objective of the Plan.</p> <p>Chief Executive's Recommendation In relation to glamping facilities, see recommendation to Submission No. 501.</p>
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383	Fáilte Ireland	<p>It is submitted that there is an absence of choice in accommodation for younger visitors and families and alternative accommodation facilities outside the main towns including holiday homes, motorhome parking, camping and glamping sites. Fáilte Ireland wishes to see alternative and a more diverse offering in accommodation with associated facilities for walkers, cyclists and families which is of a high quality.</p> <p>It is considered that the Plan should particularly support the development of tourist accommodation and facility offerings to increase the dispersal of visitors throughout the county. The following amendments to Objective RE O96 are proposed: Support additional tourist accommodation and other types of tourism infrastructure such as motorhome parking, glamping, caravan and camping and with associated toilet and shower facilities at appropriate, sustainable locations, where the vitality and vibrancy of nearby serviced centres is not compromised.</p>	<p>Chief Executive's Response The submission is noted and accepted. It is considered appropriate to replace RE O96 with a new objective that includes diverse accommodation offerings and associated facilities.</p> <p>Chief Executive's Recommendation Replace RE O96 with the following objective: Support the diversification of the county's tourist accommodation offer, including the development of appropriately scaled camping/glamping and campervan accommodation and their associated infrastructure (including parking and toilet facilities) within/or proximate to existing settlements, established tourism assets and at an appropriate scale, subject to planning and environmental considerations, particularly where they support nearby settlements.</p>
80	Cllr. Suzanne Doyle	<p>The submission suggests that the Plan includes policies to support the delivery of rural based eco-tourism projects in appropriate locations both within</p>	<p>Chief Executive's Response The Draft Plan includes policies to support rural based eco-tourism projects in Chapter 4 (RE P24) and in</p>

	<p>the chapter dealing with tourism (chapter 4) and in other relevant chapters such as rural enterprise / development (chapter 9).</p> <p>It is stated that Kildare is well placed to realise tourism opportunities and could build on the acknowledged assets of Kildare town as the key tourism destination in the county. The growing tourism market is not being met in Kildare and is not being facilitated through policies in the Draft Plan.</p> <p>The delivery of a diverse range of bed night opportunities would enhance the profile of the county as a tourism destination. It is contended the plan fails to appreciate the importance of appropriately located bed nights, and it is important that bed night supply be strategically located where tourism attractions exist.</p> <p>It is requested that the following statement be included in the CDP “while the council considers that camping sites should be located on appropriately zoned land within established/or adjacent to existing settlements, small scale camping sites may be appropriate to complement tourism assets in rural locations within or adjacent to existing settlements / attractions. The planning authority may facilitate proposals for camping / glamping sites which support rural tourism initiatives subject to proper planning and sustainable development.”</p> <p>The plan should restrict the use of these developments for anything other than tourism. This would help deliver a supply of competitively priced bed nights that will enhance the attractiveness of Kildare as a tourism destination. Currently, supply in the county is oversubscribed with capacity being used by business</p>	<p>Chapter 9 (RD P1). In addition, within Chapter 4 there is an objective (RE O122) to promote Kildare Town’s development as a National Tourism Hub. It should also be noted there is a further objective (RE O94) which is to identify strategic sites capable of accommodating new tourism ventures.</p> <p>In relation to tourism accommodation there is an objective (RE O96) which supports additional tourist accommodation and other types of tourism infrastructure such as motorhome parking at appropriate locations in addition to Objective RE O105 to support the development of sustainable forest-based tourism facilities and accommodation at appropriate locations within the Coillte Estate.</p> <p>Chief Executive’s Recommendation Replace RE O96 with the following objective: Support the diversification of the county’s tourist accommodation offer, including the development of appropriately scaled camping/glamping and campervan accommodation and their associated infrastructure (including parking and toilet facilities) within/or proximate to existing settlements, established tourism assets and at an appropriate scale, subject to planning and environmental considerations, particularly where they support nearby settlements.</p>
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		<p>related demand due to our proximity to Dublin thus leaving a shortage of supply for the Tourism market.</p> <p>Other counties more traditionally associated with tourism have embraced the concept of providing more rural tourism offerings including accommodation. Links to some examples are provided in the submission. It is also suggested that tourism offerings including accommodation should support cycling as a form of transport and it is anticipated this would be less expensive than urban based accommodation.</p>	
385	County Kildare Chamber	<p><u>Former Industrial Peatlands</u> The former industrial peatlands in West Kildare should be looked at as multi and mixed-use lands into the future, with potential for industry, tourism and biodiversity schemes.</p>	<p>Chief Executive’s Response The former industrial peatlands in West Kildare are identified throughout the Draft Plan.</p> <p>Section 4.24 identifies policies and objectives for Peatland Tourism, including the development of peatways, bike-hire facilities, recreational forestry, wilderness, eco-tourism based on biodiversity and a National Peatlands Heritage Park.</p> <p>Section 7.12.7 identifies policies and objectives for a comprehensive “after use” framework plan for the industrial peatlands and associated workshops, office buildings, industrial sites and power stations in Kildare, acknowledging the significant contribution that these expansive lands make towards the special landscape of the Bog of Allen.</p> <p>Section 9.8 identifies policies and objectives which support the appropriate and sensitive diversification of peatlands, whilst ensuring the protection of their ecological, archaeological, cultural, and educational significance.</p>

			<p>Section 12.14.4 has a specific action (BI A22), which seeks to 'Work with Bord Na Mona to prepare a Green Infrastructure Masterplan that will inform the delineation of core areas, stepping stones and corridors (long distance peatways) as identified in Sections 12.14.6, 12.14.7 and 12.14.8, that may inform the designation of an interconnected Bog of Allen Nature Reserve, Special Amenity Area Order and/or National Peatlands Park.'</p> <p>Section 13.6.5 has an objective (LR O40), which seeks to investigate the feasibility of developing a Midlands Peatlands National Park in consultation with Offaly County Council, Bord na Móna, Coillte, NPWS, local landowners and all other relevant stakeholders to include areas of (inter alia) high nature value, amenity, education/science and eco-tourism potential.</p> <p>The policies, objectives and actions contained within the above sections shall help realise the potential of the former industrial peatlands lands in West Kildare, specifically in relation to industry, tourism and bio-diversity.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
470	IPCC	The end of industrial extraction of peat within the County has heralded a new opportunity to reverse the biodiversity loss and greenhouse gas emissions emanating from the large expanses of brownfield sites. The benefit from the rehabilitation and restoration of these areas in terms of conservation and ecosystem services cannot be understated. Coupled with the development of the blueways and greenways, creating a corridor for tourism, the peatlands of the county can	<p>Chief Executive's Response Agree to change RE O126 as suggested.</p> <p>Agree, in part to amend RE O127 as suggested.</p> <p>Chief Executive's Recommendation Amend RE O126 as follows: ...network of bogs and industrial railways and a designation of a National Peatlands Heritage Park</p>

		<p>be the gateway for the midlands bringing international and domestic visitors. If sensitive to the receiving environment there is a chance for a sustainable tourism economy, creating jobs and supporting the indigenous population who also benefit from the local environmental amenity.</p> <p>The IPCC supports the creation of a National Peatlands Park. It is proposed to amend Section 4.24 Peatland Tourism (RE O126) to omit 'Heritage' after 'National Peatlands'.</p> <p>It is proposed to edit RE O127 to 'Support in conjunction with Offaly County Council, Laois County Council and all other relevant stakeholders such as Bord na Mona, Coillte, NPWS and other relevant stakeholders such as environmental Non-Governmental Organisations, any proposal for a new National Peatlands Heritage Park centred in Kildare on Bord Na Mona cutaway bogs incorporating the wider biodiversity hotspots, increasing recognition of the wider peatland landscape within Kildare, Laois and Offaly.</p>	<p>...and to make all other necessary changes to the Plan on foot of the above.</p> <p>Amend RE O127 as follows: ...such as Bord na Mona, Coillte and the NPWS, and other relevant stakeholders such as environmental Non-Governmental Organisations, any proposal for a new National Peatlands Heritage Park centred in Kildare on Bord Na Mona cutaway bogs in Kildare, Laois and Offaly.</p>
405	Kildare Climate Action Linkage Group	The submission requests the consistent use of National Peatlands Park throughout the Plan omitting the word 'Heritage'.	<p>Chief Executive's Response Agreed.</p> <p>Chief Executive's Recommendation See recommendation to submission 470 (IPCC) above.</p>
432	West Kildare SMART Rural Alliance (SRA)	It is contended that Failte Ireland recognises sustainable eco-tourism as a growth market for Ireland and that Kildare has a unique opportunity to maximise this potential via the rehabilitation of former industrial peatlands.	<p>Chief Executive's Response The suggested amendments to Section 4.21 and 4.21.1 to include reference to eco-tourism and peatlands are noted, however it is considered more appropriate to amend policy objective RE 095 (which already refers to the development of tourism in Kildare centred on many</p>

		<p>The submission requests the following changes to the second paragraphs of Section 4.21 and Section 4.21.1:</p> <p>The key focus for the Midlands/Failte Ireland region will be the further development and promotion of the local culture, heritage product and eco-tourism.</p> <p>Kildare currently has a varied tourism portfolio with a position of excellence in heritage, golf, equine including horse racing, adventure activities, shopping, walking and cycling (including the Greenways and Blueways) and peatlands based eco-tourism.</p> <p>It is also suggested to amend Objective RE O95 to include peatlands as a tourism offer to be supported in the expansion and development of tourism in Kildare.</p> <p>The submission requests the consistent use of National Peatlands Park throughout the Plan omitting the word 'Heritage'.</p> <p>It is also requested that the following paragraph be added to Section 4.24 after paragraph 2:</p> <p>Given its proximity to Dublin, Kildare is well positioned to serve as a gateway county for visitors accessing the peatlands. Establishing an inter county National Peatlands Park and integrating this development with the Blueway and Greenways has the potential to establish a world class peatland's / activity based experience. This would grow eco-tourism in a way which complements Kildare's current offering, and help deliver a Just Transition to the peatland communities of West Kildare.</p>	<p>aspects including eco-tourism) to include further reference to Peatlands.</p> <p>It is agreed that all references to 'National Peatlands Heritage Park' should be changed to 'National Peatlands Park'. Whilst the submission suggests additional text in the Plan relating to peatlands tourism, it is considered that the policies and objectives of the Plan adequately support such initiatives.</p> <p>It is an objective of the Rathangan Town Plan (Objective ST R7, Appendix 2) to 'Promote Rathangan as a tourist destination having regard to its location on the future Grand Canal Greenway and River Slate and to include linkages to Lullymore Heritage Park and Killinthomas Woods'.</p> <p>It is also an objective of the Plan (TM O36) to support the implementation of the Local Link Rural Transport Programme Strategic Plan 2018-2022.</p> <p>Objectives RE O130 and RE O131 support the development of Monasterevin and Athy as Blueway arrival / destination towns. It is considered that an additional objective should be included to support the development of Rathangan and Robertstown as Blueway arrival / destination locations.</p> <p>Chief Executive's Recommendation Amend Section 4.21: The key focus for the Midlands/Mid-East Failte Ireland Into Kildare region will be the further development and promotion of the local culture and heritage product,</p>
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		<p>The submission requests the following new objective to be inserted after Objective RE O131: Support and facilitate the development of Rathangan as a Blueway destination town based on its natural and built heritage, proximity to the peatlands and Lullymore Heritage & Discovery Park and collaborate with the National Transport Authority and Local Link to provide connectivity.</p>	<p>including the development of ‘the Ireland’s Ancient East’ brand as it relates to Kildare.</p> <p>Amend Objective RE O95 as follows: ...such as those centred on the racing industry, motorsports, retail, heritage, historical heritage (both persons and places), geology, peatlands, golf and eco-tourism to include: Arthur’s Way, the Dublin – Galway Greenway, the Barrow Blueway, the Shackleton Trail, Shackleton Museum, Mondello the Gordon Bennett Route, the Grand Canal Greenway, Brigid 1500, a Fitzgerald Family Trail, the Made of Athy Trail, Castledermot Town Wall and other opportunities. Such developments shall be subject to AA screening and where applicable, Stage 2 AA.</p> <p>Amend all references to ‘National Peatlands Heritage Park’ to read ‘National Peatlands Park’</p> <p>Insert the following objective after RE O131: Support and facilitate the development of Rathangan and Robertstown as Blueway destination locations having regard to their natural and built heritage assets.</p>
576	County Kildare Leader Partnership (CKLP)	<p><u>Amend RE O127</u> The text provided in relation to the amendment is the same as the existing Objective RE O127 in Section 4.24 of the Draft Plan, which relates to support for a new National Peatlands Heritage Park.</p> <p><u>Amend RE P20.</u> The amendment proposed reads as follows: Continue to work closely with key stakeholders in the tourism industry including Kildare Failte, Failte Ireland, Waterways Ireland, County Kildare Leader Partnership</p>	<p>Chief Executive’s Response The submission requests an amendment to Objective RE O127 but does not specify the amendment, however, it is noted that the Draft Plan already contains an Objective RE O127 relating to support for a new National Peatland Heritage Park.</p> <p>It is noted that the Kildare County Council policy document ‘Economic Strategy ‘Kildare 2025 Economic Development Strategy’ aims to support social enterprise initiation and start-ups through targeted programmes</p>

		<p>and the National Parks and Wildlife Services, in order to develop the Barrow Blueway for tourism and recreation and ensure ease of access to this amenity.</p>	<p>and initiatives and provide tailored training for existing social enterprises. This will be achieved with the support and co-operation of a range of stakeholders that include the LEADER Partnership.</p> <p>Therefore, it is considered appropriate to amend RE P20 to include reference to the County Kildare Leader Partnership.</p> <p>Chief Executive's Recommendation Amend RE P20 as follows: ...including Kildare Failte, Failte Ireland, Into Kildare, Waterways Ireland, County Kildare Leader Partnership and the...</p>
413.	Kildare Public Participation Network	<p><u>Peatland Tourism</u> Submission requests that all references to a 'National Peatlands Heritage Park' be changed to 'National Peatlands Park' throughout the County Development Plan.</p>	<p>Chief Executive's Response Accepted.</p> <p>Chief Executive's Recommendation Amend all references to 'National Peatlands Heritage Park' to read 'National Peatlands Park'</p>
468	Ann Behan	<p>Amend all references to National Peatlands Heritage Park to National Peatlands Park in chapter 4 to provide consistency in the Plan. E.g., amend wording to last line of first paragraph in 4.24 to exclude the word heritage. Also amend RE O126 and RE O127 to exclude heritage.</p> <p>Refer to West Kildare Just Transition Plan 2022, in the Draft Plan.</p>	<p>Chief Executive's Response See response to submission 413 above regarding the National Peatlands Park</p> <p>The 'Local Just Transition Plan for West Kildare' is referred to in objective EC O56. This objective supports its implementation.</p> <p>See Chief Executive's response to submission 181 Lullymore Heritage and Discovery Park CLG in relation to the requests outlined above regarding policy EC P17 and objectives EC O51 and EC 054.</p>

		<p>Amend policy EC P17 by inserting “and its potential to further the growth of tourism to the County” at the end after the Bog of Allen.</p> <p>Amend EC O51 to include “the local communities, and other key stakeholders” after Bord na Mona.</p> <p>Amend EC O54, to include “and landscape” after the word Ecological.</p>	<p>Chief Executive’s Recommendation See recommendation to submission 413 above</p>
560	Cllr. Suzanne Doyle	<p>The submission recommends that Objective RE O25 be amended to acknowledge Kildare town as the primary tourism town within the County, continue to support and develop Kildare town as a tourism, bloodstock and manufacturing location.</p>	<p>Chief Executive’s Response Objective RE O25 is to ‘Continue to support and develop Kildare Town as a bloodstock, tourism and manufacturing location’.</p> <p>Section 4.21.1 identifies a number of areas of strategic tourism potential in the county. It recognises that there is a concentration of tourist attractions located within the cluster around Kildare Town, including: St. Brigid’s Cathedral and Round Tower, the Irish National Stud, Japanese Gardens, St. Fiachra’s Garden, Kildare Town Heritage Centre and Kildare Outlet Village. This cluster is identified on the Kildare Tourism Map (Map Ref. V1-4.1).</p> <p>Section 8.7.2.4 of the Draft Plan recognises Kildare Town’s designation as a primary tourism town in the county.</p> <p>In addition, the Draft Plan was informed by the Kildare 2025 Economic Development Strategy and Section 6 of the Strategy, which deals with Sustainable Tourism, Hospitality & Leisure recognises the potential to develop and market an equine tourism trail (Thoroughbred County Experience) featuring Museums at the Curragh and Irish National Stud, the Curragh</p>

			<p>Plains, Curragh Gallops and Racecourse; Irish National Stud; Stud Farms, all of which are predominantly located in close proximity to Kildare Town.</p> <p>It is considered that Section 4.4.5 of the Draft Plan adequately addresses the issues raised in the submission.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
538	Senator Mark Wall	The submission requests that Kildare County Council in association with the office of public works develop the Abbey at Castledermot as a tourist attraction and incorporate it into a South Kildare Tourism trail.	<p>Chief Executive's Response Objective UD A3 of the Plan is to prepare and implement on a phased basis Town Renewal Masterplans for various settlements including Castledermot.</p> <p>Renewal Masterplans will focus on maximising the potential of towns and villages built and natural heritage by using these existing assets to enhance their role as visitor destinations and helping to create new local employment opportunities. The tailored approach adopted by Renewal Masterplans to each settlement's regeneration will provide for the development and enhancement of their overall function and 'unique selling point' (USP) through the identification and implementation of priority projects. In this regard, a Town Renewal Masterplan should be viewed also as a plan of action and a platform which establishes a targeted and co-ordinated long term investment strategy, enabling the creation of local synergies (i.e., the development of tourism-based enterprises) which will in turn kickstart a broader economic regeneration of a settlement.</p>

			Having regard to the above, it is not considered that any further changes to the Plan are necessary.
			Chief Executive's Recommendation No changes to the Draft Plan.
383	Fáilte Ireland	It is requested that the Council ensures a consistency in the use of Fáilte throughout the Plan as opposed to Failte (without the fada) which appears in the Plan.	Chief Executive's Response The submission is noted and agreed.
			Chief Executive's Recommendation Replace Failte (without the fada) with 'Fáilte Ireland' throughout the Plan.
383	Fáilte Ireland	The submission states that Fáilte Ireland is in the process of preparing Regional Tourism Strategies for each of their four Regional Experience Brands and highlights the purpose of these strategies. These strategies will also provide a strategic framework for a suite of Destination and Experience Development Plans (DEDPs) which will sit underneath them.	Chief Executive's Response While Chapter 4 currently includes Policy RE P17, it is considered appropriate to add a new objective to the Plan in support of the preparation of a Regional Tourism Strategy for Ireland's Ancient East.
		It is requested that the Plan include an objective supporting the preparation and implementation of Regional Tourism Strategies in the County Development Plan, to support the continued collaboration with Fáilte Ireland and tourism stakeholders to ensure the successful implementation and delivery of these tourism plans.	Chief Executive's Recommendation Add a new objective before RE O118: Support the preparation and implementation of a Regional Tourism Strategy and to support the continued collaboration with Fáilte Ireland and all relevant tourism stakeholders.
383	Fáilte Ireland	The submission proposes the following new objectives to be inserted into the tourism section of the Plan: (i) The Council will support the preparation of Destination Experience Development Plans (DEDP) and other tourism masterplans both	Chief Executive's Response While Chapter 4 currently includes Policy RE P17 and Objective RE O118 in particular, (it is considered appropriate to replace RE O118 with the proposed new objective (i) and to add a new objective in support of the

		<p>within the county and also those which cross from the county into neighbouring counties in collaboration with Fáilte Ireland and other tourism stakeholders.</p> <p>(ii) The Council will continue to work with Fáilte Ireland and tourism stakeholders to implement the Thoroughbred Country Destination Development Plan (TCDDP) and its key catalyst projects including, The New International Thoroughbred Trail and The Thoroughbred County.</p>	<p>Thoroughbred Country Destination Development Plan specifically.</p> <p>Chief Executive's Recommendation Replace RE O118 with the following objective: Support the preparation of Destination Experience Development Plans (DEDP) and other tourism masterplans both within County Kildare and also those which cross from County Kildare into neighbouring counties in collaboration with Fáilte Ireland and other tourism stakeholders.</p> <p>Add a new objective after RE O118: Continue to work with Fáilte Ireland and tourism stakeholders to implement the Thoroughbred Country Destination Development Plan and its key catalyst projects including, 'The New International Thoroughbred Trail' and 'The Thoroughbred County'.</p>
383	Fáilte Ireland	<p>Kildare Town has been granted investment under Fáilte Ireland's Destination Towns funding programme to enhance public spaces such as squares, streetscapes and markets. It is considered that the project subject of this funding should be specifically referenced in Section 4.7- Urban Growth, Regeneration and Placemaking, with an objective supporting their prioritisation and delivery for example the completion of the Market Square project in Kildare Town.</p>	<p>Chief Executive's Response It is considered appropriate to include an objective in the plan in support of all projects funded under the Fáilte Ireland's Destination Towns funding programme.</p> <p>Chief Executive's Recommendation Add a new objective under Section 4.7 of the Plan: Support and prioritise the delivery of all projects funded under the Fáilte Ireland's Destination Towns funding programme to enhance public spaces and projects.</p>
383	Fáilte Ireland	<p>It is requested that the Council support the advancement of the Curragh masterplan which safeguards the use and future development of this area for recreation. Objective RE O123 is</p>	<p>Chief Executive's Response It is considered that Objectives RE O106 & LR O19 and Actions AH A4 & LR A4 adequately address the Council's support of the Curragh masterplan. An</p>

		<p>acknowledged but it is suggested that it be strengthened as follows: To facilitate and support the preparation of the Curragh Masterplan which will investigate the feasibility of developing a Tourism Destination Centre within the Curragh which would focus on the equine and military history of the area. This process will be carried out in conjunction with Failte Ireland and other tourism stakeholders.</p>	<p>amendment of RE O123 is however proposed to strengthen the said objective.</p> <p>It should also be noted that a Curragh Plains Draft Conservation Management Plan is also being prepared with a second phase of public consultation due to take place as soon as the Draft Plan has been prepared. The focus of the second consultation will be on wayfinding and branding.</p> <p>Chief Executive's Recommendation Amend RE O123 as follows: Investigate the feasibility of developing a Tourism Destination Centre within the Curragh which would focus on the equine and military history of the area, in conjunction with Fáilte Ireland Into Kildare and other tourism stakeholders.</p>
383	Fáilte Ireland	<p>It is considered that the CDP should support the tourism sector to invest in digital technology, with a particular focus on sectors with low digital presence such as visitor attractions and activities. The following new objective is proposed to be inserted into the tourism section: Encourage and support investment in digital technology in the tourism sector, with a particular focus on sectors such as visitor attractions and activities with low digital presence and/or integration.</p>	<p>Chief Executive's Response It is considered that the issues raised are outside the scope of the Draft Plan.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
383	Fáilte Ireland	<p>The tourism section of the Plan is welcomed. It is considered that the following amendments will further enhance this section: Kildare's tourist attractions and tourism amenities are therefore important assets for the development of the</p>	<p>Chief Executive's Response The submission is noted and accepted. Amendments to Section 4.21 of the Plan are proposed in order to reflect the submission.</p>

	<p>county and are fundamental to the enjoyment by both visitors and residents.</p> <p>The key focus for the Midlands/Mid-East Fáilte Ireland Ireland's Ancient East region-brand (in which Kildare is located) will be the further development and promotion of the local culture and heritage product.</p> <p>The Department of Transport, Tourism and Sport and Fáilte Ireland are responsible for the delivery of policy and investment in tourism in Ireland. Fáilte Ireland promotes Ireland based on a Regional Experience Brand where Kildare falls within 'Ireland's Ancient East'. The aim of the branding is to inspire visitors to travel to Ireland's Ancient East by appealing to their interest in local culture and heritage. develops, promotes and invests in regional tourism through Regional Experience Brands. Kildare sits within the Irelands Ancient East regional experience brand. The strategic focus for Ireland's Ancient East is to refine and strengthen the destination's brand proposition to embrace the broader offering of the destination and increase its consumer appeal to a wider audience; increase knowledge and awareness, and improve the 'navigability' of the region; alongside establishing iconic and signature visitor experiences and strong destination towns that have the potential to become key regional attractors to drive and disperse targeted domestic and overseas visitors.</p>	<p>Chief Executive's Recommendation Amend Section 4.21 as follows: Kildare's tourist attractions and tourism amenities are therefore important assets for the development of the county and are fundamental to the enjoyment by both visitors and residents. The important contribution that the community and the vast numbers of volunteers throughout the county make to the enhancement of Kildare as a place to visit is widely acknowledged and recognised. The key focus for the Midlands/Mid-East Fáilte Ireland Into Kildare region will be the further development and promotion of the local culture and heritage product, including the development of 'the Ireland's Ancient East' brand as it relates to Kildare.</p> <p>The Department of Transport, Tourism and Sport and Fáilte Ireland are responsible for the delivery of policy and investment in tourism in Ireland. Fáilte Ireland promotes Ireland based on a Regional Experience Brand where Kildare falls within 'Ireland's Ancient East'. The aim of the branding is to inspire visitors to travel to Ireland's Ancient East by appealing to their interest in local culture and heritage. develops, promotes and invests in regional tourism through Regional Experience Brands. Kildare sits within the 'Irelands Ancient East' regional experience brand. The strategic focus for Ireland's Ancient East is to refine and strengthen the destinations' brand proposition to embrace the broader offering of the destination and increase its consumer appeal to a wider audience, increase knowledge and awareness, and improve the 'navigability' of the region, alongside establishing iconic and signature visitor experiences and strong destination towns that have the potential to become key regional</p>
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			attractors to drive and disperse targeted domestic and overseas visitors.
383	Fáilte Ireland	<p>It is requested that the Plan refer to 'festivals' in Policy RE P23.</p> <p>The submission highlights Objective RE O108 of the Plan and suggests the following addition to strengthen the objective: It is an objective of the Council to support the provision of accessible tourism and to provide appropriate access for the Disabled and appropriate Changing Places at all key tourist centres within the County.</p> <p>The submission notes the reference to ecotourism in Policy RE O113 and submits that it should be amended to sustainable tourism as ecotourism is a particular product offering.</p>	<p>Chief Executive's Response The submission is noted and accepted.</p> <p>Chief Executive's Recommendation Amend RE P23 as follows: ... the development of new festivals and events.</p> <p>Amend RE O108 as follows: Support the provision of accessible tourism and to provide appropriate access for the disabled and appropriate Changing Places at all key tourist centres within the County.</p> <p>Amend RE O113 as follows: Promote Kildare as a hub for ecotourism sustainable tourism and the...</p>
383	Fáilte Ireland	<p>The submission welcomes the idea of examining the feasibility of establishing another tourist information centre on a year-round or seasonal basis which could be in partnership with a Town Development Group, Tidy Towns or Business Improvement District Group. The following amendment to RE O100 and RE O109 is requested:</p> <p>RE O100: Direct the provision of tourist related facilities such as information offices Tourist Information Centres, self-service brochure units, kiosks and cultural centres, into town and village locations to support and strengthen the existing economic infrastructure of such centres.</p>	<p>Chief Executive's Response The submission is noted and accepted. Amendments to RE O100 and RE O109 are proposed to reflect the submission.</p> <p>Chief Executive's Recommendation Amend RE O100 as follows: Direct the provision of tourist related facilities such as information offices Tourist Information Centres, self-service brochure units, kiosks and cultural centres...</p> <p>Amend RE O109 as follows: Examine the feasibility of establishing another tourist office (Kildare Town has a Bord Fáilte Fáilte Ireland approved tourist office)...</p>

		RE O109: Examine the feasibility of establishing another tourist office (Kildare Town has a Bord Fáilte Fáilte Ireland approved tourist office) or visitor information point in the Key Town of Maynooth, which would serve the north of the County.	
383	Fáilte Ireland	<p>The submission welcomes the identification of the importance and role that greenways and blueways can have in promoting visitors to a county, as well as for local residents. It is considered that further objectives seeking the accreditation for the Barrow Blueways as well as an objective promoting shared access to water facilities would further strengthen this section. The following is proposed:</p> <p>Amend Policy RE P20: Continue to work closely with key stakeholders in the tourism industry including Kildare Fáilte, Fáilte Ireland, Waterways Ireland and the National Parks and Wildlife Services, in order to develop the Barrow Blueway for tourism and recreation and ensure ease of access to this amenity. At the appropriate time full accreditation for the Barrow Blueway will be sought by Kildare County Council.</p> <p>Proposed new objective in Section 4.26: To support both the enhancement of existing and development of new access to water locations in the County for recreation purposes. The provision of shared facility centres for water-based activities in the County shall be supported by the Council.</p>	<p>Chief Executive's Response While the reference to accreditation of any blueway route is outside the scope of the Draft Plan, it is proposed to include an additional objective to Section 4.26.</p> <p>Chief Executive's Recommendation Add a new objective to Section 4.26: Support both the enhancement of existing and development of new access routes to water locations in the County for recreation purposes at appropriate locations and subject to all relevant planning and environmental considerations.</p>
172.	Umerus Community Development Peatlands (UCDCLG)	<p>Submission requests the inclusion of a new policy statement as follows: Promote the development of the Barrow Blueway as a major Blue and Green infrastructure to promote nature</p>	<p>Chief Executive's Response Objective RE O128 refers to supporting the Barrow Blueway and it is agreed this should be amended to have specific regard to the Barrow Blueway Economic Plan. Furthermore, Objective RE O129 is to support the</p>

		<p>tourism hubs in the county linked to existing and new nature and tourism sites.</p> <p>This is requested to recognise the importance of the establishment of the 5th National Blueway – the Barrow Blueway –as an opportunity to create a major nature-tourism brand in West and South Kildare as recognised in the new Green Infrastructure Strategy. The Plan should also reference the Barrow Blueway Economic Plan, the West Kildare Just Transition Plan and the revised Kildare Tourism Strategy.</p>	<p>development of a tourism masterplan for the River Barrow which sets out an integrated framework for tourism development along the River Barrow.</p> <p>Objective EC O56 is to support the implementation of the ‘Local Just Transition Plan for West Kildare which identifies actions to support and advance sustainable, social, economic, environmental development in the transition to a low carbon future in the West Kildare region’. See response to submission from Fáilte Ireland in relation to the county tourism strategy.</p> <p>Chief Executive’s Recommendation Amend RE O128 as follows: Support the development and marketing of the Barrow Blueway, including the Barrow Blueway Economic Plan, and facilitate related commercial opportunities throughout the county, subject to compliance with the Habitats Directive.</p>
172.	Umerus Community Development Peatlands (UCDCLG)	<p>Welcome the objectives REO125, 126, 127 and 130 to support peatland conservation and tourism at Umerus Peatlands Park.</p> <p>Requests that the Map on Page 43 (Map Ref. V1-4.1) is updated in line with the Green Infrastructure Map which recognises Umerus Peatlands Park as a steppingstone for nature tourism. Also recommends the inclusion of Church of Oak on the map, to create a new tourism hub incorporating Monasterevin, Rathangan, the Barrow Blueway.</p>	<p>Chief Executive’s Response Map V1-4.1 has been prepared by Fáilte Ireland (and not Kildare County Council) and is replicated here for information purposes only. The most up-to-date version of this map will be published in the CDP when it is adopted. Objective RE O84 supports a strategy for Monasterevin and the current investment at the Church of Oak Distillery.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
495	Suzanne Murphy	The submission backs the concept of the National Peatlands Park as a means of conserving our peatlands. Protecting our peatlands has huge benefits	<p>Chief Executive’s Response The submissions’ support for the National Peatlands Park Initiative is noted. Chapter 4 contains objectives</p>

		<p>for the following reasons: reduces flooding, protects endangered species of bird, absorb carbon and stimulates tourism.</p> <p>The submission supports the development of peatways and linkages to greenways and blueways by linking in with local communities. This has enormous potential in Kildare in Lullymore & Lullybeg and in Umeras Peatlands Park.</p>	<p>which are clear in their support for the development of peatways and their linkages to greenways and blueways, and specifically refer to the proposed Umeras Peatlands Park and existing Lullymore Heritage and Discovery Park.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
172.	Umerus Community Development Peatlands (UCDCLG)	<p>Requests Council to delete the word 'heritage' from objective RE O126, as follows, for reasons of consistency</p>	<p>Chief Executive's Response Agreed.</p> <p>Chief Executive's Recommendation Amend RE O126 as follows: ...on the network of bogs and industrial railways and a designation of a National Peatlands Heritage Park.</p>
181	Lullymore Heritage & Discovery Park CLG	<p>Insert reference to eco-tourism and peatlands based eco-tourism into the chapter. It is recognised by Fáilte Ireland as a growth market and established attractions (e.g. IPCC and Lullymore) are key attractions in the Ancient East, the latter winning an award for environmental innovation attracting thousands of international and domestic visitors every year.</p> <p>Suggested text: The key focus for the Midlands / Fáilte Ireland region will be the further development and promotion of the local culture, heritage and eco-tourism.</p> <p>Kildare currently has a varied tourism portfolio with a position of excellence in heritage, golf, equine, peatlands based eco-tourism</p> <p>Suggested changes to Objectives:</p>	<p>Chief Executive's Response The suggested amendments to Section 4.21 and 4.21.1 to include reference to eco-tourism and peatlands are noted, however it is considered more appropriate to amend policy objective RE 095 (which already refers to the development of tourism in Kildare centred on many aspects including eco-tourism) to include further reference to Peatlands.</p> <p>Chief Executive's Recommendation Regarding RE O95, see recommendation to Submission No. 432.</p>

		<p>RE 095: Support the expansion and development of tourism in Kildare, investigating the feasibilities of key opportunities such as those centred on.....peatlands.</p>	
181	Lullymore Heritage & Discovery Park CLG	<p>Change reference to National Peatlands Park, i.e., remove the word 'Heritage' and provide additional narrative as follows: Kildare is well positioned due to its close proximity to Dublin as a gateway county for the Peatlands to millions of international visitors annually and approx. 2.5 million residents in surrounding counties. The designation of an inter county National Peatlands Park, protection and further development of existing facilities and new activities such as the Blueway and Greenways have the potential to become a world class peatland / activity-based experience. This could greatly assist in changing Ireland's global eco - tourism position and stimulate further visitor experiences to complement Kildare and Ireland's current offering.</p> <p>New Objective proposed to realise the potential for peatlands tourism at an inter county level (A map has been submitted of the West Kildare Smart Tourism Alliance which illustrates the locations of Bogs and Blueways in Kildare, Laois and Offaly and other tourism attractions): Support the West Kildare Smart Rural Alliance and access for peatland communities to the European Network for Rural Development's Smart Village initiative in conjunction with Offaly County Council, Laois County Council, Leader companies in each county and all other relevant stakeholders.</p>	<p>Chief Executive's Response It is agreed that all references to 'National Peatlands Heritage Park' shall be changed to 'National Peatlands Park'. Whilst the submission suggests additional text in the Plan relating to peatlands tourism, it is considered that the policies and objectives of the plan adequately support such initiatives.</p> <p>In relation to the Smart Village initiative, see response to Submission No. 432 in Chapter 9.</p> <p>Chief Executive's Recommendation Amend reference in RE O126 and RE O127 as follows: 'National Peatlands Heritage Park'.</p> <p>In relation to the Smart Village initiative, see recommendation to Submission No. 432 in Chapter 9.</p>

147	National Peatlands Park Group	<p>The term 'National Peatlands Heritage Park' should read 'National Peatlands Park' throughout the Plan (amend RE O126 and RE O127).</p> <p>The Kildare Tourism Map presented on page 43 of Chapter 4 should be updated to include the Church of Oak Distillery outside Monasterevin and the proposed Umeras Peatlands Park as supported in this Draft County Development Plan. These represent major net tourist attractions in West Kildare associated with the Barrow Blueway and the development of a National Peatlands Park.</p>	<p>Chief Executive's Response The term 'National Peatlands Park' will be used throughout the CDP.</p> <p>Map V1-4.1 has been prepared by Fáilte Ireland (and not Kildare County Council) and is replicated here for information purposes only. The most up-to-date version of this map will be published in the CDP when it is adopted. Objective RE O84 supports a strategy for Monasterevin and the current investment at the Church of Oak Distillery.</p> <p>Chief Executive's Recommendation Amend reference in RE O126 and RE O127 as follows: National Peatlands Heritage Park.</p>
181	Lullymore Heritage & Discovery Park CLG	<p>Proposes a new objective to support Rathangan given its potential to benefit from the Blueway and a number of other attractions in the vicinity. A submission for a new bus service starting in Allenwood and connecting Lullymore, Rathangan, Monasterevin and Kildare town is currently being assessed by the National Transport Authority. This would provide access to Lullymore Park to the Blueway towns. Proposed New Objective as follows: After RE O131 - Support and facilitate the development of Rathangan as a Blueway destination town based on its natural and built heritage, proximity to the peatlands and Lullymore Heritage & Discovery Park and collaborate with the National Transport Authority and Local Link to provide connectivity.</p>	<p>Chief Executive's Response It is an objective of the Rathangan Town Plan (Objective ST R7, Appendix 2) to 'Promote Rathangan as a tourist destination having regard to its location on the future Grand Canal Greenway and River Slate and to include linkages to Lullymore Heritage Park and Killinthomas Woods'.</p> <p>It is also an objective of the Plan (TM O36) to support the implementation of the Local Link Rural Transport Programme Strategic Plan 2018-2022.</p> <p>Objectives RE O130 and RE O131 support the development of Monasterevin and Athy as Blueway arrival / destination towns. It is considered that an additional objective should be included to support the development of Rathangan and Robertstown as Blueway arrival / destination locations.</p>

			<p>Chief Executive's Recommendation Insert the following objective after RE O131: Support and facilitate the development of Rathangan and Robertstown as Blueway destination locations having regard to their natural and built heritage assets.</p>
<p>410</p>	<p>Celbridge Community Council</p>	<p><u>Tourism Heritage</u> Submission states that the draft Plan needs to include extremely strong protection for all heritage assets of Celbridge, as they are the only explicit economic opportunities called out in the economic development chapter of the Celbridge Local Area Plan (LAP) 2017-2023.</p> <p>Requests that Objective RE O142 includes the following additional text: RE O142: Ensure heritage assets (built and natural) that are or have the potential to become the focus for tourism development, are appropriately managed and their special interest conserved from potential adverse effects from visitors or development in general and that best practice standards in relation to the environmental management of tourism enterprises are adhered to.</p> <p>Further requests that this section must include an additional objective that expands on the concern regarding "potential adverse effects from ... development" expressed in objective RE O142 to explicitly address how the need for heritage conservation will be balanced with the Town Centre First policy / need for towns to develop as 10-minute towns. States that it would be judicious to prevent</p>	<p>Chief Executive's Response The request for changes to objective RE O142 is not accepted as it is considered there are sufficient and appropriate safeguards contained across various chapters of the draft Plan, including Chapters 11, 12, and 14 to protect heritage assets in the county from potential adverse effects from development. The request to prevent development within or adjacent to protected structures, ACAs and Landscape Character Areas classified as High Sensitivity (3,4 and 5) is not accepted. Aside from being considered ultra vires such a policy would have the effect of sterilising large portions of the county including the majority of town centres.</p> <p>The request for additional text in objective RE 100 relating to the co-location of facilities is accepted.</p> <p>The comments relating to RE O144 are noted. The designed landscape of St. Wolstan's and its historic landscape link to Castletown demesne, is already acknowledged in the Celbridge Local Area Plan 2017-2023. It is considered that this relationship can be further explored as part of the next review of the Celbridge Local Area Plan.</p>

	<p>development at sites containing (or adjacent to); Protected Structures; within Architectural Conservation Areas (ACAs) and; within Landscape Character Areas with sensitivity classified as High Sensitivity (3), Special (4) or Unique (5).</p> <p>Submits that objective RE O100 be expanded to suggest that such information offices may be co-located with other public information offices / centres such as Citizen's Information, Libraries, etc. to make the provision of such facilities more feasible.</p> <p>States that objective RE O144 is welcomed but should explicitly name the historic demesnes of Donaghcumper and St. Wolstan's as the designed landscapes of all three demesnes collectively form the landscape setting of Castletown House and its grounds.</p> <p>Submits that objective RE O145 should be expanded to include Celbridge Abbey, Oakley Park and the Liffey Valley and should also address how Celbridge can be promoted as a gateway to Castletown House.</p> <p>Submits that objective RE O146 is welcome but would benefit from calling out the integrations that would be most strategic for Heritage Tourism such as connecting the Grand Canal and Royal Canal with the Liffey in Celbridge and with Castletown House.</p> <p>States that in addition to Action RE A7 there should be actions relating to other priority projects identified through the Town Renewal Plan processes that have potential to positively contribute to heritage tourism in Kildare towns.</p>	<p>The request regarding objective RE O145 is not accepted. Detailed supporting objectives relating to the promotion of Castletown House as a tourism destination in Celbridge is contained in the current Local Area Plan for the town.</p> <p>The comments relating to objective RE O146 is noted. The purpose of this objective is to provide a high level and strategic support for the integration of greenways/blueways and heritage/tourist trails at county level. It is considered that the next review of the Celbridge LAP may provide an opportunity for including more detailed supporting objectives in this area.</p> <p>The request for further actions in addition to Action RE A7 relating to the implementation of priority projects of the Celbridge Town Renewal Plan is not accepted. It is considered that the Celbridge Local Area Plan, when reviewed, would provide a more appropriate context for the inclusion of such detailed and site-specific objectives.</p> <p>Chief Executive's Recommendation Amend objective RE O100, as follows: ...to support and strengthen the existing economic infrastructure of such centres. Consider the potential for co-locating such facilities with existing facilities such as libraries and citizen information centres.</p>
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395	Geological Survey of Ireland (Read in conjunction with Dept. Environment, Climate & Communications submission, same number, submitted together)	<p>GSI requests the design of future signage to consider the use of information panels to highlight the significance of a County Geological Site or an area of geological and/or geomorphological interest that are in the vicinity of waymarked and signposted walking routes, trails, Greenways and Blueways.</p> <p>In respect of the Midlands Peatlands National Park the GSI offer advice and support and would consider themselves relevant stakeholders.</p>	<p>Chief Executive's Response While it is outside the remit of the Draft Plan to consider the use of specific information panels to highlight the significance of any geological site, it should be noted that Objective RE 093 supports and facilitates the erection of standardised signage for tourism facilities and tourist attractions as part of national and regional initiatives.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
547	Siobhan Parker	It is submitted military, equine, medieval, industrial, and early Christian heritage could be leveraged to reach several sustainable development goals, generate eco-tourism / just transition training and employment. The foundations are there through the towns' built and natural environment to create an industrial heritage centre encompassing Bord na Mona, Irish Ropes', and Newbridge Silverware with reference to military and equine history. A creative arts and festival calendar would be required to support and maximise the potential of these assets.	<p>Chief Executive's Response Specific details in relation to local projects will be reviewed / addressed in the Newbridge Local Area Plan. However, it should be noted the Draft Plan does contain some objectives in relation to Newbridge such as objective (RE O77) which is to support Bord Na Mona with proposals for their headquarters at Newbridge to become a Green Energy Hub, which focuses on the higher order aspects of the renewable energy industry and a climate action training centre. There is also an objective (RE O123) to investigate the feasibility of developing a Tourism Destination Centre within the Curragh which would focus on the equine and military history of the area, in conjunction with Fáilte Ireland.</p> <p>It should be further noted that there is a policy (RE P22) for the Council to work with stakeholders including the OPW, the Heritage Council, the Arts Council, local communities and businesses to support and promote</p>

			the development of heritage and cultural tourism in County Kildare.
			Chief Executive's Recommendation No change to the Draft Plan.
507	Brian McArdle	The submission states that there is a huge opportunity to repurpose bogs as biodiversity areas, carbon sinks and a natural amenity for residents and tourists alike. States that the potential of using existing Bord na Mona railways as 'peat-ways' to link greenways and blueways is incredible and would also act as a network of green roads transforming into a de facto national park stretching across Kildare and Offaly to showcase the bogs and our industrial heritage.	<p>Chief Executive's Response Kildare County Council recognises and supports the longer-term strategic planning for industrial peatland areas, which should include a comprehensive after-use framework plan for the industrial peatlands and associated infrastructure. This has potential for tourism resources, examples of which could include, peatways, bike-hire facilities, recreational forestry, wilderness, eco-tourism based on biodiversity and a National Peatlands Heritage Park.</p> <p>This is reflected in Policy RE P19, which promotes the tourist development potential of 'after use' peatlands, subject to proper planning, environmental protection and sustainable development. Objective RE O126 facilitates the development of a tourism resource using cutaway peatlands in conjunction with Bord na Mona and Into Kildare, subject to environmental considerations and nature designations such as, inter alia, peatways on the network of bogs and industrial railways and a designation of a National Peatlands Heritage Park. Objective RE O126 supports in conjunction with Offaly County Council, Laois County Council and all other relevant stakeholders such as Bord na Mona, Coillte and the NPWS, any proposal for a new National Peatlands Heritage Park centre in Kildare on Bord na Mona cutaway bogs in Kildare, Laois and Offaly.</p>

			<p>It is considered that the provisions of Section 4.2.4 of the Draft Plan adequately address the issues raised in relation to the amenity and tourism potential of former Bord na Mona bogs.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
288	Sutton House Hospitality trading as Barberstown Castle	There is no reference to Barberstown Castle Hotel in the draft CDP or on the Kildare Tourism Map in Chapter 4 of the Draft Development Plan, despite other hotels being included in the Heritage Section. Similarly, while other hotels are listed within the text of Chapter 4 Barberstown Castle Hotel is not and this should be rectified.	<p>Chief Executive's Response Noted and agreed in part.</p> <p>Chief Executive's Recommendation Amend the fourth paragraph of Section 4.21.1 as follows: <i>The rich architectural and archaeological heritage of the county is also acknowledged with many renowned structures and houses including Castletown House, Carton House, Barberstown Castle, the Wonderful Barn, Moone High Cross and Castledermot Round Tower.</i></p> <p>The Tourism Map is produced by Into Kildare and has been included in the Draft Plan for information purposes only. It is outside the scope of the Draft Plan to affect change to the Tourism Map for County Kildare.</p>
288	Sutton House Hospitality trading as Barberstown Castle	The submission outlines plans for the future development of the Barberstown Castle site. The layout of this proposed development has been informed by an Archaeological Impact Assessment. These proposed plans would increase the amount of tourist accommodation on site and offer different types of accommodation.	<p>Chief Executive's Response Detailed consideration of any potential future developments is outside of the scope of a Development Plan. Detailed consideration can only take place under the planning application process.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

<p>81</p>	<p>Mondello Park</p>	<p>The submission made by Cunnane Stratton Reynolds on behalf of Mondello Park Sports Limited seeks to strengthen the role of Mondello Park as a combined sports, recreation, and tourism facility with potential for job creation and technical development.</p> <p>Outlined within the submission are the venues' existing features and operations along with the future intentions of the facility. The park is hoping to develop a skid pan in the centre of the circuit to facilitate skid pan training, which will require additional buildings such as a workshop and office space. In addition, the park seeks to be Ireland's arena for the testing of future technology and intends to build an internationally recognised centre for the development of automotive technology. It is anticipated that the campus will generate jobs and sustainable employment in the area.</p> <p>A few objectives and policies are highlighted in the Draft Plan which the Park believes are indirectly supportive of motorsports at the venue such as RE O1, RE O2, RE P23, and RE P25. It is also contended that the Parks vision is consistent with the aim for Chapter 4.</p> <p>It is requested that the Plan develop a 'Racing County' theme bringing together the traditions of horse racing and motor sport in Kildare and include such text in Chapter 4.</p> <p>An additional objective is proposed for Chapter 4 to read 'strengthen, promote and support Mondello Park as the home of Irish Motor Sport, as a centre of driving excellence, as a tourism, leisure and education centre and to develop it as a nationally significant automotive</p>	<p>Chief Executive's Response</p> <p>The Draft Plan includes Objective RE O95 which supports the expansion and development of tourism in Kildare including, inter alia, motorsports and specific reference is made to Mondello in this regard, however it is considered reasonable to include an additional objective, along with additional associated text in Section 4.29 which is titled 'Events and Festivals'.</p> <p>Having regard to the above, it is not considered that any further changes are necessary with respect to Chapter 4.</p> <p>Chief Executive's Recommendation</p> <p>Amend Section 4.29 as follows:</p> <p>...County Kildare hosts a wide range of festivals and annual events including the internationally renowned Punchestown and The Curragh racing festivals and a number of racing events at Mondello Park which provide a significant boost to the County's tourism industry.</p> <p>To include an additional objective in Section 4.29 to read as follows:</p> <p>Support Mondello Park as a tourism, leisure and education centre and to support its development as a nationally significant automotive innovation centre subject to the proper planning and sustainable development of the area.</p>
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		<p>innovation centre consistent with the proper planning and sustainable development of the area.'</p> <p>It is also suggested to amend text in the first paragraph of Section 4.29 to read as follows. New text in bold "...and The Curragh racing festivals and motorsport activities at Mondello Park which provide a significant boost to the County's tourism industry".</p> <p>Finally, it is requested to amend RE P25 to include the promotion of Mondello Park as an international racing circuit.</p>	
168	Calverstown Action Network	Supports the Kildare National Peatlands Park proposed by the National Peatlands Park group as it responds to our county promise of 30% protected land by 2030.	<p>Chief Executive's Response Of particular note are Objectives RE O125, to support and facilitate the development of Umeras Bog into a Peatlands Park, and the related objectives, namely RE O126, to facilitate the development of a tourism resource using cutaway peatlands such as the designation of a National Peatlands Heritage Park, and RE O127 to support (in conjunction with Laois and Offaly County Councils) any proposal for a new National Peatlands Heritage Park.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
223	Colm Walsh	The Development Plan should have an action which allows for continued support and development of the 'Made of Athy' programme. This programme should also be used as a template for similar uses elsewhere.	<p>Chief Executive's Response It should be noted that Objective RE O95 supports the expansion and development of tourism in Kildare, by investigating the feasibility of key tourism opportunities, including the Made of Athy Trail which directly relates to the Made of Athy programme. It is therefore considered that RE O95 adequately addresses the request as raised in this submission.</p>

			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
241.	Colm Walsh	<p>The submission states that the town of Athy with its rail and road network could be developed as a day trip destination for the population of the Greater Dublin Area. The town could specialise in antiques, books and crafts and could develop similar to Hay-on-Wye (Wales), Rye (East Sussex) or Fiskars in Finland. The submission notes that towns benefit from the type of people who make day trips in search of curiosities.</p>	<p>Chief Executive's Response The contents of the submission are noted. The draft Plan acknowledges the potential of the built heritage and natural assets being instrumental in transforming Athy as a tourism destination of regional significance. In this regard, the Draft Plan includes several objectives which support the tourism and cultural offering of the town, including specific emphasis on supporting the development of the Barrow Blueway. Furthermore, the Athy Local Area Plan 2021-2027 (LAP) outlines a comprehensive and ambitious vision for the town which seeks to achieve a sustainable model of development for the town, the focus being centred on maximising the potential of Athy's built and natural heritage by using these existing assets to enhance its role as a visitor destination and create new local employment opportunities, including the development of tourism-based enterprises.</p> <p>Furthermore, the Athy LAP is accompanied by an Urban Regeneration Framework which outlines the potential uses of vacant buildings which it states should be imaginative and flexible, responding to the rapidly changing trends and requirements of our economy. The Plan specifically identifies and supports a number of alternative uses within Athy Town Centre including, live-work units, remote working facilities, enterprise incubation hubs, tourist 'spin-off' enterprises, tourist accommodation and specialised services (speciality food/craft shops).</p>

			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
191	Fergal Reidy	<p>Celbridge: Castletown House needs a front car park. The council should work with the OPW to make this a real jewel in Kildare.</p> <p>Leixlip: The Wonderful Barn and Connolly's Folly are neglected</p>	<p>Chief Executive's Response The Draft Plan under objective (RE O 144) recognises the sensitive and unique quality and importance of Castletown House and its demesne and history as a unique element of heritage tourism and educational potential. It is also an objective (RE O145) to protect and promote key sites and tourist facilities in the north of the county such as the Wonderful Barn and other key sites linked to the estates of Carton and Castletown while encouraging the development of Leixlip and Celbridge as tourism gateways to these significant tourism sites and facilities.</p> <p>There is also an action (RE A7) to prepare an integrated public and tourism destination at the Wonderful Barn and associated land, to be informed by a detailed conservation and management plan while it is also an objective within Chapter 11 (AH 022) to safeguard the amenities of the Wonderful Barn including the adjacent buildings.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
308	Irene O'Neill	<p>This submission states that it is being made by a member of the Kildare Branch of the Inland Waterways Association of Ireland (IWAI).</p> <p>Corbally Harbour: The submission outlines the tourism potential and business opportunities of Corbally Harbour for those boating, cycling and walking between Sallins and Corbally.</p>	<p>Chief Executive's Response The contents of the submission are noted. It is considered that in order to provide clarity to the support of both Corbally Harbour and the Naas Harbour as tourism destinations an amendment is proposed to Objective RE O137.</p> <p>In relation to RE O154 which relates to the development of berthing and other ancillary</p>

		<p>Policy Re P27 is welcome and the submission supports RE O155 also.</p> <p>In respect of Objective RE O154 users of the local waterways would like to work with KCC and Waterways Ireland in creating ways for berthing and in creating additional mooring locations. The economy of many areas would benefit from extra moorings namely, Lullymore, Robertstown north of the canal, Rathangan on both sides of the bridge, Sallins extending to Soldier's Island, and both sides of Newbridge Road where it blocks the Corbally Canal.</p>	<p>infrastructure at key locations along the canal systems in conjunction with the relevant authorities, these will be the subject of a planning application from Waterways Ireland under the Planning and Development Act 2000 (as amended) and will therefore be subject to public consultation during the process.</p> <p>Chief Executive's Recommendation Amend Objective RE O137 as follows: Work with Waterways Ireland to progress the delivery of the (i) Naas to Sallins Greenway and (ii) Naas to Corbally Harbour Greenway and to develop the Naas Harbour and the Corbally Harbour itself for amenity purposes.</p>
207	Deirdre Lane	<p>That KCC act with urgency to save the rail infrastructure on Kildare peat lands as stewards of the bogs and urge other county councils to act to support the Kildare centric peatlands park.</p> <p>KCC should focus on being an agri tourism leader.</p> <p>Industrial heritage of Kildare is underdeveloped as a tourism attraction.</p>	<p>Chief Executive's Response In relation to the Industrial heritage of Kildare being underdeveloped as a tourism attraction, it should be noted that Chapter 4 and Objective RE O125, support and facilitate the development of Umeras Bog into a Peatlands Park, and the related objectives, namely RE O126, to facilitate the development of a tourism resource using cutaway peatlands such as the designation of a National Peatlands Heritage Park which will include preserving and facilitating the development of peatways on the network of bogs and industrial railways., and RE O127 to support (in conjunction with Laois and Offaly County Councils) any proposal for a new National Peatlands Heritage Park.</p> <p>Chapter 4 and specifically Section 4.30 recognises Agri-Tourism as a key driver of the local and rural economy and includes specific policies and objectives, which support the development of agri-tourism.</p>

			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
367	Cliff at Lyons Unlimited Company	<p>The submission highlights national and regional policy in terms of supporting tourism.</p> <p>The importance of the Cliff at Lyons Hotel as a local employer and a national and international tourist destination should be explicitly recognised as part of the Kildare County Council Development Plan 2023-2029. This will ensure the Hotel can continue to develop in a sustainable manner. A suggested wording for specific text to be included in the forthcoming Kildare County Council Development Plan 2023-2029 is as follows;</p> <p>Provide for the development of the Cliff at Lyons Hotel current and future landholdings subject to the capacity of the lands to absorb development without detracting from the lands built and natural heritage context.</p> <p>The Kilkenny City and County Development Plan 2021-2027 is referenced as containing objectives which relate to the Mount Juliet Estate and how a version of objectives may be appropriate to the Cliff at Lyons Hotel.</p>	<p>Chief Executive's Response Section 4.21 of the Draft Plan outlines policies and objectives which will support, promote, protect, improve, encourage, and facilitate the development of tourism throughout the county. It is considered an objective which relates specifically to the Cliff at Lyons Hotel is not warranted, however it is accepted that the Lyons estate is a significant tourist attraction in the North Kildare area, and this should be acknowledged in the text of section 4.21.1 and objective RE O145.</p> <p>Chief Executive's Recommendation Amend section 4.21.1 as follows: ...including, Castletown House and Demesne, Carton House, Maynooth Castle, Conolly's Folly, Leixlip Castle, Lyons Estate and St Patrick's College Maynooth and also in the south of the county including the Shackleton Museum and Barrow Blueway.</p> <p>Amend RE O145 as follows: ...such as the Wonderful Barn, Obelisk, Arthur's Way and other key sites linked to the estates of Carton, Lyons and Castletown...</p>
379	Value Retail Dublin Ltd (Owners of Kildare Village)	<p>The submission states the Kildare Tourist Outlet Village (KTOV) plays an important role in Kildare Town and the wider county as an economic driver and this should be acknowledged. It is the only retail outlet of its kind within the Republic of Ireland and employs approx. 1,000 people and expects to employ approx.</p>	<p>Chief Executive's Response The Tourism Map is produced by Into Kildare and has been included in the Draft Plan for information purposes only. It is outside the scope of the Draft Plan to affect change to the Tourism Map for County Kildare.</p>

		<p>1,350 people once Phase 3 is fully occupied. Additionally, the KTOV currently attracts over 4 million visitors a year, and this is expected to grow exponentially with the opening of Phase 3.</p> <p>The Draft Development Plan includes a Tourism Map that identifies the tourist attractions in the County. However, the KTOV is not identified on the map despite being referenced as a key tourist attraction within the Draft Development Plan.</p>	<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
576	County Kildare Leader Partnership (CKLP)	<p>Amend RE O104: (noted that RE O33 is referred to in the submission but the text of the submission is more applicable to RE O104). Submission recommends amendment to RE O104 as follows:</p> <p><i>In conjunction with the LEADER Programme, encourage and support start-up enterprises in tourism across Kildare.</i></p>	<p>Chief Executive's Response Having regard to this submission as a whole it is considered more appropriate to include an overarching Core Strategy objective in Chapter 2 as set out below.</p> <p>Chief Executive's Recommendation Amend RE P20 as follows: <i>...including Kildare Failte, Into Kildare, Waterways Ireland, County Kildare Leader Partnership and the...</i></p>
472	Keep Ireland Open	<p>The submission recommends the insertion of the following text in Section 4.22 Environmental Sustainability and Tourism, underlined.</p> <p><u>Tourism and recreational development shall be assessed against the nature and scale appropriate to the character of the area and shall be located to be visually sympathetic to its surroundings.</u></p> <p>The submission recommends an additional objective:</p> <p><u>Protect the landscape from inappropriate tourism development by ensuring that developments and other</u></p>	<p>Chief Executive's Response Agreed with amendments. The siting of new tourist and recreational development shall not have a negative impact on the character of the area.</p> <p>The matters raised are outside the remit of a Development Plan. Such recommendations may be included in County Tourism Strategies.</p> <p>Chief Executive's Recommendation Insert the following text in Section 4.22 Environmental Sustainability and Tourism:</p>

	<p>activities associated with tourism or recreational activity are sensitively located so that they don't cause damage, be detrimental to or detract from the traditional character or appearance of areas of scenic or visual amenities and ensure that the layout, design and associated infrastructure are of highest quality. It must ensure the protection, maintenance, enhancement and conservation of amenities, be compatible with their intensity, scale and balance and ensure that it is not located where it would be detrimental to environmentally sensitive areas and landscapes. Ensure the highest quality standards of design so that there are no significant adverse impact on nature the natural environment in coastal areas, Natura 2000 sites, historic archaeological sites, maritime heritage or the countryside generally. It must be integrated, assimilated and absorbed into the landscape to take advantage of natural screening and topography</p> <p>The submission recommends the inclusion of additional objectives in Section 4.22</p> <ul style="list-style-type: none"> • The Council in assessing development proposals will consider the following criteria: The need for the development and facility to be provided, justification for the proposed site location, details on accessibility including pedestrian and cycle provisions and linkages to the proposed development • The Council in assessing development proposals will consider the following criteria: Where new buildings are proposed, they should be modest in scale, sensitively located and designed having regard to existing buildings, topography and 	<p>...where the quality of the built heritage and environment must be protected from inappropriate development – whether tourism related or not. Tourism and recreational development shall be assessed against the nature and scale appropriate to the character of the area and shall be located to be visually sympathetic to its surroundings.</p> <p>Insert the following new objectives into Section 4.21 (Tourism):</p> <p>Protect all landscape types from inappropriate tourism development by ensuring that developments and other activities associated with tourism or recreational activity are sensitively located so that they do not cause damage, are not detrimental to or detract from the traditional character or appearance of areas of scenic or visual amenities and ensure that the layout, design and associated infrastructure are of the highest quality.</p> <p>Ensure the highest standards of design are used in the development of tourism related facilities to ensure that there are no significant adverse impacts on the landscape, including Natura 2000 sites and historic archaeological sites. Such facilities must be integrated into the landscape to take advantage of natural screening and topography.</p> <p>Include an additional objective in Section 4.22:</p> <p>Consider the following criteria in assessing tourism development proposals:</p> <ul style="list-style-type: none"> - The need for the development and facility to be provided. - Justification for the proposed site location.
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		<p>landscaped and be adequately serviced and suitably managed.</p> <ul style="list-style-type: none"> • Seek to restrict and prevent developments which would damage or detract from the quality of scenic areas and identified natural heritage assets. Particular care shall be taken in regard to the siting of noise generating sports and golf course development so as not to conflict with the enjoyment of areas used for informal recreation and existing public rights of way and walking routes. • Ensure that golf course development do not impinge on existing public rights of way and walking routes by identifying them prior to development • Development proposals for Noise Generating Sports will not normally be permitted unless there is no conflict with the enjoyment of areas used for informal recreation or engagement • Consider the potential environmental effects of a likely increase in tourist/tourism related traffic volumes shall be considered and mitigated as appropriate. • Safeguard our natural assets for future generations from unsuitable tourism projects <p>The submission recommends the inclusion of an additional objective to direct tourist-based developments such as information centres and cultural centres into existing settlements where there is adequate Infrastructure to service these activities.</p> <p>The submission recommends the inclusion of additional objectives:</p>	<ul style="list-style-type: none"> - Details in relation to accessibility including pedestrian and cycle provisions and linkages to the proposed development. - Proposed developments should be modest in scale, sensitively located and designed having regard to existing buildings and topography. - Proposed developments must be adequately landscaped, serviced and suitably managed. <p>Include an additional objective in Section 4.22: To facilitate tourist-based developments such as information centres and cultural centres into existing settlements where there is adequate infrastructure to service these activities.</p>
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		Visitor/Habitat Management Plans will be required for proposed projects as relevant and appropriate. All tourism strategies and plans should monitor the ongoing effect of tourism on sensitive features with particular focus on natural heritage assets.	
405	Kildare Climate Action Linkage Group	The submission requests that the CDP outlines how any negative environmental impacts as part of increased tourism in the area, such as induced demand for transport, will be managed.	<p>Chief Executive's Response An entire section of the Plan is dedicated to Environmental Sustainability and Tourism. In addition to the policy and objectives in Section 4.22, Objective LR O54 of the Plan states that it is an objective of the Council to ensure that any increase in visitor numbers to countryside recreational facilities are managed to avoid significant negative effects including loss of habitat and disturbance.</p> <p>Furthermore, see response to submission 472 (Keep Ireland Open) in relation to environmental sustainability and tourism.</p> <p>Chief Executive's Recommendation Please see recommendation to submission 472 (Keep Ireland Open) in relation to environmental sustainability and tourism.</p>
468	Ann Behan	Section 4.21 is referred to and it is asked how the CDP will mitigate against any induced demand for transport, and associated negative environmental impacts, as part of increased tourism in the area?	
WATERWAYS			
247	James Delaney	This submission relates to providing access to swimming spots along the River Liffey and the provision of a safe swimming access at the Blessington Lakes. The Liffey is a shared resource, but most people don't have access to it as land along the banks of the river are in private ownership. The	<p>Chief Executive's Response The Council recognises the significance of natural amenities as a major resource for visitors and local people. Section 4.21.1 refers specifically to the River Liffey as being a significant natural attraction. Policy RE P27 refers to maximising the opportunities for the use of</p>

	<p>submission requests that the Draft Plan includes an objective to further protect any access that is currently available and to try to create access to areas that are currently stuck behind large fences and to promote outdoor swimming in the county.</p> <p>Suggested text: It shall be an objective of the council to protect public access to the Liffey and other swimming and walking spots and to promote wild swimming in the county by seeking opportunities with existing landowners to provide public access to the river at suitable locations.</p> <p>Other counties such as Westmeath and Cavan benefit from their lakes and it is requested that an action be included in the Draft Plan to undertake a feasibility study to investigate further opportunities to provide safe swimming access along the Blessington Lakes. The Draft Plan should include an objective to provide access for outdoor swimming along the Blessington Lakes.</p>	<p>the River Liffey for tourism and recreational amenity purposes. Objective RE O153 states that it is an objective to preserve the undeveloped sections of the Liffey Valley as a resource for tourism and to develop paths and walkways where appropriate, subject to environmental and other constraints and considerations. Similarly, Objective LR O37 states that the Council will promote and enhance public access for all to the upland areas, rivers, lakes and other natural amenities of County Kildare, in conjunction with the relevant landowners and agencies, while protecting environmental sensitivities and ecological corridors.</p> <p>It is important to note that the Draft Plan is a strategic land use document and therefore cannot provide an exhaustive list of all potential activities that could potentially be developed for tourism related activities such as river swimming.</p> <p>In terms of the Blessington Lakes there is only a small portion of these that lie within the administrative boundary of Kildare County Council the remainder being under the jurisdiction of Wicklow County Council. A Development Plan can only apply objectives and policies that relate to their own administrative area.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
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445	IWAJ Kildare	<p>Objectives RE O137, RE O155 and Policy RE P27 are welcomed and supported. The benefits of these are noted which include bringing tourism to the waterways, providing business opportunities for water-based activities such as kayaking / canoeing and other ancillary services such as food / refreshments.</p> <p>Regarding objective RE O154 it is submitted that users would like to work with stakeholders in creating ways for berthing and additional mooring locations. Naas Harbour Quarter along with other local areas would benefit from extra moorings.</p>	<p>Chief Executive's Response The positive comments in relation to the above are noted and acknowledged. In relation to Objective RE O154 it should be noted that while it is outside the scope of the Council to provide berthing/mooring facilities the Council can support Waterways Ireland with the provision of such facilities at appropriate locations.</p> <p>Chief Executive's Recommendation Include a new objective in Section 13.6: Support and facilitate Waterways Ireland and other relevant stakeholders with the provision of additional mooring and berthing facilities at appropriate locations throughout the County.</p>
446	David Knox	<p>RE O137; Corbally Harbour: When the large silt build-up (i.e. the island) in the harbour is removed, this will make an ideal space for vessels large and small.</p> <p>REP27; The submission supports this objective.</p> <p>REO154; As well as the Naas Harbour Quarter (described in Naas LAP), the economies of many other local areas would benefit from extra moorings; examples include Lullymore, Robertstown north of the canal, Rathangan on both sides of the bridge, Sallins</p>	

		extending to Soldier’s Island, and both sides of Newbridge Road where it blocks the Corbally Canal.	
576	County Kildare Leader Partnership (CKLP)	Amend RE O137 to state: Work with Waterways Ireland and Kildare Leader Partnership to progress the delivery of the (i) Naas to Sallins Greenway and (ii) Naas to Corbally Harbour Greenway and to develop the harbour itself for amenity purposes.	<p>Chief Executive’s Response It is noted that Section 4.26 of the Draft Plan states that “Waterways Ireland in conjunction with Kildare, Carlow, Laois and Kilkenny County Councils, LEADER Companies and Failte Ireland have set out a strategy to develop the existing track way along the Barrow Line of the Grand Canal and Barrow River as a 112km shared-use trail for tourism and recreational purposes, branded the ‘Barrow Blueway’”. Having regard to this submission as a whole it is considered more appropriate to include an overarching Core Strategy objective in Chapter 2 as set out below.</p> <p>Chief Executive’s Recommendation Amend Section 4.26 as follows: Waterways Ireland in conjunction with Kildare, Carlow, Laois and Kilkenny County Councils, LEADER Companies and Failte Ireland Into Kildare have set out a strategy to develop the existing track way along the Barrow Line of the Grand Canal and Barrow River as a 112km shared-use trail for tourism and recreational purposes, branded the ‘Barrow Blueway’.</p> <p>Amend RE P20 as follows: ...including Kildare Failte, Failte Ireland Into Kildare, Waterways Ireland, County Kildare Leader Partnership and the...</p>
GENERAL			

558	Irish Wind Energy Association	<p>A further objective should be inserted into Section 4.3, which would state the following. RE 014 'Work with EirGrid and ESB Networks to support the provision of resilient electricity supply and distribution system to accommodate the future economic growth of the county and to facilitate the transition of heat and transport from fossil fuels to electricity.'</p> <p>In relation to Section 4.24 Peatland Tourism, the submission states that linkages could also be created through wind farm projects.</p>	<p>Chief Executive's Response The suggested objective, as outlined above, is considered reasonable and in accordance with the Draft Plans' stated aim to transition from fossil fuels as a power source.</p> <p>A specific reference within section 4.24 stating that linkages could be created through wind farm projects is not considered necessary as the policies and objectives of the plan already support the development of renewable energy, including wind farms on former industrial peatlands subject to environmental assessments (RD O29).</p> <p>Chief Executive's Recommendation Insert the following objective after RE O13: Work with EirGrid and ESB Networks to support the provision of a resilient electricity supply and distribution system to accommodate the future economic growth of the county and to facilitate the transition of heat and transport from fossil fuels to electricity.</p>
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CHAPTER 5 – SUSTAINABLE MOBILITY & TRANSPORT			
Sub No.	Name	Summary of Issues Raised	Chief Executive's Responses & Recommendations
STRATEGIC INFRASTRUCTURE			
515	Meath County Council	<p><u>Transport</u> Submission welcomes objective TM O59 relating to facilitating the development of the Maynooth Outer Orbital route. Also notes the provisions of TM O60 which outlines the Council's intention to co-operate with adjoining local authorities to improve road infrastructure in settlements such as Kilcock and Maynooth. Further notes and welcomes objective TM O95 in this regard.</p> <p>Welcomes the provisions of TM A7, TM O11 and TM O25 regarding the promotion of walking/cycling infrastructure. States that Meath County Council is working collaboratively with the NTA and other stakeholders to deliver the NTA Cycle Network Plan for the GDA and would welcome engagement with the Council on the delivery of improved walking and cycling infrastructure.</p> <p>Notes and welcomes objectives relating to the improvement of public transport including TM O1, TM O46 (DART+) and objective TM O43 which seek to facilitate and support the extension of the Dart + line to Kilcock.</p> <p>Submission states that DART+ provides significant opportunities for Maynooth and Meath County Council look forward to working with the Council and Irish Rail in the delivery of this improved service.</p>	<p>Chief Executive's Response The contents of the submission relating to transport are noted.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

		<p>Welcomes the inclusion of TM O58 which supports the implementation of Table 5.4 'Priority Road and Bridge Projects'. Notes that Kildare, Fingal and Meath County Councils have discussed and agreed to co-operate on the provision of a link between the M3 (junction 4 Clonee/R157 Dunboyne -Maynooth Road and the M4 (at Lucan/Leixlip)). Submits that Meath County Council will continue to support the provision of a link road at this location.</p>	
417.	St. Patrick's College Maynooth	<p>Submission by John Spain Associates on behalf of St. Patrick's College, Maynooth. Submission notes the publication of the National Planning Framework (NPF) and accompanying National Development Plan, along with the Regional Spatial and Economic Strategy (RSES). Submits that the new national and regional policy has sought to move away from unsustainable spatial patterns of development towards a model of compact growth and regional balance. Notes that the RSES has identified Maynooth as one of three Key Metropolitan Towns which is projected to grow significantly and states that the draft Plan supports the overall strategy for Maynooth.</p> <p>States that given that the RSES identifies that most of the future growth in Maynooth will take place to the west and north-west of the town, it is requested that the draft Plan includes a specific transport objective for the provision of an additional station on the western side of Maynooth where the track will be upgraded as part of the DART + West proposals, consistent with the Draft Transport Strategy for the Greater Dublin Area.</p> <p><u>Core Strategy</u></p>	<p>Chief Executive's Response</p> <p>The contents of the submission are noted. The request to prioritise the preparation of a local area plan and a supporting Local Transport Plan for Maynooth is further noted. The preparation of a new local area plan for Maynooth in conjunction with Meath County Council forms part of the Council's work programme for 2022. As part of the plan-making process the Local Transport Plan will take the form of an Area-Based Transport Assessment (ABTA) which is currently being progressed by the Council. The ABTA will examine the existing and proposed transport infrastructure and service provision across all modes of transport including sustainable means within the town. The ABTA will provide an understanding of the existing constraints and modal share, and identify the interventions required within the Plan area and in the wider context. This is in order to effectively accommodate the anticipated increase in demand and ensure the optimal transportation interventions can be put in place to drive a long-term shift towards sustainable movement and net zero emissions. It is noted that the ABTA has been subject to an initial round of public consultation with a second exercise being envisaged to be undertaken later in 2022. It is considered appropriate to amend action TM A2 for clarification purposes.</p>

	<p>Welcomes the designation of Maynooth as a Metropolitan Key Town in the settlement hierarchy. Notes and supports the provision for additional population allocation for Maynooth arising from the implementation of the MASP which will be dealt with as part of a new local area plan for the town. Notes that this new LAP for Maynooth is to be a joint plan between Kildare and Meath County Councils. Requests that the preparation of this LAP be prioritised in the coming months.</p> <p><u>Housing</u> Notes the provisions of the chapter and the role of the Housing Needs Demand Assessment (HNDA). States that the chapter supports several specialist types of housing including social, affordable and cost rental housing.</p> <p>Notes objective HO O21 of the draft Plan in relation to housing for older persons. Notes the support outlined by the plan for McAuley Place as a national exemplar model of housing for older people. States that this provides an opportunity to develop a similar model for Maynooth and submits that they support such initiatives and would be willing to engage with the Council to explore opportunities to deliver housing for older people on its lands in Maynooth.</p> <p>Notes the provisions of the draft Plan in relation to supporting the provision of purpose-built student accommodation in Maynooth to meet the anticipated student accommodation demand. Submission also supports the Council's commitment to work in partnership with the Land Development Agency (LDA), and other housing bodies.</p>	<p>The request to include a specific objective relating to the provision of a future railway station is accepted. It is considered that the insertion of such an objective would align with Measure RAIL6 – New Rail Stations of the National Transport Authority's Draft Greater Dublin Area Transport Strategy 2022-2042.</p> <p>The request to identify the proposed 'Western Orbital Road' as one project, is noted. However, it is considered that they are two separate projects. For the purposes of clarity, it is proposed to amend the draft Plan so that all the proposals for relief roads in Maynooth are referred to as forming part of the overall Maynooth Outer Orbital Route scheme.</p> <p>Chief Executive's Recommendation Amend TM A2 as follows: Prepare, implement and review (where appropriate) Local Transport Plans (LTPs)/Area Based Transport Assessments (ABTAs) Transport Strategies (TSs) for each of the statutory LAP settlements⁴ in County Kildare in consultation with the TII and the NTA, based on the following ABTA guidelines published by the TII/NTA – ABTA 'How To Guide', Pilot Methodology (September, 2021) and the Area Based Transport Assessment Advice Note (December, 2018) TII's Area Based Transport Assessment Guidance Notes (2018). LTP/ABTAs will include the transport priorities for each settlement in terms of public transport infrastructure and services; cycle investment; improvements to the pedestrian environment; parking measures and road enhancements. LTP/ABTAs must be developed to provide a framework to cater for the movement of pedestrians, cyclists, public transport services and private vehicles which are aligned with the hierarchy of users and modal shift targets set out in</p>
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	<p><u>Transport</u> Welcomes Action TM A2 to prepare Local Transport Plans (LPT) for each of the urban centres in Kildare covered by a LAP. Requests that given the urgency of preparing a new LAP for Maynooth, the preparation of the LPT would be expedited so that it would be prepared in tandem with the draft Maynooth LAP. Submits that the LPT should contain objectives to reduce CO2 emission levels by introducing and promoting more sustainable modes of transport, including walking and cycling. States that such measures would also provide access and connectivity between the town centre and lands to the north and west.</p> <p>Welcomes the inclusion of objectives relating to the delivery of various transportation infrastructure projects necessary to support the growth of Maynooth. Further welcomes the inclusion of Objective TM O46 relating to supporting the delivery of proposed new rail facilities. Submission is supportive of a park and ride facility to be provided in conjunction with the new Maynooth West station.</p> <p>Notes provisions of the draft Plan relating to the construction of the Maynooth Relief Road including TM O59. Notes that Table 5.4 include this under Project No. 4 the 'Inner Relief Road, Maynooth' running from the Kilcock Road to the Moyglare Road, and under Project No. 5 the 'Western Inner Relief Road, Maynooth' from the Kilcock Road to the Rathcoffey/Straffan Road. However, for greater clarity we would respectfully suggest that these two roads projects would be listed as one project (with perhaps a number of phases) and titled as the 'Maynooth Western Orbital Road'. Submitter</p>	<p>this Plan. The Accessibility and Movement Objectives of Local Area Plans should be based on relevant LTP/ABTAs.</p> <p>Amend TM O46 as follows: Support and facilitate, in co-operation with Irish Rail and the National Transport Authority the delivery of the following proposed new facilities to connect to the existing and proposed rail network including DART+:</p> <ul style="list-style-type: none"> • A second New Sallins & Naas railway station sited to the west of the existing station in Sallins, including a park and ride facility (1 000 spaces). • Collinstown or Maynooth railway Sstation/Ddepot sited to the west of Maynooth including a park and ride facility (1 000 spaces – 500 initially). • Kill park and ride facility - bus based (500 spaces). <p>Amend TM O25 as follows: Ensure the provision of improved cycle and walking infrastructure linking Maynooth Town Centre, the Royal Canal Greenway, the train station, the proposed Maynooth Outer Orbital Route and to Kilcock and Leixlip.</p> <p>Amend Table 5.4 as follows:</p> <table border="1" data-bbox="1261 979 2011 1350"> <tr> <td data-bbox="1261 979 1323 1238">2</td> <td data-bbox="1323 979 1693 1238">Outer Relief Road, Maynooth Outer Orbital Route</td> <td data-bbox="1693 979 2011 1238">L1012 Moyglare Road and Dunboyne Road (County- Meath) to be delivered by Meath County Council under Section 85 agreement.</td> </tr> <tr> <td data-bbox="1261 1238 1323 1350">4</td> <td data-bbox="1323 1238 1693 1350">Inner Relief Road, Maynooth Maynooth Outer Orbital Route</td> <td data-bbox="1693 1238 2011 1350">R148 to L1012 c. 3km – Kilcock Road to Moyglare Road.</td> </tr> </table>	2	Outer Relief Road, Maynooth Outer Orbital Route	L1012 Moyglare Road and Dunboyne Road (County- Meath) to be delivered by Meath County Council under Section 85 agreement.	4	Inner Relief Road, Maynooth Maynooth Outer Orbital Route	R148 to L1012 c. 3km – Kilcock Road to Moyglare Road.
2	Outer Relief Road, Maynooth Outer Orbital Route	L1012 Moyglare Road and Dunboyne Road (County- Meath) to be delivered by Meath County Council under Section 85 agreement.						
4	Inner Relief Road, Maynooth Maynooth Outer Orbital Route	R148 to L1012 c. 3km – Kilcock Road to Moyglare Road.						

		<p>confirms that it is willing to facilitate the delivery of this road and will work constructively with the Council on its design and routing and further states their believe that there are synergies to be had with the DART+ West project, in terms of access arrangements to the depot to the west of Maynooth. Submits that this matter would be actively pursued with the NTA.</p> <p><u>Urban Design, Placemaking and Regeneration</u> Submission notes and supports the inclusion in the draft Plan under Objective UD A2 relating to the preparation of a series of Masterplans / Urban Frameworks over the lifetime of the Plan for a number of specified key development areas in the County, in co-operation with relevant stakeholders.</p>	<table border="1" data-bbox="1263 193 2042 379"> <tr> <td data-bbox="1263 193 1323 379">5</td> <td data-bbox="1323 193 1688 379"> <p>Examine options for a Western Inner Relief Road in Maynooth Maynooth Outer Orbital Route</p> </td> <td data-bbox="1688 193 2042 379"> <p>From Kilcock Road to Rathcoffey / Straffan Road.</p> </td> </tr> </table> <p>Amend Table 5.4, by including additional Roads Priority Projects, as follows:</p> <table border="1" data-bbox="1263 480 2042 592"> <tr> <td data-bbox="1263 480 1688 592"> <p>Maynooth Eastern Ring Road (MERR) (part of the Maynooth Outer Orbital Route)</p> </td> <td data-bbox="1688 480 2042 592"> <p>R148 to R405 – Leixlip Road to Celbridge Road.</p> </td> </tr> </table> <p>Amend TM O59 as follows: Support and facilitate in conjunction with Meath County Council, private developers and landowners, the construction of the Maynooth Relief Road Outer Orbital Route.</p>	5	<p>Examine options for a Western Inner Relief Road in Maynooth Maynooth Outer Orbital Route</p>	<p>From Kilcock Road to Rathcoffey / Straffan Road.</p>	<p>Maynooth Eastern Ring Road (MERR) (part of the Maynooth Outer Orbital Route)</p>	<p>R148 to R405 – Leixlip Road to Celbridge Road.</p>
5	<p>Examine options for a Western Inner Relief Road in Maynooth Maynooth Outer Orbital Route</p>	<p>From Kilcock Road to Rathcoffey / Straffan Road.</p>						
<p>Maynooth Eastern Ring Road (MERR) (part of the Maynooth Outer Orbital Route)</p>	<p>R148 to R405 – Leixlip Road to Celbridge Road.</p>							
501	Fiona O'Loughlin	<p>The submission reiterates the need for a second bridge enabling a ring road, and the necessity of a proper traffic management plan within Newbridge.</p>	<p>Chief Executive's Response A second bridge and new orbital route has been proposed in Table 5.4 of the Draft Plan while Objective TM O61 supports and promotes the delivery of a second bridge crossing in Newbridge as a priority.</p> <p>A Traffic Management Plan will inform the emerging Newbridge Local Area Plan, preliminary work for which has already commenced.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>					
547	Siobhan Parker	<p>The town has significantly outgrown its early roots as a major medieval religious settlement. The one bridge over the Liffey and the quiet country roads are now</p>	<p>Chief Executive's Response The Draft Plan includes an objective (TM O61) to support and promote the delivery of a second bridge crossing in Newbridge as a priority of this development plan. In</p>					

		carrying heavy goods traffic causing severe strain on the network.	<p>addition, there are several other priority road / bridge projects identified in Newbridge (table 5.4). These include, two inner relief road projects, improvements to Morrinstown and Sex's Bridges, and to examine the feasibility of developing a ring road on the north and north-east of the town to connect with the orbital relief road and to link with the M7 south-west of the town.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
53	Gerard Delaney	The submission refers specifically to Newbridge and highlights the need for a new bridge and a new orbital route.	<p>Chief Executive's Response A second bridge and new orbital route has been proposed in Table 5.4 of the Draft Plan while Objective TM O61 supports and promotes the delivery of a second bridge crossing in Newbridge as a priority.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
560	Cllr. Suzanne Doyle	<p>The submission recommends that Table 5.4 of the Draft Plan be amended to include "Delivery of South Green connector to Monasterevin Road."</p> <p>States that the Council investigate the feasibility of developing an orbital route around Kildare Town linking Monasterevin Road to Dublin Road.</p>	<p>Chief Executive's Response It is noted that the list of projects set out in Table 5.4 is not exhaustive and further projects shall be identified in the Kildare Town Local Area Plan, the preparation of which has commenced.</p> <p>Chief Executive's Recommendation No change to Draft Plan.</p>
560	Cllr. Suzanne Doyle	The submission recommends that the following projects be added to Table 5.4 'Priority Road and Bridge Projects': "Investigate feasibility of orbital route around Kilcullen" and "Upgrade of railway bridges serving South Green in Kildare Town."	<p>Chief Executive's Response It is noted that the list of projects set out in Table 5.4 is not exhaustive and further projects shall be identified in the various Local Area Plans (as per note appended to the end of Table 5.4).</p>

			Chief Executive's Recommendation No change to Draft Plan.
NATIONAL & REGIONAL ROAD NETWORK			
560	Cllr. Suzanne Doyle	The submission recommends that Objective TM O80 be removed as it is far too restricting.	<p>Chief Executive's Response</p> <p>Objective TM O80 is included in Section 5.7 of the Draft Plan and refers to National Roads. Section 5.7 states that there are three National Routes in County Kildare, namely, the N7 linking Naas and Dublin; the N81 running along the border between Kildare and Wicklow; and the N78 connecting Ballitore (Junction 3 on M9) and Athy and onwards to Ballylynan.</p> <p>Section 2.5 of the Spatial Planning and National Roads Guidelines (2012) states that all development plans and any relevant local area plans must implement the policy approaches outlined on page 12 including: “...Lands adjoining National Roads to which speed limits greater than 60 kmh apply: The policy of the planning authority will be to avoid the creation of any additional access point from new developments or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60kmh apply. This provision applies to all categories of development, including individual houses in rural areas, regardless of the housing circumstances of the applicant...”</p> <p>It is noted that the Office of the Planning Regulator (OPR) has evaluated and assessed the draft Plan under the provisions of Sections 31AO(1) and 31AO(2) of the Planning and Development Act 2000 (as amended) and the submission received from the OPR requests that the Planning Authority includes an additional policy which restricts access to the national road network in the county</p>

			<p>regardless of the housing circumstances of the applicant (Observation No. 2 in OPR submission refers).</p> <p>It is considered that TM O80 is sufficiently robust, however, it is proposed to amend HO P26 in Section 3.16 having regard to the OPR submission.</p>
			<p>Chief Executive's Recommendation Amend HO P26 as follows: ...premature obsolescence of regional roads, (see Chapter 5), through the creation of excessive levels of individual entrances and to secure investment in non-national roads, regardless of the housing circumstances of the Applicant.</p>
410	Celbridge Community Council	<p><u>Motorways</u> Objective TM O73 needs to be specific as to the nature of the overpass (pedestrian and cycle bridge overpass) to align with Action TM A6 to "Develop a new pedestrian and cycle link from Celbridge to Leixlip, via Castletown House, through the former Hewlett Packard site, across the M4 to the Wonderful Barn and onto Leixlip Town Centre and Leixlip Louisa Station." Additionally, the words "former HP site" might be rephrased to the "Kildare Innovation Campus".</p>	<p>Chief Executive's Response Accepted. In keeping with objective MT 1.11 of the Leixlip Local Area Plan 2020-2023 it is considered that the objective TM O73 should be amended to include specific reference to a pedestrian and cycle overpass.</p>
			<p>Chief Executive's Recommendation Amend TM O73 as follows: Examine the feasibility of delivering a pedestrian and cycle overpass of the M4 to link the Wonderful Barn at Leixlip to the Kildare Innovation Campus (the former Hewlett Packard site) and Castletown Demesne in Celbridge in consultation with Transport Infrastructure Ireland, while being sensitive to the heritage sensitivities of both sites.</p>
468	Ann Behan	<p>It is submitted that Table 5.5 virtually includes every regional road in the county in addition to the 20 priority road projects in table 5.4. In this regard it is suggested that the following sentence is added to TM O85 "During the life of this Plan, select a (section of) regional road linking two urban settlements in each of the municipal</p>	<p>Chief Executive's Response It should be noted that the progression of the listed roads for improvement is subject to funding. Additionally, is not considered appropriate to be bound by municipal district boundaries when selecting a (section of) regional road to be improved.</p>

		districts and investigate the feasibility of providing a segregated shared path adjoining it".	Chief Executive's Recommendation No changes to the Draft Plan
PARKING & TOWN CENTRES			
560	Cllr. Suzanne Doyle	<p>The submitter questions the inclusion of the following in Section 5.12: "According to the NTA Draft Transport Strategy for the Greater Dublin Area 2022-2042, the supply and management of parking at destinations is central to the management of travel demand. Limiting the availability of parking spaces and/or increasing the cost of parking will encourage the use of sustainable modes of transport and reduce traffic congestion."</p> <p>The submission states that this statement fails to take account of competition that town centres are facing from out of town large retail centres which planning decisions have supported. If this approach is adopted congestion will be reduced but unviable commercial town centres will result. The statement also fails to acknowledge that this position is predicated on a very sophisticated public transport service that does not exist in most towns in the hierarchy of settlements. The critical mass required to deliver a sophisticated public transport network does not exist nor will it given the prescriptive nature of NDP growth figures. However, given the modal shift that Dublin has engaged in and the historic retail leakage from Kildare into Dublin, it might be argued that to create a reasonable balance of car parking provision that will enhance convenience for shoppers, will attract our local community to shop local which will reduce net journey times.</p>	<p>Chief Executive's Response Sustainable Movement and Transport is underpinned by policy at a national and regional level. The sustainable mobility policies and objectives in the Draft Plan have been informed by a number of policies including, but not limited to, the Draft Transport Strategy for the Greater Dublin Area 2022-2042. This Strategy provides a framework for the planning and delivery of transport infrastructure and services in the Greater Dublin Area (GDA) over the next two decades. The Strategy sets out measures that the NTA believes are essential in meeting the objectives of the transport strategy to foster sustainable development and to fully integrate land use planning and transport planning, as a means of reducing travel demand.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

560	Cllr. Suzanne Doyle	The submission recommends that Objective TM 0117 be amended to include the following text: “To provide appropriately located tourism bus spaces in towns that offer visitor attractions.”	<p>Chief Executive’s Response Objective TM refers to landscape proposals, public lighting and street tree planting. However, objective TM O107 refers to car parking. It is considered appropriate to include a new objective in relation to bus parking.</p> <p>Chief Executive’s Recommendation Include new objective in Section 5.12 Parking after TM O115 as follows: Facilitate the provision of bus parking facilities at appropriate locations.</p>
538	Senator Mark Wall	The submission requests that HGV parking parks be facilitated and encouraged in all towns to free up parking of HGVs in housing estates.	<p>Chief Executive’s Response Specific HGV parking is considered desirable to prevent nuisance and annoyance, and for safety reasons. While Section 5.12 currently includes Objective TM O114 with respect to HGV parking, it is considered appropriate to replace this objective with a new objective.</p> <p>Chief Executive’s Recommendation Replace TM O114 with the following objective: Where appropriate, to require the provision of HGV parking facilities at motorway service areas, fuel filling stations, new industrial developments and other appropriate locations within the County.</p> <p>Amend the title of the Section 5.12 heading from ‘Car Parking’ to ‘Parking’.</p>
365	An Post	Postal facilities which are located in town/city centre areas have relatively specific requirements, primarily with regards access and deliveries. Any HGV bans would therefore affect business and should not apply to An Post. Similarly, 24 hour access to these premises must be maintained.	<p>Chief Executive’s Response Objectives TM O101 and TM O102 in Chapter 5 ‘Sustainable Mobility and Transport’ seek to assess the potential for HGV management measures in town centres, where appropriate. Banning An Post vehicles from town centres would not be considered appropriate as part of any potential HGV management measures.</p>

			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
507	Brian McArdle	<p>The submission states that there should be a levy on car parks that don't provide an equivalent number of secure bike stands, including space for disabled and cargo bikes. These should be close to the door or amenity for passive surveillance with segregated access. It further refers to car parks and discouraging car use in every way and suggests that car parks should be located at the periphery of town centres with cycling and walking prioritised.</p>	<p>Chief Executive's Response In relation to cycle parking, the Planning Authority requires the provision of a minimum level of secure cycle parking facilities in association with new development and changes of use. This is consistent with the objectives and policies of the National Cycle Policy Framework 2009 to 2020 (or any subsequent updates) and the Draft GDA Cycle Network Plan (NTA, 2021).</p> <p>The cycle parking standards set out in Table 15.5 of Chapter 15 Development Management Standards shall apply and cycle parking provision shall be in accordance with Section 5.4.1 of the Draft Plan.</p> <p>In relation to car parking, the standards are set out in Table 15.9 and car parking provision shall be in accordance with Section 5.12, which contains the policies and objectives guiding the provision, siting and quantum of car parking in developments. It is noted that there is, inter alia, an objective to promote appropriate parking arrangements for specific user requirements including age friendly parking, hidden disabled, disabled parking and motorcycle parking in towns, public transport nodes and other destinations (TM O113).</p> <p>In Policy TM P10, it is the policy of the Council to balance the demand for parking against the need to promote more sustainable forms of transport, to limit traffic congestion and to protect the quality of the public realm from the physical impact of parking, while meeting the needs of businesses and communities.</p>

			<p>It is considered that the policies and objectives contained in the Draft Plan adequately address the issues raised in the submission.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
560	Cllr. Suzanne Doyle	<p>The submission recommends that Objective TM O118 be amended to include the following text: "In destination retail towns and tourism destination towns to accommodate off street car parking in convenient locations through provision of multi-storey car parking." States that the capital investment required for delivery of same should be self-financing over time through car parking charges.</p>	<p>Chief Executive's Response TM O118 relates to street lighting and cabling. Notwithstanding same however it should be noted that any proposals to amend the Draft Plan to provide for car parking facilities in Kildare Town falls outside the scope of this draft Plan and therefore cannot be taken into consideration at this stage. It should be noted that the preparation of a local area plan for Kildare Town forms part of Kildare County Council's work programme for 2022. Furthermore, it is noted that the Council's programme for local area plans is based on the preparation of a series of evidence-based assessments including an Infrastructural Assessment (Settlement Capacity Audit), a Social Infrastructure Audit, and an Area Based Transport Assessment (ABTA) to determine the suitability and capacity of specific sites to accommodate particular land use zoning objectives. The adequacy and location of car parking facilities and the form such parking should take, to support tourism and other uses will be considered during the preparation of the Local Area Plan for Kildare Town.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
410	Celbridge Community Council	<p><u>Car Parking</u> Submits that objective TM O109 "To facilitate, along with the NTA and TII, the conversion of the private car fleet to electric..." should include that charging</p>	<p>Chief Executive's Response The request relating to TM O109 is noted. For further details relating to accessibility of EV charging infrastructure see the response to submission No. 276.</p>

		<p>infrastructure is accessible to all and provided in a safe location.</p> <p>Submits that objective TM O115 to "Support car sharing initiatives as part of new housing developments and workplaces." should include for the provision of car sharing initiatives in existing developments and existing workplaces.</p> <p>Alternatively, this should be contained in a new objective.</p>	<p>The request relating to objective TM O115 is not accepted. It is considered that this objective is specifically targeted at developing car sharing initiatives in proposed developments which would be assessed during the development management process i.e., considered by the Planning Authority as part of traffic and transport management arrangements proposed as part of a planning application.</p> <p>Chief Executive's Recommendation Regarding TM O109, see recommendation to Submission No. 276.</p>
SUSTAINABLE TRAVEL			
330	Maynooth Cycling Campaign	<p>The Plan should explicitly state that a significant reduction in car use is an essential requirement for a sustainable future. The submission notes that TII design requirements specify that planners design for increased number of vehicles in the future and this is incompatible with decarbonising of transport and avoiding climate change.</p> <p>Support 10-minute settlement but 10 minutes by foot, bike and public transport covers various distances. Active travel is feasible if made attractive to people who drive their cars for short journeys.</p> <p>The Targets should be broken down into individual urban areas and rural areas countywide. The targets should include a target for 2030 to align with the Climate Action Plan.</p> <p>The language used in the plan lacks ambition, 'promotion' and 'feasibility'.</p>	<p>Chief Executive's Response In relation to the comments raised regarding the unsustainable use of the car, and the request that the Plan should explicitly state that a reduction in car use is an essential requirement for a sustainable future, it should be noted that Section 5.1 of the Draft Plan states that 'current levels of car use are unsustainable and that a transition towards more sustainable modes of transport, such as walking, cycling and public transport is required'.</p> <p>The comments in relation to the 10 minute settlement are noted. According to 'Get Ireland Walking' an individual can walk 1km in approximately 10 minutes, therefore many of the 0-3km trips can be made by walking or cycling (Section 5.4 (Sustainable Movement) refers).</p> <p>The Sustainable Energy Climate Action Plan is currently being prepared which may, depending on the publication date of same, further inform the targets of the Draft Plan, including with respect to modal shift targets. Should it be</p>

	<p>Additional objective is proposed as follows: Encourage new employees, house buyers and parents to consider active and sustainable travel in conjunction with Kildare stakeholders.</p> <p>TM O6 - Amendments suggested: Replace “Support and encourage” with “Require”.</p> <p>Insert “which deliver modal change” after “implement Workplace Travel Plans.”</p> <p>TM A7 - Replace “footpath connection” with “a dedicated shared path”.</p> <p>TM A13 – Insert: Prepare a Cycle Network Study for each of the key towns in County Kildare consisting of the primary links identified in the NTA’s Draft Greater Dublin Area Cycle Network Plan (2021), local links and links to surrounding settlements; include key strategic cycle routes, greenways connecting the major towns, connections between the major towns and surrounding settlements, key strategic cycle routes, greenways and local links, all in accordance with the National Cycle Manual. The study will include draft widths, levels of services and identify local targets.</p> <p>TM A16 - Replace “upgraded” with “dynamic”.</p> <p>Insert additional Action: Design separate facilities for pedestrians, cyclists and vehicle drivers unless vehicle speeds and levels of activity are low. If numbers are high, shared space will result in a poor level of service for all.</p>	<p>published after the adoption of the County Development Plan, the Plan may be varied to take account of specific targets relative to the various elements of the Plan. In the meantime however, the Modal Shift Targets will be reviewed as part of the evidence base (specifically related to the Area Based Transport Assessments) to inform the preparation of the various statutory Local Area Plans throughout County Kildare.</p> <p>In relation to the proposed objective to encourage new employees, house buyers and parents to consider active and sustainable travel in conjunction with Kildare stakeholders, this is outside the remit of a land use plan. The Council through the provision and facilitation of sustainable travel infrastructure aims to make active travel a more convenient option for all, which is necessary to meet our climate targets.</p> <p>In respect of the first proposed change to TM O6 it is outside the remit of a land use plan to ‘require’ that employers develop and implement Workplace Travel Plans. The objective of a Workplace Travel Plan is to promote more sustainable travel options, reducing the need for employees to travel alone by car, thereby delivering modal change. Having regard to same it is however considered appropriate to amend TOM O6 to reference the need to promote more sustainable travel options.</p> <p>It is considered reasonable to make a change to TM A7 to reflect the existing routes that are proposed in the National Cycle Network (Draft 2022) connecting the settlements in the MASP.</p> <p>In relation to TM A13, the existing text of this action is considered to be appropriate. However, the minor proposed</p>
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	<p>TM O58 - Insert “the National Investment Framework for Transport in Ireland (NIFTI)” between “subject to assessment against” and the “Principles of Road Development”.</p> <p>TM O71 – Delete as it is incompatible with government climate change objectives.</p> <p>TM O85 – Add “During the life of this Plan, select a (section of) regional road linking two urban settlements in each of the municipal districts and investigate the feasibility of providing a segregated shared path adjoining it.”</p> <p>The submission states that Table 5.5 includes 44 regional roads virtually every regional road in the county. This is in addition to some 20 priority road projects listed in Table 5.4 (Section 5.1 Roads and Street Network).</p> <p>TM O98 Insert “potential” before “vulnerable road users”. Replace “shall be subject to the requirements of the Guidelines for Setting and Managing Speed Limits in Ireland (2015)” with “in accordance with the Stockholm Declaration”.</p> <p>Submission requests an additional objective: Reduce motorised traffic in town centres where alternative routes exist so as to promote walking and cycling in the interests of road safety.</p> <p>TM O107 - Replace “Seek to reduce” with “Reduce”.</p>	<p>amendment to the last sentence of the objective is accepted.</p> <p>The change from upgraded lighting to dynamic lighting is not accepted. The type of lighting to be used is outside the remit of a land use plan.</p> <p>In relation to designing separate facilities for pedestrians, cyclists and vehicle drivers, the Draft Plan is a strategic land use plan and so this level of detail is considered to be more suitably addressed at a local level through Area Based Transport Assessments which are used to inform the evidence base to support the preparation of Local Area Plans.</p> <p>In relation to the introduction of text referring to the National Investment Framework for Transport in Ireland (NIFTI) it is not considered warranted. The NIFTI has been developed to ensure sectoral investment is aligned with the National Planning Framework (NPF) and supports the delivery of the ten National Strategic Outcomes (NSOs). The NPF is a higher-level plan that all development plans across the country must have regard to.</p> <p>The comments in relation to TM O71 are noted. However, this is a road measure (Measure ROAD 9, refers) in the NTA’s Draft Transport Strategy.</p> <p>It is recommended that Objective TM O85 is deleted as it is already addressed under TM O58. While it is an objective of the Council to undertake improvements to Regional Roads as soon as possible and during the life of the Plan, TM O58, similar to all other objectives, actions and targets of the Plan are subject to the availability of financial resources. Objective TM O1 states the Council’s support to</p>
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	<p><u>Travel Mode Targets</u> The submission states that the targets quoted are incorrect as it adds up to 115% and 130%. Furthermore, the submission proposes new targets for each mode of transport.</p>	<p>implement the NTA Draft Transport Strategy therefore it is recommended to remove the various standards referenced in Objective TM O58 relating to these Guidelines as the Council will endeavour to implement all aspects of the Strategy as they relate to Kildare.</p> <p>Having considered the wording of TM O98 in the context of the submission received, it is considered more appropriate to omit TM O98 having regard to the Draft Development Plan Guidelines (2021) which states that objectives dealing with specific issues that are governed by other legislative codes, should not be included as objectives in development plans.</p> <p>There are numerous objectives in the Plan that promote sustainable modes of transport over the use of private modes of transport (see Section 5.4.1; Walking and Cycling and Section 5.4.2; Public Transport). It is not considered necessary to include the additional objective as proposed.</p> <p>The request to amend TM O107 is not accepted as any reduction in car parking spaces should be considered on a case-by-case basis having regard to the individual circumstances of each individual settlement, based on an evidence-led assessment, and informed by the requisite public consultation.</p> <p>In relation to the targets, it should be noted that it is usual for persons to use more than one mode of transport to complete a journey. It is not considered appropriate to review the mode share targets at this time. The targets provided in the Plan are interim targets until the completion of the Sustainable Energy Climate Action Plan. It should be noted that it is an action of the Plan to prepare, within 1 year of the adoption of the County Development Plan a</p>
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			<p>Sustainable Energy Climate Action Plan (SECAP) for County Kildare to provide a baseline analysis for Kildare and for the inclusion of measurable targets on renewable energy and climate change mitigation and adaptation.</p> <p>Chief Executive’s Recommendation Amend TM O6 as follows: Support and encourage employers to develop and implement Workplace Travel Plans based on the NTA’s Workplace Travel Plans: A Guide for Implementers (2013), in order to promote more sustainable travel options.</p> <p>Amend TM A7 as follows: Investigate the feasibility of providing a footpath dedicated shared path connection between the settlements in the MASP area to align with the proposed routes identified in the National Cycle Network (Draft 2022) or any subsequent updates to same. from Maynooth to Celbridge.</p> <p>Amend TM A13 as follows: ...The study will include draft widths, levels of services and identify local targets.</p> <p>Amend TM O58 as follows: Secure the implementation of the Priority Road and Bridge Projects and the Regional Roads Identified for Improvement (Table 5.4 and 5.5, refer) and maintain corridors free from development to facilitate future roads, cycle facilities and other transport infrastructure improvement identified within this Plan (Tables 5.4 & 5.5) and Local Area Plans. The further progression of the road projects is subject to assessment against the ‘Principles of Road Development’ criteria set out in Section 13.2 of the Draft Transport Strategy for the Greater Dublin Area 2022-2042. Where the road project is an orbital road around a town centre, the</p>
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			<p>development must be accompanied by enhanced public transport, cycling and pedestrian facilities in the relevant centre, as required by Section 13.5 of the Draft Transport Strategy for the Greater Dublin Area 2022-2042.</p> <p>Delete objective TM O85 and TM O98 of the Plan.</p>
468	Ann Behan	<p>Amend TM O16 to include the words “including winter maintenance” after the wording ensure regular maintenance.</p> <p>Amend TM O19 by replacing the word “dedicating” with “dedicate” while also adding the words “in each municipal district” after pilot town.</p> <p>Amend TM PO32 to include the word “support” instead of “promote and encourage”.</p> <p>Amend TM A7 to include the wording “dedicated shared path” instead of “footpath connection” from Maynooth to Celbridge.</p> <p>Amend the last line of TM A13 to read “levels of service” as opposed to “level of services”</p> <p>Amend TM A16 to include the word “dynamic” after the word upgraded.</p> <p>Include an additional action “to design separate facilities for pedestrians, cyclists, and vehicle drivers unless vehicle speeds and levels of activity are low. If numbers are high, shared space will result in a poor level of service for all”.</p> <p>Reference is made to TM T2, TM T3, and TM T4. It is also submitted that the targets set out are</p>	<p>Chief Executive’s Response See responses to submissions 413 and 330.</p> <p>Chief Executive’s Recommendation See recommendations to submissions 413 and 330.</p>

		<p>underwhelming. The targets should be aiming for walking and cycling to make up at least 66% of all trips to both work and education.</p> <p>Amend TM O98 to include the word “potential” prior to vulnerable users at the end of the first sentence. Add the wording “in accordance with the Stockholm Declaration” at the end of the second sentence in this objective.</p> <p>Add an additional objective to read “reduce motorised traffic in town centres where alternative routes exist so as to promote walking and cycling in the interests of road safety”.</p>	
405	Kildare Climate Action Linkage Group	<p>The submission requests Objective TM O71 to be deleted as it is incompatible with government Climate Change objectives.</p> <p>The submission states that Table 5.5 includes 44 regional roads in addition to some 20 priority road projects listed in Table 5.4.</p> <p>It is proposed to amend TM O85 as follows: Progress the regional roads identified for improvement as set out in Table 5.5 subject to funding. During the life of this Plan, select a (section of) regional road linking two urban settlements in each of the municipal districts and investigate the feasibility of providing a segregated shared path adjoining it.</p> <p>The submission requests Objective TM O98 to be amended as follows: Set and apply speed limits taking into account the function of the road or street, the characteristics of the</p>	<p>Chief Executive’s Response See response to submission no. 330.</p> <p>Chief Executive’s Recommendation See recommendation to submission no. 330.</p>

		<p>surrounding area, the design of the street environment and the presence of potential vulnerable users. The speed limits shall be in accordance with the Road Traffic Act 2004 (as amended) and shall be subject to the requirements of the Guidelines for Setting and Managing Speed Limits in Ireland (2015) in accordance with the Stockholm Declaration.</p> <p>The submission proposes the following additional objective:</p> <p>Reduce motorised traffic in town centres where alternative routes exist so as to promote walking and cycling in the interests of road safety.</p>	
405	Kildare Climate Action Linkage Group	<p>The submission requests the following additional action: Design separate facilities for pedestrians, cyclists and vehicle drivers unless vehicle speeds and levels of activity are low. If numbers are high, shared space will result in a poor level of service for all.</p>	<p>Chief Executive's Response It is considered that action TM A5 adequately address the provision of segregated walking and cycling routes.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
429	Westar Group	<p>The submission from Hughes Planning & Development Consultants on behalf of the Westar Group also makes some suggested policy amendments and inclusions relating to road and sustainable transport infrastructure as follows:</p> <ol style="list-style-type: none"> 1. Request that the scope of Item No. 17 as included within Table 5.4 'Priority Road and Bridge Projects' of the Draft Plan, which indicates that it is the intent of the Planning Authority to 'examine options for a link road from the R407 to the R403 including a new Liffey Crossing east of Clane', be broadened to also include for the associated provision of pedestrian and cycle infrastructure along this link and crossing. 	<p>Chief Executive's Response It is considered that TM P7 which states that it is a policy of the council to ensure that local roads within the county are designed to a suitable standard to accommodate sustainable modes of transport adequately addresses point number 1 above.</p> <p>The Draft Plan has been drafted in such a way that the actions, where possible, are more specific than the objectives that precede them. Having regard to same it is considered more appropriate to retain TM A18 as an action rather than label it as an objective. The Council is committed and it continues to remain an action of the Council to investigate the feasibility for a new pedestrian bridge</p>

	<p>2. Request that KCC designate Action TM A18 as listed within the Draft Plan, which relates to a feasibility study in respect of a 'new pedestrian bridge crossing the River Liffey in the vicinity of Alexandra Bridge in Clane', as a development plan objective as opposed to an action to expedite this assessment in the shorter term.</p> <p>3. Request the inclusion of a new objective as part of the Draft Plan which provides for the undertaking of a feasibility study regarding the provision of a cycle-way from Clane to Sallins along the R407 road, in line with the recently published Draft Greater Dublin Area Cycle Network strategy, in order to facilitate access from Clane to the Sallins/Naas Train Station by way of sustainable modes of travel.</p> <p>Submits that objective TM O27 should be amended to include the bridge crossing over the River Liffey as follows: Investigate the feasibility of developing a cycle-way at the following locations: - crossing the River Liffey in the vicinity of Alexandra Bridge Clane – from Milltown to Newbridge along the R416 – from Ballitore to Crookstown – from Castledermot to the south west, along the R448 to the county boundary – from Athy along the N78 to the east as far as the M9 Motorway – from Caragh Village to Naas along the R409 and R445 – from Clane Village to Sallins along the R407.</p> <p>The submission also notes the inclusion of Objective TM O43 which seeks the extension of the DART+ southwest to Naas/Sallins and Newbridge.</p>	<p>crossing the River Liffey in the vicinity of Alexandra Bridge in Clane</p> <p>It is considered that objective TM O20 of the Plan to secure the development and delivery of the cycle network identified in the Draft Greater Dublin Area Cycle Network Plan (2021) adequately addresses point number 3 above.</p> <p>Considering the responses to point numbers 1 and 3 above, no further changes are proposed to TM O27.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
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		Submits that whilst the Westar Group is supportive of the above objective, it is considered that the connection of Clane to Sallins through the provision of additional cycle lanes would facilitate further sustainable use of public transport and would provide improved access for the population of Clane to the existing Train Station at Sallins, thus ensuring the critical mass in place to sustain such additional services and reduce car dependency in Clane in line with the key goals of the NPF and the RSES.	
443	Clane Community Council	<p>There is an opportunity to communicate a framework to transition the delivery of increased sustainable transport modes using the 'Avoid-Shift-Improve Approach' and the four core principles of the 'Design Manual for Urban Roads and Streets' (2019) (DMURS).</p> <p>It is submitted that in light of Climate Action, that Kildare County Council should add a policy objective to prepare for the decommissioning and re-use of fossil fuel storage and retail infrastructure.</p> <p>The Council should acknowledge that the designed capacity and that increasing capacity that becomes subsumed by private car movements is not compatible with climate action. Air quality measurements in urban areas should therefore become a prerequisite to investment in roads capacity.</p>	<p>Chief Executive's Response</p> <p>The Draft Plans' aim is to support and prioritise investment in more sustainable modes of travel, the transition to a lower carbon transport system, and the development of a safer, efficient, inclusive, and connected transport system. Although not labelled the 'Avoid-Shift-Improve Approach' the approach taken in Chapter 5 (Sustainable Mobility & Transport) and throughout the Draft Plan is quite clear in promoting a consolidation and reduction in private vehicle trips, shifting from private vehicles to more sustainable modes of travel, and improving the options for people to move from a fossil fuelled vehicle to a hybrid or electric one.</p> <p>The Draft Plan fully supports DMURS (2019) which is mandatory for all urban roads and streets within the 60 km/h urban speed limit zone except for Motorways and in some other exceptional circumstances. The policies and objectives throughout Chapter 5 support the principles set out in the Design Manual for Urban Roads and Streets (2019).</p> <p>As outlined above, the Draft Plan is clear in promoting more sustainable modes of travel over heavily fossil fuelled dependent methods. However, dependence on fossil fuel is still an economic reality in the short to medium term and an</p>

			<p>objective, which seeks the decommissioning of fossil fuel storage and retail infrastructure is not considered viable or realistic under current circumstances.</p> <p>The submission's comment that increasing road capacity that becomes subsumed by private car movements is not compatible with climate action is noted. However, the Draft Plan under TM T1 sets a specific target to 'As a minimum, reduce the current car-based trips to work from 74% to 50% and the car-based trips to education from 50% to 40% by the end of this Plan period.' The Draft Plan is very clear in promoting sustainable modes of travel over private car movements. One of the outcomes of promoting more sustainable modes of travel should be improved air quality, however, to align air quality with investment in roads capacity would be problematic as the two are not always directly related.</p>
			<p>Chief Executive's Recommendation No change to Draft Plan.</p>
413.	Kildare Public Participation Network	<p><u>Overarching Goals, Policies and Objectives</u> Submission proposes the amendment of objective TM O7 as follows: TM O7: ...such as pedestrianisation, pedestrian priority and/or improved pedestrian/cycling facilities, in particular increasing the number of safe crossings.</p> <p>Submission proposes inserting additional provision to also including 'trailing locations' into objective TM O8.</p> <p>Submission proposes the amendment of objective TM O11 as follows: Proposed Additions: (v) Enfield to Edenderry disused railway line.</p>	<p>Chief Executive's Response The proposed additional text in Objective TM O7 is noted and accepted.</p> <p>The proposed change to Objective TM O8 is not accepted. The locations for car-free residential, town centre and other developments will be delivered through a plan-led approach supported by either an Area Based Transport Assessment or a Transport Strategy for individual towns in the county, which will inform the emerging statutory Local Area Plans.</p> <p>In respect of the two additions to TM O11; the Trans-European Transport Network (TEN-T) which traverses Kildare is the North Sea-Mediterranean Corridor which</p>

	<p>(vi) Along a Kildare section of the Trans-European Transport Network (TEN-T).</p> <p>Submission proposes rewording target TM T1 as follows: As a minimum, reduce the current car-based trips to work from 74% to 33.3% and the car-based trips to education from 50% to 33.3% by the end of this Plan period.</p>	<p>comprises the M7 motorway and the railway line from Belfast to Cork, via Sallins, Newbridge, Kildare, Monasterevin from Dublin. It is not the intention of the Council to examine these routes as cycle pathways as there are more appropriate cycle routes such as those in the GDA Transport Strategy that will be pursued during the lifetime of the Plan.</p> <p>In respect of the disused rail line from Enfield to Edenderry, the Draft Plan under Objective LR A11 already refers to investigating the feasibility of developing long distance walking and cycling routes along disused sections of railway lines such as the Edenderry to Enfield (former Midland Great Western) line. The Draft Plan has also identified part of the railway line from Edenderry to Carbury Bog as a Peatway Corridor. This Corridor will provide for long distance amenity and recreation route with very significant tourism potential. Therefore, the proposed change is not accepted as it is already sufficiently addressed in the draft Plan.</p> <p>In respect of TM T1 the targets in the draft Plan are extremely ambitious. It is important to be realistic in target setting which should be rooted in an evidence-based approach such as the POWSCAR data (Place of Work, School or College – Census of Anonymised Records), which provides an understanding of existing commuting patterns for the population. For instance, taking the town of Kildare, 52% of work and college trip destinations of the residents of Kildare Town (Census 2016) are not accessible by public transport. Therefore, the extremely ambitious targets currently in the draft Plan is considered to be onerous for a town like Kildare (which is on a trainline) to achieve as they currently stand</p>
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			<p>Chief Executive's Recommendation Amend TM O7 as follows: Introduce measures to reduce traffic congestion in town centres such as pedestrianisation, pedestrian priority and/or improved pedestrian/cycling facilities, in particular, increasing the number of safe crossings.</p>
468	Ann Behan	<p>Amend TM O7 to include cyclist facilities.</p> <p>Amend TM O11 to include additional projects such as the Enfield to Edenderry disused railway line and along a Kildare section of the Trans-European Transport Network (TEN-T). It is also asked how feasibility is defined? And if trialling can be included as part of these feasibility studies to ensure time is not lost on reports?</p> <p>It is submitted the target in TM T1 is underwhelming. If a 2:1 approach is taken as per Government plans, the targets, at a minimum should be 33.3% for both car-based work and education trips.</p>	<p>Chief Executive's Response See response to submission 413 above.</p> <p>Chief Executive's Recommendation See recommendation to submission 413 above.</p>
405	Kildare Climate Action Linkage Group	<p>The submission commends policy statement TM P1, but questions if an action will be included to set out the criteria, and how it will be applied, to ensure this prioritisation occurs.</p> <p>It is suggested that the following objectives be amended as follows: TM O6 - Support and encourage Require employers to develop and implement Workplace Travel Plans which deliver modal change based on the NTA's Workplace Travel Plans: A Guide for Implementers (2013).</p>	<p>Chief Executive's Response There are numerous policies, objectives and actions in Chapter 5 that address the prioritisation of walking, cycling and public transport and to encourage the use thereof. In addition, Figure 5.8 of the Plan outlines the user hierarchy to consider during the design of roads and streets which prioritises sustainable forms of transportation. Thus, it is not considered necessary to add additional actions to the Plan.</p> <p>Regarding TM O6 it should be noted that it is not within the remit of this Plan to require employers to develop and implement Workplace Travel Plans.</p>

	<p>TM 07 - Introduce measures to reduce traffic congestion in town centres such as pedestrianisation, pedestrian priority and/or improved pedestrian/cyclist facilities, in particular increasing the number of safe crossings.</p> <p>An additional objective is also proposed to be included in the Plan: <i>Encourage new employees, house buyers and parents to consider active and sustainable travel in conjunction with Kildare stakeholders.</i></p> <p>Submission proposes inserting additional provisions to Objective TM O11, as follows: <i>(v) Enfield to Edenderry disused railway line.</i> <i>(vi) Along a Kildare section of the Trans-European Transport Network (TEN-T).</i></p> <p>Furthermore, the submission questions how ‘feasibility’ is defined and if trialling can be included as part of these feasibility studies to ensure time is not lost on reports.</p> <p>Submission proposes rewording target TM T1 as follows: <i>As a minimum, reduce the current car-based trips to work from 74% to 50% 33.3% and the car-based trips to education from 50% to 40% 33.3% by the end of this Plan period.</i></p> <p>Regarding Targets TM T2, TM T3 and TM T4, it is submitted that these targets are hugely underwhelming and that a 2:1 approach should be taken. The targets should collectively be aiming for walking and cycling to</p>	<p>The proposed additional text in Objective TM 07 is noted and accepted.</p> <p>A feasibility study are preliminary studies undertaken at the very early stage of a project to determine whether the project is viable. The issues addressed in feasibility studies differs depending on the size and complexity of a project.</p> <p>The targets in the draft Plan are extremely ambitious. It is important to be realistic in target setting which should be rooted in an evidence-based approach such as the POWSCAR data (Place of Work, School or College – Census of Anonymised Rec-ords), which provides an understanding of existing commuting patterns for the population. For instance, taking the town of Kildare, 52% of work and college trip destinations of the residents of Kildare Town (Census 2016) are not accessible by public transport. Therefore, the extremely ambitious targets currently in the draft Plan is considered to be onerous for a town like Kildare (which is on a trainline) to achieve as they currently stand.</p> <p>See response to 413 above (PPN).</p> <p>Chief Executive’s Recommendation See recommendation to 413 above (PPN).</p>
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		make up at least 66% of all trips to both work and education.	
560	Cllr. Suzanne Doyle	The submission recommends the inclusion of the following text in Objective TM 071: “To establish a working committee with Irish Rail for the management, maintenance and upgrading of railway bridge network throughout the county.”	<p>Chief Executive’s Response</p> <p>It is noted that it is an objective of the Council to support and facilitate enhanced orbital movement between the N3, the N4 and N7 national roads, by the widening of existing roads and/or the development of new road links, for the purpose of providing resilience to the operation of the M50 and incorporating provision for sustainable transport as provided for in the NTA’s Draft Transport Strategy for the Greater Dublin Area 2022-2042 and the Regional Spatial and Economic Strategy (TM O71).</p> <p>While the maintenance and renewal of the track, structures and buildings of Iarnrod Eireann is the responsibility of Iarnrod Eireann, it is noted that it is customary for Local Authorities to enter into maintenance agreements with Iarnrod Eireann in respect of road structures owned by Iarnrod Eireann that require Council maintenance, such as rail crossings and barriers however it is not considered necessary to establish a working committee, through the Draft Plan, for such purposes.</p> <p>Chief Executive’s Recommendation</p> <p>No change to the Draft Plan.</p>
472	Keep Ireland Open	<p>The submission supports the following policies, objectives and actions; (Chapter 5) TM O1, TM O11, TM O16, TM O20 to TM O23 and TM O27 to TM O29; Actions TM A 5 to TM A 7, TM A13, TM A 16 and TM A 18; Draft Greater Dublin Area Cycle Network Plans- All</p> <p>The submission recommends the inclusion of new objectives:</p>	<p>Chief Executive’s Response</p> <p>Objective TM O1 Supports the NTA Draft Transport Strategy for the Greater Dublin Area (2022-2042) and facilitates and secures the implementation of projects identified within the Strategy.</p> <p>Policy TM P2 seeks to prioritise and promote the development of high-quality, suitable, safe and sustainable</p>

	<ul style="list-style-type: none"> • Promote, facilitate, support, improve and actively encourage the development, enhancement and expansion of an integrated coherent network of safe cycle routes (including long distant routes) in association with other agencies by facilitating the construction of cycleways. • Enhance and maintain these routes by providing signposting, lighting and road surfaces to a high standard and with separation from vehicular traffic as set out in 2020 DMURS Interim Advice Note. • Encourage the development of off-road cycling. Ensure that the upgrading of roads will not impact negatively in the safety or perceived safety of cyclists and that any dedicated cycle routes should, where possible, follow off-road tracks and quiet country roads. • Support the development, maintenance and enhancement of trails and routes in co-operation with the Sports Council, the NTA, the NTO, the NWMWAC, the Heritage Council and other bodies to develop cycle touring routes including those linking with adjoining counties particularly in areas of high amenity. • Promote, facilitate and support the policies of the NCN 2009 and facilitate its maintenance, enhancement and expansion. • Ensure that any dedicated cycle routes which are developed away from the main public carriageway are well lit. • Implement the recommendations and proposals within the NCN Scoping Study (2010). 	<p>walking and cycling pathways and facilities, both intercounty and intra-county.</p> <p>Objectives TM O16- TM O33 seek to provide an interconnected network of cycling routes across the county and to secure the development and delivery of the cycle network identified in the Draft Greater Dublin Area Cycle Network Plan.</p> <p>Objective LR O42 is to lead and support the extension and interconnection of Greenways, Blueways, Peatways and trails within and outside County Kildare in consultation with Coillte, Bord na Móna and all other relevant stakeholders.</p> <p>Objective LR O44 seeks to promote the expansion of cycle facilities throughout the county and to liaise with Fáilte Ireland, the Sports Council, the National Transport Authority and other bodies in the development of cycling touring routes throughout the county and adjoining counties, in particular in areas of high amenity.</p> <p>Objective LR O49 supports the development of ancillary infrastructure for Greenways and cycle routes (i.e. trailheads, signage, rest areas, parking, lighting, toilets, etc.) in line with the Greenways and Cycle Routes Ancillary Infrastructure Guidelines (2018) of the Department of Transport, Tourism and Sport in co-operation with landowners, Waterways Ireland, Government Departments and other Local Authorities</p> <p>Action LR A9 seeks to prepare and implement a County Walking Strategy, within the lifetime of the Plan. This strategy will seek to identify established and proposed walking routes in the county, evaluate these routes and make recommendations for their promotion.</p>
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	<ul style="list-style-type: none"> • Support the delivery of Greenway projects specified in the Greater Dublin Cycle Network in conjunction with relevant organisation and bodies. • Support, promote, identify establish and actively encourage the provision, development, extension and design of off road interlinked walkways and cycleways (mention routes) including long distance walkways and particularly those with historic associations in conjunction with the Irish Sports Council, IW and other stakeholders to link with a strategic network of trails from residential areas, open spaces and existing or new public rights of way to provide access to scenic, lakeshore and river features and to link with adjoining counties, including cross border counties in partnership with their councils, the state, private and voluntary sectors. • Support the sustainable development of greenways and blue ways which seek to support the protection of natural heritage and design. • Walking and Cycling will be promoted, developed, facilitated and encouraged in accordance with initiatives contained in "Smarter Travel 2009" by improving existing cycleways and by developing a network of safe maintained and guarded cycle routes and footpaths on existing roads. Ensure, where possible, that cycleways and footpaths are effectively separated from major vehicular carriageways. Provide, promote, improve and extend the network of off road cycle and walking routes on all new road improvement or redesigned schemes including regional, local distributor and local collector roads and on roads being up-graded, to ensure personal safety, particularly at night and a more convenient, pleasant, attractive and comfortable environment. Support the installation of 	<p>Chief Executive's Recommendation No change to draft Plan.</p>
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		<p>infrastructure measures e.g new and wider pavements, road crossings, retrofitted, if necessary, which would facilitate and encourage safe walking and cycling</p> <ul style="list-style-type: none"> • Provide, create, promote, plan, support, maintain, enhance, encourage, extend, facilitate and support initiatives to develop and improve walking, rambling and cycling in conjunction/co-operation the Irish Sports Council, walking and cycling groups, landowners, farmers, local communities and other relevant organisations and bodies by identifying/defining more dedicated walking and cycling routes(named) to enable the creation of a high quality, coherent, pleasant, integrated and comprehensive dedicated off road countywide joined up network of local and regional cycling/walking routes, footpaths, greenways, particularly in rural are and between settlements, that link communities to key destinations and amenities, including local walks, long distance walks and established rights of way, through open spaces, strategic green corridors, river corridors and other off-road routes particularly those with historic associations or other areas of interest and maximise their potential. Expand and extend existing routes by utilising links from residential areas to provide access to lakeshores, rivers and scenic areas. • Seek opportunities for the development of suitable walking routes, cycle tracks and bridle paths along historic access routes. • Augment existing networks and trails at key heritage sites. • Provide, where feasible, adequate car parking and/or lay-bys for walkers and cyclists, (from your local knowledge name important locations) and 	
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		<p>other appropriate points to facilitate access to amenities from 9am until dark.</p> <ul style="list-style-type: none"> • Identify and implement a strategic, coherent and high- quality cycling and walking network that is interconnected with recreation attractions. • Provide, signposting, information boards and public lighting for walking cycle routes at appropriate locations. • Protect the integrity, extent, scenic quality, visual setting and functionality of existing and future Greenways and walking and cycle routes. • Protect the routes of, and prohibit development, which would hinder the creation and development of future Greenways, walking and cycling routes including those identified in the Plan. • Ensure that development proposals protect the routes of potential linkages such as linear paths, footpaths trails, greenways and cycleways through a site where the Council considers that an opportunity to provide a linkage to or between adjoining. • Protect established walking and cycling and keep them free from development which would adversely impact upon them. Council may seek to incorporate the provision of pedestrian and cycleways routes to link amenities and points of interest as a condition of planning permission. • Encourage the provision of access routes to amenity areas in co-operation with landowners and protect them from inappropriate development and will seek to extend those spaces and pathways that can usefully form green links, footways and cycleways to connect residential areas with parks and open space and with each other. • Protect and preserve routes of former railway lines by enhancing, conserving, safeguarding and 	
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		<p>preserving greenway routes as long distance walking and cycling routes along or in proximity of these rail lines from inappropriate development which could compromise their development. Along these corridors other uses shall not be considered. Where these corridors have been compromised by development, adjacent land which could provide opportunities to bypass such an impediment and reconnect these routes for walking/cycling shall be protected for this purpose</p> <ul style="list-style-type: none"> • Where feasible, provide separate trails for walkers and cyclists in the interests of safety and convenience with appropriate surfaces for each type of user. The separation of walkways and cycleways is the practice in other countries 	
<p>413.</p>	<p>Kildare Public Participation Network</p>	<p><u>Walking and Cycling</u> Submission requests that the objectives and actions set out below be amended as follows: TM O16: Ensure regular maintenance including winter maintenance, of walking and cycling routes...</p> <p>TM O19: Investigate the feasibility of dedicating Dedicate a street(s) to pedestrian only activity on certain days of the week or at certain times of the day, in a pilot town in each of the Municipal Districts during the life of this Plan.</p> <p>TM O32: Promote and encourage Support the use of the Toolkit for School Travel (2019)...</p> <p>TM A7: Investigate the feasibility of providing a footpath connection dedicated shared path from Maynooth to Celbridge.</p>	<p>Chief Executive's Response In relation to the suggested change to TM O16 'regular maintenance' would include maintenance at all times of the year. This is an operational issue for the Council and the detailed specifics are outside the remit of a land use plan.</p> <p>The proposed change to TM O19 is not accepted. An objective of the County Development Plan should be realistically achievable and evidence-based and every Municipal District in the county may not have a town that is appropriate for this pilot programme. Such a proposal would also be outside the remit of a Development Plan.</p> <p>The change to TM O32 is not accepted. The change from 'promote and encourage' to 'support' is not considered to be a material change that is warranted.</p> <p>In relation to TM A7 and TM A13, see response to Submission No. 330.</p>

		<p>TM A13: Prepare a Cycle Network Study for each of the key towns in County Kildare consisting of the primary links identified in the NTA's Draft Greater Dublin Area Cycle Network Plan (2021), local links and links to surrounding settlements; include key strategic cycle routes, greenways connecting the major towns, connections between the major towns and surrounding settlements, key strategic cycle routes, greenways and local links, all in accordance with the National Cycle Manual. The study will include draft widths, level of services and identify local targets.</p> <p>TM A16: Provide new or upgraded dynamic lighting for all footpath and cycle track schemes...</p>	<p>The change from upgraded lighting to dynamic lighting is not accepted. The type of lighting to be used is outside the remit of a land use plan and is an operational matter for the Council.</p> <p>Chief Executive's Recommendation In relation to TM A7 and TM A13, see recommendation to Submission No. 330.</p>
405	Kildare Climate Action Linkage Group	<p><u>Walking and Cycling</u> The submission requests that the objectives and actions set out below be amended as follows:</p> <p>TM O16 - Ensure regular maintenance, including winter maintenance, of walking and cycling routes and ensure that all roads in new developments are designed in accordance with the principles, approaches and standards contained in the Design Manual for Urban Roads and Streets 2019, the National Cycle Manual (NTA, 2011 – or the pending update) and the Draft GDA Cycle Network Plan (NTA, 2021).</p> <p>TM O19 - Investigate the feasibility of dedicating Dedicate a street(s) to pedestrian only activity on certain days of the week or at certain times of the day, in a pilot town, in each municipal district, during the life of this Plan.</p> <p>TM O32 - Promote and encourage Support the use of the Toolkit for School Travel (2019) by teachers, parents</p>	<p>Chief Executive's Response See response to 413 above (PPN).</p> <p>Chief Executive's Recommendation See recommendation to 413 above (PPN).</p>

		<p>and others and promote and encourage, in consultation with the Department of Education, substantial changes in relation to the items that learners are expected to bring to and from school daily to encourage more learners to cycle to school</p> <p>TM A7 - Investigate the feasibility of providing a footpath connection dedicated shared path from Maynooth to Celbridge.</p> <p>Revised TM A13 - Prepare a Cycle Strategy for each of the key towns in County Kildare consisting of the primary links identified in the NTA's Draft Greater Dublin Area Cycle Network Plan (2021), local links and links to surrounding settlements; include key strategic cycle routes, greenways connecting the major towns, connections between the major towns and surrounding settlements, key strategic cycle routes, greenways and local links all in accordance with the National Cycle Manual. The study will include draft widths, levels of service and identify local targets.</p> <p>TM A16 - Provide new or upgraded dynamic lighting for all footpath and cycle track schemes subject to the consideration of ecology and impacts on wildlife. Appropriate environmental assessments will be required and may result in unlit sections which may include some parts of the county's Greenways.</p>	
405	Kildare Climate Action Linkage Group	<p>A range of specific measures in relation to lighting are outlined. These include using sensors on roads, streets, motorways and in public buildings to save energy, using low lux readings for light installations, and generating electricity for lighting through wind energy. Production of electricity can also be used to power trains. A pilot using dog stool to power lights in areas of high dog fouling.</p>	<p>Chief Executive's Response</p> <p>A range of objectives are included in section 5.13 regarding public lighting. There is an objective (TM O119) to ensure that all new street lighting is provided in accordance with best practice guidelines and standards. Section 15.7.9 also refers to the objectives outlined in section 5.13. While section 6.8.2 also includes objectives in relation to light pollution. In addition, there is an objective EC O10 in section</p>

			<p>7.4, which is to support energy efficient lighting at appropriate locations in both rural and urban areas.</p> <p>Electricity generated from wind energy and other renewable energy projects will be fed to the electricity grid to support all types of electrical infrastructure including public lighting, and electric rail where provided.</p>
			<p>Chief Executive's Recommendation No change to Draft Plan.</p>
468	Ann Behan	<p>A range of specific measures in relation to lighting are outlined. These include using sensors on roads, streets, motorways and in public buildings to save energy, using low lux readings for light installations, and generating electricity for lighting through wind energy. Production of electricity can also be used to power trains. A pilot using dog stool to power lights in areas of high dog fouling.</p>	<p>Chief Executive's Response See response to submission 405 above.</p>
			<p>Chief Executive's Recommendation See recommendation to submission 405 above.</p>
385	County Kildare Chamber	<p><u>Transport & Infrastructure:</u> The Chamber supports the idea that all community facilities and services are accessible within a 10-minute walk or cycle from homes or are accessible by public transport services. Kildare County Council must ensure these facilities are delivered in conjunction or in advance of any future residential or commercial development and are sufficient to cope with inevitable increased demand into the future.</p> <p><u>Kildare Village</u> The Plan must support the electrification expansion of the rail line, to Kildare Village, a central hub within the County, a key connector between the different regions within Kildare.</p>	<p>Chief Executive's Response <u>Transport & Infrastructure:</u> The submissions' comments that the Council must ensure that community and transport facilities are delivered in conjunction or in advance of any future residential or commercial development and are sufficient to cope with inevitable increased demand into the future are noted. Section 15.4.1 gives clear guidance that 'the need for new residential development to achieve sustainable densities at appropriate locations, should also be balanced with considerations such as existing and future (planned) capacity of the physical and social infrastructure to appropriately cater for the envisaged population.'</p> <p>Also, in accordance with the provisions of Section 15.5.1 applications for residential development over 20 units or,</p>

	<p><u>Kilcock and Sallins train Stations</u> The Chamber believes that Kilcock train station in the North-West of the County should be expanded, owing to its proximity to areas such as Maynooth, Celbridge and Leixlip, and its continuing rise in population as a commuter town.</p> <p>The Chamber also believes there should be the promotion and investment in increased numbers of 'Park and Ride' facilities, and the electrification of the Sallins/Naas train line.</p> <p><u>Public Transport and Active Travel</u> Additional and expanded public transport networks and active travel schemes, are the only tools in ensuring that public transport is viable, and therefore need to be fully committed to within the Development Plan, with funding mechanisms future proofed.</p> <p>The development plan should also cater for less traditional modes of public or active travel, encouraging the expansion of existing bike schemes. Currently legislation is being drafted at central government level regarding the provision for e-scooter use. The plan should encourage new models and private operators into the space, to increase the pace of growth into the area and providing more alternatives for the public.</p> <p><u>Electric Charge Points</u> The Council through the development plan should be a leader in promoting the incorporation of electric charge points throughout our towns and villages, and in residential communities and commercial settings.</p>	<p>2,000m² in the case of commercial developments, (including office/industrial developments), will be required to be accompanied by a Social Infrastructure Audit (SIA) in order to demonstrate that the proposed development, in conjunction with other extant permissions for residential development, will not place an unacceptable burden on the existing capacity of social infrastructure in the area. The Council will place particular emphasis on the need to ensure that any required social infrastructure will be developed either in tandem with, or prior to any new residential development.</p> <p><u>Kildare Village</u> There are currently no proposals within the Draft Plan to support the electrification expansion of the rail line to Kildare Village as such plans have now been identified at a national/regional level. However, TM A1 of Chapter 5 states that it is an action of the Council to 'Prepare a County Kildare Sustainable Mobility Plan that addresses the long-term mobility needs of communities and businesses in the county.'</p> <p><u>Kilcock and Sallins</u> Objective TM O3 is clear that it will 'facilitate and support the extension of the DART+ line to Kilcock, the extension of the DART+ Southwest line to Naas / Sallins and Newbridge and the extension of the LUAS network, in co-operation with Irish Rail, the Department of Transport and the National Transport Authority.'</p> <p>Section 5.4.2 of the Draft Plan supports Park and Ride facilities that are proposed in Sallins & Naas and Maynooth or Collinstown and will investigate the feasibility of providing for a Park and Ride facility for Newbridge train station in consultation with Irish Rail and the NTA.</p>
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			<p><u>Public Transport and Active Travel</u> Chapter 5, in particular sections 5.4.1 and 5.4.2, contain policies, objectives and actions, which support the expansion of public transport networks and active travel schemes.</p> <p>In relation to encouraging 'active travel' modes and moving away from reliance on the private car, it should be noted that Objective TM O17 seeks to ensure new development provides for filtered permeability for private vehicle access in accordance with the NTA Permeability Best Practice Guide in order to give a competitive advantage to active travel modes for local trip making.</p> <p>No law around e-scooters is currently in place and it is expected that regulations will not be introduced until 2023 under the Government's action plan for the National Sustainable Mobility Policy. It was therefore considered that to set out policies and objectives in relation to the use of e-scooters would be premature at this juncture.</p> <p><u>Electric Charge Points</u> In relation to the submissions' comments regarding the promotion and incorporation of electric charge points throughout our towns and villages, and in residential communities and commercial settings, it should be noted that Section 5.12 (Car Parking) sets out clear policies and objectives, which support the provision of electric charge points throughout the County at appropriate locations.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
413.		<u>Road and Street Network</u>	Chief Executive's Response

	Kildare Public Participation Network	<p>Submission requests the amendment of objective TM O58 as follows: TM O58: ...The further progression of the road projects is subject to assessment against the National Investment Framework for Transport in Ireland (NIFTI) 'Principles of Road Development' criteria set out...</p> <p><u>Road and Street Design</u> Submission proposes the following additional objective: New objective: Reduce motorised traffic in town centres where alternative routes exist to promote walking and cycling in the interests of road safety.</p> <p><u>Car Parking</u> Submission requests that objective TM O107 be amended as follows: TM O107: Seek to Reduce the level of on-street parking...</p>	<p>Objective TM O58 has been revised in response to Submission 330. Objective TM O1 states the Council's support to implement the NTA Draft Transport Strategy therefore it is recommended to remove the various standards referenced in Objective TM O58 relating to these Guidelines as the Council will endeavour to implement all aspects of the Strategy as they relate to Kildare.</p> <p>Section 5.10 of the Draft Plan is a specific sub-section on how roads and streets in the county should be designed in accordance with DMURS. There are sufficient policies and objectives and actions under Section 5.4.12 to support walking and cycling. Furthermore, as per Objective CSO 1.9 the larger settlements will have a dedicated local area plan where specific projects for improving the modal shift can be considered and addressed, as appropriate, at settlement level.</p> <p>The request to amend TM O107 is not accepted as any reduction in car parking spaces should be considered on a case-by-case basis having regard to the individual circumstances of each individual settlement, based on an evidence-led assessment, and informed by the requisite public consultation.</p>
			<p>Chief Executive's Recommendation Regarding TM O58, see recommendation to submission No. 330.</p>
405	Kildare Climate Action Linkage Group	<p>The submission requests additional text to be inserted into objective TM O58, as follows: Secure the implementation and maintain corridors free from development to facilitate future roads, cycle facilities and other transport infrastructure improvement identified within this Plan (Tables 5.4 & 5.5) and Local</p>	<p>Chief Executive's Response See response to submission no. 413.</p> <p>Chief Executive's Recommendation See recommendation to submission no. 413.</p>

		<p>Area Plans. The further pro-gression of the road projects is subject to assessment against the National Investment Framework for Transport in Ireland (NIFTI) 'Principles of Road Development' criteria set out in Section 13.2 of the Draft Transport Strategy for the Greater Dublin Area 2022-2042. Where the road project is an orbital road around a town centre, the development must be accompanied by enhanced public transport, cycling and pedestrian facilities in the relevant centre, as required by Section 13.5 of the Draft Transport Strategy for the Greater Dublin Area 2022-2042.</p> <p>Submission requests that objective TM O107 be amended as follows: TM O107 - Seek to reduce Reduce the level of on-street parking with a view to the reallocation of the roadspace to sustainable modes and to investigate the feasibility of delivering parking on suitable backland sites that would not jeopardise the vitality and vibrancy of the relevant town/village centre.</p>	
289	Department of Transport	<p>The department published its new National Sustainable Mobility Policy on 7 April 2022, which builds upon and replaces Smarter Travel, A Sustainable Transport Future 2009-2020 and the National Cycle Policy Framework. The council may wish to take note of this policy and remove the references to the old policies.</p>	<p>Chief Executive's Response Noted and agreed. It is considered appropriate to delete all references to the superseded documents and to add a new National Sustainable Mobility Policy (2022) sub-section to section 5.2 'Policy Context'.</p> <p>Additionally, in response to the recently published National Sustainable Mobility Policy (2022) it is considered appropriate to add two new objectives and one new action to section 5.4 of the Plan and to amend TM A10 and TM A13 of the Plan.</p> <p>Chief Executive's Recommendation</p>

			<p>Delete sections 5.2.5 and 5.2.6 of the Plan.</p> <p>Add the following new sub-section to section 5.2: National Sustainable Mobility Policy (2022)</p> <p>The Sustainable Mobility Policy sets out a strategic framework for active travel and public transport in Ireland to 2030. This Policy is primarily focused on measures to promote and facilitate active travel and public transport for all and, in doing so, encourage less private car usage.</p> <p>The Policy is guided by three key principles which are underpinned by 10 high-level goals. The key principles are:</p> <ul style="list-style-type: none"> • Safe and Green Mobility • People Focused Mobility • Better Integrated Mobility. <p>An action plan (2022 -2025) accompanies the policy and includes a comprehensive range of new and expanded measures across the 10 high-level goals. The plan will be reviewed and updated in 2025 and a new action plan will be put in place for 2026 to 2030.</p> <p>Add new objective after TM O15 in Section 5.4: Support action 87 of the National Sustainable Mobility Policy Action Plan 2022-2025. In this regard, the Council will support the NTA to expand shared car, bike and powered personal transporters (PPT) services at transport hubs and interchanges.</p> <p>Add new objective after TM O23 in Section 5.4.1: Support action 27 of the National Sustainable Mobility Policy Action Plan 2022-2025. In this regard, the Council will</p>
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			<p>support the NTA and TII to develop and implement an active travel infrastructure programme for Naas.</p> <p>Add a new action after TM A5 in Section 5.4.1: Support action 26 of the National Sustainable Mobility Policy Action Plan 2022-2025, to develop pedestrian enhancement plans for Naas and Maynooth in co-operation with the NTA.</p> <p>Amend TM A10 as follows: Support the development of a model for bike share schemes, the extension of the Dublin Bike Scheme and/or other bike sharing schemes to key settlements and towns within County Kildare and encourage..</p> <p>Amend TM A13 as follows: Prepare a Cycle Network Study for each of the key towns in County Kildare consisting of the primary links identified in both the TII's National Cycle Network (2022) and the...</p>
289	Department of Transport	To make public transport fully accessible to people with disabilities requires a 'whole journey approach'. Local Authorities are a key stakeholder by ensuring a universal design approach to the built environment'. This including footpaths, tactile paving, cycle paths, roads, pedestrian crossing points, town greenways and bus stops/shelters. In this regard the submission welcomes the text, 'ensure the application of universal design principles in all new transport infrastructure (including public transport pick up points)', (TM 03 on page 8 of Chapter 5: Sustainable Mobility and Transport).	<p>Chief Executive's Response Noted.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
289	Department of Transport	The submission welcomes the support for the TFI Local Link Rural Transport Programme (TM 036 on page 21 of Chapter 5: Sustainable Mobility and Transport) and the	<p>Chief Executive's Response Noted.</p>

		Connecting Ireland Rural Mobility Plan in the draft County Development Plan (TM 010 on page 15 of Chapter 5: Sustainable Mobility and Transport.)	Chief Executive's Recommendation No change to the Draft Plan.
375	Land Development Agency	<p>The LDA notes the strategic approach of the Council to transition to a lower carbon transport system and facilitate a more sustainable modal shift. However, they note the provisions of Table 15.9 of the Draft Plan which provide for maximum parking standards which are not applicable to residential development. The submission states that the non-application of a maximum standard is a missed opportunity to encourage the use of private transport and transition to a lower carbon transport system. Similarly, the submission states this is not in line with the Draft GDA Transport Strategy it is recommended that parking standards are expressed as maximum values.</p> <p>Furthermore, the submission references the Design Standards for Apartments (2020) which places emphasis on the need to reduce, or even eliminate, car parking in appropriate locations. The submission provides the following reference from the Guidelines: "In suburban/urban locations served by public transport or close to town centres or employment areas and particularly for housing schemes with more than 45 dwellings per hectare net, planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard."</p>	<p>Chief Executive's Response The comments in relation to maximum car parking standards are noted. It is an objective of the Draft Plan under TM O104 that "all residential development proposals in areas within walking distances of town centres and public transport services will be subject to maximum parking standards as a limitation to restrict parking provision and achieve modal shifts to sustainable modes of Transport". The objective should be amended to include additional wording in respect of appropriate walking distances and the type of public transport.</p> <p>See changes proposed in Section 15.7.8 under the same submission number.</p> <p>Chief Executive's Recommendation Amend TM O104 as follows: ...within walking distances of town centres (800 metres i.e. a 10-minute walk) and high-capacity public transport services (Dart+ services, Bus Connects routes and any designated bus only/ bus priority route) will be subject to maximum parking standards as a limitation to restrict parking provision and achieve modal shifts to sustainable modes of transport.</p>
559	Newbridge Community Development	Newbridge needs a significant modal shift from private vehicular transport towards active transport modes. It requires safer routes to schools and more pedestrian-friendly layouts for junctions and routes to further prioritise alternative modes. Transport Orientated	Chief Executive's Response Chapter 5 'Sustainable Mobility and Transport' includes several objectives that support active transport modes and sustainable planning around these modes. Objective TM A11 prioritises access to schools by the development of a Local Permeability Scheme. Objective TM A15 requires

		<p>Development (TOD) zones should be designated close to public transport nodes.</p> <p>The development of safe cycling and walking links between Newbridge and popular amenities such as The Curragh Plains, Pollardstown Fen, Canal bank walks at both Milltown and Corbally Harbour (LR051) is welcomed. A link should also be provided between Newbridge and Great Connell and onward to Naas. All of these links should also be properly mapped.</p> <p>There is also a continuing lack of pedestrian connectivity between the Main St, Whitewater SC and Newbridge Silverware. This axis needs to be enhanced, the pedestrian experience prioritised with safer junctions, wider footpaths, wayfinding infrastructure and measures to address the oppressive car congestion that is a feature of both Military Rd and Main St itself.</p>	<p>local traffic management improvements to provide safer routes to schools in order to support the Green-Schools Travel Programme, including the 'School Street' initiative and the 'Safe Routes to School' Programme, in consultation with all the relevant stakeholders and agencies.</p> <p>Objective TM O11 states it is an objective of the Council to Investigate the feasibility of developing high-quality, suitable, safe and sustainable cycling pathways between Naas and Newbridge.</p> <p>The Draft Kildare County Development Plan does not include any permeability links for Newbridge as Newbridge has its own statutory Local Area Plan. The matter of permeability and a better pedestrian experience can be considered as part of the review of the Newbridge Local Area Plan, preliminary work for which is already underway.</p>
		<p>Chief Executive's Recommendation No change to the Draft Plan.</p>	
410	Celbridge Community Council	<p><u>Sustainable Mobility and Transport</u> Submission notes that there is a lack of information relating to Celbridge in Chapter 5. States that the draft Plan downplays Celbridge's role in the county and disregards the large number who commute from Celbridge. Notes the unsustainable travel patterns that have developed within the town and submits that to avoid continuation of the established commuting patterns from Celbridge, Chapter 5 needs to include Celbridge in maps, figures and tables relating to Sustainable Mobility and Transport in County Kildare. Submits that the draft Plan fails to acknowledge the significance of Celbridge and asks how might decision makers with a national remit that rely on the County</p>	<p>Chief Executive's Response The comments regarding the lack of information on Celbridge in the draft Plan are noted. It is considered that the inclusion of such detailed information (maps, figures, tables) is not appropriate in a Plan, the purpose of which is to guide and manage the strategic development of the County as a whole. It should be noted that the level of detailed information requested will be included in the local transport plan (ABTA/Transport Strategy) for Celbridge, which will be prepared as part of the next local area plan for the town. It is not accepted that the draft Plan downplays the role of Celbridge. The town has been identified as playing an important role in the development of the county, given its important designation as a 'Self-Sustaining Town' and its</p>

	<p>Development Plan for insight be informed of the needs of the town with respect to transport.</p> <p>Submits that objective TM O7 should also include the implementation of one-way roads and the removal of parking spaces as these methods will be required in some town centres to win back space for the provision of improved pedestrian facilities.</p> <p>Refers to section 5.4.1 and states that due to some objectives/ actions being subject to collaboration and/ or funding from other organisations and bodies, this section of the document would benefit from a table that lists proposed route sections which would also include information such as source and destination of route, whether the route section is part of a wider project, how the route section will be planned, budget source, along with details relating to the type of application (Part 8) and if a feasibility assessment is required.</p> <p>Refers to objective TM O11 which lists distinct routes between a small number of destinations. States that unless the feasibility of these routes has already been established, this objective should be updated to also include:</p> <ul style="list-style-type: none"> • Celbridge and Maynooth • Celbridge and Leixlip • Celbridge to Lucan <p>Submits that it is unclear why Objective TM O11 is listed in the table before the 5.4.1 Walking and Cycling sub-section when all other cycle objectives are in sub-section 5.4.1 Walking and Cycling. Asks if it is because this relates to the proposed National Cycle Network? Or will it be of a different quality?</p>	<p>strategic location within the (MASP) Dublin Metropolitan Area.</p> <p>It is considered that the strategic transport needs of Celbridge are comprehensively addressed by the draft Plan which incorporates/supports the development of critical public transport infrastructure in the town such as Bus Connects and DART+ Southwest (Celbridge-Hazelhatch) projects along with the Hazelhatch Link Road Scheme and the upgrade of the existing bridge in the town. It should be noted that the draft Plan is informed by the Draft Transport Strategy for the Greater Dublin Area 2022-2042 and not the other way around.</p> <p>TM O7 has been devised to provide broad support to reduce traffic congestion within town centres. It is not considered that it needs to provide an exhaustive list of every measure which could be employed. It is considered that 'improved pedestrian facilities' includes the removal of car parking and the implementation of one-way traffic on streets.</p> <p>Additionally, objective TM O107 seeks to reduce the level of on-street parking with a view to reallocate roadspace to sustainable modes and action TM A3 is to identify filtered permeability measures which "filters out" through traffic on selected streets to create a more attractive environment for walking and cycling. Considering the aforementioned, no changes are proposed to TM O7.</p> <p>The request in relation to providing a table in section 5.4.1 giving detailed information on all the proposed walking and cycling projects in the county is not accepted. Aside from the amount of space such a table would occupy, it should be noted that walking and cycling measures/projects are identified in settlements as part of the Local Transport Plan</p>
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	<p>Submits that objective TM O12 should also include the following routes:</p> <ul style="list-style-type: none"> • Maynooth to Tallaght (BusConnects route) • Celbridge to Newbridge (extension of route between Celbridge and Naas onto Newbridge or increased service on GoAhead 120B) • Routes proposed as a result of the Strategic Land Use, Employment and Transportation Study of North East Kildare (Objective RE O14) and Area Based Transport Assessments carried out during the preparation of Local Area Plans (Action TM A2) may also include: <ul style="list-style-type: none"> ○ Enhanced connection between Celbridge and Maynooth to include a link between West Celbridge, Maynooth Business Campus and West Maynooth (University / new Research & Technology Park) ○ Celbridge to North-West Dublin (Blanchardstown and Dublin Airport) <p>Requests that action TM A6 be amended as follows: TM A6: Develop a new pedestrian and cycle link from Celbridge to Leixlip, via Castletown House, through the former Hewlett Packard site Kildare Innovation Campus, across the M4 to the Wonderful Barn and onto Leixlip Town Centre and Leixlip Louisa Bridge Station.</p> <p>Submits that action TM A7 be reworded as follows: TM A7: Develop a new pedestrian and cycle link from Maynooth to Celbridge.</p> <p>Submits that Actions TM A11 and TM A12 regarding permeability connections should include a commitment</p>	<p>(ABTA/Transport Strategy). Accordingly, it is considered that such information is more appropriately included as part of a local area plan for individual settlements in the county.</p> <p>Objectives TM O11 and TM O12 are both based on the main commuter flow patterns to work as identified in section 5.4, with a specific focus on commuter flow patterns in and around the Key Towns of Maynooth and Naas. A few additional routes have been inserted into these objectives on the foot of a direction by the elected members.</p> <p>Regarding the Maynooth to Tallaght (BusConnects route), it is considered that the implementation of all the BusConnects routes is adequately supported in the Plan by objectives TM O9, TM O12 and TM O13.</p> <p>The objectives (TM O10, TM O12) in the Plan in support of the Implementation of the local route proposals as identified within the Connecting Ireland Rural Mobility Plan and the action (TM A4) to continue to work with NTA to identify best route options to serve the county over the period of the plan adequately addresses the proposal to add the route between Celbridge and Newbridge.</p> <p>Regarding the Strategic Land Use, Employment and Transportation Study of North East Kildare, it is considered appropriate to add a new objective to section 5.4 of the Plan in support of the implementation of the study. Action TM A2 of the plan already addresses the implementation of the Area Based Transport Assessments, therefore no changes are proposed in this regard.</p> <p>The request to amend the wording of action TM A6 to include reference to Kildare Innovation Campus is accepted.</p>
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		<p>to ensure that permeability connections are implemented.</p> <p>Requests that Action TM A13 be expanded to at least include all towns in the Dublin Metropolitan Area and Newbridge, that is, the key towns and all towns clustered with them. States that ideally something of the calibre of South Dublin County Council's Cycle South Dublin Programme of Work should be prepared.</p> <p>Submits that new objectives/ actions need to be included to progress needs identified during the Celbridge Town Renewal Plan consultation and defined in the Final Proposed Projects Document</p>	<p>In relation to TM A7, see response to Submission No. 330.</p> <p>The request in Actions TM A11 and TM A12 to include a commitment to ensure that permeability connections are implemented is not accepted. It should be noted that in many instances such permeability measures will rely on planning permission being obtained under the Part 8 process. In this regard, it is a reserved function of the elected members to approve such schemes.</p> <p>Action TM A13 states that the Cycle Network Studies will consist out of the primary links identified in the NTA's Draft Greater Dublin Area Cycle Network Plan (2021), connections between the major towns and surrounding settlements, key strategic cycle routes, greenways and local links. It is therefore not considered necessary to amend the text of this action.</p> <p>The request to include actions/objectives for supporting the provisions of the Celbridge Town Renewal Plan is not accepted. Objectives and actions supporting the implementation of the Celbridge Town Renewal Plan will be incorporated into the next local area plan for the town.</p> <p>Chief Executive's Recommendation Add a new objective after TM O13 of the Plan: Ensure the delivery of the transport proposals of the Strategic Land Use, Employment and Transportation Study of North East Kildare, when prepared, in co-operation with all relevant stakeholders. (Refer to Objective RE O14)</p> <p>Amend TM A6 as follows: Develop a new pedestrian and cycle link from Celbridge to Leixlip, via Castletown House, through Kildare Innovation Campus the (former Hewlett Packard site), across the M4 to</p>
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			<p>the Wonderful Barn and onto Leixlip Town Centre and Leixlip Louisa Bridge Station.</p> <p>In relation to TM A7, see recommendation to Submission No. 330.</p>
410	Celbridge Community Council	<p><u>Public Transport</u> Requests that action TM O35 be amended as follows: TM O35: Seek to address urban congestion with particular emphasis on facilitating the development of town local bus services for the Key Towns within the County ensuring connectivity to and from residential areas, key employers, and public transport hubs such as train stations, along with retail and amenity sites. Local bus services should serve both the Key Town and other towns that are clustered with it.</p> <p>Notes that objective TM O43 mentions "the extension of the LUAS network" and questions if this is relevant to County Kildare.</p>	<p>Chief Executive's Response The comments relating to public transport are noted and accepted.</p> <p>The reference to the LUAS network in objective TM O43 is noted. It is considered that the intention of this objective is merely to support and facilitate the possibility of such services in the county.</p> <p>Chief Executive's Recommendation Amend TM O35 as follows: Seek to address urban congestion with particular emphasis on facilitating the development of town local bus services for the Key Towns along with associated identified economic clusters within the County ensuring connectivity to and from residential areas, key employers, and public transport hubs such as train stations, along with retail and amenity sites.</p>
410	Celbridge Community Council	<p><u>Road and Street Network</u> States that objective TM O58 should not limit provision of "enhanced public transport, cycling and pedestrian facilities in the relevant centre" to only incidents when the road project is an orbital road but make such provision for any significant new road infrastructure to be provided in a town.</p> <p>Objective TM O67 should be rephrased to apply only require this for significant / non-domestic solar energy</p>	<p>Chief Executive's Response The request in relation to objective TM O58 is not accepted. As is noted in the objective the provision in question is a requirement of section 13.2 in the Draft Transport Strategy for the Greater Dublin Area 2022-2042. Objective TM O1 states the Council's support to implement the NTA Draft Transport Strategy therefore it is recommended to remove the various standards referenced in Objective TM O58 relating to these Guidelines as the Council will endeavour to implement all aspects of the Strategy as they relate to</p>

		<p>development due to the upcoming changes whereby domestic solar energy development will be exempted from planning.</p> <p>Notes that item No. 6 on Table 5.4 - Priority Road and Bridge Projects simply states, "Upgrade existing bridge in Celbridge". Submits that this should be more specific in terms of the details of the upgrade, for example, "Provide a shared pedestrian and cycle bridge directly adjacent to the existing road bridge in Celbridge.'</p> <p>States that it is not clear why there is a specific Objective TM O61 to "Support and promote the delivery of a second bridge crossing in Newbridge as a priority of this development plan" in addition to Objective TM O58 which references "other transport infrastructure improvement identified within this Plan" and item 11 of Table 5.4 - Priority Road and Bridge Projects.</p>	<p>Kildare. Furthermore, it should be noted that the provision of public transport, cycling and pedestrian facilities is not limited to only orbital road projects but to all new road infrastructure as addressed in CSO 1.12 and section 5.10 of the Plan.</p> <p>It is recommended to delete Objective TM O67 as it is already addressed by Section 7.6. Section 7.6 has been revised in response to Submission 555. The revised text includes the following extract: 'A Glint and Glare assessment will accompany any application to consider any impacts to low flying aircraft or passing vehicles.'</p> <p>The request to provide more details in relation to the upgrade of the bridge in Celbridge is not accepted as it is considered that such information is not considered necessary in a table the purpose of which is to provide a broad overview of priority strategic roads and bridge projects in the county.</p> <p>Objective TM O61 was inserted into the plan on foot of a direction by the elected members.</p>
358	Deirdre Lane	<p><u>Sky Train in Newbridge</u> To address road and noise pollution a sky train should be built in Newbridge. The international firms in the area could use the Newbridge centric Skytrain for their logistics, goods and staff transport</p> <p>KCC should build inclusive transport. It should also ensure ease of access for wheelchair/pram users.</p>	<p>Chief Executive's Recommendation No changes to the Draft Plan.</p> <p>Chief Executive's Response While the comments are acknowledged and noted, the matter of providing new rail infrastructure is a function of Irish Rail and is outside the scope of this Draft Plan.</p> <p>Section 5.1 in Chapter 5 'Sustainable Mobility and Transport' of the Draft Plan states it is the aim of the Council to promote and facilitate ease of movement within and access to County Kildare, by integrating sustainable land</p>

		<p>Grants should also be given to communities to develop sustainable transport.</p>	<p>use planning and a high-quality integrated transport system; and to support and prioritise investment in more sustainable modes of travel, the transition to a lower carbon transport system, and the development of a safer, efficient, inclusive, and connected transport system.</p> <p>Policy TM P2 states it is policy of the Council to prioritise and promote the development of high-quality, suitable, safe and sustainable walking and cycling pathways and facilities, both intercounty, intra-county (in consultation with all relevant stakeholders including neighbouring local authorities) and within the towns and settlements of County Kildare within a safe road/street environment that will encourage a shift to active travel that is accessible for all, regardless of age, physical mobility, or social disadvantage.</p> <p>Action TM A1 also states that a County Kildare Sustainable Mobility Plan will be prepared that addresses the long-term mobility needs of communities and businesses in the county. The Plan should address urban and rural transport issues and the integration of transport modes and public transport connections between the towns and villages of the county.</p> <p>Having regard to all of the above it is considered that the matters raised in this part of this submission are adequately addressed in the Draft Plan.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
552.	Department of Housing, Local	The Department references action TM A16 and advises that there should be a presumption against the lighting of entire footpaths and cycle tracks, in areas with low or	<p>Chief Executive's Response TM A16 states that new or upgraded lighting for all footpath and cycle track schemes will be subject to the consideration</p>

	Government and Heritage	no levels of background light. It is in these situations that the introduction of artificial light will have the most significant negative impacts on wildlife and biodiversity.	of ecology and impacts on wildlife which is considered to satisfactorily address the concerns raised. Chief Executive's Recommendation No change to the Draft Plan.
507	Brian McArdle	The submission refers to the list of Priority Road and Bridge Projects in Table 5.4 and the list of Regional Roads identified for improvement in Table 5.5 and states that it gives the impression that the Council are prioritising work on road projects as opposed to active travel projects.	Chief Executive's Response Whilst the Council is committed to the promotion of active travel and public transport use, continued investment in the county's road and street network is necessary to ensure the sustainable and efficient movement of people and goods within the county, to provide access to developing areas and to support economic activity. As outlined earlier, the Draft Plan contains a comprehensive range of policies and objectives supporting the provision of active travel projects. It is considered that the policies and objectives contained in Chapters 5 and 15 of the Draft Plan adequately address the issues raised in the submission. Chief Executive's Recommendation No change to the Draft Plan.
507	Brian McArdle	The submission refers to the new Celbridge-Hazelhatch bridge and, as a result, the submitter suggests that Celbridge village should be pedestrianised.	Chief Executive's Response In supporting the changing roles and functions of town centres and developing a sustainable model for their development, the Council has commenced the preparation of Town Renewal Masterplans for settlements of all sizes across the county. Renewal Masterplans (as outlined in Table 14.1) will focus on maximising the potential of towns' and villages' built and natural heritage by using these existing assets to enhance their role as visitor destinations and help to create new local employment opportunities. The tailored approach adopted by Renewal Masterplans to each

			<p>settlements' regeneration will provide for the development and enhancement of their overall function and 'unique selling point' (USP) through the identification and implementation of priority projects. In this regard, a Town Renewal Masterplan should be viewed also as a plan of action and a platform which establishes a targeted and co-ordinated long term investment strategy, enabling the creation of local synergies (i.e., the development of tourism-based enterprises) which will in turn kickstart a broader economic regeneration of a settlement.</p> <p>It is noted that a Celbridge Town Renewal Master Plan is currently being progressed by the Strategic Projects and Public Realm Team. A draft masterplan and a Priority Project Report has been circulated to Members of Celbridge-Leixlip Municipal District. It is anticipated that the Masterplan will be finalised by the end of 2022. As part of the draft masterplan, an extensive public consultation was carried out along with inputs from TII, the NTA and KCC Transportation and Public Safety Department. Urban Design Analysis was undertaken, which includes detailed Movement and Public Realm Analysis of the town.</p> <p>It is considered that the provisions of Section 14.5.3 of the Draft Plan adequately address the issues raised in the submission.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
507	Brian McArdle	The submission disagrees with the inclusion of Objective TM O4 in the Draft Plan when there is no objective to specifically support active travel, given that it is the primary policy of TM P1.	<p>Chief Executive's Response Policy TM P1 promotes sustainable development through facilitating movement to, from, and within the county that is accessible to all and prioritises walking, cycling and public transport.</p>

			<p>As outlined above the submitter objects to the inclusion of TM O4 where it is an objective to 'Support the use of gas in transport by a presumption in favour of applications for CNG refuelling infrastructure, subject to the satisfaction of normal planning and environmental criteria.'</p> <p>However, Policy TM P2 provides that it is the policy of the Council to prioritise and promote the development of high-quality, suitable, safe and sustainable walking and cycling pathways and facilities.....within towns and settlements of County Kildare within a safe road/street environment that will encourage a shift to active travel that is accessible for all, regardless of age, physical mobility, or social disadvantage.</p> <p>Furthermore, Section 5.4.1 contains Objectives and Actions that provide for active travel and a shift to more sustainable modes of travel, which will mean reclaiming car-dominated space for upgrading walking and cycling infrastructure to better serve the daily, local trips of people of all ages, abilities and backgrounds in every neighbourhood.</p> <p>In addition, Objective TM O55 states that it is an objective of the Council to ensure that the planning, design and implementation of all road and street networks within urban areas across the county accord with the principles set out in the Design Manual for Urban Roads and Streets (2020), the National Sustainable Mobility Policy (2022) and all other standards where relevant.</p> <p>It is considered that the policies and objectives contained in Chapter 5 of the Draft Plan adequately address the issues raised in the submission.</p>
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			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
507	Brian McArdle	The submission states that Action TM A3 should be replicated in the housing section of the Draft Plan to ensure it is considered in housing decisions.	<p>Chief Executive's Response Action TM A3 in Section 5.3 states that it is an action of the Council to identify filtered permeability measures including homes 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.</p> <p>It is noted that the definition of 'home zone' and 'low-traffic neighbourhoods' contained in Section 5.3 describes them as residential streets designed to meet the needs of pedestrians, cyclists, children and residents where the dominance of the car is removed or removed entirely.</p> <p>By their definition, the measure contained in TM A3 will apply to residential development.</p> <p>It is considered that the policies and objectives contained in Chapter 5 of the Draft Plan adequately address the issues raised in the submission.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
507	Brian McArdle	The submission states that there is no mention of permeability for active travel modes throughout new and existing estates in any policy or objective in housing, which should be corrected.	<p>Chief Executive's Response It is an objective of the Council in TM O17 to "Ensure new development areas are fully permeable for walking and cycling at a minimum, public transport (where appropriate) and provide for filtered permeability for private vehicle access in accordance with the NTA Permeability Best Practice Guide, in order to give a competitive advantage to active travel modes for local trip making.</p>

			<p>It is considered that the provisions of Chapter 5 of the Draft Plan adequately address the issues raised in the submission.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
520	Newbridge Community Development	Facilities, transport and open spaces must have access for all abilities.	<p>Chief Executive's Response Objective TM O3 in Chapter 5 'Sustainable Mobility and Transport' ensures the application of universal design principles in all new transport infrastructure (including public transport pick up points) and strives to adapt existing infrastructure to become more accessible, where feasible, in accordance with the County Kildare Access Strategy – A Universal Access Approach (2020-2022) and the Department of Justice and Equality's National Disability Inclusion Strategy (2017- 2021).</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
513	Kilcullen Community Association (Ann Cashman)	This submission seeks to support any measures within the development plan that help the establishment of an enhanced connectivity of pedestrian or ideally an off-road cycle route. These routes particularly outside or between the Local Area Plans of Naas and Kilcullen need to be considered at a countywide level. It is also noted that the submission supports the Irish Wetlands survey, a map of which accompanies the submission.	<p>Chief Executive's Response Chapter 5 'Sustainable Mobility and Transport' includes several objectives that support active travel and it is noted that the cycle routes between the key town of Naas and town of Kilcullen will be further investigated in action TM A13 which states that a Cycle Network Study will be prepared for each of the key towns in County Kildare consisting of the primary links identified in the NTA's Draft Greater Dublin Area Cycle Network Plan (2021), connections between the major towns and surrounding settlements, key strategic cycle routes, greenways and local links.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

53	Gerard Delaney	It is highlighted that the new cycle lanes / parklets have made Newbridge Main Street less safe and less accessible. Proposals are put forward for cycle path routes and one way traffic systems within parts of the town.	<p>Chief Executive's Response The proposals relating to new cycle lanes / parklets and one-way system interventions are noted, however, it is considered more appropriate that such proposals be assessed as part of the Traffic Management Plan that will inform the emerging Newbridge Local Area Plan, preliminary work for which has already commenced. This submission has now been forwarded to the Transportation team for their review/consideration.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
156	Donal McCormack	<p>The submission asks for reference to be made of the upcoming National Cycle Network.</p> <p>The submission requests increased support for public transport between towns in Kildare and those towns on the border between counties (e.g. Blessington).</p>	<p>Chief Executive's Response Objective TM O20 of the Draft Plan references the cycle network identified in the Draft Greater Dublin Area Cycle Network Plan (2021).</p> <p>It is considered that Objectives TM O9, TM O10, TM O12 and TM O13 adequately address public transport between towns.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
113	Health Service Executive	There are 6 recommendations in relation to active travel which include setting aside funding streams to ensure projects are progressed, provision of landscaping and greening of pedestrian and cycle routes, provision of green walkways / cycleways along common commuter routes, transport corridors doubling as green infrastructure links, identifying barriers to the use of public transport and provision of measures to increase the use of public transport.	<p>Chief Executive's Response The Draft Plan places a strong emphasis on promoting active travel and this is outlined in section 5.4.1 where it is a policy (TM P2) to prioritise and promote the development of sustainable walking and cycling pathways and facilities that will encourage a shift to active travel. There is also an objective (TM O17) to ensure new development areas are fully permeable for walking and cycling to give a competitive advantage to active travel modes for local trip making. In relation to public transport there are a range of objectives</p>

			<p>and targets outlined in section 5.4.2 which seek to encourage and promote public transport with an overarching policy (TM P3) to support agencies in delivering major improvements to the public transport network and to encourage a shift from car-based travel to public transport. Finally, regarding funding Action TM A4 seeks funding from the NTA for suitable smarter travel projects.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
195	Elizabeth Cullen	<p>Facilitate car-sharing, have higher parking charges for vehicles with a higher carbon footprint, provide a drop-in centre for advice on reducing carbon emissions, and develop more cycle routes. Reference is also made to a dangerous roundabout linking Naas to Clane proposing that it be revised as it may inadvertently divert drivers to Dublin rather than Naas.</p>	<p>Chief Executive's Response The Draft Plan includes Objective TM O115 which supports car sharing initiatives as part of new housing developments and workplaces. The matter of car-parking charges or a drop-in centre for advice on reducing carbon emissions are matters that are outside the scope of the Draft Plan.,Section 5.4.1 outlines several objectives in relation to the development of new and improved cycle routes throughout the county, a number of which are supported by the National Transport Authority GDA Cycle Network Strategy. . The issue raised with regard to the roundabout is noted however the exact location of same has not been identified.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
273	Donal Knight	<p>States that the use of cycles in preference to cars should be encouraged wherever possible to tackle climate change and to improve the general health of the population.</p> <p>Submits that any new roads whether to housing or industrial estates should be designed so that there are</p>	<p>Chief Executive's Response The contents of the submission are noted. The draft Plan contains a range of policy objectives which prioritises sustainable transport modes such as walking, cycling and public transport over private car usage.</p> <p>Standards relating to the layout and design of new cycling provision in new developments is governed by the Design</p>

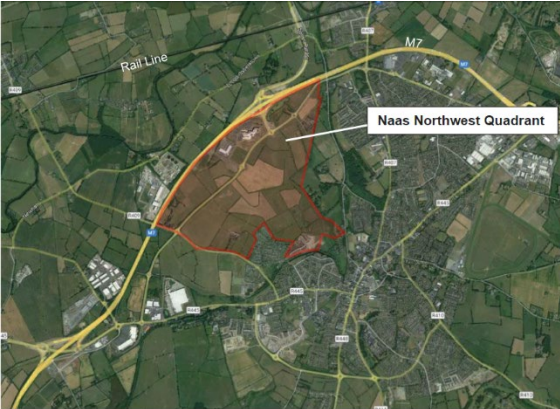
		<p>bicycle lanes on either side and at a different level from the road and that this will require a change of mind-set on the part of planners and the public.</p> <p>Submits that rather than try to re-invent the wheel and the cycle lane, look at other countries where they are well-established. Notes that at present in the county there are cycle lanes that do not allow for cycles to enter or exit side roads, such as on the Naas-Kilcullen Road at Killashee because there are no kerb drops at the necessary places. States that improvements could be made in the first instance by having all schools accessible by cycle lane and children trained accordingly. Submits that yield and stop lines on minor roads should be placed behind cycle lanes to give cyclists on the major road priority.</p> <p>Contends that where possible, sufficient cycle parking should be available at bus stops and train stations to encourage the use of cycles within local areas. Hopes that public transport at some stage will be able to accommodate bicycles and states that the Council should be at the forefront in advocating this.</p> <p>Acknowledges that the draft plan already includes the intention to do something, but the commuting population is growing daily so the sooner a cycling infrastructure is established the fewer people will need to travel by car to work.</p>	<p>Manual for Urban Roads and Streets (updated 2019). Standards relating to cycle lane design in urban areas are governed by the National Cycle Manual (National Transport Authority, 2011). Objective TM O16 requires that the Council complies with both aforementioned documents regarding maintenance of existing bicycle infrastructure and the design of new cycle lanes.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
322	Rathangan Tidy Towns	<p>The submission is supportive of the idea of cycle networks outlined in Chapter 5 and refers to objective TM O29. Support is also given for TM O21 which includes the development of a walking route between Lullymore, Killinthomas Woods and Rathangan.</p>	<p>Chief Executive's Response The positive comments in relation to chapter 5 are noted. It will be proposed to investigate the feasibility of providing a cycle route to link Donadea Forest to Killinthomas Woods.</p>

		<p>However, it is requested that the Council considers providing a cycling route to link Donadea Forest to Killinthomas Woods to enable the connection of various natural amenities and enhance local eco-tourism.</p> <p>In relation to cycling routes it is stated that they should not be lit up to the detriment of wildlife, while LED lights are recognised for their energy saving, research has shown that they have a negative impact on wildlife.</p> <p>Support is also given to carpooling to help reduce our carbon footprint and make people change their behaviours. This would be of benefit to rural areas where driving is often the only choice.</p>	<p>Regarding the lighting of cycling routes, there is an action (TM A16) in section 5.4.1 which is to provide new or upgraded lighting for all footpath and cycle track schemes subject to the consideration of ecology and impacts on wildlife. Appropriate environmental assessments will be required and may result in unlit sections which may include some parts of the county's Greenways.</p> <p>In relation to car-pooling, there is Objective TM O155 supports car sharing initiatives as part of new housing developments and workplaces. This may be effective in rural villages / settlements where development proposals are submitted. Other initiatives in the Plan which support more sustainable forms of transport in rural areas include TM O36 which supports the implementation of the Local Link Rural Transport Programme.</p> <p>Chief Executive's Recommendation Add the following new action to section 5.4.1: Investigate the feasibility of providing a cycling route linking Donadea Forest to Killinthomas Woods.</p>
313	Andre Duesterhus	<p>A pedestrian and cycle connection between Maynooth and Celbridge is essential. The housing situation is at a critical level in both towns and requires good connectivity for potential overflow capacity. It is essential that an intermodal integration takes place on equal footing between both towns.</p> <p>The submission requests that the word Celbridge should be added to TM O25 and that TM A7 which refers to footpath connection between Maynooth and Celbridge should also include a cycle link.</p>	<p>Chief Executive's Response It is considered that as Celbridge is part of the MASP area reference to the town should be included in Objective TM O25. This inclusion of Celbridge would also be in accordance with the proposed and existing Cycle Network Plan for the GDA (2013 and Draft 2021) in respect of Maynooth, Celbridge and Leixlip.</p> <p>In relation to TM A7, see response to Submission No. 330.</p> <p>Chief Executive's Recommendation Amend TM O25 as follows:</p>

		<p>The submission states that the Draft Plan lacks vision. The North Kildare triangle (Celbridge, Maynooth and Leixlip) has the potential to be an important centre for development for decades to come. With a university and the business campus, it offers the opportunity to become not only a centre for academics and businesses, but also for tourism and leisure at the outskirts of the capital.</p> <p>A potential merger of these towns on a 50-year time scale to create new opportunities would require excellent intermodal connections between these three centres. While Maynooth to Leixlip is planned and Leixlip to Celbridge is included in the Draft Plan, the Maynooth to Celbridge one is missing.</p>	<p>Ensure the provision of improved cycle and walking infrastructure linking Maynooth Town Centre, the Royal Canal Greenway, the train station, the proposed Maynooth Outer Orbital Route and to Kilcock, Celbridge and Leixlip.</p> <p>In relation to TM A7, see recommendation to Submission No. 330.</p>
317	Bridget Armstrong	<p>Agrees with TM O2 and TM O24; Objects to permeability in Finlay Park; Objects to TM O38 which relates to new and enhanced public transport infrastructure in Naas; Objects to TM O39 a bus route through the Northwest Quadrant.</p>	<p>Chief Executive's Response</p> <p>The comments are noted. The County Development Plan does not contain any details regarding a permeability link in Finlay Park. A Development Plan is a strategic policy document and detailed specifics relevant to an area such as individual permeability links are best provided in a local area plan.</p> <p>In order to provide for the modal shift necessary to meet Ireland's climate targets it is imperative that public transport is integrated within the built-up environment making it more convenient for people to use. In this context and in response to concerns over TM O39, a key element of the development of the Northwest Quadrant is the provision of a bus-only link. This link would provide an integrated approach to public transport in the development of an area from the outset, making convenient, accessible public transport the central concept in the overall development of the area. An amendment to the objective is required to clarify the exact nature of the proposed link.</p>

			<p>Chief Executive's Recommendation Amend TM O39 as follows: Support the delivery and facilitate investigations into the feasibility of a bus-only link priority route to the Sallins bypass through the Northwest Quadrant in Naas which will provide a direct bus service to the Sallins Railway Station from the town centre of Naas. to Sallins Bypass Junction 9A on the M7. This route will provide a new higher density central spine corridor leading into Naas., with a priority bus corridor that will provide a direct service to Sallins Railway Station from the town centre.</p>
352	Millennium Falcon Holdings Ltd	<p>This submission outlines how the upcoming development of the Naas Northwest Quadrant should become a sustainable transport hub. It outlines such a hub in this location would be supported by both planning and transport policy documents at National, Regional, County and Local level.</p> <p>This submission recommends the following objectives in relation to improving public transport in the Naas Northwest Quadrant between Naas and Sallins which is envisaged to accommodate significant future growth. These objectives include:</p> <ul style="list-style-type: none"> • Seeking to address urban congestion with particular emphasis on facilitating improved bus transport movement and reliability and improved links to bus and railway stations. • Examining existing public transport links within the county with a view to promoting and facilitating improvements where feasible. 	<p>Chief Executive's Response The Objectives at the end of Section 5.4.2 on Chapter 5 'Sustainable Mobility & Transport' are considered comprehensive in relation to improving public transport in the county and mainly cover the additional objectives recommended by this submission.</p> <p>Objective TM O38 relates to promoting and facilitating the development of a public transport hub in proximity to Naas and Sallins (as amended) in accordance with the Draft GDA Transport Strategy which has identified the creation of a second train station for Naas and Sallins to the west of the current station which will also be served by a strategic Park and Ride site. Therefore, it is considered premature in advance of the site selection of the second station to identify a specific area for a strategic transport hub. However, the Northwest Quadrant has already been identified for a bus terminus/mobility hub as part of the longer-term vision for Naas which will support the bus-only link through the Northwest Quadrant which connects to the Sallins Train Station.</p>

	<ul style="list-style-type: none"> • Supporting the electrification of rail services within County Kildare, thereby delivering enhanced services and reducing air and noise emissions. • Seeking to provide an electric powered BRT service in Naas / Sallins, linking Naas town centre, the Northwest Quadrant, Naas Bus Transport Interchange, Naas and Sallins train station, and Sallins Town Centre. • Seeking to provide a bus interchange facility adjacent to the M7 Junction 9A serving local, regional and intercity bus services. • Promoting the use of electric buses and BRT within the county and region through the provision of necessary supporting infrastructure. • Providing Park & Ride facilities for those accessing regional / national train services and also those accessing BRT / bus services at Naas / Sallins. • Providing dedicated cycle and pedestrian linkages to Naas / Sallins bus interchange. • Providing a shared and micromobility hub within the Transport Hub including high quality bicycle parking and car share facilities. <p>This submission is accompanied by a document entitled 'A Unique Opportunity for Creating an Integrated and Sustainable Transport Mobility Hub'. This document describes a number of elements that would make up a sustainable transport mobility hub in the Naas Northwest Quadrant. It outlines in detail how each would operate in this location and best practice examples. These elements include:</p> <ul style="list-style-type: none"> • Electric powered Bus Rapid Transport (BRT) service linking Naas town centre, the Northwest Quadrant and Sallins and Naas Train Station; 	<p>Furthermore, Action UD A2 in Chapter 14 'Urban Design, Placemaking and Regeneration' states it is an action of the Council to prepare a series of Masterplans / Urban Design Frameworks over the lifetime of the Plan, which includes the Northwest Quadrant, Naas. It should be noted that work is already underway on the Northwest Quadrant Masterplan which will be informed by the recently adopted Naas Local Area Plan 2021 – 2027.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
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		<ul style="list-style-type: none"> • Bus Transport Interchange (BRT services, Regional and National bus services); • Park and Ride –rail and bus services; • Enhanced cycle and bus linkages; • Car Charging facilities; • Car Share Facilities; and • Bicycle maintenance stand. <p>The extract below from this submission illustrates the extent of the Naas Northwest Quadrant.</p>  <p>The map shows an aerial view of the Naas Northwest Quadrant, which is highlighted in a brownish-orange color. The quadrant is bounded by the M7 motorway to the north and east, and the Naas Canal to the south. A 'Rail Line' is visible to the west of the quadrant. The surrounding area includes residential and commercial buildings, roads, and green spaces.</p>	
272.	Deirdre McCarthy	<p>The submission refers to the commissioning of the National Transport Authority’s Cycle Network Plan for the Greater Dublin Area (GDA). Notes the provisions set in place for the plan including the requirement that it identify and determine in a consistent, clear and logical manner the following cycle networks comprising the Urban Network, Inter-Urban Network and Green Route Networks within the GDA, including County Kildare. Refers to routes in Kildare including K10 Grand Canal Greenway, K11 Barrow Canal Greenway, K12 Pollardstown Feeder Greenway, K13 Naas Canal</p>	<p>Chief Executive’s Response</p> <p>The request to have a specific objective to protect the adjacent landscape and visual amenity of these proposed greenways to protect them from large scale industrial developments is noted. All applications for industrial developments in the county are assessed on a case-by-case basis having regard to each area’s individual characteristics and sensitivities. This assessment also examines the potential impact of nearby/adjacent amenities such as greenways/blueways, either existing or proposed. Proposals for industrial development in the countryside would be required to comply with objectives, inter alia: RD</p>

	<p>Greenway and K17 Greenway along former Naas to Baltinglass railway line.</p> <p>Notes that the above routes, which are predominantly off-road greenways, have the potential to significantly enhance tourism and active travel within Kildare both of which are objectives of the draft Plan. Refers to Objective TM 01 of the Council to support the NTA Draft Transport Strategy for the Greater Dublin Area (2022-2042) and facilitate and secure the implementation of projects identified within the Strategy.</p> <p>Submits that in relation to the greenways identified in the Cycle Network Plan the Council should give serious consideration, as an objective of the draft Plan, to the protection of the adjacent landscape and visual amenity of these proposed greenways such that they are not adversely impacted by large scale industrial developments which are not in character with the area. It requests that in addition, consideration should be given to classifying the aforementioned greenway routes as Class 4 -Special Landscape Sensitivity Areas and afforded similar status as 'Scenic Routes' and 'Scenic Views'.</p> <p>Part 4d: Rural Cycle Routes of the Cycle Network Plan for the Greater Dublin Area (GDA) has also been included as an attachment to this submission.</p>	<p>O1, RD O5 and RD O32, (relating to the protection of the rural landscape) and meet the provisions set down in Table 9.1 'Criteria for Assessment of One-off Enterprises in Rural Areas'. It is therefore considered that the need for such safeguarding of amenities like greenways is already sufficiently provided for in the draft Plan. Furthermore, it should also be noted that the public are afforded an opportunity as part of the statutory timeframes associated with all planning applications to submit observations to the Planning Authority, which are then fully considered as part of the planning assessment process, prior to the issuing of any planning decision.</p> <p>The request that consideration should be given to classifying the greenway routes as Class 4 - Special Landscape Sensitivity Areas and afforded similar status as 'Scenic Routes' and 'Scenic Views' is noted. The designation of Class 4 – Special Sensitivity Areas was the result of a countywide landscape character assessment exercise which was conducted in 2004. It is considered that the classifying of such routes as Class 4 areas would need to be evidence-based and would require a full review of the Landscape Character Assessment (LCA) which is not considered to be feasible at this stage of the development plan process. It should be noted however that it is an action of the Draft CDP to review and update the LCA within two years of the adoption of the Plan. On the issue of scenic views, it should be noted that Action LR A6 of the draft Plan provides for the review and update of all Scenic Routes and Views in the county within two years of the adoption of the Plan. The addition of walking routes such as greenways and blueways will be taken into consideration at that stage.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
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276.	County Kildare Access Network	<p>Submission requests that the CKAN logo be included with the graphics under policy TM P1.</p> <p>Requests objective TM O37 to be amended as follows: TM O37: <i>Liaise with and encourage transport providers and other agencies (e.g. NTA, developers etc) to improve bus transport movement, accessibility, reliability, to ensure pick up points...</i></p> <p>Requests objective TM O103 to be amended as follows: TM O103: <i>... including the provision of fully accessible EV charging facilities...</i></p> <p>Requests objective TM O107 be amended as follows: <i>'while ensuring the needs of persons with disabilities are met'.</i></p> <p>Submission requests the insertion of a new objective, as follows: <i>'The location, size and design type of disability bay to be as per current Irish Wheelchair Association Guidelines where possible.'</i></p> <p>Requests that objective TM 0109 includes an additional bullet point, as follows:</p> <ul style="list-style-type: none"> <i>'EV Charging Points to be accessible to all.'</i> <p>Requests objective TM 0113 be amended to include <i>'bicycle'</i>.</p>	<p>Chief Executive's Response</p> <p>The request to include the CKAN logo is noted (as is the CKAN jpeg logo attached to the submission) however, it is noted that the other 'logos' in the chapter are merely generic transport icons designed to make the draft Plan more visually friendly and publicly accessible. The insertion of logos from any specific non-statutory organisation into a statutory land use plan such as the draft Plan is considered to be inappropriate.</p> <p>The request to amend the objectives TM O37, TM O103, TM O107, TM O109 and TM O113 is accepted.</p> <p>The request to include a new objective on the design of disability bays is not accepted as it is considered that objectives TM O3, TM O113 and SC O29 already provide sufficient policy support in this area.</p> <p>Chief Executive's Recommendation</p> <p>Amend TM O37 as follows: <i>...to improve bus transport movement, accessibility and reliability.....</i></p> <p>Amend TM O103 as follows: <i>...ensure that car parking, including the provision of fully accessible EV charging facilities....</i></p> <p>Amend TM O107 as follows: <i>....the vitality and vibrancy of the relevant town/village centre, while also ensuring the needs of persons with disabilities are met.</i></p> <p>Add a final bullet point to TM O109 to read as follows:</p> <ul style="list-style-type: none"> <i>Ensuring EV charging points are accessible to all, where possible.</i>
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			Amend objective TM O113 as follows: ...disabled parking, bicycle parking and motorcycle parking in towns, public transport nodes and other destinations.
315	Seamus Dolan	<p>The submission objects to TM O38 road connection between Naas Town Centre, Sallins Railway Station and the Northwest Quadrant. If introduced this will merely move thousands of vehicles through Finlay Park which currently is a quiet residential estate.</p> <p>Building an additional road through Finlay Park and the environs of the canal would impact the environment, create a rat run, impact negatively on Finlay Park, create bottle necks, impact health. Building an additional road in the vicinity of the Grand Canal and Millennium Road would destroy habitats containing a wide diversity of wildlife including water birds and ducks.</p> <p>Investment in a greenway and safe cycle lanes for school children to travel to and from Finlay Park and the Northwest Quadrant would be welcome instead.</p>	<p>Chief Executive's Response The comments in the submission are noted, however, Objective TM O38 does not relate to any road connection. This section of the Draft Plan relates to Public Transport and the referenced objective refers to a public transport hub for which no location has been specified. To provide clarity to the objective it is recommended to make an amendment. It is also considered prudent to remove the narrative concerning improving bus linkages within the town of Naas as this is already addressed by Objective RPO 4.48 in the Naas Local Area Plan 2021-2027.</p> <p>Chief Executive's Recommendation Amend TM O38 as follows: Work with statutory agencies and stakeholders to promote and facilitate the development of a public transport hub in proximity to Naas and Sallins with new and enhanced public transport infrastructure to which will connect road, rail and public bus transport, including Park and Ride and interchange facilities. Ensure the bus network in Naas improves linkages between Naas Town Centre, surrounding residential and employment areas, Sallins Railway Station and the Northwest Quadrant.</p>
315	Seamus Dolan	The submission objects to TM O39 - bus priority route link to Sallins Bypass through the Northwest Quadrant. This objective should be removed and replaced with the	<p>Chief Executive's Response The comments in the submission are noted. An Outer Orbital Route in Naas is deemed contrary to National Strategic Outcome 1 (compact growth) and NPO 54</p>

		development of bus routes outside residential areas and using an outer orbital route.	<p>(reduction in greenhouse gas emissions) of the NPF and therefore is not a viable solution for Naas. In order to provide for the necessary modal shift necessary to meet Ireland's climate targets it is imperative that public transport is integrated within the built-up environment making it more convenient for people to use. Therefore, a key element of the development of the Northwest Quadrant is the provision of a bus-only link. An amendment to the objective is required to clarify the exact nature of the proposed link.</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 317.</p>
371	DAA	The submission welcomes the policies TM P12, TM P13, TM P18 and objectives TM O144 and TM O145.	<p>Chief Executive's Response Noted and welcomed.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
364	Ursula King	The Development Plan should provide actions relating to Active Travel.	<p>Chief Executive's Response Section 5.4.1 in Chapter 5 'Sustainable Mobility and Transport' has a number of Policies, Objectives and Actions to support active travel.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
364	Ursula King	The Development Plan should investigate pilot sensor lighting in urban situations in Kildare as soon as possible, and if successful, rollout to other areas.	<p>Chief Executive's Response Section 5.13 of the Draft Plan relates to public lighting wherein Objective TM O120 relates to motion sensors replacing sodium lights in order to improve the efficiency of the existing public lighting system.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

<p>422</p>	<p>Fintan Flood</p>	<p>This submission relates to the connectivity of cycle paths and routes to the interchanges at Newhall Naas. There has been no provision for cycle paths in the recently installed interchanges at Newhall and the subject lands may provide a solution to accessing across the M7.</p>  <p>Case for Connectivity The subject lands comprise of a house, historic mill, and outbuildings on farmland and are equidistant between Ladytown Business Park and Newhall Business Park. The lands have been impacted by the new interchange and junctions for the M7 motorway. The submission was supportive of the Part 8 application (2021) intention to put cycle paths on both sides of the R445 and a drainage attenuation area within the landholding. The submitter is amenable to the future installation of off-road cycle paths/ pedestrian routes that could be used to link across the motorway into Naas by way of access through the Motorpark Industrial estate in Newhall or parallel to the motorway.</p>	<p>Chief Executive's Response It is a policy of the Draft Plan to prioritise and promote the development of high-quality, suitable, safe and sustainable walking and cycling pathways and facilities, both inter-county, intra-county (in consultation with all relevant stakeholders including neighbouring local authorities) and within the towns and settlements (TM P2, refers). It is also a priority of the Council to deliver the cycle network identified in the Draft Greater Dublin Area Cycle Network Plan (2021) (Objective TM O20, refers) where it is noted that the subject lands do not form part of this Strategy. The measures contained in the GDA Strategy are considered high priority projects which will connect large urban settlements such as Naas and Newbridge.</p> <p>It is important to note that it is a policy of the Draft Plan to promote agri-tourism (RE P24, refers) and Objective RE O150 states that the Council will facilitate and encourage the re-use of redundant farm buildings of vernacular importance for appropriate owner-run agri-tourism enterprises subject to the proper planning and sustainable development of the area.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
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	<p>It is stated that there is also the opportunity to provide a future access to near the island on the Liffey, which is a local fishing spot and also the attenuation pond would be redirected onto the historical drainage channel to establish a historical watercourse.</p> <p>The submission states that there appears to be no provision for pedestrian and cycle paths which would link across the M7 motorway to Naas and the future development of the Corbally Canal Spur. The recent works to Floods Cross have left the original road in place, and this could be used as part of the greenway towards the Liffey.</p> <p>The subject site has been used as a large transport truck depot and for a temporary food truck. The submitter now wants a greener use more in keeping with the rural location. It is stated that the farm complex and landscape setting need to be attractive enough to become a destination in themselves for the adjoining urban population, including the reestablishment of the old mill pond and water channels. A future development of the Grand Canal towards Corbally with a greenway route or access to the river Liffey near Caragh/ Victoria Bridge may be facilitated by way of a route through the clients landholding. It is considered that a café/ restaurant and farm shop could form part of the existing barn outbuildings. Images of similar type development have been included.</p>	
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<p>378</p>	<p>Iarnród Éireann</p>	<p><u>Current Rail Development in Kildare County</u> The submission provides an overview of Iarnród Éireann’s current rail developments and submits that these developments would greatly assist in the enablement of target TM T4 of the Plan.</p> <p>The support for the delivery of the DART+ Programme in the Plan is welcomed. The submission provides a progress update of the DART+ Programme and highlights the transformational upgrade/change to the future public transport network that the DART+ will provide.</p> <p>A progress update of the DART+ Southwest project and the key infrastructural elements thereof are provided. In addition, the submission highlights the service frequency and capacity increases that will be provided along the railway corridor between Hazelhatch & Celbridge Station and Dublin City Centre</p>	<p>Chief Executive’s Response The submission is noted and accepted.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>

		<p>The submission welcomes the support of the DART+ programme in TM 09 and submits that the DART+ will be critical to achieving the Council's aim under target TM T1.</p> <p>The extent of the DART+ Programme and the various elements are summarised in Appendix A of the submission.</p> <p>The submission provides a progress update with regards to Iarnród Éireann's Accessibility Programme.</p> <p>The submission provides an overview of Iarnród Éireann's approved non-DART fleet enhancements and the benefits thereof for Kildare County.</p> <p>It is submitted that Iarnród Éireann has progressed the planning and development of several new stations to add access to the network.</p>	
378	Iarnród Éireann	<p>The submission outlines Iarnród Éireann's priorities for key DART network expansions and enhancements and highlights the benefits thereof.</p> <p>In this regard, Iarnród Éireann welcomes Objective TM O43 of the draft Plan which aims to facilitate and support the extension of the DART+ line in co-operation with Irish Rail, the Department of Transport and the National Transport Authority.</p> <p>The submission provides an overview of Iarnród Éireann's future plans for Intercity and Outer Suburban Service enhancements. Objective TM O52 is welcomed and the submission states that Iarnród Éireann's long-term ambitions will assist in achieving the</p>	<p>Chief Executive's Response Noted.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

	<p>aforementioned objective.</p> <p>The submission provides an overview of Iarnród Éireann intercity electrification priority and the benefits thereof. It is highlighted that Iarnród Éireann will include the outcomes on Intercity and inter-regional connectivity from the strategic rail study by DoT/DfI(NI) as part of this priority once they are known.</p> <p>The submission welcomes the support for the electrification of Intercity services through objective TM O44.</p> <p>The submission outlines the benefits of the Accessibility Programme and welcomes the support thereof in objective TM O40.</p> <p>The submission welcomes the support for the development of the Iarnród Éireann Customer Information Services (CIS) Strategy Report in Objective TM O41.</p> <p>It is submitted that Iarnród Éireann will work closely with the Council and all stakeholders and service providers to facilitate the development of a public transport hub in Sallins & Naas as set out in TM O38.</p> <p>The submission welcomes objectives TM O46 and TM O47 expressing the support of the Council to facilitate the delivery of the proposed new park and ride facilities and the investigation of a P&R facility at Newbridge train station.</p> <p>The submission provides an overview of the Rail Freight 2040 Strategy and highlights the benefits of rail freight in</p>	
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		<p>the context of climate change and environmental targets. Objective TM O50 in support of the implementation of the Rail Freight 2040 Strategy is welcomed.</p> <p>The Department of Transport (DoT) and the Department of Infrastructure (Northern Ireland) (DfI(NI)) have commenced an All-Island Strategic Rail Review with faster Intercity connectivity, improved regional connectivity, and rail freight forming key elements. It is submitted that Iarnród Éireann will prioritise the outcomes of this review as part of its future plans upon completion of the study.</p> <p>Any future measure or proposal by the Council which may impact on the property of the CIÉ Group must be fully discussed and agreed with the CIÉ Group Property Division in advance.</p> <p>Any proposals to add railway structures, including but not limited to bridges, to the Register of Protected Structures should be notified to the Senior Track and Structures Engineer of Iarnród Éireann.</p>	
378	Iarnród Éireann	<p>It is submitted that Iarnród Éireann aims to develop a Multi-Modal Interchange Strategy [previously referred to as the 'Sustainable Interchange Programme'] which will enable more sustainable end-to-end journeys to be made by rail. The submission highlights what the strategy will include and the benefits of implementing such a strategy.</p> <p>The submission welcomes the support for the Multi-Modal Interchange Strategy in Objective TM O42.</p>	<p>Chief Executive's Response It is considered necessary to amend TM O42 to reflect the Multi-Modal Interchange Strategy [previously referred to as the 'Sustainable Interchange Programme'].</p> <p>Chief Executive's Recommendation Amend TM O42 as follows: Support the implementation of the Irish Rail Multi-Modal Interchange Strategy Sustainable Interchange Programme to...</p>

378	Iarnród Éireann	<p>The objectives (TM O24, TM O25 and TM O26) to improve walking and cycling integration with rail are welcomed.</p> <p>With respect to TM O26, it is submitted that the DART+ West project is seeking to permanently close Blakestown level crossing and is not proposing any replacement bridge, given the current low use of this level crossing and the proximity of the R449 link road. The existing infrastructure is considered adequate for the current level of development in Kilmacreddock/ Collinstown area.</p> <p>The submission states that Iarnród Éireann is aware of Kildare County Council's objective to develop strategic employment lands at Collinstown and indicated Iarnród Éireann's co-operation to facilitate the provision of new access over the railway, separate to the DART+ West Railway Order application. Discussions with regards to the masterplan for the Collinstown strategic development lands may include the inclusion of a potential new station and a Park & Ride facility to serve Collinstown.</p>	<p>Chief Executive's Response The DART+ West project is of strategic importance and plays a critical role to facilitate a modal shift towards the use of sustainable public transport by providing an alternative to the car to more citizens. It is therefore considered appropriate to amend TM O26 to facilitate the provision of new pedestrian access over the railway separate to the DART+ West Railway Order application.</p> <p>Chief Executive's Recommendation Amend TM O26 as follows: Liaise with Irish Rail with respect to identifying and developing a new pedestrian crossing over the Rail line (separate to DART +) retaining access from Kilmacreddock to Intel/Greenway at Blakestown Cross over the Rail Line in order to promote "Active Travel" permeability links to the Strategic Employment Lands at Collinstown.</p>
378	Iarnród Éireann	<p>The submission recognises the ambition to provide a segregated walking and cycle corridor parallel to the railway lines but submits that in practice it will be difficult to realise.</p> <p>It is highlighted that Iarnród Éireann does not own sufficient excess lands that would deliver the objective, without impacting on the safe operation of the railway. Furthermore, the submission stated that this matter would require the input of the National Transport Authority in the first instance to ensure the corridor accords with the Transport Strategy for the Greater</p>	<p>Chief Executive's Response The submission is noted and accepted. In taking account of the issues raised and in the interests of public safety it is proposed that TM A8 be omitted from the draft Plan.</p> <p>Chief Executive's Recommendation Delete TM A8 of the draft Plan.</p>

		Dublin Area and thereafter the responsibility for the statutory application for approval and delivery of the walking/cycling routes would likely fall to the National Transport Authority and/or the relevant Local Authority.				
433	John Lawler	<p><u>Railway Station / Platform site</u> The submission requests that a central site be identified as a potential station / platform site within the village of Caragh. An area adjacent to the line is currently flagged as "C New Residential and could be used for a 'short elevated' platform.</p> <p><u>New bridge</u> Caragh is accessed via numerous bridges given the proximity of the Liffey, canal and railway. Can we do something to protect our bridge heritage long term with the provision of a new, sympathetically designed bridge on the R409 adjacent to the existing protected structure. In light of a new bridge being installed, could the existing narrow Liffey bridge be dedicated to cycle / pedestrian use only.</p> <p><u>Victoria Bridge</u> Can reduced speed zones be set in proximity to Victoria Bridge as this road is a direct run to Allen and Arkil Quarries, which sees much heavy haulage traffic.</p>	<p>Chief Executive's Response</p> <p><u>New bridge</u> The comments on a new sympathetically designed bridge on the R409 adjacent to the existing protected structure are noted. Table 5.4 – Priority Road and Bridge Projects outlines the following:</p> <table border="1"> <tr> <td>20</td> <td>Investigate the feasibility of a new river crossing to the south-east of Caragh village.</td> <td>South-east of Caragh village.</td> </tr> </table> <p>Regarding the existing historic bridge at the above location, please note that there is an action (AH A12) to carry out an audit of all historic rail and road bridges, and disused railway lines in Kildare and liaise with stakeholders regarding the management, maintenance, and enhancement of same.</p> <p>The suggestion that the existing bridge be dedicated to cycle / pedestrian use only will be assessed as part of the above audit.</p> <p><u>Railway Station / Platform site</u> The proposal outlined in the submission for a potential station / platform site within the village of Caragh is noted. It is considered this proposal is addressed under Objective TM O45 of Volume 1, which states the following: 'Investigate, in co-operation with Irish Rail and the National Transport Authority, the provision of new railway stations and the upgrading/relocation of existing stations.'</p> <p><u>Victoria Bridge</u></p>	20	Investigate the feasibility of a new river crossing to the south-east of Caragh village.	South-east of Caragh village.
20	Investigate the feasibility of a new river crossing to the south-east of Caragh village.	South-east of Caragh village.				

			<p>The proposal that reduced speed zones be set in proximity to Victoria Bridge as this road is a direct run to Allen and Arkil Quarries, which sees much heavy haulage traffic is noted. The making of Special Speed Limits is a reserved function of the Elected Members by the making of a Bye Law under the Road Traffic Act 2004 (as amended) and is subject to the requirements of the Guidelines for Setting and Managing Speed Limits in Ireland (2015). It should be further noted that objective TM O101 seeks to channel HGV traffic associated with landfill and extractive sites onto the regional and national road networks insofar as possible.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
434.	Maynooth Community Council	<p>Notes that the issue of traffic congestion in the town is a chronic and well-documented issue, and as documented in the Maynooth Local Area Plan, requires significant planning and investment that has still not materialised. Refers to Appendix 1 of the submission which has the views of the community collected from a public meeting held by the community council in October 2010. Submits that the ring road is currently a series of cul de sacs. States that the most important section of the ring road, the Maynooth Eastern relief road (MERR), has been delayed repeatedly. States that linking housing to infrastructure development is necessary to achieve sustainable growth. Welcomes that the ring road is prioritised in Chapter 5 and notes other identified priority roads projects in Maynooth. Welcomes objective M O72 relating to the M4 interchange. Emphasises the importance of a second junction rather than improvements to Junction 7. States that no further</p>	<p>Chief Executive's Response The issues and concerns relating to traffic and transport in Maynooth are noted by the Council. It is the function of the County Development Plan to provide an overarching level of support to strategic transport and movement policies in the county, whilst specific issues are generally dealt within the context of the local area plan. In this regard, it should be noted that the preparation of a new local area plan for Maynooth forms part of the Council's work programme for 2022. As part of the plan-making process an Area-Based Transport Assessment (ABTA) is currently being undertaken for the town. The ABTA will examine the existing and proposed transport infrastructure and service provision across all modes of transport including sustainable means within the town. The ABTA will provide an understanding of the existing constraints and modal share, and also identify the interventions required within the Plan area and in the wider context. This is in order to effectively accommodate the anticipated increase in demand and ensure the optimal transportation interventions can be put in place to drive a</p>

	<p>development should take place until the supporting roads infrastructure is in place.</p> <p><u>Public Transport</u> Submission welcomes the inclusion of targets TM A19 and TM T4 specified in the plan relating to the promotion of sustainable movement. States that the experience in Maynooth is that Bus Connects is taking effect and providing a real alternative to car travel.</p> <p>Notes the provisions of objectives TM O12, TM O13. States that for Maynooth's unique circumstances it makes sense to provide more express options particularly at peak times. Notes the importance of objective TM O35 with regard to facilitating the development of town bus services for the Key Towns within the County ensuring connectivity to and from residential areas to key destinations including train stations and bus stops.</p> <p>Welcomes DART+ West project as supported by objective TM O9 also supports the extension of the DART+ to Kilcock (objective TM O43)</p> <p>Notes that the car park at the train station has already been extended to the maximum but is still full at peak times and submits there is a need for park and ride facilities as outlined in objective TM O46. Submission favours placing the park-and-ride near the proposed depot between Maynooth and Kilcock with access from the M4 motorway to take traffic to the facility.</p> <p>Refers to planned closing of Blakestown cross as part of the DART+ project and outlines support for some form of pedestrian crossing as per the provisions of objective TM O26.</p>	<p>long-term shift towards sustainable movement. It is noted that the ABTA has been subject to an initial round of public consultation with a second exercise being planned for later in 2022. The local area plan for Maynooth will integrate the key recommendations of the ABTA regarding the provision of transport infrastructure and provide safeguards (through an infrastructure phasing and delivery schedule) which will ensure that development can only proceed in tandem with the delivery of identified transport infrastructure requirements.</p> <p>It should be noted that the planned M4 upgrade project is subject to a separate process which is being advanced by the National Roads Design Office and Transport Infrastructure Ireland.</p>
		<p>Chief Executive's Recommendation No change to the Draft Plan.</p>

	<p>Notes the popularity of routes such as the 139 Bus for cross-cutting journeys to Clane, Tallaght or Blanchardstown.</p> <p><u>Cycling and Walking</u> States that providing safe cycling and walking infrastructure is essential in encouraging people to reduce car use. Welcomes the provisions of target TM T1 in this regard but submits that there is a climate imperative to reduce the targets even further. Notes the number of students (including third level students) that walk/ cycle to school/university. Submits that as a town built on a human scale there is further opportunity to create pedestrian routes through the centre that encourage people to walk more. States the walk from the train station to the College should be shorter. Also notes the potential for an opening between Maynooth Castle and Manor Mills. States that more should be done with the Moyglare road up to the Maynooth Education Campus. Outlines concerns about safety and pedestrian/cycle infrastructure on the Newtown Road. Refers to the possibility for an additional pedestrian and cycling bridge over the canal between Bond bridge and Jackson bridge. States that the new cycleways described in TM O11 and TM O25 are particularly interesting.</p> <p><u>Appendix 1: Maynooth Community Council Public Meeting and Traffic submission (22 October 2019)</u> (Attached to the submission)</p>	
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		<p>Appendix relates to the issues discussed and highlighted by both community groups and residents of Maynooth regarding traffic in Maynooth.</p> <p>States that this meeting provided the forum for residents, businesses, and commuters alike to voice their concerns and explore possible solutions to the current serious traffic issues in our town.</p> <p>Issues of concern related to the impact of traffic on senior citizens, businesses, school children and their parents, and vulnerable persons.</p> <p>Appendix provides details of the following:</p> <ul style="list-style-type: none"> • A range of short-term solutions to the problem ranging from traffic enforcement, restrictions and improvement works. • Appendix provides a list of speakers at the meeting, these persons represented community groups, transport providers, local businesses, and individual residents. • Appendix provides a list of issues that were raised at the meeting including issues relating to access, public consultation, safety, infrastructural constraints, congestion, and proposed projects. 	
538	Senator Mark Wall	The submission requests Kildare County Council to work with Iarnród Éireann and the NTA to reopen toilet facilities at Newbridge train station.	<p>Chief Executive's Response This is outside the scope of the Draft Plan.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
538	Senator Mark Wall	The submission requests to extend the short hop zone pricing zone to include all the train stations in south Kildare as part of the Greater Dublin Transport Strategy or an equivalent pricing structure.	<p>Chief Executive's Response The pricing zones with respect to Iarnród Éireann are outside the remit of a county development plan.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

538	Senator Mark Wall	Support and promote the delivery of Park and Ride facilities on the network of motorways throughout the county.	<p>Chief Executive's Response It is considered that Objectives TM O46, TM O47 and TM O81 of the Draft Plan adequately address the issue raised in the submission. The locations of the proposed new park and ride facilities of Objective TM O46 have been identified in the NTA's Park & Ride Strategy: Greater Dublin Area dated April 2021.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
538	Senator Mark Wall	The submission requests Kildare County Council and the relevant agencies to provide additional bus shelters in the county including one in Athy.	<p>Chief Executive's Response It is considered that Objective TM O37 of the Draft Plan adequately addresses the issues raised in the submission.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
538	Senator Mark Wall	The submission requests Kildare County Council to work with the NTA to further develop public transport from all villages in County Kildare to connect with larger towns and onward transport.	<p>Chief Executive's Response Chapter 5 contains various objectives and actions in support of the development of public transport in County Kildare. Action (TM A1) is to prepare a County Kildare Sustainable Mobility Plan that addresses the long-term mobility needs of communities and businesses in the county. The plan should address urban and rural transport issues, the integration of transport modes and public transport connections between the towns and villages of the county.</p> <p>Objective (TM O12) is to promote and facilitate the implementation of public transport projects (bus and rail) and encourage transport providers and other agencies (e.g. NTA, developers etc.) to improve public transport (bus and rail) and to have regard to and support recently implemented and/or planned routes under NTA's Bus</p>

			<p>Connects and proposed / planned routes under NTA's Connecting Ireland Rural Mobility Plan...</p> <p>Having regard to the above it is considered that the submission is already addressed in the Draft Plan.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
538	Senator Mark Wall	<p>The submission requests Kildare County Council to prioritise and build a public footpath to Colstown Cemetery Castledermot within the lifetime of the plan.</p>	<p>Chief Executive's Response Colstown Cemetery is located approximately 1 km outside of the small town boundary of Castledermot. Considering the aforementioned distance it is not considered appropriate to prioritise a public footpath to Colstown Cemetery in the Plan at this time.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
468	Ann Behan	<p>The first line of section 5.3 is referred to and figure 5.1. It is recommended that the CDP moves away from quoting the 'triple bottom line' approach and moves towards a 'doughnut economics' approach that recognises the planet does not depend on the economy, but the economy is completely dependent on the natural world.</p> <p>Transport is the area where the local authority can have the greatest impact on climate change, the CDP should state that a significant reduction in car use is an essential requirement for a sustainable future. TII design requirements for increased vehicle numbers in the future are incompatible with decarbonising of transport and avoiding climate change.</p>	<p>Chief Executive's Response Sustainable transport must also be balanced against economic, social, and environmental goals, as indicated in Figure 5.1. Although these imply that each goal fits into a specific category, they often overlap. For example, pollution is generally considered an environmental issue, but it also affects human health (a social issue), and fishing and tourism industries (economic issues). It is therefore not considered appropriate to move away from the 'Triple Bottom Line' approach.</p> <p>There are numerous policies, objectives and actions in Chapter 5 that address the prioritisation of walking, cycling and public transport and to encourage their use. In addition, Figure 5.8 of the Plan outlines the user hierarchy to consider as part of the design of roads and streets which prioritises</p>

	<p>The targets for modal change and the concept of a 10-minute settlement are welcomed. The targets for modal change should be broken down into individual urban areas and for rural areas county wide. Target for 2030 should also be included which is a key date for Ireland's commitment on climate action.</p> <p>It is disappointing that the wording of many objectives / policies refers to promotion and feasibility, the plan would be more progressive if it referred to achieving and / or enabling. For example, in section 5.4 it states “Kildare County Council will endeavour to deliver a reduction in private car usage broadly in line with the 51% reduction in emissions by the end of this decade” it is submitted that this lacks ambition and recognition of the seriousness of climate action.</p> <p>Inclusion of policy TM P1 is commended. It is asked if an action will be included to set out the criteria, and how it will be applied, to ensure this prioritisation occurs?</p> <p>Amend TM O6 to read require employers to develop and implement workplace travel plans which deliver modal change based on the NTA's workplace travel plans: A Guide for Implementers (2013).</p> <p>An additional objective is also recommended which is “to encourage new employees, house buyers and parents to consider active and sustainable travel in conjunction with Kildare stakeholders”.</p> <p>Amend the second sentence of TM O58 to include “the National Investment Framework for Transport in Ireland (NIFTI)” prior to ‘Principle of Road Development.</p>	<p>sustainable forms of transportation. The comments in relation to the wording of particular parts of the Plan are noted however the realisation of the various objectives, actions and targets is very often dependent on resources (financial or otherwise) being available to a wide range of stakeholders. Also it may not be appropriate to progress with particular objectives in certain instances for a variety of reasons, hence the wording of ‘feasibility studies’ or similar in various parts of the Draft Plan.</p> <p>Regarding TM O6 it should be noted that it is not within the remit of the Draft Plan to require employers to develop and implement Workplace Travel Plans.</p> <p>See response to submission 413 in relation to the proposed new objective regarding employees, house buyers and parents and TM O107.</p> <p>See response to submission 330 in relation to TM O58 & TM O71</p> <p>Provision for electric charge points is included in section 15.7.8. They are also supported through objectives TM O110 and TM O111 in section 5.11.</p> <p>Chief Executive's Recommendation See recommendation to submission 330 in relation to TM O58 & TM O71.</p>
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		<p>Delete objective TM O71 as it is incompatible with government Climate Change objectives.</p> <p>Electric vehicle/bikes and charge points should be researched and included in the Draft, as it will help reduce emissions, alleviate traffic, and provide a means of alternative transport.</p> <p>Amend TM O107 to exclude the words “Seek to”.</p>	
ROAD AND STREET DESIGN			
507	Brian McArdle	The submission refers to the setting of speed limits in urban areas of the county.	<p>Chief Executive’s Response</p> <p>The design of roads and streets, the regulation and management of speed and the safety of road users are all intrinsically linked.</p> <p>It is noted that the making of Special Speed Limits is a reserved function of the Elected Members by the making of a Bye Law under the Road Traffic Act 2004 (as amended) and is subject to the requirements of the Guidelines for Setting and Managing Speed Limits in Ireland (2015).</p> <p>While the setting of speed limits is a reserved function of the Elected Members, the design of urban streets in Ireland is informed by DMURS (2020) which is mandatory for all urban roads and streets within the 60km/h urban speed limit zone except for motorways and, in exceptional circumstances, certain urban roads and streets, with the written consent of the relevant Authority.</p> <p>DMURS outlines a user hierarchy to consider during the design of roads and streets which prioritises sustainable forms of transportation. The hierarchy considers pedestrians, cyclists, public transport and private motor</p>

			<p>vehicles in this order. To recognise the importance of electric vehicles in reducing Greenhouse Gas emissions, Kildare County Council will add electric vehicles to the hierarchy to be considered before private motor vehicles.</p> <p>In addition, it is the policy of the Council to ensure that streets and roads within the county are designed to balance placemaking and movement, to prioritise sustainable modes of transport and to provide a safe traffic calmed street environment in accordance with the principles set out in the Design Manual for Urban Roads and Streets (2020) while meeting the needs of road users of all ages and abilities (TM P8).</p> <p>It is therefore considered that Chapter 5 of the Draft Plan adequately addresses the issue raised in the submission.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
266	Irish Farmers Association	The Council should take account of vehicles needed to access farms when carrying out alterations. Roads are often made narrower to slow down traffic resulting in wide vehicles being unable to safely manoeuvre. Designs need to be practical when providing new junctions, putting in cycle lanes etc.	<p>Chief Executive's Response The design of urban roads and streets is informed by DMURS (2019) which is mandatory for all urban roads and streets within the 60km urban speed limit zone. It is a policy (TM P8) within section 5.10 to ensure that streets and roads within the county are designed to balance placemaking and movement, to prioritise sustainable modes of transport and to provide a safe, traffic-calmed street environment, while meeting the needs of road users of all ages and abilities. It should be further noted that objective TM O101 seeks to channel HGV traffic associated with landfill and extractive sites onto the regional and national road networks insofar as possible.</p>

			Chief Executive's Recommendation No change to the Draft Plan.
289	Department of Transport	References in the draft Plan to the 2019 version of DMURS should be replaced with references to the 2020 DMURS Interim Advice Note – Covid-19 Pandemic Response, for example on page 25, TM 055, Chapter 5 Sustainable Mobility and Transport.	Chief Executive's Response Noted and agreed.
			Chief Executive's Recommendation Replace all references in the draft Plan to the 2019 version of DMURS with references to the 2020 DMURS Interim Advice Note, Covid-19 Pandemic Response.
AVIATION RELATED			
392	Department of Defence	<p><u>Safeguarding of Military Operations at and near Casement Aerodrome</u></p> <p>The following areas are Operational Military Airspace above County Kildare:</p> <p>EIR 15 – approaches into and out of Casement, from ground level to 3,000 ft above sea level.</p> <p>EIR 16 – from various base altitudes to approx. 24,500 ft above sea level.</p> <p>MOA 3 and MOA 4 – for military pilot training, from ground level to up to 45,000 ft above sea level.</p> <p>These air spaces are in frequent use, where standard rules of the air may not apply and where aircraft may be operating at lower levels than that permitted for civil aircraft. The DoD Property Management Branch have requested to be notifiable parties regarding:</p> <ul style="list-style-type: none"> • Wind farms within these military operation areas. 	<p>Chief Executive's Response</p> <p>The Departments issues in relation to Casement Aerodrome and The Curragh Camp are noted. Map 5.2 of the Plan refers to 'Areas of Aviation Significance & Aerodrome Context' and this includes MOA 4 and the outlines (where they lie above Kildare) of MOA3, EIR15 and EIR 16. It is considered appropriate to update this map to identify MOA 3, EIR 15 and EIR 16.</p> <p>In relation to wind farm developments, Section 3.4.2 of the Wind Energy Strategy states that any wind farm application within the Military Operating Area (which covers the majority of the County including approaches to Casement and The Curragh Camp) will be considered on its own merits in accordance with Development Plan standards and consultation with the Department of Defence. It is considered appropriate to include an objective in the plan to reflect that proposals will be referred to the Department for comments.</p>

	<ul style="list-style-type: none"> • Solar farms within 5km of Casement Aerodrome. <p><u>Safeguarding of Military Operations at The Curragh Camp</u> The Defence Forces training centre is located at The Curragh Camp, where helicopter operations and parachute training takes place. The DoD have requested to be notifiable parties regarding:</p> <ul style="list-style-type: none"> • Wind Farms within 5NM (i.e. 9.25km) of Curragh Camp, and • Solar farms 3km from Curragh Camp. <p>The submission includes reference to 'Range Danger Area' where any construction or development would leave the range unusable.</p> <p>The Irish Aviation Authority does not have remit for military installations or training areas.</p>	<p>Furthermore, objective TM O140 already requires any significant proposed development within 6km of Casement Aerodrome's runways to be referred to the Department of Defence. It is considered appropriate to amend this objective to explicitly reference wind and solar farms. Objective EC O24 requires the submission of Glint and Glare Assessments as part of any solar energy development where there is likely to be any impact on neighbouring uses, transportation and aviation safety.</p> <p>Chief Executive's Recommendation Update Map 5.2 'Areas of Aviation Significance & Aerodrome Context Map' to show MOA 3, EIR 15 and EIR 16, as per Department of Defence submission.</p> <p>Include new Objective under 5.14.10 'Aviation in General' as follows: Refer, where appropriate, proposed wind farm development applications located within MOA4 (as per Map 5.2) and refer proposed solar farm development applications located within 3km of the Curragh Camp to the Department of Defence.</p> <p>Amend TM O140 as follows: Refer any significant proposed development (including wind and solar farms), where appropriate, within 6km of Casement Aerodrome's runways (i.e. within the plan area of its Inner Horizontal and Conical Surfaces) or under its Approach Surfaces, to the Department of Defence, and to limit the heights of development under its 'obstacle limitation surfaces' which extend into Kildare (as are indicated on Kildare CDP maps) in accordance with ICAO 'obstacle limitation guidance.</p>
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<p>392</p>	<p>Department of Defence</p>	<p>Military Low Flying Training The DoD indicates there are 3 training areas where tall objects (i.e. objects 30m or taller) ‘could be incompatible’ with low-flying training areas. These are located at Edenderry, Newbridge and Athy, as illustrated below.</p>	<p>Chief Executive’s Response The legal authority for limiting the heights or types of physical development in the vicinity of ‘service aerodromes’, over and above the international ICAO (International Civil Aviation Organization) and EASA (European Aviation Safety Agency) limitations, arises under Section 36 of the Defence Act 1954. Section 36 of the Defence Act 1954 includes a proviso that property owners adversely affected by any such limitations may receive compensation.</p> <p>The M4, M7, N7 and M9 are located close to the settlements of Leixlip, Maynooth, Kilcock, Celbridge, Naas, Newbridge, Kildare and Monasterevin. It is not considered appropriate to place height restrictions on 11km wide corridors, centred on these roads, prohibiting structures over 30m tall, especially where this includes significant parts of the County’s urban settlements. Pylons, for example, are taller than 30m and these facilitate powerlines to traverse motorways, in some instances, and are key infrastructural components for the development of the county.</p> <p>Notwithstanding this, Section 3.4.2 of the Wind Energy Strategy states that any wind farm application within the Military Operating Area will be considered on its own merits in accordance with Development Plan standards and consultation with the Department of Defence.</p>
		<div data-bbox="495 400 1052 794" data-label="Image"> <p>A map of the Dublin region showing three overlapping circular areas labeled 'OLF Training Area'. One circle is centered on Edenderry, another on Newbridge, and the third on Naas. The map includes various roads, rivers, and place names.</p> </div> <div data-bbox="495 821 1064 1276" data-label="Image"> <p>A detailed map showing helicopter routes in the Dublin region. It features several yellow boxes labeled 'DCT' (Decision Height) and various flight levels (FL) such as FL240, FL230, and FL310. Specific routes are identified with alphanumeric codes like 530517N0070429W and 530028N0065229W. The map also shows roads like the M4 and M7, and locations like Monasterevin and Moone.</p> </div> <p>Critical Low Level Helicopter Routes</p>	<p>Chief Executive’s Recommendation No change to the Draft Plan.</p>

		<p>The DoD are opposed to tall structures (i.e. taller than 30m) within 3NM (i.e. 5.55km) of route centrelines of the M4 Motorway, M7 Motorway, N7 National Route, M9 Motorway as these routes are identified as critical low-level routes in support of Irish Air Corps. The DoD Property Management Branch have requested to be notifiable parties regarding Wind Farms or taller structures (structures 30m or taller) within 5.55km of route centre lines.</p>	
440	John de Robeck	<p>The submission provides extracts from a report by Captain Fintan Ryan ME, Chartered Engineer, Specialist Field: Flight Operations, Defendant: Baroness Caroline and Mr John de Robeck.</p> <p>The report provides an overview of the nature of gliding and the various risks involved with launching and landing. It states that aeroplanes towing gliders fly directly over the Punchestown Racecourse and Event Complex when they take-off from Runway 03 and gliders and aeroplanes make their approach to land on runway 21 over the Punchestown complex.</p> <p>It is the professional opinion of the author of the report that the practice of taking off and landing with gliders in tow or in free flight over the assembled crowds in Punchestown during events is extremely hazardous and potentially catastrophic. The report highlights glider accident statistics in the UK, US, Ireland and Gowran Grange specifically.</p> <p>It is the professional opinion of the author of the report and the Irish Aviation Authority that a physical barrier is essential and should be erected to separate the aircraft movement area from livestock. It is stated that the</p>	<p>Chief Executive's Response The statutory elements and remit of the development plan are set out clearly in the Planning & Development Act. In preparing the development plan, planning authorities must exercise caution not to inappropriately stray into the operation of other statutory codes and regulatory regimes that relate to the development sector, but are outside the remit of a county or city development plan. This is applicable to policies or objectives for non-planning functions governed by other legislation and regulations. Therefore, no changes can be proposed to the draft Plan having regard to the contents of this submission.</p> <p>Chief Executive's Recommendation No changes to the draft Plan.</p>


		<p>operational procedures at Gowran Grange as they exist pose an unacceptable risk to participants and are not safe. The refusal of Dublin Gliding Club to erect a frangible fence and/or permit the erection thereof prevents the granting of a license by the Irish Aviation Authority to the Defendant to have the aerodrome licence as is required under the lease and the Orders made by the Circuit Court.</p> <p>The report outlines the requirements for busy glider aerodrome sites and concludes that Gowran Grange only has two of these characteristics and is deficient with regards to the other requirements such as for example being clear of areas where crowds of people are assembled.</p>	
371	DAA	The submission recommends consultation with the IAA and IAA-ANSP (The Irish Aviation Authority Air Navigation Services Provider).	<p>Chief Executive's Response Agreed.</p> <p>Chief Executive's Recommendation Amend TM O145 as follows: Refer to the IAA, the IAA-ANSP (Air Navigation Services Provider) and to Dublin Airport Authority any proposed development of more than 90m above ground level which might lie under the small part of Dublin Airport's Obstacle Limitation Surface which lies above Kildare.</p>
515	Meath County Council	Submission welcomes the provisions of Chapter 5 including TM P18 and TM O144 and TM O145. Submits that the objectives will ensure the protection of these airfields and is consistent with similar policies in Meath County Development Plan 2021-2027.	<p>Chief Executive's Response Noted and welcomed.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
MOTORWAY SERVICE STATIONS			

484	Circle K Ireland Energy Group Limited	<p><u>Summary of Appendix from Coakley O'Neill Town Planning</u></p> <p>This submission relates to the existing Circle K M9 Kilcullen Motorway Service Area located on the M9, to the south of the town of Kilcullen</p> <p>The submission highlights the strategic importance of motorway service areas on the county's road network and requests, firstly, an acknowledgement of the establishment of a Circle K Motorway Service Area on the M9 Motorway outside Kilcullen and, secondly, an appropriate designation to support its continued operation and potential for future expansion.</p> <p>The Guidelines for Planning Authorities: Spatial Planning and National Roads, 2012 is the primary policy document regulating the planning and development of MSAs. This document states that planning authorities may consider policies for the provision for offline Motorway Service Area facilities with reference to the requirements and advice included in the most up-to-date NRA guidance on the location and layout of the NRA's service areas.</p> <p>The submission notes that no change is proposed between the current CDP and Draft Plan regarding policy provisions for Motorway Service Areas. The absence of adequate policy provisions for Motorway Service Areas risks undermining their important function on the motorway network. It is not the function of TII to zone these areas. Zoning of land rests with the relevant county planning authority.</p>	<p>Chief Executive's Response</p> <p>It is not considered appropriate or necessary to specifically zone the existing Circle K M9 Kilcullen Motorway Service Area (MSAs) located on the M9.</p> <p>The decisions by ABP, which have been identified in the submission, all relate to the construction of new MSAs and not the extension or re-development of existing MSAs. To argue that any appropriate future extension or re-development of the existing Circle K M9 Kilcullen Motorway Service Area is reliant on it being zoned is not considered reasonable.</p> <p>However, due to its size and strategic importance, an objective which acknowledges the establishment of a Circle K Motorway Service Area and that supports its continued operation is deemed appropriate.</p> <p>Chief Executive's Recommendation</p> <p>To insert the following objective after TM O77: Support and facilitate the continued operation of existing Motorway Service Areas throughout the county.</p>
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		<p>The submission states that there is an onus to zone established motorway services areas with a designation that supports their continued operation and viability. This has been done by other Planning Authorities.</p> <p>The Kilcullen MSA remains within an unzoned agricultural rural area and is subject to the policy provisions associated with these areas which are highly restrictive in terms of advancing new development. Planning risks to the operation and potential expansion of the facility associated with this can be found in the decisions of An Bord Pleanála. Four decisions by ABP which relate to Motorway Service Stations have been identified. It is requested that the existing Motorway Service Area at Kilcullen is given recognition in the Development Plan by way of an appropriate designation.</p>	
PRIORITY ROADS AND BRIDGES			
538	Senator Mark Wall	<p>The submission requests the following to be considered as part of the final plan:</p> <ul style="list-style-type: none"> • That Kildare County Council provide a new bridge alongside the heritage bridge on the Naas to Caragh road. • That Kildare County Council make provision for a 2nd bridge in Newbridge. 	<p>Chief Executive's Response Table 5.4 (Priority Road and Bridge Projects) of the Draft Plan includes project number 20 - 'Investigate the feasibility of a new river crossing to the south-east of Caragh village' and project number 11 – 'Second bridge crossing in Newbridge'. In addition, Objective TM O61 supports and promotes the delivery of a second bridge crossing in Newbridge as a priority.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>

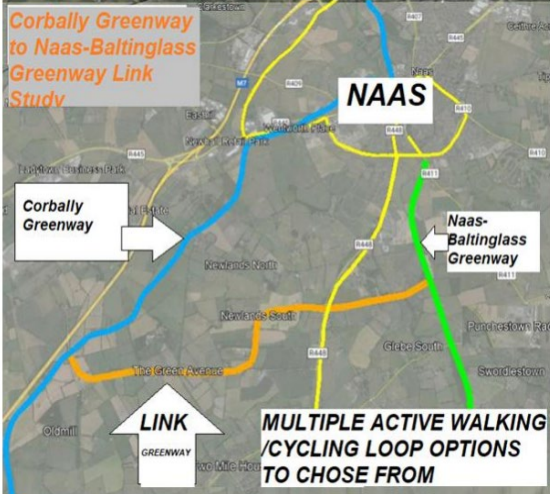
302.	Ann Moran	<p>The submission requests that the Council urgently review the need for the upgrade and development of the L5054 Ballygoran Local Road in order to help alleviate the traffic issues coming into Maynooth from the Clane and Straffan direction, develop the road network in a safe and sustainable manner in order to better utilise the regional roads and better connect and improve traffic flow to settlements and industry including Intel in Leixlip and the M4 Business Park in Maynooth.</p>	<p>Chief Executive's Response It is an objective of the Council (TM O90 refers) to maintain and improve all local roads to an appropriate standard as per the annual Road Work Programme, subject to availability of resources. It is considered outside the scope of the Draft Plan, a 6-year plan, to list all such local road improvements as the priority list for road improvements are likely to change during the life of the Plan having regard to the level of development in certain areas, weather conditions etc.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
191	Fergal Reidy	<p>The submission outlines that there is a lack of infrastructure and services in North Kildare to cater for the existing and growing population. Reference is made to several towns including Celbridge, Maynooth, and Leixlip.</p> <p>North Kildare is a black spot for bad roads, bridges and a lack of proper footpaths.</p> <p>Celbridge: Needs extra Liffey bridges and a ring road. The 1,000 new housing units started in the last year will make traffic worse. Several bad / dangerous bridges and junctions are highlighted in the area. Some proposals are made to improve junctions in the town. It is suggested that more pedestrian bridges are needed to link the old town with the new town.</p> <p>Leixlip: Canal bridge is dangerous and not fit for purpose. There are not enough public car parks in the town and businesses are failing. A new road to run</p>	<p>Chief Executive's Response While it is outside the scope of the Draft Plan to address car parking concerns and local road / junction improvements within the towns highlighted above, it should be noted that several projects are identified for the above-mentioned towns within table 5.4 – Priority Road and Bridge Projects. These include upgrading the existing bridge in Celbridge along with a second bridge crossing for the town which will include pedestrian and cycling infrastructure, while outer and inner relief roads are planned for Maynooth along with examining options for the provision of a western inner relief road. In addition, several regional roads and junctions have been identified for improvement in table 5.5. of Chapter 5 and these include projects around Maynooth, Celbridge and Leixlip.</p> <p>Also of note in the Draft Plan are Action TM A6 to develop a new pedestrian and cycle link between Celbridge and Leixlip and Action TM A7 to investigate the feasibility of providing a footpath connection between Maynooth and Celbridge. Note</p>

		<p>parallel to the canal would help residents in the Confey area.</p> <p>Maynooth: Two bypasses are needed. New roads suggested for several locations. New links to the M4 are also needed. Despite numerous plans work has not commenced to deliver the required infrastructure.</p> <p>These towns are compared with Trim, which has four river bridges and a bypass.</p>	<p>the Chief Executive's Response and Recommendation to Submission No. 330 in relation to TM A7.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
GREENWAYS, TRAILS & CANALS			
6	Tom Halligan	<p>New dedicated pedestrian and cyclist route between the Royal Canal and the Grand Canal Greenways</p> <p>The submission proposes a new dedicated pedestrian and cyclist route between the Royal Canal and the Grand Canal Greenways.</p> <p>It is suggested that the route links to the existing proposed new walking and cycling route between Celbridge and Leixlip Louisa Bridge in the Draft Kildare County Development Plan 2023-2029.</p> <p>The submission suggests that the proposed new pedestrian and cyclist route be extended from the R404 crossing the Celbridge / Lucan Rd at Youngs Cross and proceeding in a south easterly direction along Stacummy Lane and then in a southerly direction along Tubber Lane Road, crossing the railway line and then joining up with the Grand Canal Greenway.</p>	<p>Chief Executive's Response It is considered reasonable to investigate the feasibility of developing a cycle connection between the Royal Canal and Grand Canal Greenways.</p> <p>Chief Executive's Recommendation Include the following new objective in Section 5.4.1: Investigate the feasibility of developing a cycle connection between the Royal Canal and Grand Canal Greenways.</p>
30			Chief Executive's Response

	<p>Celbridge Cycling Campaign</p>	<p>Co. Kildare needs to take advantage of its location by offering a safe cycling link between the Royal and Grand Canal greenways.</p> <p>A potential link between the Royal and Grand Canal greenways would be beneficial for tourism, leisure and help people cycle safely to school, work, sports clubs and to train stations.</p> <p>A route is proposed between Hazelhatch and Louisa Bridge (see maps below) and has an overall length of circa 8km.</p> 	<p>It is considered reasonable to investigate the feasibility of developing a cycle connection between the Royal Canal and Grand Canal Greenways.</p> <p>Chief Executive's Recommendation Include a new objective in Section 5.4.1 as follows: Investigate the feasibility of developing a cycle connection between the Royal Canal and Grand Canal Greenways.</p>
<p>337</p>	<p>Sabina Reddy</p>	<p>The submission proposes a cycle link between Kilcullen and Naas and Kilcullen and Newbridge.</p>	<p>Chief Executive's Response The Council is committed to improving and enhancing pedestrian and cycle infrastructure across the county in order to offer people an accessible, safe, realistic and sustainable alternative to private vehicles. In this regard, it is considered that support for the investigation of the feasibility of a pedestrian / cycle link between Corbally Harbour and Kilcullen should be provided for in the Draft Plan. This route could then connect to Newbridge via the Naas to Newbridge cycle link which has already been identified.</p> <p>Chief Executive's Recommendation</p>

			Amend TM O22 as follows: Investigate the feasibility of developing a greenway/cycle way connecting the Corbally Line through Dowdingstown Wood and Two Mile House to Kilcullen.
318	Orla O'Neill	<p>The potential for active, sustainable transport routes for leisure and commuting should be strengthened within the CDP. It is 7.3km between Kilcullen and Newbridge train station and 13km between Kilcullen and Naas Hospital. These routes are/ can be cycled by adults, but they should be treated as urban. The submission states that DMURS should be used to keep the speed to a level which keeps the cyclist safe.</p> <p>Submits that better road routes should be developed through connecting greenways. The submission attaches a proposal to connect the Corbally Canal Basin to Kilcullen.</p> <p>States that Kilcullen lacks the ability to be self-sufficient therefore should have better transport links.</p> <p>The submission references the congestion on the Main Street and that cycle lanes need to be developed and cyclists need to be protected from the traffic.</p> <p>Attachment: Prepared on Behalf of the Kilcullen Community Association showing a potential off-road cycle link connecting Kilcullen to the Corbally Canal Basin. The submission states that these routes are outside of LAPs and need to be considered at a county level. Submits that it is an imperative that any opportunity to brown land sites that may need licensing or extending of operations including quarries and</p>	<p>Chief Executive's Response It should be noted that the Council is committed to improving and enhancing pedestrian and cycle infrastructure across the county in order to offer people an accessible, safe, realistic and sustainable alternative to private vehicular use. In this regard, it is considered that support for an investigation of the feasibility of a pedestrian / cycle link between Corbally Harbour and Kilcullen should be provided for in the Draft Plan.</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 337.</p>

		recycling centres that provision could be made to incorporate walkways or greenways.	
9	Greenway Delivery	<p>Include a policy to connect the Naas to Corbally Harbour Greenway with the Naas to Baltinglass Greenway. The connecting Greenway Link would open up a range of walking and cycling routes in the Naas area and also provide the option to connect the four schools in the Pipers Hill / Killashee area with a direct off-road cycling and walking route directly into Naas.</p> <p><u>Summary of Appendix</u> The proposed Greenway link between the Naas to Corbally Harbour Greenway with the Naas to Baltinglass Greenway would provide an opportunity to interconnect the numerous linear routes that radiate south from Naas town centre. See map below, which clearly outlines the proposed Greenway Link.</p> <p>If the Greenway network outlined (see map below) was developed it would provide a unique tourism opportunity and would also be beneficial to the equine industry in the immediate locality, which benefits from a calm and tranquil environment.</p> <p>Recommendations: Prioritise the feasibility study of Corbally Greenway to Naas / Baltinglass Greenway link to short term.</p> <p>Prioritise the delivery of the Corbally Greenway to Naas / Baltinglass Greenway link as short to medium term (subject to feasibility findings).</p>	<p>Chief Executive's Response The Naas – Baltinglass Greenway relates to the former Tullow railway line in County Kildare. Objective RE O134 in Chapter 4, states the following 'Investigate the feasibility of developing a walkway/cycleway along the former Tullow railway line in County Kildare.'</p> <p>The submission has made a strong argument for a proposed Greenway link between the Naas to Corbally Harbour Greenway and the Naas to Baltinglass Greenway which would provide an opportunity to interconnect the numerous linear routes that radiate south from Naas town centre. It is therefore considered that the feasibility of this Greenway Link should be explored further.</p> <p>An additional objective below TM O21, which looks at the feasibility of the above Greenway is considered to be the most appropriate option in this instance.</p> <p>As part of the same submission it is noted that changes are requested to Objective LR O50 in Chapter 13 however it is considered that the recommendation as below adequately addresses same. Furthermore, a change is proposed to Objective RE O134 (Chapter 4) arising from this submission which should also be noted.</p> <p>Chief Executive's Recommendation Add the following new objective after TM O21: Investigate the feasibility of connecting the Naas to Corbally Harbour Greenway with the proposed Greenway along the former Tullow railway line/ Naas-Baltinglass Greenway and, where considered feasible, to initiate the delivery of this</p>

			<p>project within the lifetime of the Plan in conjunction with all relevant landowners.</p>
<p>2</p>	<p>Greenway Delivery</p>	<p>Particular concern raised in relation to a proposed industrial solar farm at Swordlestown which, if granted, would result in the loss of 500m of the Naas to Baltinglass Greenway.</p> <p>Summary of Appendix as below: Swordlestown Industrial Solar Development (Planning Ref. 22/111), which is proposed to be constructed directly on top of the Naas to Baltinglass designated Regional Greenway (Old Sallins to Tullow rail line) is highlighted which would be contrary to the NTA Naas-Baltinglass route as a Regional Greenway in the GDA Cycle Network Plan.</p> <p>Add necessary objectives to Sustainable Movement Section of CDP, including amending TM O21 to add a reference to the NTA GDA 2013 Cycle Network Plan K17 (Naas-Baltinglass Greenway) as well as NTA (K13)</p>	<p>Chief Executive's Response The Naas Canal Greenway (Sallins – Herbertstown – towards Kilcullen) outlined in the submission relates to the Naas to Corbally Harbour Greenway, which is identified in TM O21 of Chapter 5 of the dCDP, and states the following 'Implement the greenway and blueway projects that promote walking and cycling in conjunction with the relevant organisations and bodies including:</p> <ul style="list-style-type: none"> • Naas to Sallins Greenway and Naas to Corbally Harbour greenways and linking these to the national Grand Canal Greenway network....' <p>The Naas – Baltinglass Greenway relates to the former Tullow railway line in County Kildare. Objective - RE O134 in Chapter 4, states the following 'Investigate the feasibility of developing a walkway/cycleway along the former Tullow railway line in County Kildare.'</p>

		Naas Canal Greenway (Sallins – Herbertstown – towards Kilcullen.	<p>The submission has made a strong argument for a proposed Greenway link between the Naas to Corbally Harbour Greenway and the Naas to Baltinglass Greenway which would provide an opportunity to interconnect the numerous linear routes that radiate south from Naas town centre. It is therefore considered that the feasibility of this Greenway Link should be explored further.</p> <p>An additional objective below TM O21, which looks at the feasibility of the above Greenway is considered to be the most appropriate option in this instance.</p> <p>Furthermore, a change is proposed to Objective RE O134 (Chapter 4), see recommendation to Submission No. 9 in Chapter 4.</p> <p>Chief Executive’s Recommendation See recommendation to Submission No. 9.</p>
556	Mary Flaherty & Brian Giblin	The proposed greenway along the disused Sallins to Tullow railway line (National Transport Authority Cycle Network Plan) for the Greater Dublin area, will run through Coughlanstown and Harristown townlands. The submission supports the development of the Sallins to Tullow railway line greenway. The Development Plan should prioritise this green way (under policy TM P2) and target its delivery by end of 2029. The designated Regional and Local Greenway Routes within Kildare must be given special protection against development upon the Greenway Route corridor, and this should be clearly articulated in the Development plan.	<p>Chief Executive’s Response</p> <p>The Draft Plan must balance the needs of, inter alia, rural based industries including agriculture but also related to the bloodstock industry as well as housing and employment at appropriate locations, in accordance with the policies and objectives of the Draft Plan, while all the while being cognisant of the significant number of landscape designations at a local, national and international level.</p> <p>Notwithstanding the above however, it is an objective of the Draft Plan (RE O134) to investigate the feasibility of developing a walkway/ cycleway along the former Tullow railway line in County Kildare. There are numerous policies and objectives in the Draft Plan (including Ch 12) that address the concerns raised in relation to biodiversity.</p>

		The plan should also set policy for the development of this greenway so that its development does not impact harmfully on local farms, biodiversity or ecology.	Chief Executive's Recommendation No change to the draft Plan.
28	Cathy Meade	<p><u>Protection of Greenway routes.</u> The proposed greenway starting from near the Naas lakes and along the old Tullow railway line would be a great addition.</p> <p>There should be a policy objective inserted into the Development Plan prioritising the designated Greenway route and ensuring its delivery by 2030.</p>	<p>Chief Executive's Response The former Tullow railway line in County Kildare has an Objective - RE O134 in Chapter 4, which states the following 'Investigate the feasibility of developing a walkway/cycleway along the former Tullow railway line in County Kildare.'</p> <p>This objective is identified as a short term objective (i.e. to be undertaken within 2 years of the adoption of the Plan) as set out in Appendix 12, Monitoring & Implementation Framework.</p> <p>An additional objective in Chapter 5 that relates to the former Tullow railway line is therefore not considered necessary.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
127	Naas Action Group	<p><u>Phase 1 of the Naas to Pipers Hill / Killashee Greenway</u> The submission refers to the delivery of Phase 1 of the Naas to Baltinglass Greenway connecting Naas town to Pipers Hill and Killashee. It is stated that a full report is attached, however there is no report attached to the submission.</p> <p>It is further stated that the greenway will provide a segregated and safe 1.5km cycling / walking route from Naas town directly to the Pipers Hill area / school</p>	<p>Chief Executive's Response The Draft Plan is supportive of projects which promote walking and cycling. The subject route is included in the Naas / Sallins Transport Strategy. There is also an action within the Naas Local Area Plan 2021-2027 "to progress the delivery of key measures outlined in the Naas / Sallins Transport Strategy 2020 on a phased basis as funding is secured". It is considered appropriate to replicate this action in the Draft Plan under Section 5.4.1.</p> <p>Chief Executive's Recommendation</p>

		<p>complex for circa 1800 students. In addition, it will relieve traffic congestion on the Kilcullen Road.</p> <p>It has stated that the project has been identified as a priority by the NTA with scheduled completion by 2030. Kildare County Council is therefore asked to prioritise its delivery in the County Development Plan to ensure the route is developed.</p>	<p>Add the following action to Section 5.4.1 of the Plan: Progress the delivery of key measures outlined in the Naas / Sallins Transport Strategy 2020 on a phased basis as funding is secured.</p>
34	Clifford Reid	<p><u>Cycleway / Walkway & Riparian Barrier for the River Barrow</u></p> <p>It is proposed the historic Barrow Drainage Scheme access routes and trails along the eastern bank of the river Barrow between Monasterevin and Athy be re-opened, upgraded and re-developed to provide a walking / cycling / canoeing route and riparian barrier linking both towns. Establishing a Blueway / Greenway route along this corridor will provide many opportunities e.g., circular routes allowing visitors to park then walk, cycle or canoe and return to their vehicle and to host events such as canoeing races. A circular canoeing route taking in both the Grand Canal and River Barrow will not only complement the Barrow Blueway but enhance its usage and attractiveness. This proposal would add circa 21 kilometres of walking and cycling infrastructure to the county.</p> <p>A riparian barrier along the 21km route would provide protection for the River Barrow (SAC - Special Area of Conservation), which is one of the most under protected waterways in Ireland with nitrate levels more than most other water bodies. Appropriate planting and habitat re-establishment will help prevent excess nitrates and agriculture run-off entering the river. Exposing people to riverside habitats will help re-connect people with nature and the outdoors.</p>	<p>Chief Executive's Response</p> <p>The Draft Plan has an action in relation to the establishment of walking and cycling routes, including TM A5 which is to prepare a walking and cycling strategy to identify and invest in new routes. There is also an objective (LR O42) to lead and support the extension and interconnection of Greenways, Blueways, Peatways and trails within and outside the county while TM O21 will investigate the feasibility of further connections from existing and proposed greenways in the county. However, the benefits of the subject proposal are acknowledged, and it is proposed to amend the Draft Plan with respect to Objective TM O21 to specifically investigate the feasibility of providing the proposed route.</p> <p>Regarding protection of the River Barrow, there are several objectives such as IN O52 in relation to protecting water quality from pollution by agricultural sources and promoting good farming practices in accordance with the Nitrates Directive (91/676/EEC) and Action Programme 2017-2021, in addition to LR O22 which is to co-operate with relevant departments in the protection and conservation of the River Barrow along with other watercourses. Furthermore, BI O24 requires any development within or adjacent to waterways to have regard to riparian buffer zones and potential uses identified in Table 12.4 of the Draft Plan.</p>

			<p>Chief Executive's Recommendation</p> <p>Add the following wording/bullet point at the end of TM O21:</p> <ul style="list-style-type: none"> Investigate the feasibility of re-opening/upgrading and re-developing the historic Barrow Drainage Scheme access routes and trail along the eastern bank of the river Barrow between Monasterevin and Athy.
308	Irene O'Neill	<p>The submission states that TM O21 refers to the Grand Canal Greenway running from Dublin to the River Shannon.</p> <p>The submission supports TM O89 and would like the opportunity to work with KCC and Waterways Ireland to fulfil the objective.</p>	<p>Chief Executive's Response</p> <p>The error highlighted in Objective TM O21 could not be found there was no reference to the River Shannon in the objective referred to.</p> <p>In relation to the objective to improve connectivity across the railways and canals in County Kildare (TM O89, refers) as per the Implementation and Monitoring Framework (Appendix 12) this will be implemented through the development management process and the Roads Department. Therefore, it will be subject to public consultation either through a Part 8 application or a planning application under the Planning and Development Act 2000 (as amended).</p>
			<p>Chief Executive's Recommendation</p> <p>No change to the Draft Plan.</p>
222	David Wright	<p><u>Greenways and Blueways</u></p> <p>The Naas Sallins walkways and towpaths need to be joined up and a footbridge delivered near Sallins Dry Dock to create a recreation loop for the people of Sallins and Naas.</p>	<p>Chief Executive's Response</p> <p>Objective LR O50 of the CDP is to facilitate the delivery of the (i) Naas to Sallins Greenway and (ii) Naas to Corbally Harbour Greenway in cooperation with landowners, Waterways Ireland and Government Departments. Furthermore, Objectives RE O137 and TM O21 expand on this to develop the harbour for amenity purposes. It is understood that as part of the recently permitted Sallins Amenity Park provision will be made to allow a footbridge to facilitate a looped walk. It should also be noted that the</p>

			Naas Local Area Plan 2021-2027 includes a number of objectives to support pedestrian and cycling connectivity to Sallins via the canal.
			Chief Executive's Recommendation No change to the Draft Plan.
445	IWAI Kildare	<p>TM O21 is referenced, and it is stated the Grand Canal Greenway runs from Dublin to the River Shannon.</p> <p>TM O89, is also referred to and IWAI welcomes the opportunity to work with stakeholders to ensure any new crossings across canals do not impede the passage of boats navigating the waterways.</p>	<p>Chief Executive's Response The positive comments in relation to the above are noted and acknowledged. It is considered reasonable to amend TM O89 to ensure that stakeholders are consulted.</p> <p>Chief Executive's Recommendation Amend TM O89 as follows: Improve connectivity across the railways and canals in County Kildare, in conjunction with relevant stakeholders including Irish Rail and Waterways Ireland, to ensure new crossings do not impede the safe passage of boats navigating waterways.</p>
446	David Knox	<p>TM O21; Grand Canal Greenway runs from Dublin to the River Shannon.</p> <p>TMO89: IWAI Kildare continues to welcome the opportunity to work with KCC, Waterways Ireland and boat owners, to ensure any new crossings across the canals do not impede the passage of boats.</p>	<p>Chief Executive's Response See response to Submission No. 445.</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 445.</p>
THE 'GALLOPS AVENUE', NAAS			
Many submissions were received relating to the inclusion of the Gallops Avenue in Table 5.4 of Chapter 5 – Priority Road and Bridge Projects. The following submissions (153 no.) were opposed to the proposed route:			

40 – Alan Hyland
 41 – Paul McGrane
 44 – Yvonne Codd
 45 – Deiric McCann
 48 – Mark Deasy
 49 – Michelle O’Rafferty
 52 – Andrew McCudden
 58 – Christine O’Sullivan
 60 – Aisling Twomey
 62 – Kieron & Patricia Gammell
 64 – Tadhg O’Sullivan
 65 – Roddy & Louise Cummins
 66 – Orlaith Cahalan Bergin
 67 – Paul Drennan
 69 – Mary Taaffe
 70 – Edmund Murphy
 71 – Shane Blake
 73 – Roisin Stewart
 74 – Cormac Ahern
 75 – Orla Ahern
 76 – Pat Breen
 77 – Naas Combined Residents Group
 79 – John Johnson
 82 – Noel Geary
 83 – Kevin Mullaney
 84 – Lana Mullaney
 85 – Derek Leahy
 88 – Bridget Leahy
 89 – Michael Skelton
 91 – Cormac O’Donovan
 92 – Chris Bergin
 95 – Gerard Burns
 102 – Aideen O’Sullivan
 103 – Catherine Corrigan
 105 – Ivan Codd

106 – Audrey Barlow
 108 – Coleman E. Mooney
 110 – Margaret Mooney
 123 – Tara Doorey
 124 – Kate Doorey
 125 – Antoinette Doorey
 126 – Aidan Doorey
 141 – Maureen Boylan
 142 – James Codd
 146 – Alan Devine
 150 – Eddie Lenehan
 151 – Jana Drennan
 154 – Marzena Kelleher
 155 – Ciaran Kelleher
 157 – Bridget Geary
 158 – Michelle Blake
 165 – Colin Rafferty
 178 – Carmel Geissel
 182 – Catherine Redmond
 183 – Eoghan Redmond
 184 – Pdraig Redmond
 185 – Barry Redmond
 186 – Mountain View Residents Association
 187 – Catherine Moran
 188 – Frank Fogarty
 198 – Brian Clohessy
 204 – Louise Hyland
 208 – Etienne DuPlesses
 212 – Louise Donnelly
 218 – Helena Hearne
 224 – Gemma Byrne
 225 – Matthew McKeon
 229 – Eva Walsh
 232 – Martin Waters

235 – Gavin McDermott
 237 – Ronan Foley
 238 – Gilmar Uyema
 239 – Mark Noonan
 245 – Fiona Uyema
 248 – Aine Loughran
 250 – Niall Purcell
 253 – Lena Lenehan
 260 – Annette and Stephen Fadian
 264 – Joshua Bakker
 271 – Deirdre Curtin
 284 – Kingsfurze Residents Association
 286 – The Paddocks Residents Association
 294 – Maria Hutchin
 304 – Carol Frost
 306 – Camilla Foley
 307 – Debbie Trundle
 309 – Doris Whelehan
 310 – Declan Holohan
 319 – Conor Prasad
 325 – Ravi Prasad
 327 – Munroo Prasad
 332 – Robert Kennedy
 333 – Conor Clavin
 334 – Marion Rackard
 335 – Marian Colleran
 338 – Claire Prasad
 339 – Mary Garrick
 340 – Kings Court Residents Association
 341 – Grainne McGlinchy
 342 – Adrian Geissel
 344 – Mark Neylon
 348 – Patrick Shore

355 – Keith Mason
360 – Tom O'Donovan
369 – Shaun Malone
384 – Ruth Neylon
387 – Sinead Ruane
388 – John O'Connell
389 – Niall Hynan
391 – Grace Clancy Hynan
397 – Gina McCawley
411 – Elizabeth Geissel
412 – Marcella Sheehan
415 – Kevin Bonner
416 – Deirdre Delaney
430 – John Kehoe
438 – Sandra Forde
441 – David Forde
453 – John Murray
460 – Gail Mooney Collins
463 – Raymond Keaney
473 – John Collins
474 – Barry McCarthy
477 – Paul Murphy
480 – Richard Behan
481 – Cathal Ruane
487 – Imelda Behan
489 – Teresa Behan
493 – JL Sheridan
506 – Richard and Eileen Kearns
514 – Mark Hendrick
519 – Kate McCoy
524 – Emma Fitzgerald
525 – Rhonda Willoughby
530 – Fiona Duignan
537 – Emer Hynan
540 – Barbara Hennessy

543 – Leslie Kelly
545 – Grace Williamson
548 – Niamh Morrin
554 – Anna Williamson
571 – Anthony Cunniam
575 – Dr. Colette Halpin
569 – Hester McAllister
570 – Anna Byrne
580 – Angela O'Beirne
581 – Liam O'Beirne
584 – Marina Carpenter
585 - Breffni Carpenter
586 – Maria and JP Grogan
587 – Aimee Carpenter
601 – Katie Gammell
602 – Samuel Gammell

The primary concerns regarding the proposed route related to inter alia the following:

- The road proposal will not address the transport and movement needs of the county, or of Naas.
- The route does not have the support of many Naas residents as evidenced by the numerous submissions to the Local Area Plan, Transport Strategy and pre-draft stage of the Kildare CDP.
- The proposal was defeated in 2019 by members of the Naas MD. It is unacceptable to disregard this democratic decision by including it in the County Development Plan, impacting on the democratic rights of constituents of Naas.
- Kildare County Council has ignored the significant opposition to the road. How many times do the residents have to say No to this road? Public opinion should be listened to. Attempts to force through the ring road in a clearly inappropriate place raise fundamental questions about democracy, transparency and governance.
- It is requested the Gallops Avenue Road be deleted from the Plan.
- The resulting traffic utilising the Gallops Avenue will have an adverse effect on nearby residents and communities.
- Traffic at the Dublin Road junction will increase substantially, affecting nearby residents and users of this junction.
- It will cause a bottleneck at crossroads exiting onto the Dublin Road junction which intersects with the Dublin Road and with Monread housing.
- Commuters will change their travel routes from the Sallins Road to move through residential areas onto the proposed route causing traffic issues in the area. It will compound commuting traffic and congestion.
- Concerns are also raised about the amount of taxpayers' money being spent on the proposed route which may never materialise. Public money should not be spent on this project, but on an outer relief road.
- It is suggested that a cycling greenway would be more suitable instead.
- The proposed route would lead to traffic congestion with congestion already being an issue on race days and an already hazardous Tipper Road.
- Concerns in relation to the volumes of traffic that would result and safety for children walking and cycling.
- Concerns in relation to noise and air pollution, from HGVs

Chief Executive's Response

The Gallops Avenue is identified as a Priority Road Project in the CDP to enable the sustainable, economic, and social development of Naas, a Key Town for County Kildare within the Eastern and Midlands Region.

This connecting piece of infrastructure will address congestion and facilitate active travel measures, whilst promoting compact urban growth and sustainable mobility to align with the core principles of the National Planning Framework.

In December 2021, the Naas Local Area Plan 2021-2027 was approved by Kildare County Council. The LAP includes an objective (MTO 3.2) to support the implementation of The Gallops Avenue along an identified and preferred route. A vigorous assessment of alternative routes was carried out as part of the Naas Sallins Transport Strategy, a precursor to the Local Area Plan.

Furthermore, objective MTO 3.3 of the Local Area Plan is to comprehensively re-examine the design of the road, focusing on green initiatives, expanded footpaths & cycle ways and tree lined verges, in compliance with DMURS and the NTAs National Cycle Manual, in order to provide a safe environment for all road users. The detailed design of the road will be subject to environmental screening (AA and EIA) and further public consultation at the project stage.

(Note: Monitoring of traffic speeds is a matter for An Garda Síochána).

<ul style="list-style-type: none"> - Concerns in relation to the speed of traffic (including HGVs) along the route and the visual impact of the proposed route on nearby residential areas - Concerns about the transport of hazardous chemical materials through built up areas very close to existing houses. - The proposal is outdated and not fit for purpose. It was drafted when Naas was a small dormitory town but it has been outpaced by extensive development. - An outer route is required to facilitate the future development of the town instead and this outer route should be a stated objective of KCC. - It's geographic location in relation to established residential areas is of concern. - It is suggested that an alternative route from 'The Ball' to the east of the racecourse beyond Craddockstown should be the only route. - An alternative route should be put forward connecting the Maudlins Roundabout and Johnstown Village or at Junction 8 on the N7. - An outer ring road is the optimal solution and the TM O83 recommendation that land at Junction 8 of the N7 (Johnstown) be retained for future access to Naas is the natural answer. - HGV's would be travelling through residential areas. HGVs starting up at traffic lights will massively increase air pollution. - Concern that the proposed route would disrupt the seclusion that the KARE Naas Local Adult Day-Care Centre enjoys. - Re-naming a road to the more eloquent "Gallops Avenue" doesn't make it safer or have less emissions than the original Road Plan. - How do KCC expect to monitor the speed limit on this proposed route? - The plan to move more traffic onto the Tipper Road is worrying for residents. It does not have sufficient footpath space and is heavily used by school children walking and cycling. As it can't be widened, this will create a dangerous road for pedestrians and car traffic. - If constructed, the road would contradict other parts of the plan which aim to improve living environments for residents. It would run through a residential area and have adverse environmental and health impacts. - This conflicts with Healthy Placemaking principles established in Chapter 14 of the Plan. It will affect views from homes, resale values and play areas. 	<div style="border: 1px solid black; padding: 5px;"> <p>Chief Executive's Recommendation No change to the Draft Plan.</p> </div>
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- The feasibility of the proposed road is questionable as best practice design in accordance with DMURS may not be achievable.
- The Ballymore development of 385 houses will put pressure on council members to vote and approve this new plan, but this is not a reason to approve it. A ring road is a better alternative.
- This proposal will decimate residential areas, remove calm and serenity of the Racecourse and not contribute to traffic congestion (sic).
- The racecourse must be preserved as a green lung for the town, for recreational and amenity purposes.
- It is directly at odds with protecting the environment and biodiversity as it will result in the loss of important green space.
- Putting a road through the racecourse behind Woodlands estate (a beautiful and mature part of Naas) is completely unsuitable.
- We believe there is sufficient material for a useful examination, in court, the media, via a political campaign, or all three, of how local government, local democracy, and local planning appears to work in this country. We believe this to be of national interest.
- It will create increased exposure to theft and burglaries.
- No consultation has taken place regarding the environmental impact of the road. Residents of the area are not aware of any adequate independent environmental impact assessment.
- It will increase congestion on Blessington Road, Ballycane Road and at Craddockstown Junction.
- The modelling undertaken does not reflect traffic from the current Blessington Road development. In planning for the future need, the alternative route from opposite the Longstone development to the Dublin Road is more suitable.
- Residents of the area have been contributing to this debate since 1999. It is debatable whether the plan and slight deviations proposed will have the desired traffic relief and now it's completely outdated.
- It will cause a loss of very important visual amenity.
- Concerns that the Sundays Well and adjoining green areas have not been considered in the environment report.
- Alternative routes were not properly considered.
- The road would reduce the open space in Racecourse Gate to below the 15% standard included in KCCs management standards.

- High block walls along the road will be unsightly and encourage anti-social behaviour, dumping etc.
- Local residents have become accustomed to solitude, peace and quiet in cul-de-sacs and therefore the road will affect the settled nature of the community with the resulting loss of amenity.

Submissions in support of the Road Project were received from the following:

267 – Majella and John O’Keeffe

296 – John Dowey

305 – Ger Lane

Submissions received supporting the Gallops Avenue Road objective raised the following issues:

- The construction of this road is for the greater good of Naas and is long overdue.
- It will meet current and future transport and movement needs of the town as a whole, supporting residents, business and visitors.
- It will improve the town by diverting and reducing traffic, making streets safer for pedestrians and cyclists.
- It will create a better flow system.
- It will open up safer spaces for cyclists and pedestrians, as a healthier alternatives to driving.
- It will create a more welcoming shopping and visitor experience.
- It will enhance the liveability of Naas town by reducing the pollution, noise and delays caused by heavy vehicles and traffic jams.
- The current road network is inadequate in meeting the needs of a growing town and is overstretched.
- The road will help future proof Naas by giving space for more sustainable transport methods.

LOCAL AREA PLAN RELATED

10	Hazel Whiteley	<p>Newbridge: Traffic congestion and the 10-minute settlement concept</p> <p>The submission refers specifically to Newbridge and identifies several issues within the town relating to traffic congestion and achieving the 10-minute settlement concept outlined in the Draft Plan. The following issues are highlighted:</p> <p>Urban design for the town and surrounding area has been lacking.</p> <p>Traffic jams are a major issue that could be improved for residents of Newbridge.</p> <p>The town is extremely difficult to access and exit, especially those dependent on a car due to age / disabilities.</p> <p>The submission also offers a number of detailed solutions to the problems outlined above including the second bridge crossing, a park and ride facility (especially on match days), pedestrian crossings outside all schools, car parking should not compete with bike lanes, provision of multi-storey car parks, re-organization of current entrance/exit arrangements at St. Conleth's GAA, re-introduction of parking spaces at the front of the theatre.</p> <p>In addition to the above, there are specific road improvement proposals to help reduce congestion which include the improvement of the intersection between the L7042 and R413, slipways at Green Road and Moorefield Road, improvements along Morristown Road and slip roads between Aldi and Lidl.</p>	<p>Chief Executive's Response</p> <p>There are many objectives within the Draft Plan which already address some of the concerns raised such as "to support and promote the '10-minute settlement' concept across all towns and villages in the county and require all Local Area Plans to incorporate policies and objectives that will assist in its implementation".</p> <p>In relation to the second bridge there is an objective "to support and promote the delivery of a second bridge crossing in Newbridge as a priority of this development plan". Furthermore, there are several objectives / actions in the Draft plan which promote park and ride facilities and safer school routes in the county which would include Newbridge.</p> <p>The proposals relating to local roads and parking interventions are noted, however, it is considered more appropriate that such proposals would be considered as part of the Traffic Management Plan that will inform the emerging Newbridge Local Area Plan, preliminary work for which has already commenced.</p> <p>Chief Executive's Recommendation</p> <p>No change to the Draft Plan.</p>
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13	Dermot Rowan	<p>Infrastructure requirements Confey/Leixlip</p> <p>The existing road structure in the Confey area is not fit to service the expanded population of Leixlip or the expected increase in population. Lands at Confey should be developed which would provide additional, badly needed housing and also a parallel increase in the quantum of supporting social infrastructure.</p> <p>There are concerns regarding the current situation within Leixlip including 13 derelict buildings along the Main Street. Captain's Hill needs to improve to adequately accommodate Leixlip.</p> <p>The submission identified the following choke points in the road structure:</p> <ul style="list-style-type: none"> • Cope bridge is collapsing and was not designed to carry the existing traffic volumes. • Captain's Hill is not designed to cope with the current traffic volumes. • Kellystown Lane with its one-way bridge cannot cope with the increasing traffic volumes. <p>The submission proposes the following solutions:</p> <ul style="list-style-type: none"> • Replacement of Cope bridge with a pedestrian and cycle lane incorporated. • Building a new road linking the N4 at Tara Co-op with the N3 at Clonee, not routed through St Catherine's park. • Widen the R149 at Confey, increase the footpath size and provide a cycle lane. • Develop the R149 to lead to a new bridge south of Intel, over the Rye River, linking Confey to the N4. 	<p>Chief Executive's Response</p> <p>The comments are noted. However, the specific issues are of a more detailed nature, which, it is considered, would be more appropriately addressed through either the statutory Local Area Plan (LAP) process or a non-statutory Masterplan process. The Leixlip Local Area Plan (2020-2023) was informed by the Leixlip Strategic Transport Assessment (2019) and acknowledges that the potential for significant development to the north of the Royal Canal and Cope Bridge will require improved access to this area as part of the future development of the strategic road network. The LAP includes a number of objectives (MT2.9, MT3.5, MT3.6, etc.) that partly address the issues raised in the submission.</p> <p>In addition to the LAP, the draft Kildare CDP 2023-2029 addresses the issues at a higher level as follows:</p> <ul style="list-style-type: none"> • It is an objective (TM O7) of the Plan to introduce measures to reduce traffic congestion in town centres. • Action TM A21 of the Draft Plan, requires all multi-unit developments to submit mobility management plans and travel plans and to implement mobility management initiatives to minimise the impact of new developments on the road and street network of the County. • Table 5.5, Nr. 12 of the Draft Plan identifies the R149 for improvement. • It is a priority project of the Draft Plan to examine options for the delivery of an orbital link road from the M4 (at Lucan / Leixlip) to the M3 (Junction 4
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		<ul style="list-style-type: none"> Consider making the main street in Leixlip one way, with traffic flowing west to east. Establish a park and ride facility (including bicycle parking), in part of the field adjacent to the canal, opposite the Confey GAA facility. 	<p>Clonee / R157 Dunboyne-Maynooth Road), see Table 5.4, Project Nr.3.</p> <p>Furthermore, and in relation to this submission particularly, action UD A2 of the Draft Plan states that it is an action of the Council to prepare a number of Masterplans including for Lands at Confey, Leixlip where the detail of the issues raised in this submission can be further addressed.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
219	Cormac Ahern	<p><u>Introduction of a link road in Naas</u></p> <p>This submission objects to a road linking Millbridge Lane and Finlay Park. The grounds of this objection are that such a road would adversely impact the quiet estate of Finlay Park and the traffic it would provide for would impact the environs of the canal with its associated habitats. Furthermore, it is stated that it is inconsistent with government policies and will not resolve the traffic issues in the area.</p>	<p>Chief Executive's Response</p> <p>In December 2021, the Naas Local Area Plan 2021-2027 (LAP) was approved by Kildare County Council. Section 10.7.3 of this LAP allows for a detailed feasibility study for a bus only route to link Millbridge Lane and Finlay Park. This local route and associated bridge crossing will be further considered in the upcoming Naas Northwest Quadrant Masterplan. It is not listed as a Priority Road Project in table 5.4 of Chapter 5 'Sustainable Mobility and Transport' of this Draft County Development Plan.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
NOISE POLLUTION			
170	Mark Bruns	<p>The submission requests that the M4 be re-surfaced next to Leixlip to reduce noise levels in nearby housing estates and improve the quality of life for those living</p>	<p>Chief Executive's Response</p> <p>The Draft Plan is a land use plan and does not address road maintenance issues.</p>

		there. This will also lead to reduced CO2 emissions from cars helping Ireland reach its climate goals.	Chief Executive's Recommendation No change to the Draft Plan.
299	Ann Moran	It is requested that the Council consider the re-surfacing of the M4 Motorway at the junctions between Celbridge and Maynooth to ensure excessive noise pollution is abated in line with EU noise related laws and regulations.	Chief Executive's Response All resurfacing of motorways is undertaken by Transport Infrastructure Ireland. The Council will ensure such works meet national and international noise pollution guidance using Objectives TM O63 and TM O64 in the Draft Development Plan. Objective TM O64 in Chapter 5 'Sustainable Mobility & Transport' ensures the requirements of S.I. No. 140 of 2006 Environmental Noise Regulations and the recommendations of the Kildare Noise Action Plan 2019-2023 are met. These seek to reduce, where necessary, the harmful effects of traffic noise, through appropriate mitigation measures that meet the best environmental options. Furthermore, Objective TM O63 in the same chapter ensures that all new developments in proximity to Motorway Routes, National Routes, Regional Routes and other heavily trafficked roads are spatially and acoustically assessed and designed to minimise noise impact.
			Chief Executive's Recommendation No change to the Draft Plan.

CHAPTER 6 – INFRASTRUCTURE & ENVIRONMENTAL SERVICES			
Sub No.	Name	Summary of Issues Raised	Chief Executive's Response & Recommendations
WATER, WASTEWATER & SURFACE WATER			
409	Irish Water	<p>Submission by Irish Water (IW) notes, and welcomes, the inclusion of many objectives in Chapter 6 of the draft Plan that will support the delivery IW plans, programmes and policies. States that these policy objectives will also ensure the sustainable management of water and wastewater in line with national and regional objectives as stated in the National Planning Framework (NPF) and the Regional Economic Spatial Strategy (RSES) for the East and Midlands Region.</p> <p><u>Infrastructural Capacity in Kildare: Water Supply</u> Submission states that there is generally capacity available to meet the population targets given in the Core Strategy but notes some levels of service improvements will be required within some areas. Further notes that leakage reduction and/or capital investment will be required to maintain/improve levels of service as demand increases. States that these proposals will be developed and prioritised through the National Water Resources Plan and investment planning process.</p> <p>Notes that Irish Water and the Council are continually progressing leakage reduction and mains rehabilitation activities, both of which are essential to facilitate compact growth and that both organisations will continue to monitor the performance of the networks to</p>	<p>Chief Executive's Response The contents of the submission by Irish Water are noted by the Council.</p> <p>See response to Submission No. 550 (Office of the Planning Regulator) & 104 (Office of Public Works)</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 550 (Office of the Planning Regulator) & 104 (Office of Public Works)</p>

	<p>ensure that the most urgent works are prioritised as required.</p> <p>States that the Water Supply Project (WSP) remains the project identified to deliver a 'new source' of water supply for the Eastern and Midlands area. States that while various analysis has been undertaken to date it remains that the WSP is the preferred approach, which will require review having regard to the National Water Resources Plan (Framework and Regional Plans and associated statutory consultations and SEAs). Notes that following the publication of the draft Regional Plan for the Eastern and Midlands Region (Group Area 4), the WSP will be reviewed, after which it is anticipated that WSP will be subject to further public consultation.</p> <p>Refers to abstraction legislation, which is expected to be enacted later this year, after which planning permission will be sought from An Bord Pleanála for the Strategic Infrastructure Project. A separate licence application will be made to the EPA.</p> <p>Submission includes a comprehensive update to IW projects in the county since its last submission to the Issues Paper at the pre-draft stage of consultation.</p> <p><u>Infrastructural Capacity in Kildare: Wastewater Treatment</u></p> <p>Submission states that the GDD project will assist the GDA local authorities in delivering on their plans for future development; not just in terms of local spatial planning policy but also in supporting consolidation of the metropolitan area and sustainable population growth along with economic prosperity in the long term. Notes that an Bord Pleanála granted a Strategic</p>	
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	<p>Infrastructure Development permission for GDD in 2019, however that decision was quashed following a legal challenge. Submits that the project's strategic importance remains unchanged.</p> <p>States that the county is served by a large number of wastewater treatment plants and that available capacity at any plant varies daily. In this regard it notes that currently the Allenwood and Kilberry treatment plants have no capacity and no project planned. States that any expansion would have to be developer-led. Submits that Allenwood sewer network is also constrained.</p> <p>States that in Athy, headroom at the wastewater treatment plant has considerably reduced since the making of the Local Area Plan and the Issues Paper stage of this CDP process. The submission notes that it may not be possible to service all the projected target population.</p> <p>The submission outlines that Rathangan has some constraints, and it may not be possible to service all the projected target population. Investigations into infiltration into the system may improve the constraints. Regarding Derrinturn, the submission notes that it currently has no headroom. However, a project has commenced and will be delivered within the lifetime of the Plan.</p> <p>Submission notes that where there are constraints, applications for developments would be on a first come, first served basis. Submits that if a project is associated with a constrained area, then any infrastructure will be developer led and that IW can work with developers to</p>	
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	<p>form the best solution for a particular site. States that this would be through the Connections and Developer Services section of Irish Water's website, as follows: https://www.water.ie/connections/developer-services/</p> <p>Submission notes the inclusion of a comprehensive update to IW projects in the county since its last submission to the Issues Paper at the pre-draft stage of consultation.</p> <p>The submission outlines a number of Capital Investment Plan Programmes pertinent to Kildare County Council: Drainage Area Plans where there are network constraints:</p> <ul style="list-style-type: none"> • Lower Liffey Valley, covering Straffan / Celbridge / Maynooth / Kilcock and Leixlip. Stage 4 commencing Q3 2022 • Upper Liffey Valley, covering Naas, Kill, Johnstown, Clane, Sallins, Prosperous, Kilcullen, Newbridge, Athgarvan, Rickardstown to commence 2022. <p><u>General Comments Lands Zoned Strategic Reserve (only for note)</u> Notes that lands zoned as Strategic Reserve are generally not serviced or nearby services are at or near capacity. States that there are no current projects in the current Capital Investment Plan to service these areas.</p> <p><u>Road and Public Realm Projects</u> Submits that early engagement in relation to planned road and public realm_projects is requested to ensure public water services are protected to enable IW to plan works accordingly and minimise disruption. States that planned public realm and road projects have the</p>	
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		<p>potential to impact on Irish Water assets and projects e.g. tree planting, building over of assets, new connections, programming network upgrades etc. Asserts that development in the vicinity of IW assets should be in accordance with its Standard Details and Codes of Practice, and Diversion Agreements will be required where an IW asset is diverted or altered.</p>	
552.	Department of Housing, Local Government and Heritage	<p>Amend Objective IN O6 the Department recommends that the phrase 'where appropriate' should be removed</p> <p>6.6 Surface Water/Drainage The Department welcomes Policy IN P4 The design of Sustainable Drainage Systems (SuDS) is best addressed at a macro level and consolidated solutions should be examined which allow for the aggregation of SuDs measures rather than a fragmented and phased approach.</p> <p>Reference to Interim Guidance Document 'Nature based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice'</p> <p>The Department welcomes objective IN O24 and recommends that a SuDs checklist is included with planning applications, as appropriate, outlining all SuDs measures considered and the reasons for selecting/not selecting each measure.</p> <p>Regarding Objective IN O34 OPW guidelines relate to flood risk zones which are not likely to cover the same area as riparian zones as outlined in Inland Fisheries Ireland (IFI) guidance. For example, a flood zone where the probability of flooding from rivers is low (less than 0.1% or 1 in 1000) could extend much further than the</p>	<p>Chief Executive's Response It is not considered appropriate to remove 'where appropriate' from IN O6 as the inclusion of such a buffer may not be possible in all cases.</p> <p>In relation to SuDS see response to OPR submission (No. 550) where SuDS references throughout the CDP are being proposed to be replaced by nature-based drainage solutions instead.</p> <p>In relation to the comments raised with respect to IN O34 it should be noted that Objective BI O24 (Chapter 12) references Table 12.4 which sets out recommended riparian buffer zones and their functional uses. Any proposed zoning maps in the Draft CDP include information on flood risk areas and as part of the preparation of the Strategic Flood Risk Assessment, Justification Tests have been prepared for the various settlements, as appropriate. In response to a submission from the OPR and the OPW, amendments to some of the proposed zonings are being recommended to only permit water compatible uses within such zones. Volume 2 of the Draft Plan includes specific objectives with respect to the small towns, villages and rural settlements (as appropriate) and identifies the land parcels for which a site-specific flood risk assessment must be prepared. Having regard to the above it is not considered necessary to amend IN O34.</p> <p>Chief Executive's Recommendation</p>

		<p>riparian zone. Therefore, to avoid confusion, the Department advises that the two zoning systems must not be included under a single objective. The IFI guidance lists development appropriate to riparian zones and these uses should be referred to in IN 034. The Department advises that water compatible development must only be considered following appropriate flood risk assessment including the carrying out of a justification test. The council should note that the uses listed as 'Water Compatible' in the OPW Guidance is not definitive and other uses should be considered on their own merits following the necessary flood risk assessment.</p> <p>Include an objective: Support the conservation, protection and enhancement of Natural Water Retention Measures (NWRM), as appropriate to the individual catchment.</p> <p>Edit Action IN A4: Prepare and carry out any identified actions of a maintenance programme for river channels, including those identified as historical drainage districts, the responsibility for which lies with Kildare County Council such actions must be subject to Ecological Impact Assessment and Appropriate Assessment in accordance with the EU Habitats Directive.</p>	<p>In relation to SuDS see recommendation to OPR submission (No. 550) where SuDS references throughout the CDP are being proposed to be replaced by nature based drainage solutions instead.</p> <p>Add the following new objective to the plan: Support the conservation, protection and enhancement of Natural Water Retention Measures (NWRM), as appropriate to the individual catchment.</p> <p>Amend IN A4 as follows: Prepare and carry out any identified actions of a maintenance programme for river channels, including those identified as historical drainage districts, the responsibility for which lies with Kildare County Council. Such actions must be subject to Ecological Impact Assessment and Appropriate Assessment in accordance with the EU Habitats Directive.</p>
457	Glenveagh Properties Limited	<p>The submission notes that the policies and objectives in relation to Sustainable Urban Drainage Systems (SuDS) have been updated in the Draft Plan to facilitate greater integration of these measures into the design of new residential development.</p>	<p>Chief Executive's Response See response to Submission No. 550 (Office of the Planning Regulator) with respect to a change to the SUDS policies/objectives of the Draft Plan.</p> <p>Chief Executive's Recommendation</p>

		<p>The submission states that Glenveagh Properties consider that some of the measures being proposed in Section 15.8 of the Draft Plan are overly restrictive in terms of how and where storm water management is provided for in new residential development schemes.</p> <p>The submission proposes the following amendment to Section 15.8 of the Draft Plan as follows:</p> <p>All planning applications for developments shall include proposals for the following:</p> <ul style="list-style-type: none"> - Detailed proposals for the management of surface water, where Nature Based Surface Water Management solutions are considered and prioritised in the first instance. Groundwater monitoring, if required, should last at least 6 months and include at least one winter season. - A Surface Water Management Plan shall be submitted which includes details inter alia the location, design and any future maintenance proposals/procedures required to maintain the surface water management system. - Proposals for surface water management shall be in compliance with the Greater Dublin Drainage Strategy (GDSDS), in particular Volume 2 Chapter 6 Stormwater Drainage Design Criteria, and CIRIA SuDS Manual (C753). - In the event that a Nature Based Surface Water Management solution is not feasible, detailed information must be submitted to explain why it was not considered to be a practical solution. Traditional drainage systems will only be permitted where a demonstrable exceptional circumstance has been provided. 	<p>See recommendation to Submission No. 550 (Office of the Planning Regulator) with respect to a change to the SUDS policies/objectives of the Draft Plan.</p>
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		<ul style="list-style-type: none"> - Sustainable Drainage Systems when included in areas of should not form part of the public open space provision, except where they should be sensitively integrated and contribute in a significant and positive way to the design and quality of open space. In instances where the Council determines that SuDS make a significant and positive contribution to open space, a maximum 10% of the open space provision shall be taken up by SuDS. In the event that underground attenuation storage structures are required, they will not be accepted under areas of public open space, save in exceptional demonstrable situations. - All existing site watercourses shall be retained and existing site pipework should be “de-culverted” where feasible. 	
320	Vera Louise Behan	<p>The Council should work closely with Irish water, to ensure that above adequate, sewerage facilities and drinking water facilities are installed as a prerequisite to developing any residential lands in the settlements of Balitore, Ballyroe, Kilkea Levistown Maganey, Kildangan, Moone, Timolin, Crookstown, Narraghmore, Kilberry, Kilmead, Calverstown, Ballyshannon, Castledermot, Crookstown Nurney, Athy, and any other area where the Council plans to zone residential.</p>	<p>Chief Executive’s Response</p> <p>The water and wastewater capacity infrastructure of each of the above settlements has been outlined in Volume 2 of the Draft Plan. A Sustainable Planning and Infrastructural Assessment (SPIA) was undertaken to assess the suitability of lands in these settlements for future development. Only lands that were considered adequately serviced in terms of sewerage and drinking water facilities were identified for residential development.</p> <p>Irish Water has established a Small Towns and Villages Growth Programme to provide funding for water and wastewater treatment plant growth capacity in smaller settlements. Timolin WWTP has been included as part of this programme for upgrade works and to provide additional capacity. The Council has also nominated Nurney, Calverstown and Kilberry to be included in this Programme.</p>

			<p>Athy has its own Local Area Plan, which was adopted in 2021. This plan ensures that adequate, sewerage facilities and drinking water facilities are installed as a prerequisite to developing any residential lands.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
403	Cairn PLC	The role of KCC in partnership with Irish Water is acknowledged. In this regard an amendment to policy IN P3 is proposed to include the wording "with an emphasis on servicing the key town of Maynooth and self-sustaining towns" after the words settlement hierarchy.	<p>Chief Executive's Response Not accepted. It will continue to be a policy to work with Irish Water to service all towns and villages throughout the county.</p> <p>Chief Executive's Recommendation No change to Draft Plan.</p>
485	Royal Institute of the Architects of Ireland	Development plans should set out how they will contribute to river basin management. This is extremely important if the decline in river quality is to be reversed. Plans should be put in place to reinstate natural river features and to remove unnatural features such as weirs. Where possible culverted streams should be opened to allow fish to move freely, and new culverts and bridges should be designed to avoid the creation of barriers to fish, while proposed nearby developments should be appropriately assessed to guarantee protection of riparian zones.	<p>Chief Executive's Response The Draft Plan contains policies and objectives that contribute to river basin management. These include Policy IN P2 to ensure the protection and enhancement of water quality throughout Kildare in accordance with the EU WFD and facilitate the implementation of the associated programme of measures in the River Basin Management Plan 2018-2021 (and subsequent updates), while there is a further policy (IN P4) to ensure adequate surface water drainage systems are in place which meet the requirements of the EU Water Framework Directive and the River Basin Management Plan to promote the use of Sustainable Drainage Systems. Objective IN O53 assesses applications for developments, having regard to the impact on the quality of surface waters and any targets and measures set out in the River Basin Management Plan and any subsequent local or regional plans.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

413.	Kildare Public Participation Network	<p><u>Water Services</u> Submission requests an additional action (in purple), as follows: New action: Urgently seek adoption of the South-eastern River Basin Management Plan in cooperation with other relevant Local Authorities and stakeholders to meet the requirements of the EU Water Framework Directive to achieve good ecological status by, at the latest 2027.</p> <p>Submission requests an additional action (in purple), as follows: New action: Enforcement and reporting of the Nitrates Regulations within all of Kildare's River catchment areas in line with statutory requirements. https://www.gov.ie/en/publication/b87ad-nitrates-directive/</p> <p><u>Surface Water / Drainage</u> Submission requests an additional objective (in purple), as follows: New objective: Require that established native vegetation should be left in-situ, wherever possible, to intercept, slow down and filter runoff as an integral part of all new development proposals.</p> <p>Submission requests an additional action (in purple), as follows: New action: It is an action of the council to ensure that the construction of swales, ponds and other SUDS or nature-based solutions will not contribute to further native biodiversity loss, by requiring that plans submitted at design stage are under the direction of a suitably experienced botanist/ecologist. Additionally, the</p>	<p>Chief Executive's Response With regard to the requests outlined above, the statutory elements and remit of the Development Plan are set out clearly in the Planning and Development Act 2000, as amended. In preparing the Development Plan, planning authorities must exercise caution not to inappropriately stray into the operation of other statutory codes and regulatory regimes that relate to the development sector, but are outside the remit of a county or city development plan. This is applicable to policies or objectives for non-planning functions governed by other legislation and regulations such as those raised in this part of the submission.</p> <p>In response to issues raised with respect to Section 6.6, see response to Observation No. 4 of the OPR submission</p> <p>The request to include waste 'reduction' initiatives is accepted.</p> <p>Chief Executive's Recommendation In response to issues raised with respect to Section 6.6, see recommendation to Observation No. 4 of the OPR submission</p> <p>Amend IN O42 as follows: Promote and facilitate communities to become involved in environmental awareness activities and community-based waste recycling and reduction initiatives, which lead to a circular economy and local sustainable waste management practices.</p>
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		<p>preferred option in employing these techniques is to allow natural recolonization, or at the very minimum, that any plantings arise from locally sourced native material of native provenance and origin.</p> <p><u>Waste Management</u> Requests amending objective IN O42, (new text in purple, deleted text crossed out), as follows: IN O42: Promote and facilitate communities to become involved in environmental awareness activities and community-based recycling initiatives reduction initiatives, which lead to local sustainable waste management practices.</p>	
405	Kildare Climate Action Linkage Group	<p>The submission referenced paragraph 3 of Section 6.1 and requested text to be added that states that Local Authorities are responsible for the enforcement of the Nitrates Directive within their catchment areas.</p> <p>The submission recommends inserting additional actions, as follows: Urgently seek adoption of the Southeastern River Basin Management Plan in cooperation with other relevant Local Authorities and stakeholders.</p> <p>Enforcement and reporting of the Nitrates Regulations within all of Kildare's River catchment areas in line with statutory requirements. (https://www.gov.ie/en/publication/b87ad-nitrates-directive/)</p> <p>Submission requests the following additional objective: Require that established native vegetation should be left in-situ, wherever possible, to intercept, slow down</p>	<p>Chief Executive's Response It is considered that Objective IN O52 adequately address the enforcement of the Nitrate Directive.</p> <p>See response to submission no. 413</p> <p>Chief Executive's Recommendation See recommendation to submission no. 413</p>

		<p>and filter runoff as an integral part of all new development proposals.</p> <p>Submission requests the following additional action: It is an action of the council to ensure that the construction of swales, ponds and other SUDS or nature-based solutions will not contribute to further native biodiversity loss, by requiring that plans submitted at design stage are under the direction of a suitably experienced botanist/ecologist. Additionally, the preferred option in employing these techniques is to allow natural recolonization, or at the very minimum, that any plantings arise from locally sourced native material of native provenance and origin.</p> <p>The submission references the EPA report, the Waste Hierarchy under the EU Waste Framework Directive and the Waste Action Plan for a Circular Economy 2020-2025.</p> <p>Considering the aforementioned, it is suggested to amend IN O42 as follows: IN O42 - Promote and facilitate communities to become involved in environmental awareness activities and community-based recycling initiatives reduction initiatives, which lead to a circular economy and local sustainable waste management practices.</p>	
468	Ann Behan	<p>Given the current ecological status of Kildare's waterbodies there should be an action to "urgently seek adoption of the South-eastern River Basin Management Plan in co-operation with other relevant local authorities and stakeholders".</p>	<p>Chief Executive's Response See response to submissions 405 & 413 above</p> <hr/> <p>Chief Executive's Recommendation See recommendation to submissions 405 & 413 above</p>

	<p>An additional action should also be included to ensure “enforcement and reporting of the Nitrates Regulations within all of Kildare’s River catchment areas in line with statutory requirements”.</p> <p>Section 6.6 is referred to and the need for SuDS are recognised. However, it is submitted that the primary nature-based solution should be to leave established native vegetation in-situ, wherever possible, to intercept run-off. SuDS can disrupt and undermine the integrity of native flora when generic swale, pond and other plants employed. Aquatic plants are some of the most problematic invasive organisms, and mis-identified invasive species are often sold in garden centres and nurseries. Any nature based or green infrastructure solution should be under the guidance of a suitably experienced botanist / ecologist.</p> <p>IN O25 is referred to and an additional objective is recommended to “require that established native vegetation should be left in-situ, wherever possible, to intercept, slow down and filter runoff as an integral part of all new development proposals”.</p> <p>An additional action is strongly recommended to “ensure that the construction of swales, ponds and other SUDS or nature-based solutions will not contribute to further native biodiversity loss, by requiring that plans submitted at design stage are under the direction of a suitably experienced botanist/ecologist. Additionally, the preferred option in employing these techniques is to allow natural recolonization, or at the very minimum, that any plantings arise from locally sourced native material of native provenance and origin”.</p>	
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		Reference is made to the extent of packaging waste produced in Ireland since 2019, with just 16% recycled. It is submitted that this is unsustainable, and a change is proposed to IN O42. (No change noted in the proposed wording).	
472	Keep Ireland Open	<p>The submission recommends the inclusion of an additional objective to promote the removal of historic culverts and infilling of water courses and to uncover existing culverts where safe and /feasibly possible.</p> <p>The submission recommends the inclusion of an additional objective to adopt a regional approach to the protection of watercourses in co-operation with adjoining counties.</p>	<p>Chief Executive's Response Objective IN O21 prohibits the culverting of drains and streams and seeks to explore opportunities to remove culverted drainage systems in favour of open, natural drainage systems.</p> <p>The matter of a regional approach to the protection of watercourses would be considered by the Eastern and Midlands Regional Authority in conjunction with Inland Fisheries Ireland and the Office of Public Works. County Kildare is part of the Eastern and Midlands Region with neighbouring counties of Wicklow, South Dublin, Meath, Offaly and Laois and is governed by a shared Regional Spatial and Economic Strategy (RSES). The Draft Plan aligns with the RSES. KCC has consulted with all neighbouring counties, including Carlow County Council which is within the Southern Region Assembly, in relation to this Draft County Plan. There are numerous policies and objectives within the plan that refer to cross-county initiatives and co-ordination (e.g. National Peatlands Park, Barrow Blueway, Joint Local Area Plans etc.).</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
350	Lorraine Benson	Kildare County Council should improve cooperation with the EPA, NPWS, LAWPRO, IFI, Teagasc, Department of Agriculture by establishing a Water Quality Task Force to drive compliance with the Water Framework and Habitats Directives with a 30m setback from rivers, bogs, and streams.	<p>Chief Executive's Response The Draft Plan includes objectives (IN O1 and IN O10) to work with relevant stakeholders such as Irish Water and LAWPRO to identify issues and improve water quality in Kildare. Further objectives in relation to protection of water quality are outlined in section 6.8.2 and they include IN O52, IN O53 and IN O54.</p>

			<p>In addition, there is an objective (BI O24) within section 12.10 which is to have regard to riparian buffer zones and potential uses outlined in Table 12.4 when considering potential developments within or adjacent to waterways. It should be noted some uses can be appropriate within 30m of watercourses.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
POLLUTION (WATER, AIR, NOISE, LIGHT)			
552.	Department of Housing, Local Government and Heritage	<p>Include the following text reported declines in insect populations have sparked global concern, with artificial light at night (ALAN) identified as a potential contributing factor. Recent scientific evidence indicates that ALAN and the ongoing shift toward white LEDs (i.e., from narrow- to broad-spectrum lighting) will have substantial consequences for insect populations and ecosystem processes.</p>	<p>Chief Executive's Response The Draft Plan includes a number of objectives that are cognisant of the impact lighting may have on biodiversity/wildlife. One such example is Objective TM A16 'Provide new or upgraded lighting for all footpath and cycle track schemes subject to the consideration of ecology and impacts on wildlife. Appropriate environmental assessments will be required and may result in unlit sections which may include some parts of the county's Greenways'. It is considered more appropriate that the detail of the matter raised be addressed as part of the forthcoming County Kildare Biodiversity Plan.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
405	Kildare Climate Action Linkage Group	<p>The submission references the Draft Kildare County Development Plan 2023-2029 - SEA Environmental Report, EPA River catchment reports and a debate answer of Minister Darragh O'Brien and the EPA Focus on Local Authority Environmental Enforcement Activity Report 2019.</p>	<p>Chief Executive's Response In preparing the Development Plan, planning authorities must exercise caution not to inappropriately stray into the operation of other statutory codes and regulatory regimes that relate to the development sector, but are outside the remit of a county or city development plan. This is applicable to policy or objectives for</p>

		<p>Considering the aforementioned, the submission requests the following:</p> <p>Replace Policy IN P7 - To actively implement the Water Framework Directive, the River Basin Management Plans, and the Local Authority Waters Programme and to attempt to achieve and maintain a high ecological status of all water bodies in the county by 2030. And at a minimum to achieve and maintain at least good ecological status for all water bodies in the county during the timeframe of this plan.</p> <p>Additional Objective - Ensure that adequate resources are in place to meet statutory water responsibilities.</p> <p>Additional Action - Active enforcement and reporting of the Nitrates Regulations within all of Kildare's River catchment areas in line with statutory requirements. https://www.gov.ie/en/publication/b87ad-nitrates-directive/</p> <p>Amend IN O58 - Promote and support the ban on the use, marketing, sale, and distribution of bituminous coal and peat in Naas, Newbridge, Celbridge, Leixlip and Maynooth.</p>	<p>non-planning functions governed by other legislation and regulations such as those raised in this part of this submission.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
468	Ann Behan	<p>Reference is made figures A7 and A8 from appendix A of the SEA, for the Draft Plan, which shows the WFD status of River and Lake Waterbody's in Kildare, 2010-2015. Links are provided to various EPA River catchment reports, pertaining to waterbodies at risk in both the River Barrow and the River Boyne catchment areas. The definition of "at risk" is outlined i.e., a</p>	<p>Chief Executive's Response See response to submission 405 above.</p> <p>Chief Executive's Recommendation See recommendation to submission 405 above.</p>

	<p>waterbody either not achieving its objective for good / high status or an upward trend in nutrients / ammonia.</p> <p>Some notes are provided from the report which show the number of waterbodies in the Barrow and Boyne catchments to be 377. It is stated that 189 of these are at risk. It is also stated that agriculture is a significant pressure on many of these waterbodies.</p> <p>Reference is made to the role of local authorities in relation to water enforcement related responsibilities, the requirement to undertake inspections to determine on-farm compliance, and by monitoring and enforcing drinking water standards in all regulated private water supplies.</p> <p>It is submitted that local authorities need to ensure they have resources to meet statutory water related responsibilities and increase enforcement action, maintain their key role in national water monitoring, and protecting public health. Where they are advised of a decline in water quality under the Red Dot+ programme investigations should be undertaken.</p> <p>Reference is made to the EPA reporting cycle, 2019 and the relatively low number of water inspections in Kildare compared with other counties.</p> <p>Given the significant pressure posed by agriculture to water quality it proposed to amend IN P7, as follows “to actively implement the Water Framework Directive, the River Basin Management Plans, and the Local Authority Waters Programme and to attempt to achieve and maintain a high ecological status of all water bodies in the county by 2030. And at a minimum to achieve</p>	
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		<p>and maintain at least good ecological status for all water bodies in the county during the timeframe of this plan”</p> <p>An additional objective is also proposed to “ensure that adequate resources are in place to meet statutory water responsibilities”.</p> <p>An additional action is also proposed “Active enforcement and reporting of the Nitrates Regulations within all of Kildare’s River catchment areas in line with statutory requirements”.</p> <p>Amend IN O58 to include “and peat” and the words bituminous coal.</p>	
FLOODING			
143	Inland Fisheries Ireland	<p><u>Flood Management</u> The submission recognises the necessity of flood management but believes there is an obvious need to move to an integrated, catchment-based approach for the management of flooding which includes the restoration of fisheries habitat for native species such as salmon.</p> <p>The submission requests that the Plan include a policy to support IFI pilot projects to investigate the incorporation of habitat restoration measures into flood management schemes on the upper Barrow and its tributaries.</p> <p><u>River Habitat Restoration</u></p>	<p>Chief Executive’s Response The submission is noted. It is considered appropriate to add a new objective to section 6.7 in support of IFI’s pilot projects.</p> <p>It is proposed to amend all references to SUDS in the Draft Plan and to replace same with Nature Based Drainage System policies, objectives and related text. Refer to response to submission no. 550 (Office of the Planning Regulator).</p> <p>Chief Executive’s Recommendation Include the following objective in section 6.7: Support Inland Fisheries Irelands’ pilot projects to investigate the incorporation of habitat restoration measures into flood management schemes on the upper Barrow and its tributaries for native species such as salmon and to address invasive fish</p>

	<p>A natural river channel is characterised by morphological features which are vital for the life cycle of fish: gravel shoals for spawning, pools and riffles where fish rest and feed and turbulent reaches which enhance oxygenation. It is submitted that there is little/no reference to the quality of river/riparian habitat in the Plan.</p> <p>In addition to the objective in the Plan to protect recognised salmonid watercourses, the submission requests that section 6 of the Plan include an objective to support river habitat restoration projects on the Barrow system in conjunction with IFI, where such projects include co-benefits to address other significant pressures.</p> <p><u>Invasive Species</u> The submission requests a policy in the Plan to support IFI's river habitat restoration pilot projects throughout the upper Barrow as a measure to address invasive fish species. The pilot projects would confer an advantage upon native fish species such as salmon and trout over invasives such as dace, but with multiple co-benefits including climate change resilience and additional flood storage.</p> <p><u>Sustainable Urban Drainage Systems (SUDS)</u> The submission requests that where proposed, ponds should be designed to reduce the potential for the introduction of non-native fish and should be managed so that they are dominated by emergent aquatic vegetation/plants with large areas which are intermittently wet.</p>	<p>species, subject to all necessary planning and environmental assessments.</p> <p>It is proposed to amend all references to SUDS in the Draft Plan and to replace same with Nature Based Drainage System policies, objectives and related text. Refer to recommendation to submission no. 550 (Office of the Planning Regulator).</p>
555		Chief Executive's Response

	<p>Irish Solar Energy Association</p>	<p>Policies should recognise the importance of renewable energy development and acknowledge that solar PV can be a water compatible development. Solar infrastructure can be deployed in areas of flood risk without increasing that risk – provided that the flood risk does not interfere with the operation of the solar farm.</p> <p>In relation to objective IN O34 it is commented that the riparian zones appear excessive due to land being a scarce resource.</p> <p>The development of solar PV on agricultural lands reduces the need for chemical pesticides and fertilisers, therefore helping improve water quality. Solar PV is a clean green form of electricity generation with clear benefits for air quality.</p> <p>By developing solar PV the land will remain free of any form of tillage thereby helping to lock in existing carbon in the soil and help with future carbon sequestration. Many developers will seek, where possible, to repower their project contract after the initial operational lifespan of the project has expired.</p>	<p>Applications in areas identified as flood risk are required to submit flood risk assessments. Development proposals will need to demonstrate that they will not increase the risk of flooding either upstream or downstream as well as on the subject site as a result of any proposed development.</p> <p>The distances referenced are defined by the OPW and Flood Risk Management Guidelines for Planning Authorities. Having regard to same it is not considered appropriate to amend the buffer zones. However, it should be noted that certain water compatible developments may be considered within flood zones.</p> <p>The comments in relation to the benefits of solar energy developments have been noted.</p> <p>See Chapter 7 (Energy & Communications) for proposed amendments to Section 7.6 ‘Solar Energy’.</p> <p>Chief Executive’s Recommendation See Chapter 7 (Energy & Communications) for proposed amendments to Section 7.6 ‘Solar Energy’.</p>
<p>518</p>	<p>Strategic Power Projects Limited</p>	<p>Reference is made to objective IN O34, and it is contended the riparian zones referred to in the objective are excessive.</p> <p>Reference is made to the first line of the fourth paragraph in section 6.8.2 and it is submitted that development of solar PV on agricultural lands reduces the need for chemical pesticides and fertilisers therefore helping to improve water quality.</p>	<p>Chief Executive’s Response The distances outlined are defined by the OPW and Flood Risk Management Guidelines for Planning Authorities, compliance with same is considered good practice, therefore it is not considered appropriate to reduce the requirements. However, it should be noted that certain water compatible developments can be considered within these zones.</p> <p>The comments with respect to pesticides and fertilisers are noted.</p>

		<p>Reference is made to the first two lines of the fifth paragraph in section 6.8.2 and it is submitted that solar PV is a clean green form of electricity generation with benefits for air quality and should be recognised and promoted.</p> <p>Developing solar PV will also ensure land is free from tillage thus locking in carbon to help carbon sequestration and contribute to climate change. This should be recognised.</p>	<p>It is not appropriate to outline the benefits of certain types of development throughout the plan. These can be demonstrated and considered on a case-by-case basis during the planning consent process.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
315	Seamus Dolan	<p>The submission agrees with the requirement for site specific flood risk assessments to be carried out, particularly prior to any further development at Finlay Park/Northwest Quadrant.</p>	<p>Chief Executive's Response The comments are noted.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
470	IPCC	<p>Amend IN O32 as follows: Recognise the important role of natural boglands, rehabilitated peatlands and other wetland areas in flooding patterns. Development in these areas shall therefore be subject to a Flood Risk Assessment in accordance with the relevant guidelines.</p>	<p>Chief Executive's Response It is agreed that the importance of intact and rehabilitated peatland with respect to flood control is recognised.</p> <p>Chief Executive's Recommendation Amend IN O32 as follows: Recognise the important role of natural boglands, rehabilitated peatlands and other wetland areas in filtering water and contributing to sound ecological status in rivers as well as flooding patterns. Development in these areas shall therefore be subject to a Flood Risk Assessment in accordance with the relevant guidelines.</p>
405	Kildare Climate Action Linkage Group	<p>The submission suggests the amendment of IN O5 as follows: Manage, protect, and enhance surface water and groundwater quality to meet the requirements of the EU</p>	<p>Chief Executive's Response Regarding IN O5, see response to Submission No. 413.</p> <p>Chief Executive's Recommendation See recommendation to submission no. 470 (re peatlands).</p>

		<p>Water Framework Directive to achieve good ecological status by, at the latest 2027.</p> <p>It is submitted that no recognition is given to the importance of peatlands in filtering water within river catchment areas and recommend inserting the following objective: Recognise the important role of natural boglands and other wetland areas in filtering water and contributing to sound ecological status in river catchment areas.</p>	
405	Kildare Climate Action Linkage Group	<p>The submission questions whether the requirements of The Planning System and Flood Risk Management Guidelines for Planning Authorities, DEHLG (2009) reflect current pluvial flooding forecasts for Kildare along a 1.5 °C trajectory? If not, how can they be improved?</p>	<p>Chief Executive’s Response KCC ensures all proposed development must consider allowances for climate change scenarios in line with current best practice guidance in Ireland namely, The Planning System and Flood Risk Management Guidelines for Planning Authorities, DEHLG (2009), the CIRA SuDS Manual, the Greater Dublin Strategic Drainage Study (GSDSDS), the Greater Dublin Regional Code of Practice for Drainage Works and the OPW Climate Change Sectoral Adaptation Plan.</p> <p>However, KCC also recognises that the potential risks and impacts due to climate change will evolve in the future and the allowances for climate change scenarios are subject to change. With that in mind KCC have identified an action as part of the CDP to develop a ‘Sustainable Urban Drainage Systems Guidance Document’ within one year of the adoption of the Plan and to ensure that all future plans and projects comply, in full, with this document when published. This document will review existing climate change allowances against current best practice and provide recommendations for future allowances. This document shall be reviewed periodically to ensure the most up to date appropriate allowances are recommended.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>

468	Ann Behan	The first sentence of section 3.17 Flood Risk Management is referred to, and it is asked if these requirements reflect current pluvial flooding forecasts for Kildare along a 1.5 OC trajectory? If not, how can they be improved?	<p>Chief Executive's Response See response to Submission No. 405 above.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
468	Ann Behan	<p>Reference is made to water resources such as Poulaphouca Reservoir which is partially in Kildare and it is noted as having a moderate status, while waters in the north-eastern corner of the county which form part of the Boyne catchment are classified as being of poor or moderate status. Policies IN P1 and IN P2 are noted in relation to water quality.</p> <p>Amend IN O5 and include additional text “to achieve good ecological status by, at the latest 2027” after the words EU Water Framework Directive.</p> <p>An additional objective is recommended to “recognise the important role of natural boglands and other wetland areas in filtering water and contributing to sound ecological status in river catchment areas”.</p>	<p>Chief Executive's Response See response to submission 405 above.</p> <p>Chief Executive's Recommendation See recommendation to submission 405 above.</p>
WASTE			
410	Celbridge Community Council	States that Objective IN O49 is an admirable objective. However, the submission notes there has already been a Part 8 consultation in relation to Objective IN O42 in the Celbridge LAP 2017-2023 "To provide a civic amenity site (recycling centre) in Celbridge on lands located south of the M4 Motorway and north of the R449 Regional Route to the west of Exit 6". States that given the lack of recycling centres in North Kildare, this	<p>Chief Executive's Response The development for a new civic amenity site in Celbridge has secured planning permission under the Part 8 process and is considered to be a 'shovel ready' project. However, the Council is awaiting the necessary funding to begin construction. This is therefore considered to be a resourcing issue outside the remit of this land use plan. Accordingly, the request for an action on its delivery is not accepted.</p>

		project which has progressed to planning should be prioritised through the inclusion of an action to progress this.	Chief Executive's Recommendation No change to the Draft Plan.
364	Ursula King	Waste should be substantially reduced in the county and the circular economy better supported. The council offices should be an example for this in reducing its waste and electricity consumption.	Chief Executive's Response Policy IN P6 in Chapter 6 'Infrastructure and Environmental Services' seeks to implement European Union, National and Regional waste related environmental policy, legislation, guidance, and codes of practice, in order to support the transition from a waste management economy towards a circular economy. Objectives IN O36 further supports implementation of this circular economy. Chief Executive's Recommendation No change to the Draft Plan.
358	Deirdre Lane	Ireland's ecological footprint is seven times its own land area. Waste should be substantially reduced especially in large supermarkets and local town/village centre shops better supported. The submission asks <ul style="list-style-type: none"> • Will KCC stipulate funding for events to be green and procurement of products to be eco. • Can the CDP roll out eco obligations linked to funding of Kildare sponsored events as part of sponsorship? The litter and pollution post some events can be avoided which would eliminate plastic food container use at events sponsored by KCC. • Will KCC pay for a mentor in each MD to be a support for creative people and assist with their events and planning applications for longer term 	Chief Executive's Response Policy IN P6 in Chapter 6 'Infrastructure and Environmental Services' seeks to implement European Union, National and Regional waste related environmental policy, legislation, guidance and codes of practice, in order to support the transition from a waste management economy towards a circular economy. Objectives IN O36 further supports implementation of this circular economy. Objective RET O5 in Chapter 8 'Urban Centres and Retail' seeks to reinforce the core of town and village centres as the priority location for new retail development, with quality of design and integration/linkage being fundamental prerequisites. Objective IN O51 also supports the implementation of the 'Deposit Return Scheme', currently being considered by Government, when it is published.

		sustainable community events and ecosystems to scale up.	It is outside the scope of the Draft Plan to address the matters raised in relation to funding and procurement as Development Plans are primarily land use plans. Chief Executive's Recommendation No change to the Draft Plan.
395	Dept. Environment, Climate & Communications (to be read in conjunction with GSI submission, same number, submitted together)	The submission states that it would be welcomed if the Draft Plan would reference Whole-of-Government Circular Economy Strategy – launched December 2021. The Department states that it would be obliged if the Council could consult directly with their respective Regional Waste Management Planning Office regarding development of the final Plan to ensure that there are adequate policy supports for the development and improvement of recycling and sorting facilities at appropriate locations.	Chief Executive's Response It is considered appropriate to amend IN O36 of the Plan to reference the recently launched Whole-of-Government Circular Economy Strategy 2022-2023. Section 6.8.1 of the Plan provides adequate support for the development and improvement of recycling and sorting facilities through the provision of objectives IN O37, IN O39, IN O44, IN O45 and action IN A6. Apart from objectives supporting the provision of additional recycling and sorting facilities, the issue of waste management is outside the remit of the County Development Plan. Chief Executive's Recommendation Amend IN O36 as follows: Encourage a just transition from a waste economy to a green circular economy in accordance with 'A Waste Action Plan for a Circular Economy 2020-2025' and the Whole of Government Circular Economy Strategy 2022-2023 'Living More, Using Less'.
405	Kildare Climate Action Linkage Group	In line with decarbonisation and reducing EU fines for failing to meet EU Climate emissions targets, it is suggested that KCC's job creations be inclusive of: <ul style="list-style-type: none"> Collection of and education on data waste and e-waste so that young people realise the negative impacts of the digital economy. 	Chief Executive's Response Collection of and education on data waste and issues relating to procurement is not a matter that can be addressed in a County Development Plan. Where it has been possible to identify targets throughout the Plan these have been included. It is anticipated that further targets would be identified through the preparation of the Sustainable Energy Climate Action Plan. It is however considered reasonable and appropriate to include an

	<ul style="list-style-type: none"> • The identification and setting of ambitious waste recycling and reuse targets and supporting initiatives. • Support for local “repair cafes” where people can bring their electronics to get fixed through providing access to KCC buildings and supporting with insurance needs. • Introducing a KCC procurement mandate to buy refurbished and remanufactured digital equipment as part of Green Procurement. <p>In line with the Waste Action Plan for a Circular Economy 2020-2025, the following additional objective is suggested: As part of an education and public awareness programme, to promote plastic and packaging as an urgent public issue. Building awareness on how to prevent it (e.g. by choosing packaging free products) and how to handle the packaging waste that arises; and raise consumer awareness on the benefits of use of reusable containers and work with retailers to encourage the provision of refill options.</p> <p>The submission suggests the revision of Action IN A5 as follows: Achieve the vision of the Waste Action Plan for a Circular Economy 2020-2025 and the Eastern-Midlands Regional Waste Management Plan 2015-2021 (and future revisions) by meeting the following targets:</p> <ul style="list-style-type: none"> • Ensure a 1% 5% reduction per annum in the quantity of household waste generated per capita over the period of the Plan. 	<p>objective in the Draft Plan to support repair cafes at appropriate locations.</p> <p>Regarding the suggestion to include an additional objective for an education and public awareness programme. It is considered that Objectives IN O41 and IN O42 adequately address this issue.</p> <p>Given the targets set out in the EU Waste Framework Directive it is considered appropriate to revise Action IN A5 as proposed.</p> <p>Chief Executive’s Recommendation Include an objective in Section 6.8.1 as follows; Support ‘repair cafes’ throughout the county at appropriate locations, in order to reduce the quantum of waste going to landfill.</p> <p>Amend IN A5 as follows: Achieve the vision of the Waste Action Plan for a Circular Economy 2020-2025 and the Eastern-Midlands Regional Waste Management Plan 2015-2021 (and future revisions) by meeting the following targets:</p> <ul style="list-style-type: none"> • Ensure a 1% 5% reduction per annum in the quantity of household waste generated per capita over the period of the Plan. • Support the target to achieve a recycling rate of 50% 55% of Managed Municipal Waste (household and commercial) by 2025 leading to 60% by 2030. • Reduce to 0% the direct disposal of unprocessed residual municipal waste to landfill over the lifetime of this plan.
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		<ul style="list-style-type: none"> Support the target to achieve a recycling rate of 50% 55% of Managed Municipal Waste (household and commercial) by 2025 leading to 60% by 2030. Reduce to 0% the direct disposal of unprocessed residual municipal waste to landfill over the lifetime of this plan. 	
468	Ann Behan	<p>IN O32 in section 6.7 is welcomed.</p> <p>Considering population growth, EPA statistics, and the recent climate act, Action IN A5 is underwhelming. A substantial revision of this is required.</p>	<p>Chief Executive's Response The comment in relation to IN O32 is noted.</p> <p>The targets outlined in objective IN A5 are set out in the Eastern-Midlands Regional Waste Management Plan 2015-2021. It is an action of the council action to achieve the vision of the plan by meeting the targets referred to in it. Therefore, it is not appropriate to include revised targets.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
LIGHTING			
485	Royal Institute of the Architects of Ireland	<p>Street lighting causes light pollution, which has consequences for animals and plants. They also use vast amounts of energy. To improve energy efficiency and environmental / human health issues every light needs to be justifiable, limit the use of light to when it is needed, direct light to where it is needed, reduce light intensity to the minimum needed, use light spectra adapted to the environment, when using white light, use sources with a "warm" colour temperature (less than 3000k).</p>	<p>Chief Executive's Response Lighting is essential for a safe and secure environment. However, the control of light pollution is important in the interests of nature conservation, residential amenity, and energy efficiency. The Draft Plan includes an objective (IN O64) to require the design of external lighting schemes to minimise the incidence of light spillage or pollution into the surrounding environment having regard to the residential amenity of surrounding areas and the need to mitigate adverse impacts on biodiversity, particularly on river corridors sensitive fauna and protected species. There is also an objective (IN O65) to investigate measures to improve the approach to street lighting</p>

			<p>and ensure new developments are lit appropriately protecting environmentally sensitive areas.</p> <p>A range of objectives and actions in relation to public lighting are also contained in sections 5.13 and 15.7.9.</p>
			<p>Chief Executive's Recommendation Amend IN O64 as follows: Require the design of external lighting schemes to minimise the incidence of light spillage or pollution into the surrounding environment having regard to the residential amenity of surrounding areas and the need to mitigate adverse impacts on biodiversity, particularly on river corridors sensitive fauna and protected species.</p>
GENERAL			
395	<p>Geological Survey of Ireland</p> <p>(to be read in conjunction with DECC sub)</p>	<p>GSI recommends the ongoing use of the GSI Groundwater maps and datasets within the Development Plan.</p>	<p>Chief Executive's Response Noted. All relevant layers including those related to groundwater can be made available on the Council's GIS data system which will be updated following the adoption of the County Development Plan.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>

CHAPTER 7 – ENERGY & COMMUNICATIONS			
Sub No.	Name	Summary of Issues Raised	Chief Executive's Responses & Recommendations
SOLAR ENERGY			
555	Irish Solar Energy Association	<p><u>Section 7.6 - Site Selection</u> In terms of site selection, proximity to the grid and grid capacity are serious limitations to where solar development may go at this time. Will the Council take grid limitations into equal consideration when determining solar applications which may be located near sensitive landscapes and other receptors? The importance of electricity grids is recognised in the REPowerEU plan and the Commission has also proposed an amendment to the Renewable Energy Directive, recognizing renewables and related grid infrastructure as a matter of overriding public interest.</p> <p><u>Biodiversity</u> The submission comments on the requirement that a minimum of 10% of each overall solar farm site shall be reserved for biodiversity purposes and asks if this requirement would also be placed on other new build environment projects. It is added that solar developments have a track record of, and an inbuilt ability to, improve biodiversity and a 10% minimum is not necessary.</p> <p><u>Landscape and Natural and Built Heritage</u> There should be a more promotive approach to the policy wording, and there should be a general presumption in favour of Solar PV unless there are</p>	<p>Chief Executive's Response In relation to the comments regarding site selection, biodiversity, landscape, natural and built heritage, grid connections and hedgerows see recommendations to amend Section 7.6 (Solar Energy) below.</p> <p>Chief Executive's Recommendation Amend Section 7.6 Solar Energy as follows: There are three basic approaches used today to harness and gain maximum benefit of solar energy in buildings. These are Passive Solar; Active Solar Heating; and Solar Photovoltaic (PV) Systems. There are a range of technologies available to exploit the benefits of the sun, including solar panels, solar farms, and solar energy storage facilities, all of which contribute to a reduction in energy demand.</p> <p>As solar energy technologies have become more effective, areas in Northern Europe like Ireland have become viable for technologies including solar panels/ tubes on roof spaces and the commercial development of solar farms together with storage facilities. As a result, solar generated energy is increasingly contributing to a reduction in energy demand and energy costs for a range of commercial, industrial and residential properties. The Climate Action Plan 2021 targets a delivery of between 1.5 and 2.5 GW of Solar PV Capacity by 2030 as part of its effort to produce 80% of Irelands electricity from renewable sources by 2030.</p>

	<p>significant adverse impacts on landscape, natural and built heritage that are not outweighed by the benefits of solar development.</p> <p><u>Grid Connection</u> EirGrid has a prerequisite that planning permission must be in place before a grid connection offer is made, therefore this wording should be removed from the plan.</p> <p><u>Removal of Hedgerow</u> Section 7.6 should be amended and read as follows “The removal of extensive stretches of hedgerow (including within the development site) will be strongly discouraged unless it is to provide a safe means of access, in which case all hedgerow removal should be replaced to the rear of the new access sightlines within the first available planting season following the commencement of development.’</p> <p>The policy could also stipulate “Where the removal of minor sections of hedgerow is proposed, the applicant shall demonstrate, to the satisfaction of the Planning Authority, that such removal is necessary for the development of the particular solar farm(s) and that compensatory planting will be required elsewhere within the development.</p> <p><u>Brownfield Sites</u> In relation to EC O21 the submission states that the Council should not elevate brownfield sites above what might be more suitable green field sites and that there should be a general presumption in favour</p>	<p>On-site auto-consumption microgeneration technologies can make a significant contribution towards a reduction in energy costs, and this will continue as technologies develop further. This type of generation is supported in the Climate Action Plan 2021, by Actions 105,107,108 and 138.</p> <p>Solar farms have the potential to affect the landscape and natural and built heritage. Cumulative impacts may also arise with farms located close to each other. Site selection is vital for potential solar farms as solar resource, topography and proximity to the grid must be considered.</p> <p>Solar Energy Developments</p> <ul style="list-style-type: none"> • All applications should indicate the estimated megawatt output of the proposed solar farm. • An assessment of the impact of the development on the receiving landscape should be undertaken, having particular regard to the landscape sensitivity classification, scenic routes and protected views. • Details of the connection to the grid shall be provided with all planning applications. • Glint and glare assessment must be undertaken and submitted with each application. • An assessment of stormwater run-off rates must be completed for each development, and attenuation measures proposed as appropriate. • The removal of extensive stretches of hedgerow (including within the development site) will be strongly discouraged. Where the removal of minor sections of hedgerows is proposed, the applicant shall demonstrate, to the satisfaction of the • Planning Authority, that such removal is necessary for the development of the particular solar farm(s).
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		<p>of solar PV across the county subject to normal planning and environmental checks and balances.</p>	<ul style="list-style-type: none"> ● In addition to the retention of hedgerows and other existing areas of biodiversity value, a minimum of 10% of each overall solar farm site shall be reserved for ● biodiversity purposes, including planting of native and pollinator friendly species or the construction of new wetland habitat. <p>Larger commercial solar farms have scope for harnessing a sizable amount of solar energy while also having the greater potential for energy storage and this type of generation is supported in the Climate Action Plan 2021, Actions 102 and 104. However, the scale of these farms has the potential to affect surrounding landscapes. Cumulative impacts may also arise with farms located close to each other. Site selection is vital for potential solar farms as solar resource, topography and proximity to the grid must be considered.</p> <p>The Council is required to achieve a reasonable balance between responding to the Climate Emergency and adhering to overall positive Government policy on renewable energy, while also enabling the solar energy resources of the Planning Authority's area to be harnessed in a manner that is consistent with proper planning and sustainable development. At present, there are no national planning guidelines to guide the future development of solar farm proposals. In their absence, the Council will assess the appropriateness of individual applications received considering the following:</p> <p><u>Site aspect, suitability, and topography</u> The Council will favour the reuse of previously developed land such as brownfield land, contaminated land or industrial land and non-productive agricultural land in preference to productive land.</p> <p><u>Biodiversity</u></p>
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			<p>purposes, a minimum of 10% of each overall solar farm site shall be reserved for biodiversity purposes, including planting of native and pollinator-friendly species or the construction of new wetland habitat.</p> <p>All existing habitats on solar farm sites should be retained and appropriately managed. The planting of 'pollinator friendly' seed mixes should be avoided.</p> <p>Appropriately detailed habitat management and restoration plans (including cutover bog restoration, where appropriate) for all solar farm applications must be submitted.</p> <p><u>Landscape character</u> Where appropriate all applications should be accompanied by a Landscape Impact Assessment (LIA) that considers the subject site in its wider context, to include the subject site, other permitted/in the pipeline renewable energy proposals, and the impact of same on the landscape sensitivity classification, scenic routes and protected views.</p> <p><u>Residential amenity</u> Noise and traffic impacts during the construction, operational and decommissioning phases will be examined to determine whether residential amenity of adjoining/nearby properties would be adversely impacted.</p> <p><u>Flooding</u> Solar farms located within areas identified as being within Flood zones A or B will be subject to a Site-Specific Flood Risk Assessment, as per the Planning System and Flood Risk Management Guidelines 2009 for Planning Authorities (or any updated guidelines). An assessment of stormwater run-off rates must be completed for each development, and attenuation measures proposed as appropriate.</p>
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			<p>development and decommissioning and reinstatement of the subject site should all be submitted.</p> <p>Amend Objective EC O21 as follows; Support the provision of solar farms in appropriate locations and to consider in the first instance developing solar farms on previously developed land. in accordance with the criteria as set out in Section 7.6 of this Plan and environmental considerations such as the movement of qualifying interest species of European Sites. Projects shall provide mitigation and monitoring where applicable.</p> <p>Amend Objective EC O25 as follows; Require decommissioning and site rehabilitation plans (including phasing where appropriate) as part of any solar farm development application, including identification of sustainable waste management solutions for components (PV solar arrays, steel support frames, battery storage, etc.) at end-of-life in accordance with the waste management hierarchy. The disposal of same to landfill will not generally be permitted. Notwithstanding the provisions of Section 42 of the Planning & Development Act 2000 (as amended), the Planning Authority may grant permission for more than 5 years, in appropriate circumstances.</p>
452	Harmony Solar Ireland Limited	<p>The submission was prepared by Fehily Timoney and Company on behalf of Harmony Solar and primarily relates to section 7.6 and section 15.11.2 with a total of 7 recommendations to be considered for inclusion in the Draft Plan.</p> <p>It is stated that the company is reviewing several sites in Kildare with the intent to develop utility scale solar developments. It is hoped that the Plan will</p>	<p>Chief Executive's Response</p> <p>The Draft Plan has regard to a range of national and international policy documents. These documents are outlined in section 7.2. It should be noted that it is an action of the Draft Plan to prepare and implement an overall Renewable Energy Strategy for the county (Action EC A3 refers), which will elaborate further on national and international policy.</p>

	<p>encourage community involvement as part of renewable energy policy objectives. It is also submitted that the Council should set robust policy objectives in the Plan to support the transition to a low carbon future through the continued development of the solar PV sector in Kildare.</p> <p>It is stated that from a spatial planning perspective, utility scale solar development has few environmental impacts. Suitable land banks are typically found in rural areas and the land requirement does not compete with or diminish agricultural potential. Solar farms can be deployed rapidly and are generally operational in circa 4 to 6 months. In respect of biodiversity and ecology, solar development can have a positive impact in rural areas.</p> <p>The credentials of the company are referenced, while National and International Policy in relation to renewable energy development is set out. Specific reference to solar PV in the Draft Plan is welcomed, however, it is considered that more explicit reference should be made to enable Kildare to achieve its potential as a key contributor in reaching national energy targets. It is submitted that a clear policy supporting solar energy in Kildare CDP 2023-2029 is required.</p> <p>It is requested that the CDP elaborates further on National and International policy for climate change and provision of renewable energy and that the plan includes a firm policy framework that supports renewable energy proposals and recognises the specific development requirements to facilitate large,</p>	<p>While solar developments are supported through policy and objectives outlined in section 7.6 it is proposed to amend this section (See response to Submission No.555).</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 555.</p>
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		<p>grid scale renewable energy projects at suitable locations in the county.</p> <p>It is submitted that the planning authority need to understand that the scale of development is determined by the requirement to maximise use of existing electrical infrastructure, therefore developments will likely be at least 10MW or greater. Regarding employment, the Irish Solar Energy Association estimates that 3.5 jobs are created per MW for a solar project, while providing rural communities with a host of benefits such as new revenue sources for landowners. They allow agricultural activities to continue, and create jobs in areas where there are limited job opportunities.</p> <p>It is requested that the following sentence be added to objective EC O17 “The Council supports the development of utility scale solar PV development at suitable locations where there is no detrimental impact on such environmental safeguards” Potential economic and employment opportunities that the development of solar PV development can bring to local economies should be highlighted in the Plan.</p> <p>The quantity of 10% for biodiversity should be reviewed on a site-by-site basis with consideration given to site conditions and landscape attributes. Developers lease lands from landowners / farmers and keeping 10% for biodiversity would remove potentially viable agricultural land from future agricultural use upon decommissioning.</p>	
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		<p>The Council should provide clarity in respect of the suggested 10% requirement reserved for biodiversity purposes, including planting of native and pollinator-friendly species or the construction of new wetland habitat as part of any solar development and whether this 10% relates to the overall site area or the solar development site area.</p> <p>The submission requests the Council to amend the biodiversity requirement and assess each application on a case-by-case basis given that certain landscape character types do not lend themselves to the inclusion of expansive areas of planting of native and pollinator friendly species, or the construction of new wetland habitat and recognise the potential environmental and visual impact of same and the impact of same to future agricultural practices. It is important to protect and maintain agricultural practices during the operational phase of any solar PV development.</p>	
452	Harmony Solar Ireland Limited	<p><u>Specifying MW output</u> It is not possible to be precise on the generation capacity/Megawatts (MW) output of a proposed solar development at application stage. There are several factors which govern the final energy output of such facilities, these include the Commission for Regulation of Utilities (CRU), and rapidly developing technology which determine MW output. Generally, within a 10-year period / duration of permission significant advances are expected in solar panel and electrical infrastructure.</p> <p>It is proposed that the planning authority include a condition which requires a developer to submit and</p>	<p>Chief Executive's Response The requirement is to submit the estimated megawatt output of the proposed solar farm. Therefore, it is not expected to be precise. The Planning Authority understands that this may change during the process of obtaining a grid offer.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

		<p>agree the final generation capacity prior to commencement of the development for the purposes of calculating the development contribution. The accepted grid offer from EirGrid or ESBN will provide the necessary evidence of the generation capacity.</p> <p>It is requested that the first bullet point under the heading solar energy developments in section 7.6 be deleted which reads “All applications should indicate the estimated megawatt output of the proposed solar farm.”</p> <p>Instead, the Planning Authority is requested to attach a condition which requires the developer to submit and agree the final generation capacity in writing with the planning authority prior to commencement of development.</p>	
452	Harmony Solar Ireland Limited	<p><u>De-commissioning of Solar Farms</u> The submission refers to objective EC O25, which is largely supported. However, it is considered that it would be more appropriate to agree a formal decommissioning plan closer to the decommissioning date and that a condition be attached to permissions as follows “A decommissioning plan will be agreed with the local authority three months prior to decommissioning the proposed development”.</p> <p>Solar farms potentially have a 45-year lifespan, therefore determining a decommissioning and site rehabilitation plan at this stage is premature. Guidance from the Scottish National Heritage report ‘Research and Guidance on Restoration and Decommissioning of Onshore Wind Farms’ is</p>	<p>Chief Executive’s Response See response to Submission No. 555.</p> <p>Chief Executive’s Recommendation See recommendation to Submission No. 555.</p>

		<p>referred to which notes that “it is best practice not to limit options too far in advance of actual decommissioning but to maintain informed flexibility until close to the end-of-life of the wind farm”.</p> <p>It is requested to include an additional sentence to EC O25 to read as follows: “A decommissioning plan will be agreed with the local authority three months prior to decommissioning the Proposed Development”.</p>	
552.	Department of Housing, Local Government and Heritage	<p>Insert an objective under Section 7.6 Solar Energy. Retention and appropriate management of existing habitats should be favoured instead of planting of introduced pollinator friendly species to maintain and restore the existing seedbank and local biodiversity. Planning applications should include appropriately detailed habitat management and restoration plans (including cutover bog restoration), as required and appropriate.</p> <p>Solar panel proposals on peatlands should be subject to EIA and AA</p>	<p>Chief Executive’s Response The protection of existing habitats and biodiversity should be protected/reinstated during the development of Solar Farms.</p> <p>See recommendation and response to Submission No. 555.</p> <p>Chief Executive’s Recommendation See response to Submission No. 555.</p>
518	Strategic Power Projects Limited	<p>The submission outlines the company’s credentials as a leading renewable energy development company. The importance of providing Solar PV and Battery Energy Storage Systems (BESS) for creating and storing renewable electricity are noted. The solar PV market in a global context over the past 10 years is outlined, while it is stated that provision of solar PV in the Irish market is increasing with additional connection offers being awarded for solar PV. The challenges in relation to the provision of wind energy are also referenced. The importance of reducing dependence on gas and oil due to recent trends in</p>	<p>Chief Executive’s Response There is an action to prepare, within 1 year of the adoption of the CDP, a Climate Action Plan for Kildare to provide a baseline analysis for the county and the inclusion of measurable targets on renewable energy and climate change mitigation and adaptation (EC A1 refers). The Climate Action Plan will have regard to all relevant up-to-date guidance in its preparation.</p> <p>Applications in areas identified as flood risk are required to submit flood risk assessments. Development proposals will need to demonstrate that they will not increase the risk of</p>

	<p>the market and the context of global warming is highlighted.</p> <p>It is submitted that the Plan was drafted in advance of the war in Ukraine and the new renewable energy plans issued by the European Commission and needs to reflect the ambition of the REPowerEU plan and provide a robust and supportive policy context for Solar PV and other renewable energy related development. The importance of BESS in supporting the electricity grid to transition from fossil fuel led generation to renewables led generation is equally as important and should be given support in the Plan.</p> <p>Policy should recognise the importance of renewable energy development and acknowledge that solar PV can be a water compatible development which can be deployed in areas of flood risk without increasing that risk.</p> <p>Reference is made to the 10% requirement for biodiversity as part of solar farm developments. It is asked if this requirement is placed on other new build environment projects that obtain permission. Solar developments have the ability to improve biodiversity due to the fact that they are quiet spaces where biodiversity can thrive. Putting a percentage on this is unnecessary.</p> <p>It is submitted that the wording in relation to hedgerows should be amended in section 7.6 to include an additional sentence after the words strongly discouraged as follows “unless it is to provide a safe means of access, in which case all</p>	<p>flooding. It is not appropriate to exempt all solar PV developments from such requirements.</p> <p>In relation to biodiversity, brownfield sites and solar farms, see response to submission no. 555. Also note 452.</p> <p>Chief Executive’s Recommendation In relation to biodiversity and solar farms, see recommendations to submission no. 555.</p>
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22	Responsible Solar for Kildare	<p>The submission highlights the Draft Development Plan of Kerry County Council and their approach to avoid the development of solar energy projects on prime agricultural land. It is submitted that EC O21 of the Plan is vague and ambiguous and the submission suggests that it be replaced by the following objective:</p> <p>“It is the objective of the Council to prevent the loss of agriculturally productive land to commercial scale solar energy development. Any developments proposed on agricultural lands must be accompanied by a detailed description of the application site lands including details of productivity, for the 10 years prior to the making of the planning application.”</p>	<p>Chief Executive’s Response Having reviewed Objective EC O21 it is considered more appropriate to amend this objective to omit the reference to previously developed lands as it is considered more appropriate to consider proposals for solar farm developments on their merits having regard to the criteria as set out in Section 7.6. See response to submission 555.</p> <p>Chief Executive’s Recommendation See recommendation to submission 555.</p> <p>Re-order the 3rd last and final bullet points under the criteria as set out in Section 7.6 (Solar Energy).</p>
22	Responsible Solar for Kildare	<p>This submission welcomes Policy EC P2 and the reference to “appropriate locations” therein. It is however noted that there is no definition or guidance of what constitutes an ‘appropriate location’ in respect of solar energy projects.</p>	<p>Chief Executive’s Response The County’s first Wind Energy Strategy (Appendix 2 of the Draft Plan) was prepared having regard to the guidance contained within the Wind Energy Development Guidelines published by the Department of Housing, Planning & Local</p>

		<p>The submission also welcomes Objective EC O2 and states that it contains helpful guidance and is an important starting point to establish the criteria for the proper planning and sustainable development of the area. It is submitted that this objective should be expanded upon to include the criteria for the siting of solar energy projects.</p> <p>The written statement in relation to Section 7.5 - Wind Energy is highlighted in the submission. It is stated that in the case of wind energy, KCC has clearly set out the various factors that affect whether or not a site is suitable for the proposed development. The submission suggests that the same list of criteria be applied to solar energy projects.</p> <p>In addition, the submission suggests that it is appropriate for Kildare County Council to explicitly state that lands of high biodiversity value are generally not appropriate for commercial scale solar development.</p>	<p>Government (2019). A sieve mapping exercise was undertaken as part of the preparation of Kildare’s Wind Energy Strategy which identified areas where windfarms are acceptable in principle, are open for consideration and are not normally permissible.</p> <p>Unfortunately, national guidance in relation to Solar Energy has not been produced to date and in the absence of same it is not considered appropriate to undertake a Solar Energy Strategy for the county at this time. However, Action LR A1 of the Draft Plan states, inter alia, that it is an action of the Council to review and update the County Landscape Character Assessment within two years of the adoption of the Plan. As part of this process, the appropriate locations for solar farm development will be considered and Tables 13.3 and 13.4 of the Draft Plan updated to clearly identify the most appropriate locations for solar farm type development.</p>
22	Responsible Solar for Kildare	<p>It is submitted that EC O17 of the Plan is vague and does not provide sufficient detail in order to guide solar energy developments to appropriate locations.</p> <p>The submission highlights policy objective KCDP 12-21 of the Draft Kerry County Development Plan, policy INF OBJ 39 of the adopted Meath County Development Plan and objective ET 13.14 of the Draft Cork County Development Plan which provide more detailed guidance on site suitability in order to guide developers appropriately.</p> <p>The submission believes that residential amenity should be considered as an important factor in the site selection process of solar developments and</p>	<p>Chief Executive’s Recommendation See response to Submission No. 555.</p> <hr/> <p>Chief Executive’s Response This submission has been noted. The Council acknowledges the importance of directing solar energy developments to appropriate locations and the importance of considering residential amenity. Note response and recommendations in submission no. 555. Also note 452 and 518.</p> <hr/> <p>Chief Executive’s Recommendation See recommendation for submission no. 555 in relation to residential amenity.</p>

		<p>recommends that this be incorporated into a policy objective of the Plan.</p>	
<p>22</p>	<p>Responsible Solar for Kildare</p>	<p>The submission references research by Jeffery Lovich a research ecologist with the US Geological Survey. The research confirms that commercial scale solar facilities can fragment important wildlife habitat or migration corridors via fences and landscape alteration and can restrict gene flow for animal as well as plant populations.</p> <p>In relation to wind energy, the submission notes policy EC O11 of the Plan and suggests that the same policy approach should be adopted for large scale solar projects.</p> <p>The submission welcomes the intention of objective EC O17 to protect biodiversity but believes it should be explicitly stated that it is the Policy of the Council to ensure that solar development does not have a negative impact on biodiversity. Policy INF OBJ 39 of the adopted Meath County Development Plan and a statement under 13.8.5 in the Draft Cork County Development Plan were highlighted as examples.</p> <p>The submission noted the bullet point in section 7.6 which states: “In addition to the retention of hedgerows and other existing areas of biodiversity value, a minimum of 10% of the overall solar farm site shall be reserved for biodiversity purposes, including planting of native and pollinator-friendly species or the construction of new wetland habitat.” This statement is believed to be confusing as developers of solar projects should be required to avoid sites of high biodiversity.</p>	<p>Chief Executive’s Response Action LR A1 of the Draft Plan states, inter alia, that it is an action of the Council to review and update the County Landscape Character Assessment within two years of the adoption of the Plan. As part of this process, the appropriate locations for solar farm development will be considered and Tables 13.3 and 13.4 of the Draft Plan updated to clearly identify the most appropriate locations for solar farm type development. In relation to Objective EC O17 it is important to read this objective alongside the guidance for solar energy developments as set out in Section 7.6 in relation to the retention of hedgerows and other existing areas of biodiversity value and the reservation of a minimum of 10% of each overall solar farm for biodiversity purposes, including planting of native and pollinator-friendly species or the construction of new wetland habitat. However it is noted that Section 7.6 could be strengthened with respect to any hedgerow removal. See also response to submission no. 555. Also note 452 and 518.</p> <p>Chief Executive’s Recommendation See recommendations in submission no. 555. Also note 452 and 518.</p>

		The following new objective is recommended: “It is an objective of the Council to support commercial scale solar energy projects at suitable locations within the County where such development does not result in a net loss of biodiversity and does not lead to habitat loss and fragmentation.”	
22	Responsible Solar for Kildare	<p>The submission notes the bullet point at Section 7.6 of the Draft Plan in relation to solar energy projects and the removal of hedgerows.</p> <p>It is submitted that, given the importance of hedgerows in the green infrastructure network, any attempts to remove any hedgerows should be resisted.</p> <p>Concerns are raised that solar developers may select sites with good screening (by way of mature trees or established hedgerows) to limit the impact of the development in the landscape however that over a period of time (during construction and operation of the facility) they would take steps to remove trees and hedgerows as they significantly reduce the performance of the PV arrays.</p> <p>‘Appendix. F: Solar energy considerations of the Review of the County Development Plan’ of the Cork Draft Development Plan specifically state that one of the factors influencing site selection is as follows:</p> <p>“Land free from obstacles that may cause shading. Secure un-shaded sites (shadow from buildings, trees and other structures can significantly reduce the performance of PV’s)”. International best practice also advises the same.</p>	<p>Chief Executive’s Response The submission is noted. The Planning Authority recognises that mature trees and established hedgerows are pillars of biodiversity and need to be protected to prevent habitat loss. See also response to submission no. 555. Also note 452 and 518.</p> <p>Chief Executive’s Recommendation See recommendations in submission no. 555. Also note 452 and 518.</p>

22	Responsible Solar for Kildare	The submission raised concerns with regards to the lack of detail of EC O25 which deals with the decommissioning and site rehabilitation plans of solar developments. The contrast of EC O25 and the objective (EC O15) dealing with the decommissioning of wind energy projects are also highlighted in the submission.	<p>Chief Executive's Response The submission is noted. It is proposed to amend EC O25 to reflect the submission. See response to submission no. 555.</p> <p>Chief Executive's Recommendation See recommendation to submission no. 555 in relation to EC O25.</p>
410	Celbridge Community Council	Submits that objective EC 018 should be reworded to require that all new houses, apartment blocks, commercial and industrial developments are future-proofed through the inclusion of solar panels.	<p>Chief Executive's Response The request in relation to EC O18 is not accepted as it is considered that such a provision which is governed by building regulations would stray outside the remit of the land use plan. It should be noted that in preparing the development plan, planning authorities must exercise caution not to inappropriately stray into the operation of other statutory codes and regulatory regimes that relate to the development sector, but are outside the remit of a county development plan. This is applicable to policies or objectives for non-planning functions governed by other legislation and regulations.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
24	Kathryna Phibbs	It is submitted that the Plan should include a clear specific policy to ensure developers choose appropriate locations for large scale solar projects that do not result in the loss of prime agricultural land.	<p>Chief Executive's Response Action LR A1 of the Draft Plan states, inter alia, that it is an action of the Council to review and update the County Landscape Character Assessment within two years of the adoption of the Plan. As part of this process, the appropriate locations for solar farm development will be considered and Tables 13.3 and 13.4 of the Draft Plan updated to clearly identify the most appropriate locations for solar farm type development.</p>

			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
24	Kathryna Phibbs	It is submitted that there should be a clearly stated policy in the Plan to ensure that solar energy projects do not have an adverse impact on their environment, the landscape or its biodiversity.	<p>Chief Executive's Response</p> <p>A set of guiding principles for solar energy developments are set out in Section 7.6 in relation to the retention of hedgerows and other existing areas of biodiversity value and the reservation of a minimum of 10% of each overall solar farm for biodiversity purposes, including the planting of native and pollinator-friendly species or the construction of new wetland habitat. However it is noted that Section 7.6 could be strengthened with respect to any hedgerow removal. See response to submission no. 555.</p> <p>Chief Executive's Recommendation See recommendation to Submission no. 555.</p>
244	Conor and Jane Horan	More detail is required to ensure solar farms do not negatively impact the visual character of landscapes.	<p>Chief Executive's Response</p> <p>Section 7.6 of Chapter 7 'Energy and Communications' requires an assessment of the impact of proposed developments on the receiving landscape, having particular regard to, inter alia, the landscape sensitivity classification, scenic routes and protected views.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
167	Mariann Klay	It is stated that there is a need to formulate clear guidelines for the selection of sites for renewable energy projects. In the absence of national guidance, such guidelines are even more important. Currently site selection is driven by landowner-developer consent and proximity to the national grid. In the meantime, applications for solar energy plants will	<p>Chief Executive's Response</p> <p>It should be noted that several of the protections suggested in relation to biodiversity and hedgerows are already included in Section 7.6 including objective EC O26. In addition, there is an overarching policy within Chapter 12 relating to protection of Biodiversity (BI P1), which is to integrate in the development management process the protection and</p>

		<p>continue to be made, in a haphazard way which will be detrimental locally. It is further stated that this source of energy will never be a major contributor to Irelands renewable total.</p> <p>Protecting prime agricultural land, biodiversity, waterways / groundwater / aquifers, and hedgerows / trees needs to be incorporated in the Development Plan. It must be compulsory for utility scale renewable energy projects to carry out Environmental Impact Assessments. In addition, renewable energy proposals must have a plan in relation to decommissioning the site and recycling materials. The local community must be consulted on proposed developments and have an input on mitigation measures.</p>	<p>enhancement of biodiversity by minimising adverse impacts and including mitigation / compensation measures.</p> <p>There is also an objective (EC O25) requiring decommissioning and site rehabilitation plans to form part of any solar farm development application. It should be noted that the Draft Plan cannot include a requirement for Environmental Impact Assessments to be submitted with applications. The provisions relating to same are outlined in the Planning and Development Act, 2000 (as amended).</p> <p>In addition, there are objectives within Chapter 6 which address protections for water infrastructure such as waterways, groundwater, and aquifers, while there is also a policy within Chapter 12 (BI P7) which protects rivers, streams, and other watercourses.</p> <p>See response and recommendations to submission no. 555 regarding solar developments. Also note 452 and 518.</p> <p>Chief Executive's Recommendation See response and recommendations to submission no. 555 regarding solar developments. Also note 452 and 518.</p>
195	Elizabeth Cullen	Housing developments and public buildings to have solar panels for water and electricity generation.	<p>Chief Executive's Response Objective EC O44 within section 7.12 of chapter 7 “requires all new development to be designed to take account of the impacts of climate change, and that energy conservation, energy efficiency and energy renewable measures are incorporated in new and existing buildings through the appropriate design and location of new development, in accordance with relevant building regulations and guidelines”.</p>

			Chief Executive's Recommendation No change to the Draft Plan.
WIND ENERGY			
552.	Department of Housing, Local Government and Heritage	<p>Section 7.5 Wind Energy Objectives EC O16 should be edited to include:</p> <p>Planning applications must include bat survey and impact assessment, including modelling, if required as well as mitigation. Bird survey must include collision risk modelling, as required. Applications must also include compressive habitat assessment. Habitats listed on Annex I of the EU Habitats Directive must be identified, qualified and evaluated. Planning applications must include detailed bird and bat monitoring programmes. The impacts of aviation lighting on wind turbines must be assessed. The connectivity with Special Protection Areas (SPAs) for birds must be assessed. Post construction bird and bat collision monitoring using standardised methods must be carried out and reports retained by Kildare County Council so that a body of scientific evidence is gathered and can be analysed to refine impact assessment.</p>	<p>Chief Executive's Response</p> <p>The requirements with respect to the information that must be contained as part of planning applications are set out in planning legislation. Certain situations will require the submission of various ecological reports and impact assessments and these will be assessed on a case by case basis depending on the locational circumstances of the proposed development.</p> <p>The Wind Energy Strategy has been prepared in accordance with the Department of the Environment, Heritage and Local Government's Guidelines for Planning Authorities on Wind Energy Development 2006 and subsequent Draft Guidelines 2019 and constitutes a plan led approach to wind development in County Kildare.</p> <p>Section 3 of the Wind Energy Strategy sets out the methodology employed to determine areas where wind energy developments are acceptable in principle, open to consideration and not permissible. The methodology considers such factors as designated sites and their associated qualifying interests as well as aviation related matters which have all informed the emerging strategy with respect to areas that are 'permitted in principle' for wind farm developments, areas that are 'open for consideration' and areas in which wind farms are not considered appropriate.</p>

			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
421	Bord na Mona (BNM)	<p>In section 7.5, it is requested that reference to the 2019 Draft Wind Energy Development Guidelines for Planning Authorities is amended to reference the 2006 Guidelines and 'any subsequent update of these Guidelines', similar to the wording in Policy EC P4.</p> <p>In relation to EC O15 (decommissioning and site rehabilitation plans as part of planning applications) concerns are expressed regarding the 30-year life span of wind farm developments. Developers may not be able to provide such details at application stage. It is suggested that this wording be amended to state that sustainable waste management solutions should be explored for wind turbine components at end of life in compliance with the waste management hierarchy and the legislation and policy in place at the time.</p>	<p>Chief Executive's Response The Wind Energy Strategy was prepared having regard to the DEHLG Guidelines for Planning Authorities on Wind Energy Development 2006 and the subsequent Draft Guidelines 2009. It is agreed that this reference should be altered in Section 7.5 of the Plan.</p> <p>In relation to Objective EC O15, it is acknowledged that the requirement to provide decommissioning details at application stage may be problematic given the 30-year life span of a project and changing policy context in the interim. It is agreed that a change to this policy should be made to refer to the waste management hierarchy as the fundamental principle in this regard. It is also considered prudent to amend this objective to require applicants to address all considerations contained in Section 6 of the County Wind Energy Strategy.</p> <p>Chief Executive's Recommendation Amend Section 7.5 as follows: A Wind Energy Strategy forms part of this Development Plan and is presented in Appendix 2. The Strategy has been prepared in accordance with the provisions of the Department of the Environment, Heritage and Local Government's Draft Guidelines for Planning Authorities on Wind Energy Development 2006 and subsequent Draft Guidelines 2019 and constitutes a plan led approach to wind development in County Kildare.</p> <p>Amend EC O15 as follows: Require applicants to submit a report addressing the issues contained in Section 6 of the County Wind Energy Strategy</p>

			<p><i>'Considerations for Wind Farm Development Planning Applications'</i> at application stage. Decommissioning and site rehabilitation plans including decommissioning and end of life facilities for battery storage, as appropriate, as part of any wind farm development application Applicants will also be requested to clearly shall also be submitted at application stage and shall identify sustainable waste management solutions for wind turbine components (battery storage, blades etc.) at end-of-life blades, demonstrating recycling facilities and/or wind turbine repurposing facilities. Details regarding the disposal of end of life blades shall be submitted with all planning applications in accordance with the waste management hierarchy. The disposal of blades to landfill will not generally be permitted.</p>
172.	Umerus Community Development Peatlands (UCDCLG)	<p>The submission states that the proposed Wind Energy Strategy should be amended from first principles for the following reasons:</p> <ul style="list-style-type: none"> • It is not consistent with Chapter 7 Biodiversity & Green Infrastructure or Chapter 13 Landscape, Recreation & Amenity. • The Landscape Assessment underpinning the Wind Energy Strategy dates from 2004 and is outdated. Peatlands were considered as industrial production areas in 2004, but since cessation of harvesting these are emerging as opportunities for biodiversity. • It is based on the Draft 2019 Wind Energy Guidelines which have not come into force and the strategy is therefore premature. • The new Green Infrastructure approach and Map in Chapter 12 needs to inform landscape 	<p>Chief Executive's Response</p> <p>The Wind Energy Strategy has been prepared in accordance with the Department of the Environment, Heritage and Local Government's Guidelines for Planning Authorities on Wind Energy Development 2006 and subsequent Draft Guidelines 2019 and constitutes a plan led approach to wind development in County Kildare.</p> <p>It is noted that the current Landscape Character Assessment dates from 2004. It is an Action of the Plan to review the LCA within two years of the adoption of the Plan. It is recommended that this Action (LR A1) be updated to include reference to the Green Infrastructure Strategy as being a key consideration in the review process.</p> <p>In relation to Aviation concerns, planning applications have both been granted and refused by An Bord Pleanála within military airspace. Please see response to the submission from the Department of Defence in this regard (under Wind Energy Strategy).</p>

		<p>protections for the Barrow Blueway and the development of new tourism hubs associated with the Blueway, particularly Umerus Peatlands Park/Church of Oak and the Peatlands National Park/Lullymore Heritage Park hubs.</p> <ul style="list-style-type: none"> • It needs to recognise nationally important greenways and blueways (from Green Infrastructure Concept map) and identify important clusters of core areas/nodes/stepping stones which can have strengthened landscape protections. • It needs to recognise recent decisions by the Council and An Bord Pleanala in rejecting the Umerus Windfarm due to aviation impacts. The area should be designated as 'not permitted' on the Wind Energy Strategy map. 	<p>Chief Executive's Recommendation Amend Action LR A1 as follows: Review and update the County Landscape Character Assessment, within two years of the adoption of this Plan, having regard to the European Landscape Convention Florence 2000, in accordance with all relevant legislation and guidance documents and to ensure consistency with the forthcoming National and Regional Landscape Character Assessment. All landscape character designations will be fully reviewed having regard to updated best practice guidance, LCAs of adjoining Local Authorities and other local relevant considerations, including clusters of biodiversity rich areas and the Council's Green Infrastructure Strategy.</p>
558	Irish Wind Energy Association	<p>The submission states that in relation to Section 7.2, the text refers to the Climate Action Plan 2019 and related wind target EC T1 – these references should be updated to reflect the new Climate Action Plan 2021.</p>	<p>Chief Executive's Response The submission correctly states that the Government's Climate Action Plan was updated in 2021. Target EC T1 will be amended accordingly.</p> <p>Chief Executive's Recommendation Amend Section 7.1 as follows: Ireland's 'Climate Action Plan 2019 – To Tackle Climate Breakdown' represents the Government's approach, aimed at enabling Ireland to meet its EU targets to reduce carbon emissions by 30 percent between 2021 and 2030 and lays the foundations for achieving net zero carbon emissions by 2050. Ireland's 'Climate Action Plan 2021 – Securing Our Future' sets out the Government's roadmap for taking actions that aim to halve emissions by 2030 and reach net zero no later than 2050.</p>

			<p>Amend Target EC T1 as follows: Support the target in the Climate Action Plan 2019 2021 for a doubling of existing on-shore wind energy from circa 4GW (today) to approximately 8GW 8.2GW by 2030.</p> <p>Amend Section 7.12.6 as follows: A Decarbonising Zone (DZ) is an area identified by the local authority, in response to action 165 of the 'All of Government Climate Action Plan, 2019'. Target 10.2 of the subsequent Climate Action Plan 2021 is to implement decarbonising zones in each local authority.</p>
558	Irish Wind Energy Association	<p>In relation to objective EC 06 of section 7.4, while the submission supports early consultation with communities, the “commencement of project planning” is ambiguous and should be replaced with “earliest practicable stage in”.</p> <p>In relation to Section 7.5, the submission states that it is possible that much more wind energy generation can be developed in the next 7 years than 107MW. It is recommended that the target be increased to 280MW as set out in Section 5.1.1 of the Draft Wind Energy Strategy.</p>	<p>Chief Executive’s Response</p> <p>It is considered that the wording of objective EC O6 should not be changed. It is vital that local communities are consulted in relation to large scale renewable energy projects at an early stage. The wording ‘commencement of project planning’ is clearer and more definitive than “earliest practicable stage in”, which is open to interpretation and would not be in accordance with best practice.</p> <p>The suggestion to increase the wind energy target to 280MW is noted, however as outlined in section 5.2 of the Wind Energy Strategy, given the practical issues in developing a wind project from site identification to end-of-construction, a full potential County resource of 280 MW may not be realised during this County Development Plan period and the delivery of 107MW is considered a more realistic target. It should be noted that this is a target and does not place a limit on wind energy production in the county over the life of the Plan. Furthermore, the submission from the Office of the Planning Regulator recommends that Action EC A1 of the Plan, which refers to the Sustainable Energy Climate Action plan, be updated so that the County Development Plan may be varied on its completion to identify the target which County Kildare</p>

			<p>can contribute in delivering its share of overall Government targets on renewable energy and climate change mitigation over the plan period, and in particular wind energy production and the potential wind energy resource (in megawatts).</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
558	Irish Wind Energy Association	<p>When finalising the plan, reference should be made, within Section 7.14, to the final version of Shaping Our Electricity Future which is EirGrid's plan for grid works to 2030.</p> <p>As part of the strengthening and improvements to resilience of the grid, various battery energy storage system (BESS) plants will be required as well as synchronous condenser plants. The submission suggests that "including the installation of Battery Energy Storage System plants and Synchronous Condenser plants" be added to EC 063.</p> <p>The submission recommends that Objective EC 071 be either deleted or amended. Grid connections are not privately owned assets but are publicly owned assets even if constructed by a wind farm developer. Roads in public ownership should be treated as infrastructure corridors for a variety of uses not just transport alone. EirGrid and ESB have recently issued their updated specifications, these specifications note that underground cables shall, as a standard, be routed within the reserve of public roads and that it is policy of ESB Networks to install underground cables in property which is in public ownership.</p>	<p>Chief Executive's Response It is agreed that Section 7.14 should be amended to refer to the final version of Shaping Our Electricity Future which is EirGrid's plan for grid works to 2030.</p> <p>The submission outlines that various battery energy storage system (BESS) plants and synchronous condenser plants will be required to strengthen the electricity transmission and distribution network. Amending EC 063 to reflect this is considered acceptable.</p> <p>The updated EirGrid and ESB specifications have recently been issued and these specifications note that underground cables shall, as a standard, be routed within the reserve of public roads and that it is policy of ESB Networks to install underground cables in property which is in public ownership. Having regard to the above, it is accepted that EC 071 may be too restrictive and should be deleted.</p> <p>In relation to Hydrogen gas being used as the fuel of choice for heavy goods vehicles it is considered that this is satisfactorily addressed in objective EC 087.</p>
			<p>Chief Executive's Recommendation Regarding Section 7.14, see recommendation to Submission No. 381 below.</p>

		<p>The submission notes that Green Hydrogen gas is likely to be used as the fuel of choice for heavy goods vehicles and it is anticipated that the Government will publish a Green Hydrogen Strategy over the coming months. Policy and Objectives should be developed to reflect the objectives of the strategy.</p>	<p>Amend objective EC O63 Support the reinforcement and strengthening of the electricity transmission and distribution network, including the installation of Battery Energy Storage System plants and Synchronous Condenser plants, to facilitate planned growth and transmission/distribution of a renewable energy focused generation, at appropriate locations and in consultation with relevant stakeholders, where they are adjacent and/or proximate to the grid network.</p> <p>Delete objective EC O71 Require the assessment of all alternative grid connection route options prior to any proposals for grid connection utilising the national road network.</p>
414	Statkraft Ireland	<p>Submission on behalf of Statkraft Ireland, part of the Statkraft group which it states is a leading company in hydropower and Europe's largest generator of renewable energy. Notes the group produces hydropower, wind power, solar power and gas-fired power, and supplies district heating, has 3,600 employees in 15 countries, and is committed to playing a leading role in the Irish Energy Market.</p> <p>States that Statkraft Ireland develops, owns and operates renewable production facilities and is also involved in the trading and origination of power from own projects and those of third parties. Submits that Statkraft Ireland's aim is to play a significant role in Ireland's transition to becoming a low carbon economy, which as outlined in the updated National Climate Action Plan (CAP) 2021 has set out an ambitious 80% target for renewable energy production out to 2030. Notes that to meet this target, the amount of electricity generated from</p>	<p>Chief Executive's Response</p> <p>On the request to remove the target of achieving 107MW of wind energy in the County over the lifetime of the CDP, this is not accepted. Specific Planning Policy Requirement (SPPR) 1 of the Draft Revised Wind Energy Guidelines 2019 requires that development plans indicate how they will 'contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts)'. In this regard, the draft Wind Energy Strategy indicates a potential wind resource of 280MW in the county, of which the Draft Plan states that 107MW is a 'realistic wind energy target for Kildare to the end of this Plan period'. It should be noted that this required figure is a target and does not place a limit on wind energy production in the county over the life of the Plan. Furthermore, the submission from the Office of the Planning Regulator recommends that Action EC A1 of the Plan, which refers to the Sustainable Energy Climate Action plan, be updated so that the County Development Plan may be varied on its completion to identify</p>

	<p>renewables will need to double. Submits that based on the CAP assumptions, onshore wind will provide a large quantity (over 4GW) of the required electricity yield to 2030.</p> <p>Notes that taking the above into consideration, the submission supports KCC's target (EC T1) relating to the doubling of onshore energy by 2030. However, it also notes that within Chapter 7 and Appendix 2 of the draft Plan that the Council considers that doubling the current number of consented onshore wind developments from 53.5MW to 107MW over the lifetime of the CDP is inadequate in terms of contributing towards our national onshore renewable targets. States that the number of consented turbines in Co. Kildare represents less than 1.5% of the additional 4.2GW of onshore wind energy required to meet these targets by 2030, a doubling of which is still less than 3%. Submits that given advances in technology and the increase in output capacity from modern turbines, along with assuming an average output of 5MW per turbine, this equates to only 21 turbines within the entirety of the county being built over the lifetime of the Plan. Submission urges the Council to remove these pre-determined targets from Chapter 7 and Appendix 2 of the draft Plan and to take a more ambitious and responsible stance in terms of the potential generation capacity of Co. Kildare over the lifetime of this CDP, whereby developments are granted based on their suitability alone as per policies EC P2, and EC P4 as well as objectives EC 011 and EC016.</p> <p>Submission welcomes policy EC P2, relating to promoting renewable energy use and generation at</p>	<p>the target which County Kildare can contribute in delivering its share of overall Government targets on renewable energy and climate change mitigation over the plan period, and in particular wind energy production and the potential wind energy resource (in megawatts).</p> <p>On the issue of the request that SEAI Wind Atlas or any similar general wind resource data not be used as a constraint when developing and considering areas for renewable energy development, it should be noted that in formulating the Wind Energy Strategy, regard was had to the provisions of the Wind Energy Development Guidelines 2006 and the Draft Revised Wind Energy Development Guidelines 2019. The Guidelines stipulate a 4-step methodology that local authorities are required to use when formulating a countywide Wind Energy Development Strategy. Step 1 of this approach is to assess the areas of wind potential ranging from areas with extensive wind energy resources to lesser wind resources using SEAI's Wind Atlas for Ireland. A baseline wind speed of 7m/s at 100m elevation was chosen as a practical and viable wind speed for wind energy development and approximately 95% of the County has this viable wind energy resource. The rationale for this is set out in Section 3.1.1 of the WES. No change is recommended at this time.</p> <p>In relation to the robust assessments of planning applications for wind energy development, Section 6 of the Wind Energy Strategy sets out the detail required at application stage and Section 3.4.2 indicates that wind farm applications within military operating areas will be considered on their own merits in accordance with Development Plan standards and consultation with the Department of Defence. The submission indicates that 'refusing planning permission based on concerns raised which are not evident in any</p>
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	<p>appropriate locations to meet national objectives towards achieving a net zero carbon economy by 2050. Also notes objectives EC O2 and EC O6 of the draft Plan relating to community consultation in the development of renewal energy projects. In this regard, the submission states that such community consultation is an important element of this planning process.</p> <p>Submission commends the Council on the inclusion of action EC A3 relating to the preparation of and implementation of a Renewable Energy Strategy for the county, as well as the inclusion of the Wind Energy Strategy (WES) in Appendix 2. Further commends the inclusion of clearly defined and zoned areas for wind development within the County so that there is no ambiguity around the zonation of areas.</p> <p>Notes that the WES has taken into consideration the SEAI Wind Atlas when assessing wind energy potential for the County. Reiterating the advancement of turbine technologies over the past decade, the submission recommends that the SEAI Wind Atlas or any similar general wind resource data not be used as a constraint when developing and zoning areas for renewable energy development. States that they believe wind resource to be a developers' constraint and a variable to be assessed as part of each individual project, with turbines now capable of harnessing more power at lower wind speeds. These advancements are key to harnessing wind energy in areas which were historically unfeasible. Submission urges the Council to remove this constraint within the WES mapping to allow for</p>	<p>National or European legal or operational aviation requirements is unwarranted'. This point is noted and is considered further in response to Submission No. 392 (Department of Defence) in this regard.</p> <p>The request that the Council support Offshore Wind development through accommodating grid connections linking offshore wind farms to the national grid system within its administrative area is noted. It is considered that the policies, objectives, actions and targets of Chapter 7 of the draft Plan and the Draft Wind Energy strategy proactively support both the development of renewable energy in the county including wind energy and the national targets relating to renewable energy production, as per EC P2 and EC T1. The Plan also supports the roll-out of Smart Grids (EC P3) and infrastructural renewal and development of electricity networks in the county (EC O4).</p> <p>Chief Executive's Recommendation See Response to Recommendation No. 12 from OPR, Submission No. 550.</p>
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		<p>additional wind energy potential within the County to be considered.</p> <p>Notes that Kildare is one of the few counties with no operating wind farms and while there are 53.5MW of onshore wind projects now consented, Statkraft states that the Council has not to date granted any of these wind farm developments at local authority level. Both consented wind farms within Kildare are from an Bord Pleanála decisions following appeal after being refused by the Council based on issues that could have been addressed through the planning process. Submission urges the Council to robustly assess projects with a view to granting suitable developments at local authority level. Submits that this is imperative given the current issues with appeal timelines at An Bord Pleanála. Submits that the average timeline currently associated with decisions for appeals stands at 52 months.</p> <p>Submission notes that the Council is requesting within the draft WES that the Department of Defence be consulted on all proposed wind farm developments within Co. Kildare as a large portion of the County lies beneath restricted Airspace and Military Operating Areas. Notes that the Council has already refused permission for wind farm developments within Co. Kildare based on aviation concerns raised by the Department of Defence, notwithstanding specialist reports commissioned which highlight these concerns are unjustifiable. States that refusing planning permission based on concerns raised which are not evident in any</p>	
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390	Philip O'Reilly	<p>The submission states that the reduction of greenhouse gases is all very well but we cannot destroy everything in the process of trying to achieve energy sustainability.</p> <p>Wind farms should be outlawed as they destroy beautiful landscapes and communities. Bogs and the Barrow Valley should be protected and not</p>	<p>Chief Executive's Response Ireland in 2019 declared a climate and biodiversity emergency. Furthermore, in 2019 Kildare County Council signed the Climate Action Charter where it was stated that the signatories had the common understanding to reduce greenhouse gas emissions and address the impacts of climate change. Renewable energy such as wind and solar energy is one of a number of actions to reduce emissions.</p>

		<p>considered fair game for windfarms. Windfarms have unsightly infrastructure. The submission states that solar farms have the potential to turn the landscape into an industrial wasteland. Renewable energy should only be offshore.</p>	<p>Similarly, the Climate Action Plan 2021 contains a renewable energy target of 80% by 2030. Therefore, Kildare cannot rely on other local authorities to meet this target and must do their part.</p> <p>The Ministerial Guidelines on Wind Energy require development plans to incorporate policies and objectives in relation to wind energy development. All renewable energy infrastructure will be assessed having the highest regard to the protection of the landscape of Kildare.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
147	National Peatlands Park Group	<p>Amend EC 011 to read as follows; 'Consider wind energy developments in suitable locations in an environmentally sustainable manner whilst having regard to Government policy, the County Wind Energy Strategy and the EU and national target of 30% of land for biodiversity.'</p> <p>Amend EC 016 to read as follows; 'Require comprehensive winter and summer bird and wildlife surveys for all proposed wind farms sites, as set out in EIA and other relevant legislation. Post-construction bird surveys should be included as a condition of planning for any consented developments to permit before and after impacts to be assessed. Turbine design and adaptation should use the best available technology to minimise harm to birds and other wildlife.' Wind farm developers should not rely on one mitigation factor alone that may not be effective for the sensitive target species (e.g. Curlew, Lapwing).</p>	<p>Chief Executive's Response The suggested re-wording of objectives EC O11 is noted, however the objective is written to encourage wind energy developments in suitable locations. The EU 30% land target for biodiversity is covered by objective LRT1.</p> <p>It is agreed that objective EC O16 should be amended to reflect a variety of mitigation measures that may be available to prevent harm to birds and other wildlife.</p> <p>Chief Executive's Recommendation Amend EC O16: Require comprehensive winter and summer bird and wildlife surveys for all proposed wind farms sites in accordance with EIA, EU Habitats and Species Directives and all other relevant environmental legislation, so that impacts on wildlife can be fully assessed and evaluated and so that appropriate mitigation and adaptation measures can be considered, to include for example removal or repositioning of turbines, introducing one black painted rotor blade (to reduce motion smear and reduce incident of collision) or the provision of</p>

			<p>technologies that help minimize harm to birds and other wildlife. Turbine design and adaptation should use the best available technology to minimise harm to birds and other wildlife.</p>
405	Kildare Climate Action Linkage Group	<p>The submission suggests the following amendments: Amend EC O11 – Encourage Consider wind energy developments in suitable locations in an environmentally sustainable manner whilst having regard to Government policy and, the County Wind Energy Strategy and the EU and national target of 30% of land for biodiversity.</p> <p>EC O16 - Require comprehensive winter and summer bird and wildlife surveys for all proposed wind farms sites, so that impacts on wildlife can be fully assessed and evaluated and so that appropriate mitigation and adaptation measures can be considered, to include for example removal or repositioning of turbines, introducing one black painted rotor blade (to reduce motion smear and reduce incident of collision) or the provision of technologies that help as set out in EIA and other relevant legislation. Post- construction bird surveys should be included as a condition of planning for any consented developments to permit before and after impacts to be assessed. Turbine design and adaptation should use the best available technology to minimise harm to birds and other wildlife.</p> <p>It is contended that wind farm developers should not rely on one mitigation factor alone that may not be effective for the sensitive target species (e.g. Curlew, Lapwing).</p>	<p>Chief Executive’s Response See response to submission 147 National Peatlands Park Group for Kildare in relation to the requests outlined above regarding objective EC O11 and EC O16.</p> <p>Chief Executive’s Recommendation See recommendations with respect to Submission no. 147 in relation to Objectives EC O11 and EC O16.</p>

495	Suzanne Murphy	The submission does not want windfarms to be permitted on bogs.	<p>Chief Executive's Response Regarding the provision of wind energy close to areas of conservation, Chapter 7 (Energy & Communications) and Appendix 2 (Wind Energy Strategy) of the Draft Plan are clear in the importance of assessing the suitability of wind farms having regard to possible adverse impacts associated with landscape, wildlife, habitats, designated sites, bird migration paths and so on. In line with Government Guidelines, a Wind Energy Strategy was prepared to inform the Draft Plan (see Appendix 2). Through a clear, evidence-based methodology and sieve mapping exercise, the Strategy identified areas where wind energy developments are 'acceptable in principle', 'open for consideration' and 'not normally permissible'. Section 7.5 of Chapter 7 of the Draft Plan, and in particular objectives EC O11 and EC O12 should be noted specifically with respect to wind energy developments.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
470	IPCC	<p>Amend Objective EC O16 to include the text in purple:</p> <p>Require comprehensive winter and summer bird and wildlife surveys for all proposed wind farms sites in accordance with EIA, EU Habitats and Species Directives and all other relevant environmental legislation, so that impacts on wildlife...</p>	<p>Chief Executive's Response Agreed. KCC is obliged to comply with EU and national environmental legislation in the assessment of all proposed developments.</p> <p>Chief Executive's Recommendation See response to Submission no. 147 above.</p>
RENEWABLE ENERGY - GENERAL			

395	<p>Dept. Environment, Climate & Communications</p> <p>(to be read in conjunction with GSI submission, same number, submitted together)</p>	<p>The Department welcomes the support for wind and solar energy in the Draft Plan. However, it is stated that the Draft Plan should be updated to reflect the increased ambition in CAP 2021 in particular the increase from a 70% target to an 80% share of electricity from renewable sources and that all references to the Climate Action Plan should reflect the 2021 Plan.</p> <p>Actions EC A2 and A3 should be time bound.</p> <p>The submission states that in respect of the wind energy target of 107MW from a potential 280MW, the rationale for same should be provided given the increased ambition as set out in CAP 2021.</p> <p>The Department requests that a specific and measurable target for solar energy should be included in order to support the national target of between 1.5 – 2.5 solar PV capacity by 2030.</p> <p>In respect of the Wind Energy Strategy Section 5.1 - Objective set out in Section 5.3 of the Draft Wind Energy Strategy for Kildare to “generate the equivalent of 70% of its electricity needs” (emphasis added) should be re-examined with reference to Section 4(2) of the “Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change” (2017) and the revised ambition for renewable energy as expressed in the Climate Action Plan 2021.</p> <p>The submission states that the Council should consider the capacity of locally available renewable</p>	<p>Chief Executive’s Response</p> <p>The submission correctly states that the Government’s Climate Action Plan was updated in 2021. All references to the Climate Action Plan 2019 will be updated to the 2021 Plan, where appropriate.</p> <p>In addition, it is considered appropriate to make specific reference to the CAP 2021 target to increase the proportion of renewable electricity to 80% by 2030 in section 7.4 of the Plan.</p> <p>Regarding actions EC A2 and A3 it should be noted that the Monitoring and Implementation Framework that accompanies the Plan (see Chapter 16 and Appendix 12) is designed to provide an overview of all objectives, actions and targets in the Draft Plan and includes details of the relevant stakeholder(s) with responsibility for realising the various objectives, actions and targets over a clearly defined timeframe (short term (1-2 years), medium term (3-6 years), longer term (beyond the life of the Plan) and ongoing.</p> <p>The potential County wind energy figure for Kildare is 280 megawatts as outlined in Appendix 2 of the Draft Plan. Given the practical issues in developing a wind project from site identification to end-of-construction, the timeframe is typically in the region of 4-5 years allowing for land negotiation, studies, grid agreement and the planning process and therefore the full potential resource of 280 MW may not be realised during this County Development Plan period. However, it is considered reasonable that the existing permitted megawatt figure from wind energy in the county (i.e. 53.5MW) could be doubled during the lifetime of the plan and that there is potential to deliver 107MW of wind energy, as part of an overall county resource of 280MW during the lifetime of this plan. It should be noted that this is a target and</p>
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		<p>energy resources, rather than existing population, as a more appropriate determinant of any potential contribution to the State's energy requirements and targets, as determined by available land, energy generation potential and environmental designations.</p>	<p>does not place a limit on wind energy production in the county over the life of the Plan.</p> <p>There is an action to prepare, within 1 year of the adoption of the CDP, a Climate Action Plan for Kildare to provide a baseline analysis for the county and the inclusion of measurable targets on renewable energy and climate change mitigation and adaptation (EC A1 refers). Solar energy targets for the county will form part of the Climate Action Plan which will have regard to all relevant up-to-date guidance as part of the preparation of same.</p> <p>Regarding the references in section 5.1 and 5.3 of the Draft Wind Energy Strategy to increase the proportion of electricity consumption generated from renewable sources to 70%, it is considered appropriate to amend the strategy to reflect the increased percentage of 80% of the Climate Action Plan 2021.</p> <p>The methodology proposed for Kildare's Wind Energy Strategy to identifying suitable areas for wind energy development follows the steps as set out in the 2019 Draft Guidelines and utilises elements from the LARES approach, as follows: Step 1 - Examination of existing Wind Speeds, Step 2 - Evaluation of the landscape and its sensitivity for wind energy developments, Step 3 - Overlay of the Wind Energy Mapping with Landscape Evaluation and Sensitivity Analysis with information regarding built and natural heritage, archaeological and amenity designations in the Development Plan and existing settlements within the county and Step 4 - Add information regarding accessibility to electricity transmission, distribution grids, aviation constraints and approved/proposed wind farm developments. The aforementioned approach has taken account of available</p>
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			<p>land, energy generation potential and environmental designations as proposed in the submission.</p> <p>The capacity of all other renewable energy resources will be determined as part of the preparation of the Sustainable Energy Climate Action Plan (SECAP) for County Kildare. (Refer to Action EC A1)</p> <p>Chief Executive’s Recommendation Update all references to the Climate Action Plan 2021 in the draft Plan.</p> <p>Amend the second paragraph of Section 7.4 as follows: Due to increased energy requirements and Governments’ target of 80% share of electricity from renewable sources by 2030 national and EU targets for energy consumption from renewable sources, our electricity supply must move away from fossil fuel sources to renewable and sustainable forms of generation.</p>
381	Eirgrid	<p><u>Renewable Energy</u> The submission requests Policy EC P2 to be amended as follows: Promote renewable energy use, and generation and associated electricity grid infrastructure at appropriate locations within the built environment and open countryside to meet national objectives towards achieving a net zero carbon economy by 2050.</p> <p>The submission welcomes Policy EC P9 and Policy EC P19 of the Plan.</p>	<p>Chief Executive’s Response It is considered appropriate to make reference to the provision for associated electricity transmission and distribution grid infrastructure in Policy EC P2. The comments in relation to EC P9 and EC P19 of the Draft Plan are noted and welcomed.</p> <p>Chief Executive’s Recommendation Amend EC P2 as follows: Promote renewable energy use, and generation and associated electricity grid infrastructure at appropriate locations within the built environment and open countryside to meet national objectives towards achieving a net zero carbon economy by 2050.</p>

555	Irish Solar Energy Association	<p><u>Section 7.3</u> Action EC A1 is worded too broadly and does not give the appropriate level of context. Action EC A1 should be reworded to give some indication of what measurable targets the plan should contain with regard to renewable energy and climate change mitigation/adaptation.</p> <p><u>Section 7.4</u> In relation to section 7.4 and the establishment of a Mid-East Energy Bureau, the submission wishes to emphasise the importance of action over discussion.</p> <p>The submission welcomes EC A3 and suggests that KCC develops a solar energy plan within its Renewable Energy Strategy, which provides stronger guidance on the location of solar sites. The submission also encourages the Council to consult with industry on establishing Best Practice Guidelines.</p> <p><u>Section 7.10</u> In relation to EC P9 the submission urges the Council to ensure that the identification of Strategic Energy Zones does not impede the development of solar energy development opportunities.</p>	<p>Chief Executive's Response</p> <p><u>Section 7.3 – renewables general</u> It is acknowledged that access to local climate data is a constraint within the Draft Plan, however, the Sustainable Energy Climate Action Plan for Kildare, when completed, will contain baseline data for the county and relevant targets for renewable energy production and climate mitigation / adaptation which may then be transposed into the County Development Plan by way of a variation of same. Such targets can then also inform the 12 statutory Local Area Plans for County Kildare.</p> <p><u>Section 7.4 – Renewables general</u> The Council awaits guidance from the Department of Housing, Local Government and Heritage so that appropriate locations for solar energy developments may be determined in a plan led manner. It should be noted that the Council has prepared a Wind Energy Strategy (Appendix 2) that was prepared in accordance with the methodology as set out in the Departments' Draft Guidelines for Planning Authorities on Wind Energy Development 2006 and subsequent Draft Guidelines 2019 and constitutes a plan led approach to wind development in County Kildare. A similar exercise will be undertaken in relation to solar energy developments following the publication of guidance relating to same</p> <p><u>Section 7.10 - Strategic Energy Zones</u> Policy EC P9 does not rule out particular developments within Strategic Energy Zones.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
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470	IPCC	<p>The submission contends that the rush for renewable energy has fragmented rare and unique blanket bog habitat and this should not happen to the conservation potential of the brownfield sites which have come out of industrial production within the County. The renewable energy agenda should be sensitive to biodiversity and conservation.</p> <p>Edit Objective EC O11 as follows: County Wind Energy Strategy while being sensitive to the EU and national target of 30% of land for biodiversity"</p>	<p>Chief Executive's Response Agreed.</p> <p>Chief Executive's Recommendation Amend EC O11 as follows: County Wind Energy Strategy while being sensitive to the EU and national target of 30% of land for biodiversity. Subject to AA screening and where applicable, Stage 2 AA so as to ensure and protect the favourable status of European sites and their hydrological connections. Such developments will have regard for protected species and provide mitigation where applicable.</p>
469	Davy Platform ICAV (Ireland)	<p>Carbon Credits can reduce emissions through two main mechanisms. Firstly, the attributing of a cost to the emission of a certain volume of Greenhouse gases creates an economic incentive for emitters to either increase the efficiency of their emitting operations, or to transition to a lesser emitting power source and thus avoid the cost of acquiring carbon credits. Secondly, the purchase of certain Carbon Credits can offset the emissions by the purchasing operator. Since the introduction of the Clean Development Mechanism (CDM) under the Kyoto Protocol, an international framework exists whereby low-carbon projects such as Windfarms, etc., would generate Carbon Credits for sale. Hence, the purchasing of Carbon Credits by emitters would fund the development of renewable energy schemes elsewhere, whether in the same jurisdiction or another country (frequently in the developing world).</p> <p>This process is supported by International, National and Regional policies but is not mentioned in the Draft Development Plan. This should be addressed</p>	<p>Chief Executive's Response Carbon Credits may be considered as part of the upcoming Sustainable Energy Climate Action Plan (SECAP) for County Kildare. Action EC A1 states it is an action of the Council to prepare SECAP with 1 year of the adoption of the County Development Plan. The matter of carbon credits is outside the scope of a Development Plan.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

		<p>by adding reference to it in Section 1.5, Section 1.8, Section 4.2 and CS0 1.2 in the Draft Development Plan. Emissions Trading should also be added to Objective RE O73</p> <p>Section 2.15.3, Section 4.4, Objective RE O6, Objective RE O23, Objective RE O49, Objective RE O53, Objective EC O1, Objective EC O3, Objective EC O5, Objective EC O44, Objective EC O57, Objective EC O63 and Policy EC P14 should include mention of ancillary sustainable energy provision.</p> <p>Objective RE O70 should be reworded to state (new wording in purple). 'Require data centres to consider the use of sustainable renewable sources of energy to fuel their operations in whole in the first instance. Where this has been demonstrated not to be possible, consider the use of renewable sources of energy in part and/or the use of carbon credits to offset carbon emissions.'</p> <p>Section 7.4 'Renewable Energy' should include the following additional text to paragraph 1: 'Under EU Directive 2001/77/EC Renewable Energy, renewable energy sources are defined as renewable non-fossil energy sources such as, but not limited to wind, solar, geothermal, wave, tidal, hydropower, bioenergy, landfill gas, sewage treatment plant gas, biogases and bio-char (i.e. the thermal treatment of natural organic materials in an oxygen-limited environment). Recognising the potential of emission-offsetting Carbon Credits to reduce global carbon emissions, energy generation projects that are 100% offset in this manner will be</p>	
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		<p>included in the definition of 'Renewable Energy' with regard to the policies, objectives and actions outlined in the Kildare County Development Plan 2023-2029.</p> <p>Due to increased energy requirements and national and EU targets for energy consumption from renewable sources, our electricity supply must move away from fossil fuel sources to renewable and sustainable forms of generation. The Council recognises the range of new and developing technologies and supporting infrastructure that can contribute to minimising greenhouse gas emissions and to securing a greater proportion of our energy needs from renewable resources, including the use of emission-offsetting Carbon Credits.</p> <p>A new objective is also proposed stating the following: 'Support and encourage the use of renewable energy and/or carbon credits by commercial and industrial developments to offset carbon emissions.'</p> <p>Objective EC O59 should be amended to read 'Require data centres to consider the use of renewable and sustainable sources of energy to fuel their operations in whole in the first instance. Where this has been demonstrated not to be possible, consider the use of renewable sources of energy in part and/or the use of carbon credits to offset carbon emissions.'</p> <p>Specific mention of support of carbon credits should also be added to Sections 15.9.2 and 15.9.3.2.</p>	
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413.	Kildare Public Participation Network	<p><u>Renewable Energy</u> Submission requests that the objectives set out below be amended (additional text in purple, deleted text crossed-out), as follows:</p> <p>EC O6: Make it a requirement of Encourage Encourage developers of proposed large scale renewable energy projects to carry out community consultation (including, but not limited to Sustainable Energy Communities, where established) in accordance with best practice and to commence the consultation at the commencement of project planning.</p> <p>EC O11: Encourage Consider wind energy developments in suitable locations in an environmentally sustainable manner whilst having regard to Government policy, and the County Wind Energy Strategy and the EU and national target of 30% of land for biodiversity.</p> <p>EC O16: Require comprehensive winter and summer bird and wildlife surveys for all proposed wind farms sites, so that impacts on wildlife can be fully assessed and evaluated and so that appropriate mitigation and adaptation measures can be considered, to include for example removal or repositioning of turbines, introducing one black painted rotor blade (to reduce motion smear and reduce incident of collision) or the provision of technologies that help as set out in EIA and other relevant legislation. Post- construction bird surveys should be included as a condition of planning for any consented developments to permit</p>	<p>Chief Executive’s Response See Chief Executive’s response to submission 22 Responsible Solar for Kildare in relation to the requests outlined above regarding objective EC O6.</p> <p>See Chief Executive’s response to submission 147 National Peatlands Park Group for Kildare in relation the requests outlined above regarding objective EC O11 and EC O16.</p> <p>The request in relation to 7.12.5 are accepted, in part.</p> <p>Chief Executive’s Recommendation See recommendations with respect to Submission no. 22 in relation to Objective EC O6 and Submission no. 147 in relation to Objectives EC O11 and EC O16.</p> <p>Insert the following new action after action EC A6: Explore the possibility of integrating solar power with EV charging in Kildare County Council owned car parks throughout the County, potentially utilizing the space on the roof tops of publicly owned buildings.</p>

		<p>before and after impacts to be assessed. Turbine design and adaptation should use the best available technology to minimise harm to birds and other wildlife.</p> <p><u>Electric Vehicles</u> Submission requests an additional objective (in purple), as follows: New objective: Explore the possibility of integrating solar power with EV charging in Kildare County Council owned car parks throughout the County, potentially utilizing the space on the roof tops of public buildings and bus shelters.</p>	
468	Ann Behan	<p>Reference is made to section 7.5. and an amendment is proposed to objectives EC O11 and EC O16.</p> <p>It is proposed to remove the first word of EC O11, “<i>Encourage</i>” and replace it with “<i>Consider</i>”. Also proposed to include “and the EU and national target of 30% of land for biodiversity” after Wind Energy Strategy.</p> <p>Amend EC O16 to read as follows “require comprehensive winter and summer bird and wildlife surveys for all proposed wind farm sites, as set out in EIA and other relevant legislation. Post construction bird surveys should be included as a condition of planning for any consented developments to permit before and after impacts to be assessed. Turbine design and adaptation should use the best available technology to minimise harm to birds and other wildlife. It is submitted that black painted rotor blades may mitigate damage for some species, there may</p>	<p>Chief Executive’s Response See response to submission 147 National Peatlands Park Group for Kildare in relation the requests outlined regarding objective EC O11 and EC O16.</p> <p>Regarding collaborating with SECs Objective EC O7 which supports, encourages and co-operates with SECs in preparing masterplans for communities and in the delivery of infrastructure and services, and assists in the development of SECs in towns throughout Kildare.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>

		<p>be more effective devices available in future. Plus develops should not rely on one factor that may not be effect for sensitive species such as curlew and lapwing.</p> <p>There should be a specific commitment to collaborate with SECs.</p>	
518	Strategic Power Projects Limited	<p><u>Measurable Targets</u> Reference is made to EC A1, which is generally welcomed. However, it is submitted that the wording is too broad and should give some indication of what measurable targets the plan should contain regarding renewable energy and climate change mitigation / adaptation.</p> <p>Actions EC A2 and EC A3 are both acknowledged and welcomed. It is suggested that EC A3 should refer to the recent REPowerEU plan published on 18th May 2022.</p> <p>Reference is made to EC P9 which is to co-operate with EMRA in identifying Strategic Energy Zones. It is submitted that care needs to be taken to ensure other development opportunities are not ruled out. This could curtail rather than promote development of assets.</p>	<p>Chief Executive’s Response It is acknowledged that access to local climate data is a constraint within the Draft Plan, however, the Climate Action Plan for Kildare, when completed, will contain baseline data for the county and relevant targets for renewable energy production and climate mitigation / adaptation. In relation to the REPowerEU Plan it should be noted the Climate Action Plan will have regard to all relevant up-to-date guidance as part of the preparation of same.</p> <p>Policy EC P9 does not specifically rule out other development opportunities in Strategic Energy Zones.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
518	Strategic Power Projects Limited	<p><u>Grid Connection</u> It is agreed that solar resource, topography and proximity to the grid are important considerations for the placement of solar technology. However, it is submitted that proximity to the grid and grid capacity are serious limitations. It is requested that the council give greater weight to grid limitations when</p>	<p>Chief Executive’s Response While acknowledging the need to increase production of renewable energy in Kildare, it should not be at the expense of protected and designated landscapes or other receptors. Each case is assessed on its own merits and can be permitted where it can be demonstrated that such development proposals will not impact on those sensitive</p>

		<p>determining solar applications which may be located near sensitive landscape and other receptors. The REPowerEU Plan is again referred to which aims to increase renewable energy production from 40% to 45% by 2030 and recognising renewables and related grid infrastructure as a matter of overriding public interest.</p> <p>There should be a general presumption in favour of solar PV unless there are significant adverse impacts on landscape, natural and built heritage. This should include ancillary development such as grid infrastructure and storage technologies which complement solar PV.</p> <p>It is requested that the wording “details of the connection to the grid shall be provided with all planning applications” be removed from the Plan as Eirgrid has a prerequisite that permission must be in place before a grid connection offer is made.</p>	<p>landscapes or other receptors such as natural and built heritage. However, it should be noted that there is an action (EC A3), to prepare and implement an overall Renewable Energy Strategy for the County in accordance with the current Climate Change Adaptation Strategy for Kildare. On completion, this document will provide further guidance on suitable locations for renewable energy developments such as Solar PV.</p> <p>Details of the proposed grid connection are required at an early stage to identify potential issues / constraints in relation to other land uses.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
22	Responsible Solar for Kildare	<p>The submission notes objective EC O6 and raised concern that developers of large-scale renewable energy projects are only “encouraged” to carry out community consultation. It is submitted that these developers should be required to carry out community consultation before during and after the formal planning process. It has many benefits as set out in the BRE Best Practice Guide ‘Community Engagement Good Practice for Solar Farms’.</p>	<p>Chief Executive’s Response The submission is noted. The Planning Authority agrees that community consultation allows developers to understand local issues. It is therefore proposed to amend EC O6 to reflect the submission.</p> <p>Chief Executive’s Recommendation Amend EC O6 as follows: Require Encourage developers of proposed large scale renewable energy projects to carry out community consultation (including, but not limited to Sustainable Energy Communities, where established) in accordance with best practice and to commence the consultation at the commencement of project planning. Details of all such</p>

			consultation shall accompany planning applications for proposed renewable energy developments.
244	Conor and Jane Horan	The Development Plan should be revised to include a 10% reduction in Council (Commercial) Rates for Local Businesses who invest significantly in equipment such as Solar Panels or Wind Turbines over a 5-year period.	<p>Chief Executive's Response While the proposal is outside the scope of this Development Plan as a land use plan, it should be noted that a review of the Development Contribution Scheme for Kildare County Council will take place later this year when proposals such as that put forward may be considered.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
193	Deirdrett Brett	It is submitted that the Plan should include rules / policies to ensure large scale energy developments are in appropriate locations and are not allowed on prime agricultural land.	<p>Chief Executive's Response In line with Government Guidelines, a Wind Energy Strategy was prepared to inform the Draft Plan (see Appendix 2). Through a clear, evidence-based methodology and sieve mapping exercise, the Strategy identified areas where wind energy developments are 'acceptable in principle', 'open for consideration' and 'not normally permissible'. There are a number of objectives in the Draft Plan that now relate to wind energy developments (Section 7.5 of Chapter 7 refers).</p> <p>In the absence of Government Guidelines with respect to solar energy developments Section 7.6 of the Draft Plan should be noted, which provides guidance with respect to solar energy proposals which must take account of such factors as the impact on the receiving landscape and biodiversity (including trees and hedgerows) the removal of which will be strongly discouraged.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

210	Naas Action Group	<p>The submission states that there is a looming energy crisis and therefore it is suggested that all applications for development (one off dwellings, large housing estates and commercial applications) be required to highlight all measures to reduce energy demand, increase energy efficiency and to provide renewable energy on site. It is recommended that this is supported by a policy.</p>	<p>Chief Executive's Response The sentiment of the policy is noted and accepted. However, building control standards govern the regulations in terms of the energy efficiency of buildings for one-off dwellings or residential housing estates. These must all now be built to a Nearly Zero Energy Building rating (NZEB). As per the Draft Development Plan Guidelines (2021) objectives dealing with specific issues that are governed by other legislative codes, including for example, the Building Regulations or the Building Control Acts, should not be included as objectives in development plans. Notwithstanding the above however, the Draft CDP under Objective EC 044 requires all new development to be designed to take account of the impacts of climate change, and that energy conservation, energy efficiency and energy renewable measures are incorporated in new and existing buildings through the appropriate design and location of new development, in accordance with relevant building regulations and guidelines.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
598	Friends of Harristown Commons	<p>The submission welcomes the consideration given to landscape, residential amenities and environmental considerations. The submission recommends objective EC O7 is amended as follows:</p> <p>Assist in the development of Sustainable Energy Communities (SECs) in urban and rural population throughout the county Support, encourage and co-operate with Sustainable Energy Communities (SECs) SECs in the preparation of energy masterplans for their communities and in the delivery of infrastructure and services and to assist in the</p>	<p>Chief Executive's Response Agreed in part.</p> <p>Chief Executive's Recommendation Amend EC O7: Support, encourage and co-operate with Sustainable Energy Communities (SECs) in the preparation of energy masterplans for their communities and in the delivery of infrastructure and services and to assist in the development of SECs in towns communities (both urban and rural) throughout the County.</p>

		development of SECs in towns throughout the County.	
598	Friends of Harristown Commons	<p>The submission states that “Development Plans - Guidelines for Planning Authorities” published in 2007 states that Development Plans should offer clear guidance to developers in framing development proposals and the planning authority in assessing such proposals. There is an absence of guidelines for other forms of energy development such as solar energy generation.</p> <p>A clear and consistent policy should be set out in the sections detailed in EC P5 to EC P13 and EC O17, EC O27, EC O32, EC O33, EC O 35, EC O36, EC O39, EC O41.</p> <p>There should be clarity regarding regulatory guidelines and the competent authority. Previously developed land, industrialised sites and rooftops should be utilised.</p> <p>Recommendation for a new policy as follows; All proposed developments which generate or supply energy will be assessed in terms of a standard set of criteria:</p> <ol style="list-style-type: none"> 1. Viability 2. Impacts in the receiving environment, including but not limited to: <ol style="list-style-type: none"> a) Impacts on Natural Heritage (including Biodiversity) b) Impacts on Archaeological Heritage c) Impacts on Visual Amenity d) Impacts on Residential Amenity 	<p>Chief Executive’s Response</p> <p>It should be noted that the Department of Housing, Local Government and Heritage prepared an updated version of the Development Plans – Guidelines for Planning Authorities (June 2022). Notwithstanding same however the Planning and Development Act 2000 (as amended) sets out both the mandatory and non-mandatory objectives that must be included in a Development Plan. As part of the preparation of the County Kildare Draft Development Plan, the relevant parts of the Planning Acts, the National Planning Framework, the Regional Spatial and Economic Strategy and a range of other policy and guidance documents (both statutory and non-statutory) were considered and have informed the contents of the Draft Plan. It is considered that the Draft Plan is set out in a clear and transparent manner identifying the relevant objectives, actions and targets (where possible and appropriate) in order to achieve the overall aim of the relevant chapter and policies contained therein. The Development Management Standards (Chapter 15) includes a wide range of guidance and standards relevant to the making of a planning application and the assessment of same however, it must be noted that Chapter 15 should not be read in isolation and, depending on the nature of a particular development proposal, other chapters in the Draft Plan may also be relevant as well as Volume 2 (zoning maps and designated sites), the Appendices (12 in total) and the Environmental Assessments.</p> <p>There is an absence of national guidance in relation to solar energy, however Section 7.6 does provide guidance to developers and assessors of solar energy developments. Notwithstanding same it should be noted that there are</p>

			<p>proposed amendments to Section 7.6 that have been included elsewhere in this report, see Submission No. 555.</p> <p>Clear and concise policies have been included in the Draft Plan relative to each of the objectives listed in this submission.</p> <p>It is outside the scope of the Draft Plan (primarily a land use plan) to provide clarity regarding regulatory guidelines and the competent authority.</p>
			<p>Chief Executive's Recommendation See Submission No. 555 for recommendations in relation to an updated solar energy policy, objectives and the associated narrative around same.</p>
598	Friends of Harristown Commons	The submission recommends a greater emphasis on energy efficiency in Chapter 7. The efficient use of energy helps to conserve resources such as land for renewal energy plants and power grids, rare metals, fossil fuels, synthetic fuels or biomass. Submission believes Energy Efficiency Section (7.12) should take greater priority within the chapter.	<p>Chief Executive's Response Chapter 7 (Energy & Communications) includes 17 policy statements, 56 objectives and 7 actions related to various aspects of energy and the promotion of more sustainable types of energy use. It is considered that energy efficiency has been afforded significant weight in this particular chapter of the Draft Plan. Furthermore it should be noted that amendments are proposed to Section 7.6 (Solar Energy), see response to Submission No. 555.</p>
			<p>Chief Executive's Recommendation See recommendation to Submission No. 555.</p>
598	Friends of Harristown Commons	The submission recommends not allowing Energy development near protected or heritage sites rather than "adopting an informed approach" as proposed in EC O2.	<p>Chief Executive's Response When assessing planning proposals, the Council must take a balanced view of the appropriateness of the proposed development having regard to a range of factors including but not limited to; residential and visual amenity, environmental and landscape impacts, impacts on designated heritage sites</p>

			and protected structures. Without a clear evidence base for not supporting particular developments at appropriate locations, it is considered that the wording of Objective EC O2 is reasonable and appropriate and should remain as drafted.
			Chief Executive's Recommendation No change to the Draft Plan.
598	Friends of Harristown Commons	The submission states that public consultation should be mandatory for large energy developments. Edit EC O6	Chief Executive's Response While it would be desirable that developers would liaise with the relevant communities at the very early stages of preparation for large energy developments in particular (noting Objective EC O6) it is outside the remit of the Draft Plan to require the undertaking of such consultation. Any submissions made by the public in relation to energy development planning applications (of any scale) would be considered by the Council planning staff in any event.
			Chief Executive's Recommendation No change to the Draft Plan.
598	Friends of Harristown Commons	The submission recommends the placing of a Decommissioning Bond on all developers of renewable Energy Facilities. Edit objective EC O15.	Chief Executive's Response Bonds are applied on a case-by-case basis in accordance with section 15.1.8 of the Draft Plan which may also take account of the decommissioning stage of renewable energy projects.
			Chief Executive's Recommendation No change to the Draft Plan.
598	Friends of Harristown Commons	The submission recommends in identifying Strategic Energy Zones as per EC O35 importance is placed	Chief Executive's Response Noted and agreed in part.

		on local landscape and its biodiversity, archaeological and heritage importance.	<p>Chief Executive's Recommendation Amend Objective EC O35 as follows; Identify Strategic Energy Zones in conjunction with EMRA as areas suitable for larger energy generating projects, community and micro energy production, whilst ensuring environmental constraints factors (including landscape, biodiversity and archaeology) and a regional landscape strategy are considered.</p>
405	Kildare Climate Action Linkage Group	<p>It is submitted that it will be a time-critical missed opportunity if specific projects and plans are not identified locally to address climate mitigation measures.</p> <p>The submitter would like to see a specific commitment from KCC to collaborate with the Sustainable Energy Communities (SECs).</p> <p>It is requested that the following should be researched and included in the Plan:</p> <ul style="list-style-type: none"> • Electric vehicles/bikes and charge points. The introduction of this type of transport will help in reducing emissions, alleviate traffic from heavily traffic areas and encourage people to get involved in alternative transport. • More charge points within the town and outside in villages as better EV infrastructure allows for greater take up in non-fossil fuel powered vehicles. 	<p>Chief Executive's Response There are 25 sustainable energy communities (SEC's) located in towns and villages throughout the county including Naas, Leixlip, Maynooth, Kildare, Kilcock, Clane, Celbridge, Monasterevin, Straffan, Kilcullen, Ardclough, Narraghmore and Ballymore Eustace. Objective EC O7 states that it is an objective of the Council to support, encourage and co-operate with SECs in the preparation of energy masterplans for communities and in the delivery of infrastructure and services.</p> <p>It should be noted that the Plan includes various objectives (TM O15, TM O31, TM O43, TM O109, TM O110 & EC O45) and an action (TM A10) to support and facilitate electric vehicles, bikes, and charge points.</p> <p>DMURS outlines a user hierarchy to consider during the design of roads and streets which prioritises sustainable forms of transportation. The hierarchy considers pedestrians, cyclists, public transport and private motor vehicles in this order. To recognise the importance of electric vehicles in reducing Greenhouse Gas emissions, Kildare County Council added electric vehicles to the hierarchy to be considered before private motor vehicles.</p>

			<p>Considering the above, no changes to the Plan are proposed.</p> <p>Chief Executive's Recommendation No changes to the Draft Plan.</p>
ALTERNATIVE SOURCES OF ENERGY			
395	<p>Dept. Environment, Climate & Communications</p> <p>(to be read in conjunction with GSI submission, same number, submitted together)</p>	<p>The submission notes the support for district heating systems. It is requested that not only those applications for new developments demonstrate that they have merely considered district heating systems / technologies in their design, but that they have the capacity to connect to such systems in the future if they cannot do so at present.</p> <p>The submission highlights the National Heat Study that has been carried out and should be used to assist in the review of the Draft Plan. The submission also refers to the Draft Policy Statement on Geothermal Energy for a Circular Economy, published in December 2021.</p>	<p>Chief Executive's Response It is an objective (EC O44) of the Council to require all new developments to be designed to take account of the impacts of climate change, and that energy conservation, energy efficiency and energy renewable measures are incorporated in new and existing buildings through the appropriate design and location of new development, in accordance with relevant building regulations and guidelines' which, it is considered, addresses this part of the submission. It is however considered appropriate to reference the recently published Draft Policy Statement on Geothermal Energy for a Circular Economy in policy EC P7 of the Plan.</p> <p>Chief Executive's Recommendation Amend EC P7 as follows: Facilitate large and smaller scale geothermal energy generating developments both standalone and in conjunction with other renewable energy projects, subject to the proper planning and sustainable development of the area and consideration of environmental and ecological sensitivities in particular the sensitivities of protected surface water or groundwater bodies and groundwater dependent terrestrial ecosystems and to have regard to the Draft Policy Statement on Geothermal Energy for a Circular Economy (2021)</p>

			published by the Department of the Environment, Climate & Communications (or any subsequent updates).
395	Geological Survey of Ireland (to be read in conjunction with Dept. Environment, Climate & Communications submission, same number, submitted together)	GSI welcomes the inclusion of the geothermal policy and objectives and recommend their geothermal suitability maps to determine the most suitable type of ground source heat for use with heat pump technologies.	<p>Chief Executive's Response It is proposed to amend EC O32 to reference the use of the Geological Survey Ireland's (GSIs) Geothermal Suitability maps.</p> <p>Chief Executive's Recommendation Amend EC O32 as follows: Promote the use of geothermal heat pumps for space heating and cooling as well as water heating in domestic, commercial and recreational buildings subject to the protection of water quality and any other relevant considerations such as the Geological Survey of Ireland's (GSIs) Geothermal Suitability maps.</p>
351	Eco Advocacy	The submission states that there needs to be much more deep-bore geothermal energy.	<p>Chief Executive's Response The Sustainable Energy Authority of Ireland (SEAI) has developed a geothermal mapping system which identifies the temperature at various depths for the whole country. This type of renewable energy generation may become viable as technologies advance.</p> <p>In Policy EC P7, it is the policy of the Council to 'Facilitate large and smaller scale geothermal energy generating developments both standalone and in conjunction with other renewable energy projects, subject to the proper planning and sustainable development of the area and consideration of environmental and ecological sensitivities'. It is an objective of the Council to promote the use of geothermal heat pumps for space heating and cooling as well as water heating in domestic, commercial and recreational</p>

			buildings subject to the protection of water quality and any other relevant considerations (EC O32).
			Chief Executive's Recommendation No change to the Draft Plan.
143	Inland Fisheries Ireland	<p><u>Hydro Energy</u> The submission highlights the significant potential for negative impacts on freshwater species and biodiversity posed by Hydro Energy projects (both large and small). Serious concerns are expressed with the policies and objectives in the Draft CDP in support of such proposals.</p> <p>Furthermore, the submission highlights several current legacy issues on hydroelectric schemes and Ireland's legal obligation in accordance with The EU Water Framework Directive (2000/60/EC) to protect and improve water quality in all waters.</p> <p>The submission suggests that the proposed policy be reworded to consider the need to address existing legacy issues at hydro schemes in County Kildare to ensure consistency of policy throughout the document.</p> <p><u>Bio-Energy</u> The submission highlights concerns that the construction of biomass facilities which utilise timber may consolidate the unsustainable afforestation of large areas of cut-over peatlands in the Bog of Allen area and could be used to "Greenwash" this unsustainable practice.</p>	<p>Chief Executive's Response It is considered that the plan adequately addresses the concerns raised in the submission and that policy EC P6 and objective EC O27 consider the impact of Hydro Energy projects on freshwater species and biodiversity.</p> <p>It is considered reasonable and appropriate to amend Objective EC O33 of the Plan to ensure the use of environmentally sustainable sources for biomass projects.</p> <p>Chief Executive's Recommendation Amend Objective EC O33: Support the location of biomass installations, particularly where the operator can demonstrate that the wood chip/wood pellets utilised are derived from environmentally sustainable sources, in areas that do not affect residential or visual amenity which are subject to normal siting, design, environmental and planning considerations and which are served by public roads with sufficient capacity to accommodate increased traffic flows.</p>

		It is requested that the plan state that the development of facilities involving the combustion of biomass will be promoted where the operator can demonstrate that the wood chip/wood pellets utilised are derived from environmentally sustainable sources.	
DATA CENTRES			
421	Bord na Mona (BNM)	BNM welcomes Policy EC P18 which supports the accommodation of Data Centres at appropriate locations. BNM is continually reviewing its property strategy to determine future industrial uses for the holdings. Workshops and stores present opportunities to be re-purposed for new sustainable industries (e.g. the former briquette production facility in Littleton, Co. Tipperary is now a plastics recycling facility).	Chief Executive's Response Proposals for data centres will be considered on their merits in accordance with the policies and objectives contained throughout the Plan in addition to Section 28 Ministerial Guidelines, where relevant.
			Chief Executive's Recommendation No change to the Draft Plan.
210	Naas Action Group	<p>The submission notes that there are two sites zoned for data centres in Naas. There are concerns as these are large energy users and should be required to provide a significant amount of energy on site. The submission notes Policy EC O59 in the Draft Plan but considers it does not go far enough. The submission recommends that they should provide a significant amount of energy which they create on site as part of a comprehensive design solution.</p> <p>The submission suggests the following rewording of EC O59: It is the Policy of the Council to require data centres to incorporate the use of renewable sources of energy on site to fuel their operations. Any</p>	Chief Executive's Response It is important to note that not all renewable energy is also sustainable and therefore sustainable energy should always be prioritised in the first instance. Therefore, it is not considered in the interests of proper planning to prioritise the use of renewable energy sources over those that would be sustainable as per the suggested amendment. However, in the interests of making the objective stronger it is recommended to amend the existing objective.
			Chief Executive's Recommendation Amend Objective EC O59 as follows: Require data centres to consider the use of renewable and sustainable sources of energy to fuel their operations, in whole in the first instance or in part where this is not possible and where it has been satisfactorily demonstrated not to be

		additional energy sources which may be required should be from sustainable sources.	possible. include strong energy efficiency measures to reduce their carbon footprint in support of national targets towards a net zero carbon economy, through the use of sustainable sources of energy generation in the first instance and then the use of renewable sources of energy to power their operations, where on site demand cannot be met in this way, to provide evidence of engagement with power purchase agreements (PPA) In Ireland. All data centre developments shall provide evidence of sign up to the Climate Neutral Data Centre Pact.
405	Kildare Climate Action Linkage Group	The submission references Objective RE O70 and submits that the Plan should clarify what criteria will be used to determine whether the use of sustainable renewable sources of energy is not possible.	<p>Chief Executive's Response See response to submission no. 210 (Naas Action Group) above.</p> <p>Chief Executive's Recommendation See recommendation to submission no. 210 (Naas Action Group) above.</p>
351	Eco Advocacy	The submitter is opposed to the flawed policy in relation to government policy on data centres, which it is submitted is counter-productive in terms of the County's reliance on energy and also exposes the County and its citizens to an unnecessary security risk of a grave kind.	<p>Chief Executive's Response It is Government Policy as set out in the National Planning Framework and the Government Statement on "The Role of Data Centres in Ireland" to promote Ireland as a sustainable international destination for Data Centres.</p> <p>Policy EC P18 of the Draft Plan supports the accommodation of Data Centres at appropriate locations and Objective EC 057 provides that the Council will consider applications for Data Centres having regard to the availability of renewable energy to power any proposed Data Centre. Furthermore, EC O59 requires data centres to consider the use of renewable and sustainable sources of energy to fuel their operations in whole in the first instance or in part where this is not possible and where it has been satisfactorily demonstrated not to be possible.</p>

			Chief Executive's Recommendation No change to the Draft Plan.
PEATLANDS			
552.	Department of Housing, Local Government and Heritage	Submission requests an objective to support the implementation of the National Raised Bog Special Areas of Conservation Management Plan 2017-2022	<p>Chief Executive's Response Agreed. The Council recognises the importance of the National Raised Bog Special Areas of Conservation Management Plan 2017-2022.</p> <p>Chief Executive's Recommendation Insert the following new objective before BI O5: Support the implementation of the National Raised Bog Special Areas of Conservation Management Plan 2017-2022.</p>
421	Bord na Mona (BNM)	<p><u>Strategic Energy Zones</u> To be consistent with the NPF and the RSES (RPO 7.35), Chapter 7 should call out and support the suitability of cutaway peatlands for renewable energy projects. BNM sites are brownfield in nature, have limited environmental constraints, are largely removed from large number of sensitive receptors, are close to the national grid and have good road access. The development of renewable energy projects on these lands has the potential to make a significant contribution to national policies and objectives across a range of sectors including renewable energy, industrial development and job creation in rural areas, ecosystem services and biodiversity as well as tourism, amenity and recreation.</p>	<p>Chief Executive's Response Peatways are referenced throughout the Regional Spatial and Economic Strategy as a heritage asset; a strategic natural asset; a growth enabler for the region; a support to the rural economy; a cultural and tourism asset; as carbon stores; as high biodiversity assets; as providing opportunity to develop a National Park; as green infrastructure; as promoting active travel and recreation via peatways; as having potential for beneficial uses including renewable energy, biodiversity, amenity uses, water storage and other infrastructure. It is considered that the Draft Plan already reflects the multi-faceted importance of the peatways in this regard, including for renewable energy as reflected in RD O29, whilst cooperating with EMRA to identify Strategic Energy Zones within the County as reflected in EC P9.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

421	Bord na Mona (BNM)	<p>BNM note Objectives EC O51 (Supporting BNM in the preparation of a long term strategic plan for former industrial peatlands) and EC O56 (supporting implementation of Local Just Transition Plan). Central to BNM's ongoing transition to diversify into new sustainable business is the use of the landbank for a range of beneficial commercial, environmental and social uses - such as renewable energy, industrial uses (including data centres), biomass cultivation, ecosystem services and biodiversity as well as recreation and tourism. These can be co-located to provide enhanced benefits to the area.</p> <p>In relation to EC P17 and EC O51, BNM expect to publish a revision of their 'Strategic Framework for the future use of Peatlands' (2011) in 2022 which will address the national significance of BNM's landholding which offers a range of opportunities to support national policy objectives relating to rural development, employment, renewable energy, recreation and tourism, and biodiversity. In many cases, these uses can be co-located providing enhanced benefits.</p> <p>BNM support the statement in the plan that there is significant potential to develop a Green Energy Hub in County Kildare. An example of such an initiative being the Learning Hub at Mount Lucas Wind Farm visitor centre.</p> <p>BNM are happy to support EC A7 (National Peatlands Park) where proposals are compatible with their integrated land-use strategy. Future climate action projects and renewable energy developments are considered a precursor to the development of</p>	<p>Chief Executive's Response It is acknowledged that BNM's Strategic Framework is under review and due for publication this year and it is anticipated that the draft Kildare CDP will influence the outputs of that document in a meaningful and tangible manner, particularly in relation to the importance of Green Infrastructure. It is considered that the CDP takes a balanced approach to the peatlands in terms of protection of the landscape whilst facilitating sustainable development at appropriate locations to facilitate the transition to a low carbon economy.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
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		amenity and to land use plans. The BNM landbank provides a unique opportunity in this regard.	
470	IPCC	<p>Edit objective EC P17 to include purple text: that these expansive lands make towards the special landscape of the Bog of Allen including the creation of a National Peatlands Park, being a focal point for the environmental landscape, conservation and amenity.</p> <p>The submission recommends that Kildare has huge potential in conservation and biodiversity and the end of industrial extraction puts forward a new agenda in terms of economic sustainability, County Kildare should seize the opportunity to engage with stakeholders and develop a new Peatland Centre of Excellence as set out in the National Peatland Strategy.</p> <p>The County already has many environmental educational facilities which could support this, such as the Bog of Allen Nature Centre and Lullymore Heritage and Discovery Centre but this needs to be first realised in policy and joined up thinking.</p> <p>Amend Objective EC O53 to include purple text: Support the implementation of the recommendations contained in the National Peatlands Strategy 2015 and any subsequent revisions including the creation of a National Peatlands Park and Peatland Centre of Excellence.</p> <p>Amend Objective EC O55 to include purple text:</p>	<p>Chief Executive's Response Agreed. KCC supports the creation of a National Peatlands Park.</p> <p>Chief Executive's Recommendation Amend Policy EC P17 as follows: that these expansive lands make towards the special landscape of the Bog of Allen and its potential to further the growth of tourism to and within the County including the creation of a National Peatlands Park, being a focal point for the environmental landscape, conservation and amenity.</p> <p>Amend Objective EC O53 as follows; Support the implementation of the recommendations contained in the National Peatlands Strategy 2015 and any subsequent revisions including the creation of a National Peatlands Park and Peatland Centre of Excellence.</p> <p>Amend Objective EC O55 as follows; Estimate an overall carbon balance when evaluating renewable energy project applications on peatlands, especially those proposed for wind or solar projects taking into account the lifetime of the project versus the potential carbon sequestration over 1000s of years of a site once rehabilitated fully.</p>

		Estimate an overall carbon balance when evaluating renewable energy project applications on peatlands, especially those proposed for wind or solar projects taking into account the lifetime of the project versus the potential carbon sequestration over 1000s of years of a site once rehabilitated fully.	
358	Deirdre Lane	<p><u>National Peatland Park</u> That the peatland park and nature conservancy investment at Umerus which should follow a 3-year rewetting engineering project be supported as a Pilot and other Kildare bogs be supported and the rail infrastructure where feasible preserved. Industrial and social heritage should also be kept and exhibited. An application for such a scheme should be accompanied by a comprehensive Environmental Impact Assessment.</p>	<p>Chief Executive's Response Two Actions in the draft plan support the development of the National Peatlands Park including EC A7 in Chapter 7 'Energy & Communications' and BI A22 in Chapter 12 'Biodiversity and Green Infrastructure'.</p> <p>There is potential for the industrial complexes associated with the former peat extraction operations to be exhibited to interpret the history and heritage of industrial peat extraction in the county and part of the county's shared heritage.</p> <p>All proposals are subject to the requirements of planning legislation and environmental consents, as appropriate.</p> <p>Chief Executive's Recommendation See recommendation in submission no. 470 above for EC P17.</p>
408	Creative Rathangan Meitheal (CRM)	<p>This submission concerns the delivery of EU Just Transition Funds in County Kildare. It outlines the role of CRM in focusing on aspects of Bord na Mona's (BNM's) socio-economic impact on the Great Midlands Region, since it ended its peat extraction activities.</p> <p>Submits that CRM is collaborating with Maynooth University and an Arts Council funded Climate Action and place-based initiative led by Carlow County</p>	<p>Chief Executive's Response The Plan includes objectives supporting the implementation of a Just Transition Plan for West Kildare. EC 056 supports the implementation of the 'Local Just Transition Plan for West Kildare' which identifies actions to support and advance sustainable, social, economic, environmental development in the transition to a low-carbon future in the West Kildare region. Further support is expressed in EC 050 in relation to the prioritisation of sourcing E.U. and National funding to support projects which assist the transition of the industrial</p>

		<p>Council with Kildare and Meath County Councils which brings environmental activists, artists and community mapping experts together.</p> <p>The submission welcomes Kildare County Council's initiative in developing a Just Transition Plan for West Kildare and notes that the Council's role within the EMRA which will manage the delivery of the EU Just Transition Funds should be referenced in the County Development Plan.</p> <p>States that Kildare County Council could help broker/facilitate partnerships by committing to cross-county projects and welcomes Kildare Leader's initiative in promoting the Smart Village concept. The submission requests that Objective EC O50 be changed to: 'Prioritise the sourcing of E.U. and National funding to support projects which assist the transition of the industrial peatlands and the communities traditionally dependant on them in a manner consistent with the principles of Just Transition (to include arts and heritage funding).' The communities most affected by the transition from peat must be treated as equals in the process.</p>	<p>peatlands and the communities traditionally dependant on them to sustainable other uses. It is considered that this objective would relate to the arts and heritage amongst others.</p> <p>In relation to the Council's commitment to cross-county projects, it is an action of the Council to support in conjunction with Offaly County Council and Laois County Council any proposal for a new National Peatlands Park on Bord na Mona cutaway bogs in Kildare, Laois and Offaly (EC A7)</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
181	Lullymore Heritage & Discovery Park CLG	<p>Additional text proposed in respect of peatlands across policy and objectives as follows: EC P17 - Support the preparation of a comprehensive "after use" framework plan for the industrial peatlands and associated workshops, office buildings, industrial sites and power stations in Kildare, acknowledging the significant contribution that these expansive lands make towards the special landscape of the Bog of Allen and its potential to further the growth of tourism to the County.</p>	<p>Chief Executive's Response The suggested change to EC P17 is addressed in responses and recommendations to submission no. 470. The potential of peatlands for tourism is addressed in Chapter 9 and an amended policy RD P1 is proposed to explicitly refer to peatlands tourism (see response to submission 172).</p> <p>Objective EC O51 is to support the preparation of the long-term strategic plan for the former industrial peatlands and it is not considered necessary to expand.</p>

		<p>EC O51 - Support Bord na Mona, the local communities and other key stakeholders in the preparation of a long-term strategic plan for the former industrial peatlands.</p> <p>EC O54 - Require an Ecological Impact and Landscape Assessment to be carried out and submitted with any planning application for energy infrastructure projects (e.g., wind and solar developments) on bog /</p> <p>Proposed new objective after ECO 57; it is considered that green energy should not be at the expense of established and growth in tourism amenities or future sustainable tourism plans. Support the preservation of the visual and environmental assets surrounding existing tourism venues or planned tourism development on the Bog of Allen and estimate the tourism related impacts of proposed large scale renewable energy projects on the delivery and growth of their services.</p>	<p>The suggested change to Objective EC O54 is noted, however a separate Objective LR O2 requires a Landscape/Visual Impact Assessment to accompany large scale proposals.</p> <p>The proposed new objective relating to the preservation of visual and environmental assets and assessment of tourism related impacts is noted. There are many policies and objectives within the plan to protect visual and environmental assets, however, it is beyond the remit of this Plan to implement a policy to estimate tourism related impacts.</p> <p>Chief Executive’s Recommendation See recommendation for submission no. 470 in relation to amending EC P17.</p>
405	Kildare Climate Action Linkage Group	<p>It is requested to include reference to the West Kildare Just Transition Plan 2022 in the text.</p> <p>In addition, the submission requests the following amendments: Amendment EC P17 - Support the preparation of a comprehensive “after use” framework plan for the industrial peatlands and associated workshops, office buildings, industrial sites and power stations in Kildare, acknowledging the significant contribution that these expansive lands make towards the special</p>	<p>Chief Executive’s Response Objective EC O56 supports the implementation of the ‘Local Just Transition Plan for West Kildare’, therefore it is adequately addressed. A new action with regards to the Just Transition Plan is also proposed to be included in Section 10.6 of the Plan, see the Chief Executive’s response to submission 181 Lullymore Heritage and Discovery Park CLG.</p> <p>Also see response to submission 181 Lullymore Heritage and Discovery Park CLG in relation to Policy EC P17 and Objectives EC O51 and EC 054.</p>

		<p>landscape of the Bog of Allen and its potential to further the growth of tourism to the County.</p> <p>Amendment EC 051 - Support Bord na Mona, the local communities, and other key stakeholders in the preparation of a long-term strategic plan for the former industrial peatlands.</p> <p>Amendment EC 054 - Require an Ecological Impact and Landscape Assessment to be carried out and submitted with any planning application for energy infrastructure projects (e.g., wind and solar developments) on bog / peatlands (including former cut-away bogs).</p>	<p>Chief Executive's Recommendation</p> <p>See recommendations to submission 181 Lullymore Heritage and Discovery Park CLG in relation to Policy EC P17 and Objectives EC O51 and EC 054.</p>
147	National Peatlands Park Group	<p>The text within section 7.12.7 (Peatlands) should include reference to the West Kildare Just Transition Plan 2022.</p> <p>Amendments should be made to the following policies and objectives: EC P17; 'Support the preparation of a comprehensive "after use" framework plan for the industrial peatlands and associated workshops, buildings, industrial sites and power stations in Kildare, acknowledging the significant contribution that these expansive lands make towards the special landscape of the Bog of Allen and its potential to further the growth of tourism to the County.'</p> <p>EC O51; Support Bord na Mona, the local communities and other key stakeholders in the preparation of a long-term strategic plan for the former industrial peatlands.</p>	<p>Chief Executive's Response</p> <p>It is agreed to include reference to the Just Transition Plan 2022 in the text of Section 7.12.7 to support objective EC O56 which refers to the implementation of the actions within the Just Transition Plan.</p> <p>The suggested change to EC P17 is accounted for in response and recommendation to submission no. 470. The potential of peatlands for tourism is addressed in Chapter 9 and an amended policy RD P1 is proposed to explicitly refer to peatlands tourism (see response to submission 172).</p> <p>Objective EC O51 is to support the preparation of the long-term strategic plan for the former industrial peatlands and it is not considered necessary to expand.</p> <p>The suggested change to Objective EC O54 is noted. A change to this objective has been recommended by the Council's SEA/AA consultants, see recommendation below.</p>

		<p>EC O54; Require an Ecological Impact and Landscape Assessment to be carried out and submitted with any planning application for energy infrastructure projects (e.g., wind and solar developments) on bog / peatlands (including former cut-away bogs).</p> <p>Environmental Impact Assessments which include ecology and landscape/ visual impacts are mandatory for developments. This should be signalled in the CDP.</p>	<p>The Planning and Development Regulations Act 2001 (as amended) prescribe the types of developments which require an Environmental Impact Assessment. It is not the function of the CDP to replicate this statutory provision.</p> <p>Chief Executive's Recommendation See recommendation for submission no. 470 in relation to amending EC P17.</p> <p>Amend Objective EC O54 as follows: infrastructure projects (e.g., wind and solar developments) on bog / peatlands (including former cut-away bogs)</p> <p>Add the following new paragraph in Section 7.12.7 to acknowledge the publication of the Local Just Transition Plan for West Kildare, 2022. The 'Local Just Transition Plan for West Kildare', commissioned by Kildare County Council, was published in March 2022. On a strategic level, the purpose of the plan is to identify bottom-up, smaller scale, localised measures to complement larger regional and national development measures and investments. In doing so, the Plan identifies projects to support and advance sustainable, social, economic and environmental development in the transition to a low carbon future in the West Kildare region. Addressing the County's turbary areas, the Plan provides a concise, coherent, thematic, and action-focused plan with an emphasis on the effective and practical implementation of projects to stimulate and enable a range of actions that can be owned and driven by the many diverse communities of West Kildare. In doing so, it draws together opportunities associated with the Just Transition Framework for the wider Midlands Region, the National Territorial Just Transition Plan,</p>
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			<p>and the impetus for the Transition to a Low Carbon Economy.</p> <p>The guiding priorities for the Plan have been to stimulate skills development and employment, to build community cohesion and to increase the resilience of the communities of West Kildare, across three key themes: Economy, Society and Environment. The Plan identifies 15 no. thematic actions which focus on overcoming challenges and capturing opportunities. The aforementioned themes of the Just Transition are at the heart of all 15 actions. Each action is designed to deliver against all three of these themes in some way. Therefore, rather than group actions by theme actions have been grouped into three areas of opportunity which have been identified as Tourism, Business and Skills and Energy. Some of the key actions identified in the Plan include:</p> <ul style="list-style-type: none"> • Progressing the opportunity for a new National Peatlands Park for Ireland • Providing a stimulus for community owned marinas and facilities as key blueway infrastructure to support the growing tourism sector • Encouraging new community development groups to emerge • Growing the capacity for communities to help themselves through 'one-stop shops' at community hubs which will enhance the ability of communities to access funding opportunities and skills training, as well as supporting remote working • Supporting community retrofitting programmes <p>The Plan also identifies three priority enabling actions which have the capacity, if realised, to support all 15 proposed thematic actions and include the following;</p>
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			<p>1. A coordinated programme of activity to bid for Just Transition Fund monies</p> <p>2. Critical partnership building</p> <p>Incorporation of the Just Transition Plan into the Local Economic Community Plan (LECP)</p>
413.	Kildare Public Participation Network	<p><u>Peatlands</u> Submission requests that the policy and objectives set out below be amended (additional text in purple), as follows:</p> <p>EC P17: Support the preparation of a comprehensive “after use” framework plan for the industrial peatlands and associated workshops, office buildings, industrial sites and power stations in Kildare, acknowledging the significant contribution that these expansive lands make towards the special landscape of the Bog of Allen and its potential to further the growth of tourism to the County.</p> <p>EC O51: Support Bord na Mona, the local communities and other key stakeholders in the preparation of a long-term strategic plan for the former industrial peatlands.</p> <p>EC O54: Require an Ecological Impact and Landscape Assessment to be carried out and submitted with any planning application for energy infrastructure projects (e.g., wind and solar developments) on bog / peatlands (including former cut-away bogs).</p>	<p>Chief Executive’s Response See Chief Executive’s response to submission 470 IPCC in relation to policy EC P17 and submission no. 181 Lullymore Heritage and Discovery Park CLG in relation to Objective EC O51 and submission no. 147 in relation to Objective EC 054.</p> <p>Chief Executive’s Recommendation See Chief Executive’s recommendations to submission 470 IPCC in relation to policy EC P17 and submission no. 181 Lullymore Heritage and Discovery Park CLG in relation to Objective EC O51 and submission no. 147 in relation to Objective EC 054.</p>
432	West Kildare SMART Rural Alliance (SRA)	<p>The submission requests the following change to Policy EC P17: Support the preparation of a comprehensive “after use” framework plan for the industrial peatlands (including associated workshops, office buildings etc)</p>	<p>Chief Executive’s Response The suggested change to EC P17 to refer to tourism is noted and accounted for in response and recommendation to submission no. 470.. The potential of peatlands for tourism is addressed in Chapter 9 and an amended policy RD P1 is</p>

	<p>in Kildare, acknowledging the significant contribution that these expansive lands make towards the special landscape of the Bog of Allen and its potential to further the growth of tourism to the County.</p> <p>The submission requests the following change to Objective EC O50: Prioritise the sourcing of E.U. and National funding to support projects which assist the transition of the industrial peatlands and the communities traditionally dependant on them in a manner consistent with the principles of Just Transition. (To include Arts & Heritage Funding)</p> <p>The submission requests the following change to Objective EC O51: Support Bord na Mona, local communities and other key stakeholders in the preparation of a long-term strategic plan for the former industrial peatlands.</p> <p>The submission requests the following change to Objective EC O54: Require an Ecological Impact and Landscape Assessment to be carried out and submitted with any planning application for energy infrastructure projects (e.g., wind and solar developments) on peatlands.</p> <p>It is considered that green energy should not be at the expense of established and growing tourism amenities or future sustainable tourism plans. The submission requests the following new objective to be inserted after Objective EC O57: Support the preservation of the visual and environmental assets surrounding existing tourism venues or planned tourism development on the Bog</p>	<p>proposed to explicitly refer to peatlands tourism (see response to submission 172).</p> <p>The Plan includes objectives supporting the implementation of a Just Transition Plan for West Kildare. EC 056 supports the implementation of the ‘Local Just Transition Plan for West Kildare’ which identifies actions to support and advance sustainable, social, economic, environmental development in the transition to a low-carbon future in the West Kildare region.</p> <p>Further support is expressed in EC 050 in relation to the prioritisation of sourcing E.U. and National funding to support projects which assist the transition of the industrial peatlands and the communities traditionally dependant on them to other sustainable uses. It is considered that this objective would relate to the arts and heritage amongst others.</p> <p>Objective EC O51 is to support the preparation of the long-term strategic plan for the former industrial peatlands and it is not considered necessary to expand.</p> <p>The suggested change to Objective EC O54 is noted, see response to submission no. 147 above.</p> <p>The proposed new objective relating to the preservation of visual and environmental assets and assessment of tourism related impacts is noted. There are many policies and objectives within the plan to protect visual and environmental assets, however, it is beyond the remit of this Plan to implement a policy to estimate tourism related impacts.</p> <p>Chief Executive’s Recommendation See Chief Executive’s recommendations to submission 470 IPCC in relation to policy EC P17 and submission no. 181</p>
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		of Allen and estimate the tourism related impacts of proposed large scale renewable energy projects on the delivery and growth of their services.	Lullymore Heritage and Discovery Park CLG in relation to Objective EC O51 and submission no. 147 in relation to Objective EC 054.
472	Keep Ireland Open	The submission recommends an additional objective in Chapter 7 as follows; Ensure that renewable energy projects located on or near peat/ands do not negatively impact on any rehabilitation measures including enhanced rehabilitation measures (i.e., blocking and re-wetting).	<p>Chief Executive's Response Agreed.</p> <p>Chief Executive's Recommendation Include a new objective in Section 7.12.7 Peatlands as follows; Ensure that renewable energy projects located on or near peatlands do not negatively impact on any rehabilitation measures including enhanced rehabilitation measures (i.e. blocking and re-wetting).</p>
GAS & ELECTRICITY			
303	Gas Networks Ireland	Hydrogen has been identified as a key enabler of Ireland and Europe's decarbonisation ambitions; Gas Networks Ireland suggests adding a short section on hydrogen under the first paragraph of Section 7.16	<p>Chief Executive's Response Noted and agreed.</p> <p>Chief Executive's Recommendation Include the following paragraph directly after the paragraph titled '7.16 Gas' ending 'to additional towns'; Hydrogen is a carbon free gas that can be produced from renewable electricity. While initially seen primarily as a decarbonisation solution for heavy goods vehicles and industry, because of its versatility, it is now recognised that hydrogen can play a key role in the decarbonisation of large swathes of the economy, power generation, transport, industry and heating. Hydrogen is also well suited to short-term and inter-seasonal storage, making it an attractive option to decarbonise energy systems and a driver of a cleaner energy future for Ireland.</p>

303	Gas Networks Ireland	Gas Networks Ireland suggests small editorial changes in relation to objective EC O87.	<p>Chief Executive's Response Noted and agreed</p> <p>Chief Executive's Recommendation Amend Objective EC O87 to read as follows; Support and facilitate the production of low carbon or renewable biogases such as hydrogen produced using renewable electricity, and biomethane, produced largely from agricultural organic matter and food waste, that can be exported as power/energy to the National Grid, subject to appropriate environmental assessments.</p>
423.	Electricity Supply Board (ESB)	<p>The submission notes ESB's role as Ireland's foremost energy company and the largest supplier of renewable electricity in Ireland. States that the company is embracing new technologies that are revolutionising the energy industry, including smarter electricity networks. Submission outlines ESB's objective to develop and connect renewables to decarbonise the electricity system by 2040, which is consistent with the objectives of the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES).</p> <p><u>Generation, Transmission and Distribution</u> States that as recognised in the draft Plan, there are three hydro generation stations on the Liffey in Kildare. Notes that by 2030 ESB will develop an additional 4 GW of new onshore and offshore wind and solar PV renewable assets to add to ESB's 1 GW of renewables operating today. By 2030, 63% of ESB's electricity will come from renewable sources and will be a net zero producer of electricity by 2040. States that to support the transition of the National Grid to a low-carbon future ESB is developing assets</p>	<p>Chief Executive's Response The contents of the submission are noted. The request to include a specific supporting objective relating to the research and development of green hydrogen is accepted. For further information on the issue of hydrogen refer to the Chief Executive's Response to the submission to the draft Plan from Gas Networks Ireland (GNI).</p> <p>The request for additional supporting text relating to the need for renewables-enabling plant to be acknowledged is accepted.</p> <p>Chief Executive's Recommendation Insert the following new objective after objective EC O88: Support the research and development of green hydrogen as a fuel for power generation, manufacturing, energy storage and transport.</p> <p>Amend section 7.16, as follows: Natural gas is the cleanest of all fossil fuels and its chemical composition makes it a more environmentally friendly fuel than oil, coal or peat. Natural gas is available in a number of the county's towns. Gas Networks Ireland</p>

	<p>such as battery storage and flexible gas fired units that respond quickly to system demand. Submits that these will be key to facilitating large scale renewables in the future.</p> <p>States that ESB is the asset owner of the Transmission System and Distribution System and ESB Networks provides the essential service of building, managing and maintaining the electricity networks in Kildare and throughout Ireland. Notes that ESB Networks is unique in that it is in direct contact with all electricity users. Notes that the focus of recent investment in the network was on continuing the reinforcement of the system to facilitate the connection of new renewable electricity generation.</p> <p><u>ESB Roll-out of EV Infrastructure</u> States that the ESB has developed a network of almost 1,350 electric vehicle charge points. Refers to the 'stretching targets for EV adoption' made by the Irish Government. States that to help meet the increase in electric vehicles, ESB, with the support of the Government's Climate Action Fund, is rolling out high power charging hubs across the country. Notes that these hubs will be capable of quickly charging between two and eight vehicles simultaneously and will facilitate vehicles travelling longer distances.</p> <p>Notes that ESB's plans also include investment in green hydrogen production, storage and generation facilities by the end of the decade, aligning with the EU strategy launched in 2020. States that as a clean, zero-carbon fuel, green hydrogen will be produced from renewable energy. Submits that greater</p>	<p>continues to assess the feasibility of new connections bringing gas to additional towns. It is recognised that natural gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand.</p>
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	<p>electrification using a renewable fuel like hydrogen for end-use applications where direct electrification is not feasible will play a significant role in the economy becoming carbon-neutral by 2050.</p> <p><u>ESB Telecoms and Telecommunications Infrastructure</u> Submission states ESB Telecoms has grown from its original function of providing a communications system for ESB to become one of Ireland's leading independent telecommunications infrastructure providers with over 400 locations nationwide. Notes that all sites developed by ESB Telecoms are made available to third party mobile phone and wireless broadband operators. Submits that their open policy of sharing infrastructure limits the overall number of telecoms structures appearing in urban and rural landscapes.</p> <p>States that their telecoms fibre network wrapped on the ESB's 110kV electricity network provides an extensive network throughout Ireland with international connectivity to the UK. Notes that in addition, SIRO (a joint venture between ESB and Vodafone) is bringing 100% fibre-to-the-building to 50 towns and cities across Ireland, including many towns in Co. Kildare.</p> <p><u>Planning Policy and Proposed Draft Plan</u> Submission notes that the process of preparing a new County Development Plan, shall be informed by the hierarchy of national, and regional planning policy. Notes the Vision and Strategic Aims for the county and notes that the draft Plan acknowledges its role as an important part of the county's climate</p>	
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	<p>action response, and the plan is mindful of the reduction requirements set out in the Climate and Action Low Carbon Development (Amendment) Act 2021. States that ESB supports the Overarching Guiding Principles as outlined in Section 1.8.1, particularly Nos. (i) and (viii).</p> <p>States that the company is working towards the delivery of Ireland’s target of at least 55% reduction in domestic GHG emissions by 2030 and acknowledge that climate action provisions are integrated as a cross cutting theme throughout the plan. Submission notes the contents of the Climate Action Plan 2021 and states that the most critical measures include the target for up to 80% of electricity to be generated by a mix of at least 5 GW offshore wind, up to 8 GW onshore wind and 1.5 - 2.5 GW from solar PV. Submits that the ESB is committed to doing its part in supporting and delivering on the Government’s energy policy.</p> <p>Notes that the Council, as stated in Chapter 7, through Appendix 2, Wind Energy Strategy (WES) of the draft Plan, will support and facilitate renewable energy use and sustainable generation at appropriate locations within the county to meet national objectives towards achieving a low carbon economy by 2050. Notes the contents of Chapter 7 regarding the strategy for renewable energy developments.</p> <p><u>Electricity Generation, Transmission and Distribution</u> Notes that both the NPF and the RSES contain promoting policies in relation to Energy Infrastructure. ESB fully supports the reinforcement</p>	
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	<p>of those policies at a local level that will accommodate the ongoing generation, transmission and distribution of electricity. Notes that across the draft Plan, but most particularly in Chapter 7 and the draft Wind Energy Strategy (WES), the Council recognises that the availability of energy is of critical importance to the continued development and expansion of employment in the county. Further notes that the Council supports the sustainable development of indigenous energy resources, with an emphasis on renewable energy supplies and that the development of secure and reliable electricity transmission infrastructure is also recognised as a key factor for supporting economic development and attracting investment to the county.</p> <p>The submission welcomes supporting statements in the draft Plan that seek to reinforce the existing grid including grid connections, transboundary networks into the county and the expansion into areas not adequately serviced. ESB also welcomes support for energy utility providers to reinforce and strengthen existing utility infrastructure and transmission/distribution networks in section 7.14 and Policy EC P19.</p> <p>It is also acknowledged that the Council shall work in partnership with existing service providers to facilitate required enhancement and upgrading of existing infrastructure and networks (subject to appropriate environmental assessment and the planning process).</p> <p>The submission notes Objective EC O65 regarding the requirement that developments involving the</p>	
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	<p>siting of overhead cables shall minimise visual impact by avoiding areas of high landscape sensitivity, sites and areas of nature conservation and/or archaeological, cultural or heritage interest. In this regard the submission states that concerns about visual, amenity, health and safety need to be mitigated through the consultation process. Submits that the NPF, RSES, local development plans and the Strategic Infrastructure Act provides the necessary framework for ensuring that all necessary standards are met, and that extensive statutory and non-statutory consultation is an intrinsic part of the planning process and ensures that there is ongoing consultation with local communities and local authorities regarding the construction of new networks. States that ESB supports the promotion of energy infrastructure objectives and submit that they must continue to protect the county's future capacity for the development of energy generation, processing and transmission.</p> <p><u>Generation and Renewables</u> Notes that ESB is increasing renewables in our power system from 30% up to 80% by 2030. Submission welcomes broad support for the development of renewable energy technologies across the entire plan, including the very comprehensive WES. Acknowledges the overall consistency and alignment of the Draft CDP along with associated Appendices with the objectives of the NPF, RSES and national guidelines.</p> <p>Notes that in relation to hydro generation about two percent of Ireland's electricity generating capacity is in the form of hydropower where the Liffey accounts</p>	
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	<p>for almost a quarter of ESB's Hydro Generating Capacity and is fully integrated into the local and national electricity transmission and distribution network. Notes that dams, reservoirs and embankments constructed for the purpose of electricity generation can be extremely hazardous. Welcomes the support for Hydro Energy as outlined in Section 7.7 of the draft Plan, along with the objective EC O29.</p> <p>Notes that 42% of all electricity generated in 2020 came from renewable sources, 86% of which came from wind. Submission acknowledges that the Draft Revised Wind Energy Development Guidelines 2019 (DHPLG) and the SEAI Methodology for Local Authority Renewable Energy Strategies (LARES) have been used to inform wind energy policy in the draft Plan. Submits that ESB supports a plan led approach through the identification of areas for wind energy development. Notes that the methodology set out in Appendix 2 of the Draft Plan identifies the most suitable locations for wind energy development. Notes the provisions of policy EC P4. Submission welcomes the provision of supporting objectives for repowering of existing wind farms. States that well-maintained renewable energy projects and associated plants can operate safely after a planning expiry date of 20-30 years whilst also having the benefit of acceptance by local communities and contributing economically through the payment of rates and community benefit funds.</p> <p>Submission states that photovoltaic (PV) systems which produce electricity directly from solar radiation are becoming more widespread as their advantages</p>	
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		<p>become apparent and as costs fall. Contends that solar projects will play a critical role in diversifying our renewable generation portfolio for the period out to 2030. Submits that solar energy is suited to Ireland's climate and expects to see increasing deployment of rooftop and grid scale solar energy. States that there is a strong correlation between wind and changing weather systems. In times of low wind there are often good solar conditions. Notes that ESB is involved in solar energy projects located in the county.</p> <p>Welcomes the support for the development of solar energy in the county as set out in the draft Plan under Section 7.6 most particularly Objectives EC O17 and EC O21. Highlights that solar farms have the potential to be built on agricultural land, whilst also accommodating the continued use of the land for grazing or for incorporating biodiversity measures. Notes the requirement to reserve 10% of each overall solar farm site for biodiversity areas and also acknowledges the contents of Objective EC O25 and states that this is welcomed as currently; Solar PV developments are subject to lengthy delays and can take in excess of 5 years to develop to construction phase. States that energy storage systems such as batteries, liquid air energy storage are some of the technologies being explored that will be essential to smoothing out the natural variability that occurs in renewable energy sources and to providing electricity at times of peak demand. Notes that the ESB is installing a synchronous condenser at Moneypoint which will be the first in the country. Notes that the grid stability provided by the synchronous condenser will replace and displace a</p>	
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		<p>fossil generator from providing these stability services, thereby lowering the carbon intensity of the electricity system.</p> <p>Submits that due to the intermittency of wind energy in particular, grid stabilisation technologies have an increasingly important role in a successful energy transition and this new technology is being deployed as a cost-effective and zero-carbon solution in strengthening the stability and resilience of the Irish grid.</p> <p>Submission notes that ESB is already installing Battery Energy Storage Systems (BESS) at existing facilities. BESS will operate by charging batteries using electricity and storing the energy until it is required. In addition, these batteries can stabilise the frequency of the electricity network enabling the operation and stability of a highly renewable system.</p> <p>Notes that ESB has partnered with dCarbonX on the assessment and development of Irish offshore green hydrogen subsurface storage. Green hydrogen, which is produced from renewable energy sources, offers potential for large scale seasonal storage of variable renewable energy. This enables zero carbon backup to the power system when intermittent renewables such as wind and solar are not available. Submits that large scale green hydrogen production and storage could leverage the continental scale of Ireland's renewable energy potential to enhance Ireland's energy security and to make Ireland a net energy exporter.</p> <p>ESB notes that the draft Plan references emerging renewable energy storage technologies such as</p>	
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		<p>battery storage systems as a viable means of providing energy security. The submission states that there is scope to further expand the CDP with the inclusion of specific policy as set out below for supporting developments of new technologies, particularly green hydrogen, as follows (in purple):</p> <p>‘Support the research and development of green hydrogen as a fuel for power generation, manufacturing, energy storage and transport.’</p> <p><u>Renewables-Enabling Plant</u></p> <p>The submission notes that energy security and sustainability are the main concerns in combatting climate change. States that notwithstanding the Government’s aim to increase the percentage of electricity generation from renewables to 80% by 2030, the contribution from non-renewable sources will still consist of 20%. Furthermore, on dull still days or nights, almost all electricity may sometimes need to come from non-renewables generation. Notes that the requirement for renewables-enabling Plant is not acknowledged in the draft Plan. Requests that given Kildare has access to the Gas Network, the inclusion of the text below (in purple) as a promotional objective for the development of Renewable Enabling Plant will further assist in the transition to a low carbon economy.</p> <p>‘It must also be recognised that natural gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand.’</p>	
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		<p>States that ESB support the above text as it will be necessary to connect additional non-renewable Plant to the grid. This efficient Plant can be applied rapidly to provide operational flexibility and the required grid support services, when needed.</p> <p><u>Telecommunications</u> Notes that the Council acknowledges the importance of high-quality telecommunications infrastructure as being critical to the development of a knowledge economy. States that ESB supports the approach and the view of the Council that to facilitate the provision of telecommunications services at appropriate locations within the county, the applicant must demonstrate compliance with national guidance. Notes that the draft Plan recognises that applications for telecommunications development shall be consistent with the updated guidelines (PL 07/2012).</p> <p>Notes ESB Telecoms are working with ESB Networks to upgrade internal ESB Communications Networks to facilitate the roll-out of ESB's 'Smart Metering' project to reduce unnecessary energy usage. States that due to the extent and reach of the electricity network, additional masts may be required in some locations to ensure the delivery of 'smart metering' to all areas. Notes that ESB Telecoms will work within the development management standards to deliver this infrastructure.</p> <p>States that ESB supports the Telecommunications policy that promotes co-location. Submits that ESB encourages policies consistent with the Department Circular to allow for the improved development of</p>	
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	<p>telecommunications infrastructure, particularly broadband capability in the area.</p> <p><u>Sustainable Transport and Electric Vehicles</u> Submits that a large proportion of the power used by electric cars will be carbon free in the future. Notes the 'stretching' targets outlined in the Climate Action Plan for Electric Vehicle (EV) adoption by 2030. States that the targets demonstrate that EVs are central to Government targets for zero carbon emissions transportation systems. Notes the support for the roll out of EVs throughout the draft Plan including Policy EC P15 and Objective EC O45.</p> <p>Further notes that these promoting objectives are underpinned by the parking standards set out in Chapter 5, TM O109, TM O110 and TM O111. Welcomes the above initiatives and notes that the standards applied are reflective of the EU Energy Performance of Buildings Directive that calls for an increase to 20% for the number of parking spaces which should have provision for electric vehicle charging infrastructure. States that such policies and objectives are facilitating growth in charge point infrastructure.</p> <p><u>Other Sustainable Transport</u> ESB also highlights that, green renewable hydrogen enables the further electrification of transport, and allow the full decarbonisation of the transport sector, as well as improved air quality as the technology replaces diesel buses and diesel HGV across Ireland. Notes that CIE and Bus Éireann along with the ESB formed part of a new, in-service, trial of fuel cell electric buses powered by hydrogen produced</p>	
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		<p>from renewable electricity from ESB's Ardnacrusha hydro-electric power station. ESB has been actively engaging with Hydrogen Mobility Ireland to deliver a coordinated approach to this cutting-edge technology in order to ensure that Ireland can benefit from being an early starter in this solution to further decarbonise transport.</p> <p><u>Conclusion</u> States that investment in infrastructure is crucial to the economic and social well-being of our country as such investment creates jobs, stimulates economic activity and provides modern, efficient facilities to provide the services that people need. Notes that there is a significant multiplier effect from investment in infrastructure which means that it stimulates growth in the local economy. Submits that this investment is also necessary to support EU and national climate policy.</p> <p>States that the final County Development Plan must include clear policies in relation to ensuring that the long-term operational requirements of existing utilities are protected. The importance of existing infrastructure and the associated Electricity Generation, Storage, Transmission and Distribution operations are strategic and national in nature. Also states that the Plan should maintain the planning policies which protect the county's future capacity for the development of energy infrastructure whilst encouraging the sustainable development of renewable energy resources.</p> <p>Considers it appropriate that the Planning Authority may grant permissions for Solar PV for more than</p>	
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		<p>five years, in appropriate circumstances. Welcomes the inclusion of supporting policies for emerging renewable energy storage technologies such as battery storage systems and other sources of renewable energy technology that are a viable means of providing energy security.</p> <p>Submits that the plan needs to ensure energy security during the transition to an all-green and renewables electricity sector by providing for adequate supporting energy structure which will include using the cleanest natural gas technologies aiding the integration of renewables in the shift to a sustainable energy system.</p> <p>States that promoting, encouraging and facilitating the use of sustainable modes and patterns of transport, including electric vehicles, to ensure the implementation of the latest standards consistent with S.I. No. 393/2021 will support the extension of charge point infrastructure.</p>	
469	Davy Platform ICAV (Ireland)	<p>Policy ECO5 of the Draft Kildare County Development Plan 2023-2029 supports the auto-generation of energy for on-site use in the continued development of industry. However, the definition of 'renewable' in this context is ambiguous regarding whether a conventional gas-fired ancillary energy generation facility would be supported by this policy if 100% offset by carbon credits.</p> <p>Policy EC P21 of the Draft Kildare County Development Plan 2023-2029 supports the continued use and development of gas networks. This policy does not speak to the further development of the conventional gas fired ancillary</p>	<p>Chief Executive's Response</p> <p>Renewable energy is energy produced from sources like the sun and wind that are naturally replenished and do not run out. A conventional gas-fired ancillary energy generation facility would not come under the above definition of renewable energy and therefore would not be supported by objective EC O5, even if 100% offset by carbon credits.</p> <p>The development of gas infrastructure is supported by objective EC O86 which supports the maintenance of the existing gas network and the further upgrading and expansion of the gas grid across County Kildare to serve existing and future residential, commercial and industrial development. It can be concluded that, by extension, this</p>

		energy facilities that are necessary for further industrial development.	objective supports conventional gas fired ancillary energy facilities that are facilitated by the existing gas network and are necessary for further industrial development.
			Chief Executive's Recommendation No change to the Draft Plan.
410	Celbridge Community Council	<u>Electric Vehicles</u> Objective EC O45 to "Promote the delivery of EV charging facilities across the county where demand is proven, both on sites owned and occupied by Kildare County Council and private sites and ensure that EV charging points are installed in such a way that they do not cause significant obstruction to footpaths, cycle lanes, access to Train stations, or bus lanes/stops." should be reworded to remove " where demand is proven " on the basis that demand is inevitable and to require that all new houses are future-proofed through the inclusion of EV charging points and that there is adequate provision of EV charging points in apartment complexes to allow all car owners to charge their vehicles overnight.	Chief Executive's Response The request in relation to amending objective EC O45 is not accepted as it is considered electric vehicle charging infrastructure requirements are sufficiently dealt with in Table 15.10 and objective TM O110 (Chapter 5) of the draft Plan. It should be noted this objective has been amended as per CE recommendation.
			Chief Executive's Recommendation Amend EC O45 as follows: Promote the delivery of EV charging facilities across the County where demand is proven, both on sites owned and occupied by Kildare County Council and private sites and ensure that EV charging points are installed in such a way that they do not cause significant obstruction to footpaths, cycle lanes, access to Train stations, or bus lanes/stops. The EV charger should be compatible with the Sustainable Energy Authority of Ireland's Triple E Register.
395	Dept. Environment, Climate & Communications (to be read in conjunction with GSI submission,	Clarity around the intention of Objectives EC 068 and EC 069 would be greatly appreciated and the Council is invited to engage directly with the Department in relation to same.	Chief Executive's Response EC O68 relates to supporting the grid infrastructure and its relationship with other adjacent counties, for example, the Dunstown 400kV substation is a substation of regional significance and the Council through this objective is seeking to support any grid reinforcement between Dunstown and Woodland 400 kV substations.

	<p>same number, submitted together)</p>		<p>The intention of undergrounding local services as required by objective EC O69 is in the interests of public safety and to preserve the amenity and visual character of an area. This is further corroborated in Chapter 14 and 15.</p> <p>Chief Executive’s Recommendation No changes to the Draft Plan.</p>
<p>TELECOMMUNICATIONS & INFRASTRUCTURE</p>			
<p>395</p>	<p>Dept. Environment, Climate & Communications (to be read in conjunction with GSI submission, same number, submitted together)</p>	<p>The submission makes reference to two documents in the context of Section 7.13, 7.15 and 7.17 of the Draft Plan, namely, ‘Harnessing Digital – the Digital Ireland Framework’ (with particular regard to Dimension 2 which places importance on supporting 5G rollout) and the National Development Plan 2021-2023 (Objective 6 which refers to high-quality international activity). The objectives within these documents can be supported via specific reference in the Draft Plan.</p> <p>The Department submits that an objective may be required to create a centralised telecoms unit to manage all issues relating to telecoms, access to local authority assets and Smart Initiatives.</p> <p>The Department submits that a commitment may be required to efficiently process applications for required permits and licences needed to support the NBP and a commitment to work with operators to streamline and simplify the process (in addition to Draft Objectives EC O89 – O93).</p>	<p>Chief Executive’s Response It is considered appropriate to amend objective EC O89 of the Plan to reference the Governments newly published Harnessing Digital – the Digital Ireland Framework (2022). NSO 6 of the National Development Plan 2021-2023 deals with continued investment in Irelands port and airport connections, it is therefore not considered appropriate to reference NPO 6 in the Plan.</p> <p>The matter of a centralised telecoms unit is noted however this is considered to be a matter that is outside the scope of the Draft Development Plan.</p> <p>It is considered that EC O89 of the Plan adequately supports and facilitates the delivery of the National Broadband Plan.</p> <p>It is outside the scope of the Draft Plan to include a commitment to publish inventories of state-owned assets as Development Plans are primarily land use plans. Regarding the request to identify suitable locations for Masts/Small Cells, this level of detail is considered to be outside of the scope of the Draft Development Plan, which is a strategic planning policy document. However, Objective</p>

		<p>With respect to ducting and other assets owned by the State, the Department encourages a commitment to publish inventories for assets and to develop a streamlined process to allow for easy accessibility for access seekers.</p> <p>Regarding 5G /Small Cell deployment the Department encourages a commitment to identify suitable urban and suburban locations owned by the State for Masts/Small Cells to support smart town initiatives/programmes.</p> <p>A commitment is also requested to replicate smart programmes / initiatives across all towns and villages across the county.</p>	<p>EC O85 supports the erection of additional masts in some areas.</p> <p>Objectives EC P3 and RE O86 of the Draft Plan support the roll-out of the Smart Grids and Smart Cities Action Plan and promote the Smart Farming’ initiative for farmers across Kildare. In addition, it is considered appropriate to add a new objective in the Plan in support of the EU Action for the Smart Villages initiative that was launched by the European Commission in 2017.</p> <p>Chief Executive’s Recommendation Amend EC O89 as follows: Support and facilitate the delivery of the National Broadband Plan and the Government’s ‘Harnessing Digital’ the Digital Ireland Framework (2022) with particular regard to 5G rollout as a means of developing further opportunities for enterprise, employment, education, innovation, and skills development for those who live and work in rural areas.</p> <p>Add a new objective to Section 9.3 of the Plan: Support the European Network for Rural Developments’ Smart Villages initiative to improve economic performance and quality of life in rural areas through digital and social innovation, in co-operation with West Kildare SMART Rural Alliance and all other relevant stakeholders.</p>
381	Eirgrid	<p>It is submitted that Eirgrid had identified major strategic infrastructure grid projects that will be required to be undertaken in the County Kildare area over the lifetime of the Plan. The submission states that the Council may consider it of benefit for the various specific projects to be identified in the Plan, and if it so wishes, this can easily be provided by EirGrid, both in list form and in GIS mapping.</p>	<p>Chief Executive’s Response While Chapter 7 currently includes Objective EC O67 and Objective EC O68 in particular, it is considered appropriate to include an additional objective supporting the Kildare-Meath Grid Upgrade.</p> <p>While Chapter 7 currently includes Objective EC O67 and Objective EC O68 in particular, it is considered appropriate to</p>

		<p><u>Kildare-Meath Grid Upgrade</u> The submission provides an overview of Eirgrid's Kildare-Meath Grid Upgrade (also known as Capital Project 966) and highlights the essentialness of the project to meet the Government of Ireland's Climate Action Plan target of 70% renewable energy generation by 2030. It is submitted that Eirgrid would welcome specific and explicit policy support for the project in the Plan.</p> <p>The strategic issue of the future development of Ireland's electricity transmission grid is highlighted and addressed in Project Ireland 2040 (National Planning Framework) and the Regional Spatial and Economic Strategies (RSES) – most notably Section 10.3 of the RSES. Consistency with these national plans, policies or strategies are requested and that the final Plan re-emphasises this issue.</p> <p>It is submitted that the importance of the electricity transmission grid in supporting our environment, society and economy should be explicitly stated and greater reference and focus should be placed on the role of the electricity transmission grid infrastructure in meeting the challenges of climate change and energy. In addition, it is considered that the plan needs to support a safe, secure and reliable supply of electricity and it needs to be explicit in subsequent iterations of the Plan.</p> <p>The submission welcomes support in executing the Grid Development Strategy - Your Grid, Your Tomorrow (2017), Shaping our Electricity Future - A Roadmap to achieve our Renewable Ambition</p>	<p>include an additional objective supporting the Kildare-Meath Grid Upgrade. It is considered appropriate to amend the pre-ambule of Section 7.14 to emphasise the importance of the future development of Ireland's electricity transmission grid and to include the Maynooth 220 kV Station to the list of stations noted as being of regional significance.</p> <p>it is however considered appropriate to require all electrical services to be located underground.</p> <p>Chief Executive's Recommendation Add a new objective after EC O68: Support and facilitate the Kildare-Meath Grid Upgrade (also known as Capital Project 966) to enable further renewable energy generation in line with the Governments' target of 80% renewable energy generation by 2030.</p> <p>Amend paragraph three and four of the Section 7.14 pre-ambule as follows: The electricity transmission grid infrastructure has a big role to play in meeting the challenges of climate change and energy and in supporting our environment, society, and economy. A comprehensive development strategy for the country's electricity infrastructure is provided in EirGrid's 2017 publication Grid Development Strategy - Your Grid, Your Tomorrow, along with the associated Grid Implementation Plan for the initial period 2017-2022. In addition, The Transmission Development Plan (TDP) 2020-2029 lists the committed projects and projects under development for the enhancement of the Irish transmission network over the coming years. The Shaping our Electricity Future - A Roadmap to achieve our Renewable Ambition (2021) provides an outline of the key developments from a</p>
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	<p>(2021), Implementation Plan 2017 – 2022 and Transmission Development Plan (TDP) (2021) and any subsequent plans prepared during the lifetime of this Plan, in order to provide for the safe, secure and reliable supply of electricity.</p> <p>Updating the following (red) reference documents to more recent publications (green) is recommended. EirGrid’s Tomorrow’s Energy Scenarios 2017 – Planning our Energy Future EirGrid’s Tomorrow’s Energy Scenarios 2019 System Needs Assessment Shaping our Electricity Future - A Roadmap to achieve our Renewable Ambition (2021)</p> <p>Several stations are noted as being of regional significance in the last paragraph of the Section 7.14 preamble. It is suggested that the Maynooth 220 kV Station be added to this list given its role as a major node on the network for the wider region.</p> <p><u>Energy Supply and Infrastructure Preamble</u> The submission states that the principles underlying Objective EC O69 and Objective EC O72 is understood but submits that the feasibility for undergrounding will always be examined. It is stated that it is not always possible for high voltage transmission infrastructure to be located underground, nor relocated, even in urban areas, for a variety of reasons including the safety security and reliability of supply and space constraints with other utilities.</p>	<p>networks, engagement, operations and market perspective needed to support a secure transition to at least 80% renewables on the electricity grid by 2030. The Council supports the sustainable implementation of these plans and strategies and any subsequent plans prepared during the lifetime of this Plan, subject to landscape, residential, amenity and environmental considerations. In addition, EirGrid’s Tomorrow’s Energy Scenarios 2017 – Planning our Energy Future considers the range of possible ways that energy usage may change in the future, taking account of energy and climate change policies, economic developments, technology evolution and adaption, and other national and international policies.</p> <p>The Council recognises that essential future upgrades are required to the electricity grid in the midlands as outlined in EirGrid’s Tomorrow’s Energy Scenarios 2019 System Needs Assessment and will support EirGrid’s programmes identifying grid solutions, in both infrastructural and technological terms, in order to facilitate the electricity targets, set out in the Government’s Climate Action Plan 2019 and the National Energy and Climate Plan 2021-2030.</p> <p>Amend the last paragraph of the Section 7.14 preamble as follows: The Maynooth 220kV and Dunstown 400kV substations are both electrical substations of regional significance and the Council will seek to support any reinforcement of the Greater Dublin Area between Dunstown and Woodland 400 kV substations.</p>
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147	National Peatlands Park Group	RD 08; Promote the provision of broadband and other communications infrastructure in rural areas of the county through supporting the continued roll out of the National Broadband Scheme and initiatives such as the EU Smart Villages Initiative.	<p>Chief Executive's Response See response to submission from West Kildare SMART Rural Alliance (Sub No. 432).</p> <p>Chief Executive's Recommendation See recommendation to submission from West Kildare SMART Rural Alliance (Sub No. 432).</p>
472	Keep Ireland Open	<p>Section 7.14 recommend the inclusion of additional objectives.</p> <ul style="list-style-type: none"> • Locate electricity transmission lines in non-scenic areas where possible. • Encourage undergrounding of existing or new lines and integrate with surface schemes where possible. • It should be acknowledged that these powerlines can have an adverse impact on the natural environment and the character of its setting and natural heritage. • Ensure that they are designed to have regard to possible interference with or damage to heritage sites, areas of archaeological importance, designated sites including pNHAs, cSACs, SPAs or sites of nature conservation. • Minimise their obstructive impact and their visual intrusiveness particularly in mountain areas by their being integrated with their surroundings. • Safeguard Natura sites and the sensitive, open character of areas of high visual amenity, high landscape designations and scenic views. The route should be identified with consideration for environmental impacts. Where impacts are inevitable mitigation must be considered in respect of Natura Sites. Networks must comply with Art 6 of the Habitats Directive 	<p>Chief Executive's Response Not agreed the following objectives consider the impact of electricity transmission infrastructure on sensitive environments and areas of high amenity:</p> <p>Objective EC O65 requires that developments involving the siting of overhead cables shall minimise visual impact by avoiding areas of high landscape sensitivity, sites and areas of nature conservation and/or archaeological, cultural or heritage interest.</p> <p>Objective EC O28, EC O69 and EC O82 all address the undergrounding powerlines in sensitive landscapes.</p> <p>Objectives BI O5 to BI O7 address consideration of potential impacts on Natura 2000 sites.</p> <p>Objective LR O2 and LRO3 require a Landscape/Visual Impact Assessment to accompany proposals that are likely to significantly effect sensitive landscapes.</p> <p>Chief Executive's Recommendation No change to the draft Plan.</p>

		<ul style="list-style-type: none"> • Landscape Impact and Visual Assessments shall be prepared where a proposed development is located in landscapes in high amenity and mountain areas or have the potential to impact upon county landscape designations and important designated sites. They shall be screened for potential impacts on Natura 2000 sites. • Where undergrounding is being pursued proposals should demonstrate that the following environmental impacts are minimised: Short to medium term impact on landscapes and the Impact on underground archaeology. • When processing applications involving the siting of electricity powerlines and overhead cables the following should be considered: Avoid area of high value landscapes, where practicable, and areas of nature conservation and archaeological interest and minimise their visual impact. 	
472	Keep Ireland Open	<p>Submission recommends in Section 7.14 the inclusion of additional objectives.</p> <ul style="list-style-type: none"> • Require the identification of Public Rights of Way and established walking routes prior to any new telecommunication developments (including associated processes) which will be prohibited if they impinge or impact thereon or on public access to the countryside or on the natural environment. • Ensure that the location of telecommunications structures should minimise and/or mitigate any 	<p>Chief Executive’s Response</p> <p>It is an action of Chapter 13 (LR A8) to review all public rights of way, having regard to the Office of the Planning Regulators recent Case Study Paper titled “Public Rights of Way and the Local Authority Development Plan” June 2021 (Survey Report on the Operation of Section 10(2)(o) of the Planning Act), during the lifetime of this Plan.</p> <p>A number of the recommendations are concerned with impacts of telecommunications infrastructure on public rights of way. It is proposed to include an additional Objective in Section 7.14. Objective EC O65 requires that developments involving the siting of overhead cables shall minimise visual impact by avoiding areas of high landscape sensitivity, sites</p>

		<p>adverse impacts on public rights of way or the natural environment.</p> <ul style="list-style-type: none"> • The Council shall, in assessing an application, take into account the impact on established walking routes. • The Council in assessing development proposals will consider the following criteria: Avoid the location of structures in sensitive landscapes, nature conservation areas or highly sensitive landscapes and where views are to be preserved. 	<p>and areas of nature conservation and/or archaeological, cultural or heritage interest.</p> <p>Chief Executive’s Recommendation Include a new Objective in Section 7.14 Ensure that the location of telecommunications structures minimises and/or mitigates any adverse impacts on public rights of way and the natural environment.</p>
CIRCULAR ECONOMY			
207	Deirdre Lane	<p>That the KCC Waste Action plan for the circular economy in Kildare will include wool.</p> <p>Artists can play a vital role supporting a Just Transition towards a carbon neutral society. The Draft Kildare County Development Plan can do more to encourage multidisciplinary collaboration. Support the development and implementation of language plans in Gaeltacht Language Planning Areas.</p> <p>Would like to see a special commitment from KCC to collaborate with the SECs. Urge KCC to consider signing up to a “Local hinterland Climate Action Charter” with member SECs to deliver local adaptation strategies and measures.</p> <p>KCC will undertake a feasibility study on 'deep geothermal' as it has many benefits beyond</p>	<p>Chief Executive’s Response The wish for KCC to give a commitment to collaborate with SECs is addressed in Chapter 7 and specifically EC O7 of the Draft Plan which states ‘Support, encourage and co-operate with Sustainable Energy Communities (SECs) in the preparation of energy masterplans for their communities and in the delivery of infrastructure and services and to assist in the development of SECs in towns throughout the County.’</p> <p>That the KCC Waste Action plan for the circular economy in Kildare will include wool is noted. Section 7.12.3 (Energy from Waste) should be amended to reflect the role that wool can play in the circular economy.</p> <p>Having regard to the proposal that the Kildare County Development Plan should support artists playing a vital role supporting a Just Transition towards a carbon neutral society and supporting the development and implementation of</p>

	<p>individual buildings in the generation of renewable electricity</p> <p>Duckweed grows on midland bogs and is a sustainable energy source. Duckweed compared against current installed green energy systems like solar and wind is 20 to 25 percent cheaper to install and run.</p> <p>KCC should run an awareness campaign for staff and the public on Energy conservation and efficiency measures.</p> <p>District Heating; Action for the council to install District heating in Newbridge as it is currently having a new cultural quarter planned and the location of the Bord na Móna Head Office and surrounding real-estate can be the driver of energy and waste savings pilots and scale up innovation in the shift to a just recovery.</p> <p>Circular Economy The strategy in Kildare should focus on tackling climate change and driving urban action that reduces greenhouse gas emissions and climate risks, while increasing the health, wellbeing and economic opportunities of urban citizens. There should be a strong focus on cooperation and creating networks, which enhance existing ways of implementing the circular economy.</p> <p>We commend the increased use of KCC on EV vehicles.</p>	<p>language plans in Gaeltacht Language Planning Areas, it should be noted that a County Development Plan is a land use plan and it is therefore outside of the scope of the Draft Plan to include the requested proposal. It is suggested that any such proposal would be more appropriately addressed through the Local Economic and Community Plan (LECP). The LECP identifies objectives and actions for strengthening economic and community development in the county</p> <p>In relation to the proposal for the Council to install District heating in Newbridge, it should be noted that this will be addressed under Action EC A4, which states.</p> <p>Carry out a feasibility assessment for district heating in County Kildare and identify local waste heat sources or renewable energy sources to facilitate such proposals.</p> <p>While it is outside the remit of the Draft Plan or the Council to undertake a feasibility study on deep geothermal, it should be noted that Section 7.8 of the Draft Plan includes a specific policy and objective in relation to geothermal energy.</p> <p>Data Centres are covered in Chapters 4 and 7 of the Draft Plan. The Plan is clear that data centres consider the use of sustainable renewable sources of energy to fuel their operations in whole in the first instance or in part where this is not possible and where it has been satisfactorily demonstrated not to be possible.</p> <p>In relation to Duckweed, section 7.4 (Renewable Energy) recognises the range of new and developing technologies and supporting infrastructure that can contribute to minimising greenhouse gas emissions and secure a greater proportion of our energy needs from renewable resources.</p>
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GENERAL			
469	Davy Platform ICAV (Ireland)	Section 7.2 'Planning Policy Context' should contain reference to the 'Climate Action Plan 2021'.	<p>Chief Executive's Response Noted and agreed.</p> <p>Chief Executive's Recommendation Section 7.2 'Planning Policy Context' in Chapter 7 should contain additional text in red.</p>

			<ul style="list-style-type: none"> • The Climate Action and Low Carbon Development Acts 2015 to 2021 • Climate Action Plan 2021
515	Meath County Council	<p>The submission notes the contents of Chapter 7 within the draft Plan and is supportive of the approach to addressing and mitigating the impacts of climate change including Action EC A2 relating to the establishment of a Mid-East Energy Bureau in collaboration with Wicklow County Council, Meath County Council and the Sustainable Energy Authority of Ireland (SEAI). Welcomes this provision and subject to resources will support Kildare County Council in the establishment of this Energy Bureau.</p> <p>Submission supports inclusion of Objective EC O38 which seeks to provide district heating proposals in conjunction with neighbouring authorities and suggests that early engagement with Meath County Council should be undertaken in relation to any such proposal.</p>	<p>Chief Executive’s Response The comments of the submission relating to energy, decarbonisation and climate change are noted.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
113	Health Service Executive	<p>The submission commends the council for the ambitious and comprehensive draft development plan and supports the many actions / objectives. It refers to several sections within the Draft Plan including Climate, Green Infrastructure, Active Travel, Employment, Food, Waste, and Implementation / Monitoring. Within the various sections a total of 31 recommendations are made.</p> <p><u>Climate:</u> There are 7 recommendations relating to climate which include an aim for towns and villages in Kildare to become carbon neutral, to carry out a</p>	<p>Chief Executive’s Response Climate change has been considered as part of all the policies, objectives, actions, and targets of the Draft Plan with the implicit aim of becoming carbon neutral. Of note, Policy EC P16 supports the identification and development of decarbonisation zones in Kildare. In relation to same and as part of a separate process, decarbonisation zones will now form part of the Council’s emerging Climate Action Plan (CAP) which is currently being prepared. The emerging CAP will include actions to reduce GHG emissions and will incorporate a monitoring framework to evaluate progress. The Draft Plan also identifies several targets within Chapter 5 to assist in the reduction of transport emissions.</p>

		<p>carbon emissions baseline study for the area and outline actions to reduce GHG emissions, while monitoring the progress on climate action. It is also recommended that the council identify infrastructure which is vulnerable to climate change and implement adaptation measures to ensure they are resilient to the impacts of climate change.</p> <p>The council should identify / investigate the feasibility of some towns and villages becoming sustainable energy communities. It is also stated that the council should act in an educational capacity on climate issues for the public, while it is suggested that all new development should be required to highlight measures to reduce energy demand, increase energy efficiency and to provide renewable energy on site. Amend wording of last sentence in section 15.3 to state “all developments” instead of “the proposed development”.</p>	<p>In addition, Chapter 7 includes several policies, objectives and actions related to renewable energy, noting Objective EC O44 which requires all new development to be designed to take account of the impacts of climate change and that energy conservation, energy efficiency and energy renewable measures are incorporated into new and existing buildings.</p> <p>There are already 25 sustainable energy communities (SEC’s) located in towns and villages throughout the county including Naas, Leixlip, Maynooth, Kildare, Kilcock, Clane, Celbridge, Monasterevin, Straffan, Kilcullen, Ardclough, Narraghmore and Ballymore Eustace. In addition, Objective EC O7 in Chapter 7 supports and encourages SECs in the preparation of masterplans for communities and in the delivery of infrastructure and services. There are also several objectives, actions and targets in support of Energy Efficiency measures under Section 7.12 of Chapter 7.</p> <p>It is not considered appropriate to amend Section 15.3 as suggested as this section relates to proposed developments.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
270	Donal Knight	<p>Submission states that the Council is to be congratulated on the production of a comprehensive Plan and that the purpose of the submission is to emphasise the necessity to think even beyond the term of the plan as actions now will have consequences far into the future.</p> <p>Notes that there is pressure from higher authorities to tackle climate change and rightly so. States that</p>	<p>Chief Executive’s Response The comments in relation to renewable energy production in the County are noted. In this regard, it is seen that Chapters 4, 7 and 9 have a range of supporting policies and objectives to promote renewable energy use and generation at appropriate locations across the county, including on former commercial peatlands operated by Bord na Móna. While the Plan extends over a six-year time frame to 2029, it is considered that its contents set out a long-term strategy that</p>

		<p>we need to use our assets and use them to the best possible advantage not just for the county but for society too.</p> <p>Refers to recent events which highlight the need to be independent in terms of food and energy and that Ireland is ideally placed geographically in terms of both. Outlines the potential to be self-sufficient in energy but have been slow to capitalise on this. Submits that with effective planning we could be net exporters of energy as well as food. States that renewable electricity accounted for 69% of all renewable energy used in 2020 and refers to other renewable statistics in the generation of electricity (from Wind and Wave energy).</p> <p>There are 24,300 ha of bogland in County Kildare, and while some of this must be reserved for ecological protection and recreational use, much of it, particularly formerly commercial peatlands could be retained for energy generation purposes. Submits that the judicious use of wind and solar generation of electricity together with the already available power distribution network from the bogs would continue to provide benefits while also allowing nature to regenerate itself. As the land was not used for human habitation or food production there will be no detrimental impact on the area.</p> <p>Also notes that wind and solar energy are by their nature, variable, so storage facilities could also be accommodated at or near present power station infrastructure and away from residential areas.</p>	<p>seek to place the county on a firm footing towards achieving the national goal of developing a net zero carbon economy by 2050.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
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364	Ursula King	KCC should seek collaborative partnerships with as many different stakeholders for a people-centred clean energy transition.	<p>Chief Executive's Response Action EC A2 in Chapter 7 'Energy and Communications' seeks to establish a Mid-East Energy Bureau in collaboration with Wicklow County Council, Meath County Council and the Sustainable Energy Authority of Ireland.</p>

			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
351	Eco Advocacy	The submission states it should be the policy of the County Council that all buildings are adequately insulated and fitted with heat recovery systems so that heat loss is minimal and the need for artificial heat is minimised.	<p>Chief Executive's Response In Objective EC O32 of the Draft Plan, it is an objective of the Council to 'Promote the use of geothermal heat pumps for space heating and cooling as well as water heating in domestic, commercial and recreational buildings subject to the protection of water quality and any other relevant considerations.</p> <p>The energy efficiency and renewable energy requirements for the construction of new residential and non-residential buildings are primarily addressed in the current Building Regulations Part L. The regulations prescribe that a reasonable proportion of the energy consumption to meet the energy performance of a dwelling is provided by renewable energy sources.</p> <p>In Policy EC P14 it is the policy of the Council to 'Require high levels of conservation, energy efficiency and the use of sustainable and renewable energy sources in new and existing buildings.' In Objective, EC O44, it is the objective of the Council to 'Require all new developments to be designed to take account of the impacts of climate change, and that energy conservation, energy efficiency and energy renewable measures are incorporated in new and existing buildings through the appropriate design and location of new development, in accordance with relevant building regulations and guidelines.' Furthermore, it is a target of the Council to 'Achieve a target of 33% improvement in energy efficiency in all buildings in line with the requirements of the National Energy Efficiency Action Plan (NEEAP) (EC T2 refers). It is also a target to retrofit all existing council housing stock before 2030 (EC T3 refers).</p>

			Chief Executive's Recommendation No change to the Draft Plan.
472	Keep Ireland Open	The submission supports the following policies, objectives, and actions; Chapter 7 Objectives EC O6, EC O8 to EC O10; Wind Energy Policy EC P4 and Objectives EC O11, EC O 12, EC O 15, EC O16; Solar Energy Policy EC P5 and Objective EC O26; Hydro Energy Policy EC P6 and all Objectives; Micro Renewal Energy, all policies, Peatlands Policy EC P17 and Objectives EC O50, EC O53 and EC O54; Energy Supply and Infrastructure Objectives EC O65 and EC O70	Chief Executive's Response Noted and welcomed. Chief Executive's Recommendation No change to the Draft Plan.
385	County Kildare Chamber	<u>Maynooth 'decarbonisation zone'</u> The Chamber welcomes the key town of Maynooth's identification as a 'decarbonisation zone' and supports the continued role out of this scheme and identification of further towns/villages around the county, within the lifetime of this plan.	Chief Executive's Response The comments in relation to the decarbonisation zone are noted and welcomed. Chief Executive's Recommendation No change to the Draft Plan.

CHAPTER 8 – URBAN CENTRES & RETAIL			
Sub No.	Name	Summary of Issues Raised	Chief Executive’s Response & Recommendations
RETAIL – GENERAL			
257	Avison Young (on behalf of Tesco)	<p><u>Retail Policies for Towns and Settlements in Kildare.</u> The submission considers that given the projected population growth for the County it is considered that there is scope to provide additional stores at appropriate locations to serve the County’s increasing population and to improve and expand existing retail facilities.</p> <p>From a high-level comparative analysis of a number of the County’s settlements, it is considered that some settlements are currently underserved by convenience retail floorspace and that, in some instances, trade may be lost to neighbouring larger settlements. In addition, there is potential for additional convenience retail in some of the settlements in the County, given their projected population growth over the lifetime of the Plan.</p> <p>An updated retail strategy would be welcomed as it would assess current retail provision in Kildare and explore ways to enhance the retail environment in a sustainable manner.</p> <p>Tesco occupies an established position within the convenience retail sector, and it is suitably positioned to bring forward an increased level of convenience retail floorspace at locations within the County that could serve the ongoing rise in population both over</p>	<p>Chief Executive’s Response Individual Local Area Plans will be prepared for the higher order settlements, where specific land use zonings will be designated through an evidence-based approach as part of the suite of local area plans to be prepared for the county (Objective CSO 1.9 refers). As per Objective RET 02 the Council will provide clear guidance on where major new retail floorspace would be acceptable throughout the county having regard to the County Retail Hierarchy as part of the preparation of the Local Area Plans. It is considered that there is sufficient high level strategic guidance within the CDP to guide future retail development across the county in accordance with the Section 28 Retail Planning Guidelines (2012).</p> <p>The comments in relation to RET O21 are noted and in order to provide for a greater degree of flexibility whilst still protecting the viability and vitality of the Core Retail Area and placing particular priority in the development of the Naas Shopping Centre, it is recommended that the objective be amended.</p> <p>The comments in relation to consultation on public realm and transport strategies are noted. The Council undergoes extensive public consultation either as part of Local Authority, Part 8 processes or the Town Renewal Masterplan processes from which Public Realm projects derive It is considered that the existing policies and</p>

	<p>the lifetime of the new Development Plan and beyond.</p> <p>Tesco considers that a range of formats would support positive planning, economic and regeneration outcomes in accordance with both national and regional policy. New convenience retailing can help to enhance the vitality and viability of town centres by complementing the overall business mix in such centres.</p> <p>Retail stores that are located adjacent or in proximity to town centres can also positively assist with urban regeneration, for example, through the development of strategically located sites. Larger format stores have the advantage of offering a greater product range while also providing Grocery Home Shopping hubs and Click and Collect facilities.</p> <p>The Draft Development Plan can facilitate the delivery of new store locations, investment, and job creation throughout the County through the implementation of a suitably robust retail policy framework that would promote store locations both within town centres and on the edge of settlements, where appropriate.</p> <p><u>Supportive Retail Policies</u> The submission requests that KCC provide flexible land use zoning objectives that will allow sites to be brought forward in the County's towns and settlements for convenience retail development over the lifetime of the Plan.</p>	<p>objectives in the Draft CDP are sufficient to support retail development (RET O3, 05, 011, 018, 019 refers). As per Objective RET 02 clear guidance on where new retail floorspace will be acceptable will be set out in local area plans in accordance with the Retail Planning Guidelines. Similarly, development management standards have been prepared under Section 15.13 in respect of Retail Development. Section 15.9.5 refers to details in respect of loading and unloading for commercial developments and car-parking (section 15.7.8) and cycle parking requirements (15.7.2) are also included within the Draft CDP.</p> <p>In relation to recognising the detailed requirements for a modern retailer including appropriate floorplates, car and bicycle parking and servicing access, where possible in the CDP, it should be noted that the application of varied standards across all commercial businesses including retailing is recognised in the CDP. Developments will be assessed on their own merits and needs, having regard to S28 Retail Planning Guidelines, the guidance of the development management standards and policies and objectives of the CDP. In relation to appropriate floorplates there have been many retailers that have applied innovative design and approaches to their retail stores and accessing arrangements to facilitate the re-use of existing brownfield sites across the country with very innovative design approaches which is particularly welcomed by the Planning Authority.</p> <p>The comments in relation to a specific objective for 'Click +Collect' retail services and grocery home shopping is noted. However, Objective RET 010 states that it is an objective of the Council to encourage and facilitate innovation and diversification in the county's retail profile and offer. Click and collect and grocery home shopping are</p>
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	<p>Given the projected population increase of the County and its key settlements, the future provision of retail facilities and enhancement of existing centres should be considered and facilitated as part of the new Development Plan. It is requested that the Local Authority provide flexibility with regard to zoning policies in order to facilitate the provision of scale-appropriate retail floorspace at appropriate locations. This will allow sites to be brought forward in the County's towns and settlements for convenience retail development over the lifetime of the Plan.</p> <p><u>Additional Retail Development in Kildare</u> The submission highlights a specific objective RET O21 which relates to Naas. It is stated that the wording of this draft objective does not allow for a suitable degree of flexibility in the delivery of new retail development in Naas. The submission notes that the objective states 'part occupation of the Naas Shopping Centre but the shopping centre has remaining unfinished since 2012 and there is no certainty as to when the centre will be completed and occupied.</p> <p>It is considered that RET O21 is a restrictive approach and may hinder the growth of Naas with new residential development not being adequately served.</p> <p>RET O21 conflicts with RET O64 with regards the 10-minute settlement concept.</p> <p>It is requested that the objective should be amended to include that development outside the core retail area will be considered on its own individual merits</p>	<p>part of the modification to retailing nationally and it is considered outside the remit of a land use plan to specifically refer to all potential diversifications of a particular commercial business. Notwithstanding the above the Council does recognise that these additional retail offerings/services often require some spatial reorganisation which can be addressed through any planning application for same, where appropriate. It is considered that the CDP supports retail and innovation in retailing sufficiently.</p> <p>Chief Executive's Recommendation RET O21: Consider either convenience or comparison retail developments in the core retail area in accordance with the sequential approach and to only consider any further convenience or comparison retail developments outside of the core retail area following the redevelopment and occupation (either in whole or in part for retail use) of the Naas Town Shopping Centre. Support and facilitate the development of retail, retail services and niche retailing in the town centre area, including new/infill development and redevelopment of an appropriate scale.</p>
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	<p>and the defined retail needs of a particular location at a particular time. Town centres cannot always accommodate new retail development due to constraints i.e., plot size, site layout, parking, delivery access. When suitable sites are not available in the town centre, edge-of-town centre sites must be considered with flexible zoning objectives to accommodate a modern convenience retail store with an appropriately sized floorplate.</p> <p>Tesco is reviewing opportunities and consider that there are limited sites that can facilitate modern convenience within the core retail areas. It is suggested that the CDP identify appropriate edge of-core retail area/edge-of-town centre locations, which support the vibrancy of the town centre, that can be developed for convenience retail use. It is also suggested that the CDP adopts a flexible approach to allow for the development necessary to provide important local services and amenities for the growing population across settlements within the County.</p> <p><u>Supporting Existing Retailers</u> It is important that existing operators are supported which includes safeguarding of delivery and access routes and spaces to undertake deliveries. Tesco currently operates a central distribution system for deliveries, which involves the consolidation of individual supplier products at a central warehouse where the products are organised and redistributed as part of a complete delivery. Adequate loading bay facilities and access routes should be maintained to ensure the commercial viability of retail premises. A</p>	
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	<p>failure to accommodate deliveries could have a detrimental impact on such premises.</p> <p>The submission requests that no policies are introduced that could lead to any restrictions on deliveries as part of the new Development Plan and that the Local Authority engage with retail operators as part of any future public realm or transportation strategies.</p> <p>It is also requested that delivery requirements of convenience food store operators are acknowledged and that policies providing for deliveries, including early morning deliveries, should be encouraged. An approach such as this will promote retail development in the County and ensure that stores can offer their customers a high-quality product.</p> <p>In the conclusion the submission states that the CDP should provide policies and objectives that can spur investment in the convenience retail sector and provide for adequate convenience floorspace to be allocated in settlements across the County in Key Towns and Self-Sustaining Growth Towns that have been identified in the Plan.</p> <p><u>Requirements of Retailers</u></p> <p>Typically, convenience retailers will require extensive open areas of floorspace with associated space for car and bicycle parking. However, characteristically the town/village centre sites offer irregular floor layouts or floors with different levels. Generally, modern larger retail convenience layouts require unobstructed and level floorplates. Where sites with these characteristics become available in or around</p>	
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	<p>town centre areas, it is important that the Local Authority recognises these sites as being suitable for accommodating the provision of convenience retailing facilities, rather than having to rely on consolidating the existing urban fabric to try and achieve a suitable conforming site. Where no such sites exist or are designated for other uses then sequentially appropriate sites should be identified for retail convenience use. Flexible land-use zonings should also be considered, when identifying potential sites for retail convenience developments.</p> <p>Convenience retail stores require car parking spaces to serve customers who are doing their weekly shop and are unable to transport their goods without the use of private motor vehicles. This is acknowledged in the Retail Planning Guidelines as the weight of a weekly convenience shopping means public transport or walking are not feasible options. Also, to ensure the highest-quality products are available for customers, particularly fresh food, it is also important that an efficient back of house area is provided.</p> <p>The submission outlines a number of factors that will determine the attractiveness of a location for new retail development which should be considered in the CDP:</p> <ul style="list-style-type: none">- Quality of the public realm.- Retail layout achievable.- Traffic management & movement strategy.- Servicing/deliveries & accessibility.- Height/mix of uses- Benefits of an improved locale through the development of a site.	
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		<ul style="list-style-type: none"> - Car and bicycle parking. - Health and safety. - Planning policy restrictions. <p>The submission also highlights particular 'back of house' requirements that is required for efficient operation of supermarkets. It points out that back of house areas are designed to minimise the need for multiple deliveries per day and central distribution systems (like those used by Tesco) remove the need for individual suppliers to visit stores.</p> <p>The submission states that the design of modern retail formats is dictated by retailers' requirements, current Building Regulations, Fire Safety and Disability Access requirements. Each of these regulations necessitates additional space requirements (circulation space, staff facilities, service yard/layout requirements etc.) which traditionally would not have been required in similar type retail stores. Having regard to the above, it is requested that the policies in the CDP for the County fully recognise these detailed requirements including appropriate floorplates, car and bicycle parking and servicing access, where possible.</p> <p><u>Click + Collect and Grocery Home Shopping</u> Role of Click + Collect and home deliveries has increased. They require a small spatial requirement within dedicated areas of the customer car parking in the most easily accessible locations. The submission requests that support for this type of retailing is included in a policy in the CDP as follows:</p>	
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		To support and accommodate the growth of 'Click +Collect' retail services and grocery home shopping.	
560	Cllr. Suzanne Doyle	<p><u>Sequential Approach – retail development.</u> The submission recommends that the zoning matrix for Local Area Plans and small towns be amended to restrict development of large convenience stores to specified sites within plans. This designation is important in recognising the capacity for such mega stores to significantly alter the retail activity of a town and as such to pro-actively engage the delivery of these utilities in a manner that will support primacy of town centres and protect sustainability of same. This is even more important since the removal of size restrictions in the 2012 Retail Planning Guidelines. Providing for the strategic development of such large-scale commercial enterprises within our towns has the capacity to drive footfall, deliver sufficient capital investment to revolutionise car use and order of priority of transport and road use and see significant improvements in the efficient development of brownfield sites and densification of our town centres. The Whitewater development in Newbridge is a good example of a project that has delivered on these fronts and is largely responsible for holding the primacy of this regional destination town centre.</p>	<p>Chief Executive's Response RET O48 states 'Require applicants to ensure that proposals for retail development which are above the Plan's assessment criteria thresholds demonstrate compliance with the assessment criteria of both the Regional Planning Guidelines 2012 and the Regional Retail Strategy.'</p> <p>Sequential Approach, as introduced in the Retail Planning Guidelines 2012, is incorporated in the strategic policy framework for guiding new retail development. It recognises the importance of sustaining the vitality and viability of town and village centres. Planning applications for retail development proposals, including extensions or a material change of use of existing development must comply with the criteria of suitability of use, size, scale and accessibility and the key principles of the sequential approach.</p> <p>In Objective RET O15, it is an objective of the Council to "Guide retail development to town and village centres in the first instance where practical and viable in accordance with the Sequential Approach as set out in Section 8.5 above, in order to ensure that the vitality and viability of existing town and village centres is sustained and strengthened."</p> <p>Section 8.5 contains many objectives that reinforce the Sequential Approach to retail development in towns and villages in Kildare, including Objective RET O47. It is considered that Section 8.5 adequately addresses the issues raised in the submission.</p>

			Chief Executive's Recommendation No change to the Draft Plan.
257	Avison Young (on behalf of Tesco)	<p>Retail Strategy The submission considers that given the projected population growth for the County it is considered that there is scope to provide additional stores at appropriate locations to serve the County's increasing population and to improve and expand existing retail facilities.</p> <p>From a high-level comparative analysis of a number of the County's settlements, it is considered that some settlements are currently underserved by convenience retail floorspace and that, in some instances, trade may be lost to neighbouring larger settlements. In addition, it is clear that there is potential for additional convenience retail in some of the settlements in the County, given their projected population growth over the lifetime of the Plan.</p> <p>An updated retail strategy would be welcomed as it would assess current retail provision in Kildare and explore ways to enhance the retail environment in a sustainable manner.</p> <p>Tesco occupies an established position within the convenience retail sector, and it is suitably positioned to bring forward an increased level of convenience retail floorspace at locations within the County that could serve the ongoing rise in population both over the lifetime of the new Development Plan and beyond.</p> <p>Tesco considers that a range of formats would support positive planning, economic and regeneration</p>	<p>Chief Executive's Response Individual Local Area Plans will be prepared for the higher order settlements, where specific land use zonings will be designated through an evidence-based approach as part of the suite of local area plans to be prepared for the county (Objective CSO 1.9 refers). As per Objective RET 02 the Council will provide clear guidance on where major new retail floorspace would be acceptable throughout the county having regard to the County Retail Hierarchy as part of the preparation of the Local Area Plans. It is considered that there is sufficient high level strategic guidance within the CDP to guide future retail development across the county in accordance with the Section 28 Retail Planning Guidelines (2012).</p> <p>The comments in relation to RET O21 are noted and in order to provide for a greater degree of flexibility whilst still protecting the viability and vitality of the Core Retail Area and placing particular priority in the development of the Naas Shopping Centre, it is recommended that the objective be amended.</p> <p>The comments in relation to consultation on public realm and transport strategies are noted. The Council undergoes extensive public consultation either as part of Local Authority, Part 8 processes or the Town Renewal Masterplan processes from which Public Realm projects derive. It is considered that the existing policies and objectives in the Draft CDP are sufficient to support retail development (RET O3, 05, 011, 018, 019 refers). As per Objective RET 02 clear guidance on where new retail floorspace will be acceptable will be set out in local area plans in accordance with the Retail Planning Guidelines.</p>

	<p>outcomes in accordance with both national and regional policy. New convenience retailing can help to enhance the vitality and viability of town centres by complementing the overall business mix in such centres.</p> <p>Retail stores that are located adjacent or in proximity to town centres can also positively assist with urban regeneration, for example, through the development of strategically located sites. Larger format stores have the advantage of offering a greater product range while also providing Grocery Home Shopping hubs and Click and Collect facilities.</p> <p>The Draft Development Plan can facilitate the delivery of new store locations, investment and job creation throughout the County through the implementation of a suitably robust retail policy framework that would promote store locations both within town centres and on the edge of settlements, where appropriate.</p> <p><u>Supportive Retail Policies</u> The submission requests that KCC provide flexible land use zoning objectives that will allow sites to be brought forward in the County's towns and settlements for convenience retail development over the lifetime of the Plan.</p> <p>Given the projected population increase of the County and its key settlements, the future provision of retail facilities and enhancement of existing centres should be considered and facilitated as part of the new Development Plan. It is requested that the Local Authority provide flexibility with regard to zoning</p>	<p>Similarly, development management standards have been prepared under Section 15.13 in respect of Retail Development. Section 15.9.5 refers to details in respect of loading and unloading for commercial developments and car-parking (section 15.7.8) and cycle parking requirements (15.7.2) are also included within the Draft CDP.</p> <p>In relation to recognising the detailed requirements for a modern retailer including appropriate floorplates, car and bicycle parking and servicing access, where possible in the CDP, it should be noted that the application of varied standards across all commercial businesses including retailing is recognised in the CDP. Developments will be assessed on their own merits and needs, having regard to S28 Retail Planning Guidelines, the guidance of the development management standards and policies and objectives of the CDP. In relation to appropriate floorplates there have been many retailers that have applied innovative design and approaches to their retail stores and accessing arrangements to facilitate the re-use of existing brownfield sites across the country with very innovative design approaches which is particularly welcomed by the Planning Authority.</p> <p>The comments in relation to a specific objective for 'Click +Collect' retail services and grocery home shopping is noted. However, Objective RET 010 states that it is an objective of the Council to encourage and facilitate innovation and diversification in the county's retail profile and offer. Click and collect and grocery home shopping are part of the modification to retailing nationally and it is considered outside the remit of a land use plan to specifically refer to all potential diversifications of a particular commercial business. Notwithstanding the above the Council does recognise that these additional retail</p>
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	<p>policies in order to facilitate the provision of scale-appropriate retail floorspace at appropriate locations. This will allow sites to be brought forward in the County's towns and settlements for convenience retail development over the lifetime of the Plan.</p> <p><u>Additional Retail Development in Kildare</u> The submission highlights a specific objective RET O21 which relates to Naas. It is stated that the wording of this draft objective does not allow for a suitable degree of flexibility in the delivery of new retail development in Naas. The submission notes that the objective states 'part occupation of the Naas Shopping Centre but the shopping centre has remaining unfinished since 2012 and there is no certainty as to when the centre will be completed and occupied.</p> <p>It is considered that RET O21 is a restrictive approach and may hinder the growth of Naas with new residential development not being adequately served.</p> <p>RET O21 conflicts with RET O64 with regards the 10-minute settlement concept.</p> <p>It is requested that the objective should be amended to include that development outside the core retail area will be considered on its own individual merits and the defined retail needs of a particular location at a particular time. Town centres cannot always accommodate new retail development due to constraints i.e., plot size, site layout, parking, delivery access. When suitable sites are not available in the town centre, edge-of-town centre sites must be</p>	<p>offerings/services often require some spatial reorganisation which can be addressed through any planning application for same, where appropriate. It is considered that the CDP supports retail and innovation in retailing sufficiently.</p> <p>Chief Executive's Recommendation Amend Objective RET O21 as follows:</p> <p>RET O21: Consider either convenience or comparison retail developments in the core retail area in accordance with the sequential approach and to only consider any further convenience or comparison retail developments outside of the core retail area following the redevelopment and occupation (either in whole or in part for retail use) of the Naas Town Shopping Centre. Support and facilitate the development of retail, retail services and niche retailing in the town centre area, including new/infill development and redevelopment of an appropriate scale.</p>
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	<p>considered with flexible zoning objectives to accommodate a modern convenience retail store with an appropriately sized floorplate.</p> <p>Tesco are reviewing opportunities and consider that there are limited sites that can facilitate modern convenience within the core retail areas. It is suggested that the CDP identify appropriate edge of-core retail area/edge-of-town centre locations, which support the vibrancy of the town centre, that can be developed for convenience retail use. It is also suggested that the CDP adopts a flexible approach to allow for the development necessary to provide important local services and amenities for the growing population across settlements within the County.</p> <p><u>Supporting Existing Retailers</u></p> <p>It is important that existing operators are supported which includes safeguarding of delivery and access routes and spaces to undertake deliveries. Tesco currently operates a central distribution system for deliveries, which involves the consolidation of individual supplier products at a central warehouse where the products are organised and redistributed as part of a complete delivery. Adequate loading bay facilities and access routes should be maintained to ensure the commercial viability of retail premises. A failure to accommodate deliveries could have a detrimental impact on such premises.</p> <p>The submission requests that no policies are introduced that could lead to any restrictions on deliveries as part of the new Development Plan and that the Local Authority engage with retail operators</p>	
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	<p>as part of any future public realm or transportation strategies.</p> <p>It is also requested that delivery requirements of convenience food store operators are acknowledged and that policies providing for deliveries, including early morning deliveries, should be encouraged. An approach such as this will promote retail development in the County and ensure that stores can offer their customers a high-quality product.</p> <p>In the conclusion the submission states that the CDP should provide policies and objectives that can spur investment in the convenience retail sector and provide for adequate convenience floorspace to be allocated in settlements across the County in Key Towns and Self-Sustaining Growth Towns that have been identified in the Plan.</p> <p><u>Requirements of Retailers</u> Typically, convenience retailers will require extensive open areas of floorspace with associated space for car and bicycle parking. However, characteristically the town/village centre sites offer irregular floor layouts or floors with different levels. Generally, modern larger retail convenience layouts require unobstructed and level floorplates. Where sites with these characteristics become available in or around town centre areas, it is important that the Local Authority recognises these sites as being suitable for accommodating the provision of convenience retailing facilities, rather than having to rely on consolidating the existing urban fabric to try and achieve a suitable conforming site. Where no such sites exist or are designated for other uses then sequentially</p>	
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	<p>appropriate sites should be identified for retail convenience use. Flexible land-use zonings should also be considered, when identifying potential sites for retail convenience developments.</p> <p>Convenience retail stores require car parking spaces to serve customers who are doing their weekly shop and are unable to transport their goods without the use of private motor vehicles. This is acknowledged in the Retail Planning Guidelines as the weight of a weekly convenience shopping means public transport or walking are not feasible options. Also, to ensure the highest-quality products are available for customers, particularly fresh food, it is also important that an efficient back of house area is provided.</p> <p>The submission outlines a number of factors that will determine the attractiveness of a location for new retail development which should be considered in the CDP:</p> <ul style="list-style-type: none">- Quality of the public realm.- Retail layout achievable.- Traffic management & movement strategy.- Servicing/deliveries & accessibility.- Height/mix of uses- Benefits of an improved locale through the development of a site.- Car and bicycle parking.- Health and safety.- Planning policy restrictions. <p>The submission also highlights particular ‘back of house’ requirements that is required for efficient operation of supermarkets. It points out that back of</p>	
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		<p>house areas are designed to minimise the need for multiple deliveries per day and central distribution systems (like those used by Tesco) remove the need for individual suppliers to visit stores.</p> <p>The submission states that the design of modern retail formats is dictated by retailers' requirements, current Building Regulations, Fire Safety and Disability Access requirements. Each of these regulations necessitates additional space requirements (circulation space, staff facilities, service yard/layout requirements etc.) which traditionally would not have been required in similar type retail stores. Having regard to these matters, it is requested that the policies in the CDP for the County fully recognise these detailed requirements including appropriate floorplates, car and bicycle parking and servicing access, where possible.</p> <p><u>Click + Collect and Grocery Home Shopping</u> Role of Click + Collect and home deliveries has increased. They require a small spatial requirement within dedicated areas of the customer car parking in the most easily accessible locations. The submission requests that support for this type of retailing is included in a policy in the CDP as follows:</p> <p>To support and accommodate the growth of 'Click +Collect' retail services and grocery home shopping.</p>	
308	Irene O'Neill	The submission supports RET O27.	<p>Chief Executive's Response The comments are noted.</p> <p>Chief Executive's Recommendation No change to the Draft Plan</p>

<p>276.</p>	<p>County Kildare Access Network</p>	<p>Submission requests that the chapter aim include additional text (in purple) as follows: ‘To continue to promote and encourage town centres..... In ensuring these areas remain attractive, universally accessible, and liveable places...’</p> <p>Submission requests objective RET 01 be amended, as follows: ‘In the interests of achieving greater social inclusion and universally accessible to shopping and services across...’</p> <p>Requests that objective RET 06 includes universally accessible for all.</p> <p>Requests that objective RET 07 includes additional wording, as follows: ‘Improve the universally accessibility of the Town Centre’</p> <p>Requests that the text on Page 273 (section 8.7.1.1) be amended to include the following text (in purple). ‘In order to reinforce the town centre as a viable, vibrant, universally accessible and attractive retail centre...’</p> <p>Requests that 8.16.1 Outdoor Dining: Section 254 License Application: Additional sentence, as follows: ‘Ensure these facilities have universally accessibility which is then maintained’</p> <p>Requests that objective RET 077 includes additional wording, as follows:</p>	<p>Chief Executive’s Response</p> <p>The request to amend the wording of the Chapter Aim is accepted. The request to amend objectives RET O1, RET O7 is accepted</p> <p>It is considered that objective RE6 O6 is designed to support to the provision of transport infrastructure to service retail development rather than specifically deal with the issue of universal accessibility. The request therefore to amend the text is not accepted.</p> <p>The suggested amendment to the text in section 8.7.1.1 is accepted.</p> <p>The request to amend objective RET O77 is not accepted as it is considered that the suggested amendment would be best integrated into section 8.16.1. The suggestion to amend 8.16.1 is also accepted. It should be noted that with regard to Section 254 applications, issues relating to access are assessed on a case-by-case basis. In instances where applications are granted conditions are typically attached to ensure 1 metre clearance between tables/seats.</p> <p>Chief Executive’s Recommendation</p> <p>Amend objective Chapter Aim, as follows: To continue to promote and encourage town centres as our primary retail centres, at the heart of our communities so that they play a vital role in ensuring these areas remain attractive, universally accessible and liveable places and to make provision for additional retail, at appropriate locations and quantum’s where necessary.</p>
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		<p>'Consideration should be given to vulnerable users, i.e., persons with a disability or the older person.'</p> <p>In support of this request the submission refers to Circular Letter PL 06/2021 which states that 'planning authorities give consideration at a local level to the principles of Universal Design when assessing a Section 254 licence application to ensure that the wider area is accessible, useable and convenient to all those who wish to use or pass through it...'</p>	<p>Amend objective RET O1, as follows: to enable the reduction in the requirement to travel to meet these needs and in the interests of achieving greater social inclusion and universal accessibility to shopping and services across all sectors of the community.</p> <p>Amend objective RET O7, as follows: Improve the universal accessibility of the town centre with particular emphasis on creating a high quality, safe and permeable environment that is easily accessible to pedestrians and cyclists.</p> <p>Amend the first sentence of the fifth paragraph of section 8.7.1.1, as follows: In order to reinforce the town centre as a viable, vibrant, universally accessible and attractive retail centre, the Main Street should be retained as the centre of commercial and retail activity.</p> <p>Amend section 8.16.1, as follows: Outdoor dining is an important contributor to the vitality and vibrancy of town and village centres, especially during the Covid-19 pandemic. When assessing license applications, the council will have regard to Section 254 of the Planning and Development Act 2000, as amended and the Licensing Outdoor Dining and Seating Guidance Document August 2021 by Kildare County Council. In keeping with Circular Letter PL 06/2021, due consideration must be given at a local level to the principles of Universal Design when assessing a Section 254 licence application to ensure that the wider area is accessible, useable and convenient to all those who wish to use or pass through it. Every effort must be made to ensure that the design and layout for outdoor seating proposals are universally accessible where practicable.</p>
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358	Deirdre Lane	Town centres need to be rejuvenated, with historic streetscapes maintained and spaces made available for themed markets. Shopping local should be encouraged and rewarded. Packaging from local businesses should be reduced and new recycling centres established that use innovative solutions.	<p>Chief Executive's Response Chapter 14 'Urban Design, Placemaking and Regeneration' outlines the importance of historic streetscapes when regenerating town and village centres. It is noted that this may be implemented as part of a Public Realm Strategy/Plan.</p> <p>Controlling shopping habits are outside the scope of a Development Plan, however, section 8.3 in Chapter 8 'Urban Centres and Retail' supports shopping local, while reducing food miles is encouraged by Objectives RET O13 and RET O14. Markets in central locations are also encouraged by Objective RET O78.</p> <p>Chief Executive's Recommendation No change to the Draft Plan</p>
560	Cllr. Suzanne Doyle	The submission recommends that Objective RE O47 be amended to include the following text: "Strengthen town centres through the sequential approach to development of town centre zonings."	<p>Chief Executive's Response It is noted that the objective referred to in the submission, namely Objective RE O47, refers to remote-working opportunities as follows: 'It is an objective of the Council to 'Support remote working opportunities from designated hub/co-working spaces, in the interests of mitigating long commuting times.'</p> <p>It is considered that the submitter intended to refer to RET O47, which is one of the objectives contained in Section 8.7.2.6 (Clane) of Chapter 8 'Urban Centres & Retail'.</p> <p>At the outset, the Sequential Approach, as introduced in the Retail Planning Guidelines 2012, is incorporated in the strategic policy framework for guiding new retail development. It recognises the importance of sustaining the vitality and viability of town and village centres. Planning applications for retail development proposals,</p>

			<p>including extensions or a material change of use of existing development must comply with the criteria of suitability of use, size, scale and accessibility and the key principles of the sequential approach.</p> <p>In Objective RET O15, it is an objective of the Council to “guide retail development to town and village centres in the first instance where practical and viable in accordance with the Sequential Approach as set out in Section 8.5 above, in order to ensure that the vitality and viability of existing town and village centres is sustained and strengthened.”</p> <p>Section 8.5 contains many objectives that reinforce the Sequential Approach to retail development in towns and villages in Kildare, including Objective RET O47.</p> <p>It is considered that Section 8.5 adequately addresses the issues raised in the submission.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan</p>
560	Cllr. Suzanne Doyle	The submission recommends that Objective RE O48 be amended to include the following text: “Encourage key retail operatives that drive footfall to locate in appropriate town centre locations that will help revitalise our town centres.”	<p>Chief Executive’s Response It is noted that RE O48 is an objective supporting the role of MERITS in providing co-working incubation and accelerator space for technology entrepreneurs and technology business.</p> <p>It is considered that the submission is referring to RET O48, which is one of the objectives contained in Section 8.7.2.6 (Clane) of Chapter 8 ‘Urban Centres & Retail’.</p> <p>RET O48 states Require applicants to ensure that proposals for retail development which are above the Plan’s assessment criteria thresholds demonstrate compliance with the assessment criteria of both the</p>

			<p>Regional Planning Guidelines 2012 and the Regional Retail Strategy.</p> <p>Sequential Approach, as introduced in the Retail Planning Guidelines 2012, is incorporated in the strategic policy framework for guiding new retail development. It recognises the importance of sustaining the vitality and viability of town and village centres. Planning applications for retail development proposals, including extensions or a material change of use of existing development must comply with the criteria of suitability of use, size, scale and accessibility and the key principles of the sequential approach.</p> <p>In Objective RET O15, it is an objective of the Council to “guide retail development to town and village centres in the first instance where practical and viable in accordance with the Sequential Approach as set out in Section 8.5 above, in order to ensure that the vitality and viability of existing town and village centres is sustained and strengthened.”</p> <p>Section 8.5 contains many objectives that reinforce the Sequential Approach to retail development in towns and villages in Kildare, including Objective RET O47. It is considered that Section 8.5 adequately addresses the issues raised in the submission.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan</p>
560	Cllr. Suzanne Doyle	The submission recommends that Objective RE O49 be amended with the following text: “Restrict development of out-of-town hospitality offerings, such as coffee shops, bistros and cafes.”	<p>Chief Executive’s Response</p> <p>It is noted that the submission erroneously refers to an Objective contained in Chapter 4 of the Draft Plan that is not connected to the subject matter of the submission. It is also noted that planning applications for coffee shops, bistros and cafes will be considered subject to zoning, all environmental considerations and the proper planning and sustainable development of the area.</p>

			<p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
<p>405</p>	<p>Kildare Climate Action Linkage Group</p>	<p>Outdoor Dining: Section 254 License application The submission suggests the insertion of the following: RET O80 - Encourage, support and promote outdoor dining facilities that contribute to vitality and vibrancy of centres at all levels of the County Retail Hierarchy, while ensuring these facilities have appropriate layouts, adequate management and contain high quality design components in line with Section 254 of the Planning and Development Act 2000 and the Licensing Outdoor Dining and Seating Guidance Document August 2021 by Kildare County Council. To reduce the volume of waste production and associated littering in Kildare’s settlements, outdoor dining using disposable plate, cups and cutlery will be discouraged.</p> <p>Additionally, the submission suggests that reduced commercial rates should be applied for a period of time to encourage, promote and incentivize the establishment of Zero Waste/Local Food shops in retail areas. It is submitted that the establishment phase for many of these innovative outlets may be difficult and suggest that KCC consider ways to facilitate.</p> <p>In line with the Brigid annual bank holiday and proposed activities, the submission suggests that retail opportunities for beer and wool should be supported to mirror her legacy.</p>	<p>Chief Executive’s Response Regarding the proposed changes to RET O80 and reduced commercial rates, it should be noted that the statutory elements and remit of the Development Plan are set out clearly in the Planning and Development Act 2000, as amended. In preparing the Development Plan, planning authorities must exercise caution not to inappropriately stray into the operation of other statutory codes and regulatory regimes that relate to the development sector, and which are outside the remit of a county or city development plan. This is applicable to policy or objectives for non-planning functions governed by other legislation and regulations, including the specific matters raised in relation to, inter alia, disposable plates and cups.</p> <p>With regards to supporting retail opportunities for beer and wool, it is considered that Section 8.2 and 8.3 provides adequate support for retail opportunities.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>

MAYNOOTH			
445	IWAI Kildare	Objective RET O27 which facilitates the development of appropriately scaled retail development in Leinster Street and Canal Harbour areas is supported.	<p>Chief Executive's Response Noted</p> <p>Chief Executive's Recommendation No change to the Draft Plan</p>
446	David Knox	Objective RET O27 which facilitates the development of appropriately scaled retail development in Leinster Street and Canal Harbour areas is supported.	<p>Chief Executive's Response Comments noted.</p> <p>Chief Executive's Recommendation No change to the Draft Plan</p>
488.	Sky Castle Ltd.	<p>Submission requests that additional text (in purple) be inserted into objective RET O28 of the draft Plan, as follows:</p> <p>RET O28: Secure the continued consolidation of Maynooth Town Centre through progressing the implementation of a joint Local Area Plan for the Maynooth and Environs area, in conjunction with Meath County Council. and the regeneration of backland and brownfield areas in the town centre.'</p>	<p>Chief Executive's Response The request to include reference to a joint local area plan for Maynooth is accepted.</p> <p>Chief Executive's Recommendation RET O28: Secure the continued consolidation of Maynooth Town Centre through progressing the implementation of the Maynooth and Environs Joint Local Area Plan and the regeneration of back land and brownfield areas in the town centre.</p>
NEWBRIDGE			
520	Newbridge Community Development	Newbridge requires the creation of a resourced Town Centre Manager.	<p>Chief Executive's Response Town Centre Mangers and Town Teams are operational matters which are not a consideration of a County Development Plan, which is predominantly a land use plan. However, there is currently a District Manager who oversees Newbridge and Town Centre First Teams are supported by Objective UD O6 point (v) in Chapter 14 'Urban Design, Placemaking and Regeneration'.</p>

			<p>The Draft Kildare County Development Plan does not include any specific entertainment programmes for Newbridge as Newbridge has its own statutory Local Area Plan. The matter of attractions can be considered as part of the review of the Newbridge Local Area Plan, preliminary work for which is already underway.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
560	Cllr. Suzanne Doyle	<p><u>Core Retail Area Maps</u> The submission states that the Core Retail Area Maps needs to include both sides of Cutlery Road and lower part of Eyre Street, Newbridge.</p>	<p>Chief Executive's Response</p> <p>It is considered appropriate to extend the Core Retail Area for Newbridge to include both sides of Cutlery Road. This submission was not accompanied by a map to clarify the 'Lower part of Eyre Street'. Notwithstanding this, the Core Retail Area is that part of a town which is primarily devoted to shopping, as distinct from the wider Town Centre Zoning Objective. The objective of the Retail Planning Guidelines is to ensure the retention of activity within the main retail centres or core areas. Whilst it is agreed that Cutlery Road is primarily in retail use, the same cannot be said for Eyre Street. In that regard, individual Local Area Plans will be prepared for the higher order settlements, where specific land use zonings will be designated through an evidence-based approach as part of the suite of local area plans to be prepared for the county (Objective CSO 1.9 refers).</p> <p>Chief Executive's Recommendation</p> <p>See Appendices for amended map with respect to Map 8.11 (Core Retail Area for Newbridge)</p>

KILDARE TOWN			
379	Value Retail Dublin Ltd Owners of Kildare Village	<p>The submission requests the following objectives to ensure the Development Plan supports further growth at Kildare Village (KTOV).</p> <p>To support and facilitate the further enhancement and evolution of the retail and tourist led offer and associated services at the Kildare Tourist Outlet Village.</p> <p>Encourage and facilitate the evolution of existing retail developments in the County by being proactive and responsive to changing retail market trends and consumer behaviour in a post COVID-19 and post Brexit environment, and recognising the need to support physical retail environments.</p> <p>It is also requested to reintroduce the following objective from the current Development Plan</p> <p>Objective ECD32: Support the development of new tourist facilities or upgrading/ extension of existing tourist facilities at tourist sites in accordance with proper planning and sustainable development principles.</p> <p>Furthermore, it is requested to add the following text in purple to Objectives in Chapter 4 'Resilient Economy and Job Creation'</p> <p>RE O25: Continue to support and develop Kildare Town as a bloodstock, tourism, including retail-tourism and manufacturing location.</p>	<p>Chief Executive's Response</p> <p>It is considered Objective RET O9 in Chapter 8 'Urban Centres and Retail' which promotes retail-led tourism throughout the county, adequately supports the tourism offer provided by the Kildare Village Outlet.</p> <p>The changes sought to Objective RET O12 are already addressed in Objective RET O10 which encourages and facilitates innovation and diversification in the county's retail profile and offer.</p> <p>The changes sought to Objective RET O44 are noted and agreed.</p> <p>Chief Executive's Recommendation</p> <p>Add the following text in red to Objective RET O44 in Chapter 8 'Urban Centres and Retail'</p> <p>Develop a well-designed pedestrian link from the Kildare Village Outlet Centre to the town centre, in consultation with the various third-party landowners, with a view to better integration, enhancing visitor experience and promoting the heritage and evening economy of the town centre. in accordance with the guidance in the Retail Planning Guidelines 2012 and accompanying Retail Design Manual.</p>

	<p>RE P15: Support, promote, protect, improve, encourage and facilitate the development of tourism, including retail tourism, throughout the county as an important contributor to job creation in accordance with the proper planning and sustainable development of the area.</p> <p>RE O95: Support the expansion and development of tourism in Kildare, investigating the feasibility of key opportunities such as those centred on the racing industry, motorsports, retail, heritage, historical heritage (both persons and places), geology, golf and eco-tourism to include: the Kildare Tourist Outlet Village, Arthur’s Way, the Dublin –Galway Greenway, the Barrow Blueway, the Shackleton Trail, Shackleton Museum, Mondello the Gordon Bennett Route, the Grand Canal Greenway, Brigid 1500, a Fitzgerald Family Trail, the Made of Athy Trail, Castledermot Town Wall and other opportunities.</p> <p>RET O9: Promote retail-led tourism in Kildare and to facilitate the provision of tourism infrastructure, as well as supporting the enhancement of existing retail tourism locations in the County such as the Kildare Tourist Outlet Village.</p> <p>RET O12: Support and encourage diversity in the retail offer, including the sustainability of the independent retail sector in the county, in response to changing retail market trends and consumer behaviour.</p>	
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		RET O44: Develop a well-designed pedestrian link from the Kildare Village Outlet Centre to the town centre, in consultation with the various third-party landowners, with a view to better integration, enhancing visitor experience and promoting the heritage and evening economy of the town centre in accordance with the guidance in the Retail Planning Guidelines 2012.	
560	Cllr. Suzanne Doyle	<p>The submission states that the Core Retail Map of Kildare town be amended to extend the complete island across from the Credit Union.</p> <p>The submitter asks if these maps are simply to demonstrate where town centre activity currently takes place or will they restrict expansion of town centre designation in Local Area Plans. The submitter is concerned that there is a need to include potential sites for large retailers such as the movement of multiples into town centre sites.</p>	<p>Chief Executive's Response</p> <p>This submission was not accompanied by a map to clarify the 'complete island' across from the Credit Union. It is noted the Credit Union is located on Bride Street in the town centre.</p> <p>In relation to the submitter's concern that the Kildare Town Core Retail Area map would restrict the expansion of town centre designation in the Local Area Plans, it should be noted that the Core Retail Area is that part of a town which is primarily devoted to shopping, as distinct from the wider Town Centre Zoning Objective. The objective of the Retail Planning Guidelines is to ensure the retention of activity within the main retail centres or core areas. Retail development proposals in towns that are located outside the Core Retail Area will be required to demonstrate compliance with the sequential approach in relation to suitability of use, size, scale and accessibility. Sequentially, the lands surrounding the Credit Union would be well located to support town centre and retail activity.</p> <p>In that regard, individual Local Area Plans will be prepared for the higher order settlements, where specific land use zonings will be designated through an evidence-based approach as part of the suite of local area plans to be prepared for the county (Objective CSO 1.9 refers). The Kildare Town Local Area Plan forms part of Kildare County</p>

			<p>Council’s work programme for 2022. During the LAP process, opportunity sites can be identified outside the Core Retail Area and these lands will be zoned accordingly.</p>
			<p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
560	Cllr. Suzanne Doyle	The submission recommends that Kildare Town Retail Objectives be added to the Draft Plan.	<p>Chief Executive’s Response As per Objective RET 02 clear guidance on where new retail floorspace will be acceptable will be set out in local area plans in accordance with the Retail Planning Guidelines. Similarly, development management standards have been prepared under Section 15.13 in respect of Retail Development. Section 15.9.5 refers to details in respect of loading and unloading for commercial developments and car-parking (section 15.7.8) and cycle parking requirements (15.7.2) are also included within the Draft CDP.</p> <p>In support of Kildare town’s designation as a primary tourism town in the county, Section 8.7.2.4 of the Draft Plan contains a number of objectives, which seek to: facilitate the consolidation/expansion of the historic retail core of Kildare Town Centre through infill development and the redevelopment/regeneration of derelict/underutilised sites and buildings (Objectives RET O42, RET O43 and RET O44 refer).</p> <p>Further, individual Local Area Plans will be prepared for the higher order settlements, where specific land use zonings will be designated through an evidence-based approach as part of the suite of local area plans to be prepared for the county (Objective CSO 1.9 refers). The Kildare Town Local Area Plan forms part of Kildare County Council’s work programme for 2022.</p>

			<p>It is considered that adding specific retail objectives for Kildare Town to the Draft Plan would prejudice the Kildare Local Area Plan, the preparation of which has commenced.</p> <p>Chief Executive's Recommendation Amend RET O42 Facilitate the consolidation/expansion of the town centre historic retail core of Kildare Town Centre through infill development and the redevelopment/regeneration of derelict/under-utilised sites and building in and around particularly those within the Core Retail Area.</p>
560	Cllr. Suzanne Doyle	<p>The submission recommends that a strict sequential approach be applied to the development of food outlets in order to protect and enhance the primacy of Kildare town centres' reputation in the hospitality industry and to improve synergies with the highly successful KROV.</p> <p>States that throughout the CDP, KROV should be the term used to describe the shopping centre at the edge of Kildare Town and not Kildare Village, as this is confusing and misleading in the context of the CDP.</p>	<p>Chief Executive's Response In relation to the development of retail outlets in Kildare Town, it is noted that the preparation of a local area plan for Kildare Town, will designate specific land use zonings through an evidence-based approach. The Kildare Town Local Area Plan forms part of Kildare County Council's work programme for 2022.</p> <p>The development of retail outlets including food outlets will be guided by the application of the sequential approach to retail development.</p> <p>In relation to the name of the retail outlet in Kildare Town, it is noted that the recent planning applications submitted by Value Retail Dublin Limited in respect of the development, namely, Pl. Ref. Nos. 22/364; 21/1834; 21/582 and 20/1456, refer to the 'Kildare Tourist Outlet Village' (KTOV).</p> <p>Therefore, it is recommended that the references to the Kildare Village shopping centre be changed to the 'Kildare Tourist Outlet Village' (KTOV).</p> <p>Chief Executive's Recommendation</p>

			Amend the Draft Plan so that references to the Kildare Village shopping centre in the Draft Plan are referred to as the 'Kildare Tourist Outlet Village' (KTOV).
CELBRIDGE			
410	Celbridge Community Council	<p><u>Retail Centre of Celbridge</u> Submits that achieving sustainability must be the guiding principle rather than promoting consumerism as for example, families with children should be able to buy footwear and clothing for their children locally rather than being dependent on large shopping centres in West Dublin or on internet shopping.</p> <p>States that objective RET O33 should be qualified to exclude backlands between the Main St and the River Liffey, because of flooding concerns.</p> <p>Requests that objective RET O34 should be qualified by a clause stating that any development at KDA1 will not negatively impact the setting of Oakley Park.</p>	<p>Chief Executive's Response It should be noted that Ireland is a competitive market economy and as such, consumer-oriented shopping centres and online shopping are permanent features of the retail offer in the country. While the function of the County Development Plan is to guide, support and promote the development of retail services at appropriate locations like Celbridge Town Centre, it cannot force the establishment of certain shops, if market forces do not consider them to be viable or sustainable. Furthermore, it should be noted that as per the RSES, Celbridge Town Centre is designated a Level 3 town centre in the retail hierarchy. Maynooth however, which is the location of an enhanced level of retail activities and services in the MASP has been designated a Level 2 Major Town Centre.</p> <p>The issue of flood risk is a site-specific consideration assessed on a case-by-case basis as part of any potential planning application. Accordingly, such a specific provision on backlands between the Main Street and the River Liffey in Celbridge is not considered appropriate.</p> <p>Section 12.2.1 of the Celbridge Local Area Plan 2017–2023 outlines in detail how any development should not negatively impact the setting of Oakley Park. The purpose of this objective is to provide specific support for this designated Key Development Area. Accordingly, the</p>

			relevant section of the Local Area Plan should be consulted regarding specific details.
			Chief Executive's Recommendation No change to the Draft Plan.
JOHNSTOWN			
363	Johnstown Garden Centre	<p>The submission states that Johnstown Garden Centre is a family business which caters for approximately 750,000 visitors each year. This business does not only specialise in plants and gardening essentials but also seasonal shopping, garden furniture, barbecues, pots and containers, homeware, and gifts. Furthermore, it has an extensive café.</p> <p>Because of this the zoning objective Q1 is considered limiting as it would not encourage growth across all areas of the business.</p> <p>It should instead read: To recognise, support and encourage the existing and future development of Johnstown Garden Centre as a destination Garden Centre with Retail/Café ancillary services. Any Future development of the Garden Centre must be in accordance with the Retail Policies and objectives set out in Chapter 9 of this Plan. Any specific development proposal must also be in accordance with the proper planning and sustainable development of the area</p> <p>Furthermore, it is submitted based on the contents of this submission, that the zoning matrix for Q1 on Page 68, 69 and 70 of the Kildare County Council</p>	<p>Chief Executive's Response Section 8.15 and Objective RET O76 in Chapter 8 'Urban Centres and Retail' clarifies that the Council in principle supports the contribution of Garden Centre enterprises to the economies of Kildare's rural areas. However, this section states, that through their expansion and diversification, care must be taken in order to ensure that such developments do not negatively impact the vitality, vibrancy and offering of the county's small towns and village centres. Having regard to this section and objective therefore it is considered that Shop (comparison) must remain only 'O' (Open for Consideration) and not 'Y' (Permitted in Principle) for zoning matrix Q1.</p> <p>Chief Executive's Recommendation No change to the Draft Plan</p>

		<p>Draft Development Plan, be amended to allow for a “Y” value for Land Use Restaurant and Shop (Comparison) as opposed to “O”.</p> <p>The justifications for these requests are that Johnstown Garden Centre is geographically well located with access off the M7 and near many towns, it is age friendly and has no residential neighbours. The Garden Café is now an integral element of Johnstown Garden Centre and the business has successfully adapted over the past number of years. The existing zoning objective in the Draft Development Plan would hamper this.</p>	
465	Johnstown Community Association	The lands zoned village centre in St. Johns Grove are underdeveloped / under used. The area needs to be developed and shop units fully utilised. Reference is also made to anti-social behaviour on this site.	<p>Chief Executive’s Response Regarding the underutilised village centre lands, it should be noted there are a range of objectives in section 4.7 which support regeneration and address derelict sites in towns and villages. These include RE O31, RE O32, RE O33 and RE O35.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan</p>
DERRINTURN			
609	Fernside Homes	Section 8.7.3.2 should be amended as Derrinturn is referred to as a Village Centre when it should be referred to as a town centre.	<p>Chief Executive’s Response It is recommended to amend section 8.7.3.2 and exclude Derrinturn and Kill. Therefore, section 8.7.3.1 should also be amended to include Derrinturn and Kill.</p> <p>Chief Executive’s Recommendation To remove ‘Derrinturn’ and ‘Kill’ from the list under 8.7.3.2 and to move both ‘Derrinturn’ and ‘Kill’ to the list under 8.7.3.1 (Ch 8 – Retail)</p>

RETAIL WAREHOUSES, DERELICT AND UNDERTILISED LAND/ BUILDINGS			
495	Suzanne Murphy	<p>The Draft Plan should not allow the building of large service stations or retail parks outside towns or villages that take business away from the town centres.</p> <p>Derelict properties in towns and villages should not be allowed to sit vacant and living above shops/restaurants in towns needs to be supported.</p>	<p>Chief Executive's Response Section 8.13 of Chapter 8 (Retail) has objectives which seek the re-use and regeneration of derelict/ obsolete/ underutilised land and buildings in town and village centres. Section 8.11 contains an objective to discourage the development of further out-of-town retail parks.</p> <p>Chief Executive's Recommendation No change to the Draft Plan</p>

CHAPTER 9 – OUR RURAL ENVIRONMENT			
Sub No.	Name	Summary of Issues Raised	Chief Executive’s Responses & Recommendations
BLOODSTOCK			
509	Broadfield Stud (Same submission as 603 for which same summary/ CE response & CE recommendation should be noted)	<p>This submission has been made on behalf of Broadfield Stud, a large stud farm south of Naas and adjacent to Punchestown, established approx. 200 years ago. Data is presented showing that 1/3 of stud farms have closed in Kildare since 2005. This provides evidence that the stud farm industry in Kildare is under threat. Policies RD P3 and RD P4 which support equine activities and bloodstock industry in the Plan are welcomed.</p> <p>To provide protection for the industry it is necessary to protect stud farms from incompatible development which threaten their viability. In this regard it is requested that a policy is included “to encourage the expansion of the bloodstock industry by protecting the equine environment in order to provide a calm, quiet and hazard free environment for the breeding of horses”.</p>	<p>Chief Executive’s Response It is considered that RD O13 protects the bloodstock industry and helps to ensure a suitable environment is maintained. Given the geographical location of Kildare however, it will not always be possible to ensure a tranquil environment for the equine industry.</p> <p>The Draft Plan must balance the needs of, inter alia, rural based industries including the bloodstock industry as well as housing and employment at appropriate locations, in accordance with the policies and objectives of the Draft Plan, while all the while being cognisant of the significant number of landscape designations at a local, national and international level.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
509	Broadfield Stud (same submission as 603 for which same summary/ CE response & CE recommendation	It is stated that mares and foals and young stock require a peaceful environment to develop and ongoing noise emitting activities, such as construction, is detrimental to that. The Council has previously acknowledged the concept of ‘incompatible development’ with equine operations however this has not been defined. It is submitted that any development which produces significant noise which interferes with the breeding and	<p>Chief Executive’s Response Objective RD O13 includes the term incompatible development. The full wording of the objective is to “Encourage the expansion of the bloodstock industry by appropriately protecting the environment and amenity value of rural areas from encroachment by urban sprawl and incompatible development.’ It is not appropriate to define the term incompatible development. Any future development in the vicinity of the</p>

	should be noted)	foaling operations is considered 'incompatible development'.	<p>bloodstock industry can be assessed on a case-by-case basis having regard to the factors in place at the time. Defining it as "any development which produces significant noise which interferes with the breeding and foaling operations" may be interpreted as precluding any form of development in the vicinity of the bloodstock industry. It is considered that the wording of RD O13 is sufficient, and it is not necessary or appropriate to define the term 'incompatible development'.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
509	Broadfield Stud (same submission as 603 for which same summary/ CE response & CE recommendation should be noted)	The Draft Plan does not include a policy to support horse breeders / stud farm operators. The council is requested to include a policy to address this i.e., "support sports horse breeding and thoroughbred breeding operations in Kildare".	<p>Chief Executive's Response In Policy RD P4, the Draft Plan recognises the importance of supporting and encouraging the continued development of a distinguished bloodstock industry in Kildare. Amendments are however proposed to same as set out below.</p> <p>Chief Executive's Recommendation Amend RD P4 to state: Support and encourage the continued development of a distinguished bloodstock and Sports Horse industry in the County, including breeding, competing and training.</p>
509	Broadfield Stud (same submission as 603 for which same summary/ CE response & CE recommendation should be noted)	RD P2 is referred to, and it is stated that it is essential to ensure the protection of the agriculture and agri-food sector in Kildare to ensure food security in the future. A further policy is requested "to ensure the preservation of prime agricultural land for food production".	<p>Chief Executive's Response Using agricultural lands for food production is supported by a whole host of policies and objectives in section 9.4 of Chapter 9 'Our Rural Economy' and in section 4.19 of Chapter 4 'Agriculture'. It would not be considered appropriate or reasonable to permit agricultural related uses only ever on lands currently used for agricultural purposes. The Draft Plan must balance the needs of, inter alia, rural based industries including agriculture but also related to the bloodstock industry as well as housing and employment at appropriate locations, in accordance with</p>

			<p>the policies and objectives of the Draft Plan, while all the while being cognisant of the significant number of landscape designations at a local, national, and international level.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
576	County Kildare Leader Partnership (CKLP)	<p>Amend RD O16: With the LEADER Programme, promote and encourage the development of activities that relate...</p>	<p>Chief Executive's Response Having regard to this submission as a whole it is considered more appropriate to include an overarching Core Strategy objective in Chapter 2 as set out below.</p> <p>Chief Executive's Recommendation To include a new objective in Chapter 2 (Core Strategy) to read as follows; Support the implementation of LEADER Programmes which aim to deliver a range of rural enterprise, social inclusion and community development initiatives in County Kildare</p>
503	Evelyn Cullen	<p>The submission welcomes the inclusion of RD P3 "Support equine related activities of an appropriate size at suitable locations in the county" and RD P4 "Support and encourage the continued development of a distinguished bloodstock industry in Kildare".</p> <p>Refers to the reduction in the number of stud farms in the county since the 1999 CDP and states that this is a significant issue and is evidence of the ongoing threat to the stud farm industry.</p> <p>Suggests that the Council provide additional protection to breeding operations by the inclusion of a policy to encourage the expansion of the</p>	<p>Chief Executive's Response Objective RD O13 supports the bloodstock industry, encourages its expansion in the County and helps to ensure that a suitable environment is maintained and protected from encroachment by urban sprawl and incompatible development. Given the geographical location of Kildare however, it will not always be possible to ensure a tranquil environment for the equine industry.</p> <p>The submission requests the Council to consider adding an additional objective to support Sports Horse Breeding and states that while Objective RD O17 mentions horse breeding, it only does so in the context of the County's racecourses.</p>

		<p>bloodstock industry by protecting the equine environments in order to provide a calm, quiet and hazard-free environment for the breeding of horses.</p> <p>In addition, it is suggested that the Council consider adding an additional objective to support Sports Horse Breeding and notes that Objective RD O17 only mentions breeding in the context of the racecourses. It is suggested that a policy be added to state as follows: <i>"It is the policy of the Council to support sports horse breeding and thoroughbred breeding operations in Kildare"</i>.</p>	<p>In relation to Policy RD P4, see response to Submission No. 509.</p> <p>Chief Executive's Recommendation In relation to Policy RD P4, see recommendation to Submission No. 509.</p>
599	Dr. Hugh Dillon	<p>Notes that Kildare is renowned worldwide and is a world leader for its equine industry which provides significant employment in the county. Submits that it is home to some of the most iconic studs and training establishments and is of high amenity value.</p> <p>Refers to the findings of the Deloitte report on The Economic Impact of Breeding and Racing in Kildare commissioned by Horse Racing Ireland (2019).</p> <p>Notes that it is important that the new Kildare CDP recognises the continued importance of the equine sector. States that the areas that are most suitable for rearing horses and have the greatest concentration of thoroughbred studs in the county are also competing with urban sprawl, industrial development and solar energy.</p> <p>Welcomes the inclusion of Objective RD 013, which states that <i>"It is an objective of the Council</i></p>	<p>Chief Executive's Response Objective RD O13 supports the bloodstock industry, encourages its expansion in the County and helps to ensure that a suitable environment is maintained and protected from encroachment by urban sprawl and incompatible development. Given the geographical location of Kildare however, it will not always be possible to ensure a tranquil environment for the equine industry.</p> <p>Any future development in the vicinity of the bloodstock industry can be assessed on a case by case basis having regard to the factors in place at the time. An objective that requires a calm, quiet and hazard – free environment is considered vague in a planning context and may be interpreted as precluding any form of development in the vicinity of the bloodstock industry.</p> <p>In Policy RD P4, the Draft Plan recognises the importance of supporting and encouraging the continued development of a distinguished bloodstock industry in Kildare. However, the submitter distinguishes the Irish Sports Horse industry and requests that more emphasis be</p>

		<p>to encourage the expansion of the bloodstock industry by appropriately protecting the environment and amenity value of rural areas from encroachment by urban sprawl and incompatible development” but states that it needs to be more specific on what environmental changes could be detrimental to horses such as toxic hazards, noise pollution and adjacent industrial type developments. States that horses need predictability and routine which a rural environment can provide.</p> <p>There is a concern that there is less emphasis being placed on the Irish Sports Horse industry in the 2023-2029 draft Plan compared to the CDP 2017-2023. The submission refers to Policy EQ 5 of the current CDP, which “Recognise and support the development of the Irish Sport Horse industry in the county, including breeding, competing and training” and states that there is no equivalent policy in the Draft Plan to specifically support the Irish Sports Horse industry. States that there is less emphasis being placed on the Irish Sports Horse Industry in the Draft Plan.</p> <p>Submission suggests that Policy EQ 5 be replicated in the Draft Plan.</p>	<p>placed on it in accordance with Policy EQ 5 of the current CDP. Changes are therefore proposed to RD P4 as set out below.</p> <p>Chief Executive’s Recommendation In relation to Policy RD P4, see recommendation to Submission No. 509.</p>
31	Michael Kinnane	<p>Due to its significant economic value, special consideration should be given to the bloodstock industry in Kildare.</p> <p>A new objective should be added which states the following</p>	<p>Chief Executive’s Response The wording of RD O13 states the following: ‘Encourage the expansion of the bloodstock industry by appropriately protecting the environment and amenity value of rural areas from encroachment by urban sprawl and incompatible development.’</p>

		<p>'It is the objective of the Council to protect the environment of the bloodstock industry which requires a calm, quiet and hazard – free environment for the proper welfare of horses and for the proper functioning of the industry.'</p>	<p>Any future development in the vicinity of the bloodstock industry can be assessed on a case-by-case basis having regard to the factors in place at the time. An objective that requires a calm, quiet and hazard – free environment is considered vague in a planning context and may be interpreted as precluding any form of development in the vicinity of the bloodstock industry. It is considered that RD O13 is sufficient.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
8	Punchestown Area Community Group	<p>Due to the rapid urbanisation of Kildare, it is requested that the following amendment be made to objective RD O13 of section 9.5 of Chapter 9: 'It is the objective of the Council to protect the environment of the bloodstock industry which requires a calm, quiet and hazard – free environment for the proper welfare of horses and for the proper functioning of the industry.'</p> <p><u>Summary of Appendix as below:</u> The equine history of Co. Kildare is outlined and the reasons why Co. Kildare has developed such a prominent role in breeding horses, rearing horses and training horses is explained. Although the inclusion of RE O13 is welcomed it is not specific enough in preventing confusion in relation to what type of development is acceptable in established equine areas. There has been a significant reduction in the number of stud farms in Kildare over the last 20 years and this can be somewhat attributed to stud farms feeling the development pressure of being located in close proximity to towns and villages.</p>	<p>Chief Executive's Response See response to Submission No. 31.</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 31.</p>

		Horses, especially thoroughbreds need quiet conditions at night and during the day. ABP have accepted the issue of horses being sensitive to noise as an important planning consideration.	
112	David Valentine	<p>The submission notes and welcomes the recognition of the contribution the equine industry makes to Kildare in the Draft Plan. The inclusion of objective (RD O13) “to encourage the expansion of the bloodstock industry by appropriately protecting the environment and amenity value of rural areas from encroachment by urban sprawl and incompatible development” is particularly appreciated.</p> <p>However, it is suggested that the horse’s environment and well-being is also considered in policy as thoroughbreds are very sensitive to their environs and are affected by small changes. It is requested that the bloodstock industry in Kildare be protected by ensuring a tranquil, hazard free environment is maintained so the industry can flourish and expand.</p>	<p>Chief Executive’s Response It is considered that RD O13 protects the bloodstock industry and helps to ensure a suitable environment is maintained. Given the geographical location of Kildare however, it will not always be possible to ensure a tranquil environment for the equine industry. The reference to ‘incompatible development’ in Objective RD O13 should however be noted whereby proposed developments, either to expand the equine industry or to locate developments in close proximity to the equine industry will be assessed having regard to the specific wording of this objective in order to facilitate the continued, sustainable, expansion of the equine industry in Kildare.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
167	Mariann Klay	The importance of this industry is noted the Draft Plan. However, the protection afforded to it does not go far enough. Grassland has never been under more threat and pressure due to development of housing and other infrastructure, but also from agriculture through demand for food and crop production. Breeding thoroughbred horses requires unpolluted, calm, hazard free environments to thrive. The amount of stud farms in Kildare has reduced by 32% over the last 20 years and this is likely to continue due to current pressures.	<p>Chief Executive’s Response See response to Submission No. 112.</p> <p>Chief Executive’s Recommendation See recommendation to Submission No. 112.</p>

		<p>It is suggested that the wording of Objective RD O13 in Chapter 9, Section 9.5 is amended to read as follows:</p> <p>“Protect the environment of the bloodstock industry which requires a calm, quiet, unpolluted and hazard-free environment for the proper welfare of horses and for the proper functioning of the industry”.</p> <p>This simple addition would add to the protection of equine enterprises and contribute to their survival for future generations.</p>	
242	Tír na Móna	<p>Submission lodged on behalf of Tir na Mona Cuideachta faoi Theorainn Rathaiochta (hereinafter called Tír na Móna), states that it is a not-for-profit, community development body, being a company limited by guarantee. Its area of interest is in the northwest of the county.</p> <p>Bridle Paths Notes that County Kildare is marketed by Fáilte Ireland as “The Thoroughbred County”, a nod to its equine heritage and notes that Fáilte Ireland, Kildare and Tipperary County Councils have launched a five-year Thoroughbred Country Destination Experience Development Plan to encourage tourism in Kildare and Tipperary by developing new and improved visitor experiences across both counties.</p> <p>States that Fáilte Ireland hopes to build on Ireland’s reputation as a leader in the breeding and racing of thoroughbred horses and attract domestic and international visitors by establishing a new and unique thoroughbred experience for the</p>	<p>Chief Executive’s Response The Council acknowledges the critical role that the horse industry has in contributing to the socio-economic and cultural life of the county and is strongly supportive of development that advances the equine industry and equine related tourist activities. In this regard, the draft Plan has an array of supporting policies and objectives which promote all aspects of the equine industry including objective RE O91 which seeks to ‘protect and nurture the environment which allows the equine industry to flourish in Co. Kildare and support the conserving and development of equine walking paths, bridle ways, tracks and trails.’ The request to designate Donadea Forest Park as the site for a bridleway at this stage of the county development plan process is considered inappropriate as any such proposal should be made on the basis of prior consultation with Coillte who are responsible for operating and managing the park. However, it should be noted that objective RE O91 would provide support for the development of a bridle way in Donadea Forest Park, if one was to be proposed during the life of the Plan, subject to planning and environmental considerations.</p>

		<p>tourist where it is hoped that accommodation linking in with the thoroughbred experience and activities ancillary to same will become available.</p> <p>Submits that Tír na Móna feels that the provision of bridle paths would be such an ancillary activity and would assist in developing tourism in the county. States that despite Kildare's equine heritage, there appears to be no public bridle paths available in the county and that visitors might reasonably expect to find a selection of such facilities but would be disappointed. States that the largest State-owned amenity in the county is Donadea Forest Park and it would appear to make sense if a bridle path was to be developed there, in furtherance of the Thoroughbred Country Destination Experience Development Plan. For this reason, Tír na Móna would like to see the creation of a bridle path in Donadea Forest Park as an aim of the forthcoming County Development Plan.</p>	<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
278	Donal Knight	<p>Notes that Kildare is renowned worldwide for its equine industry which provides employment in the county and amenities such as racecourses which attract visitors from all over, further supporting ancillary businesses. States that these amenities should be protected from adverse development in their localities and supportive projects encouraged.</p> <p>Poses the question that when visitors travel to an area for one reason, why not offer another reason to stay longer or return later? States that racegoers should be encouraged to avail of local amenities and accommodation. Protection should be given to the environment in which the industry</p>	<p>Chief Executive's Response The draft Plan contains a range of policies and objectives to support the development of the tourist offer in Kildare, including the development of tourist accommodation and equine related activities. The draft Plan acknowledges the contribution of equine related tourism to the rural economy of the county. It also recognises the scenic value of the rural countryside for visitors and notes that development should occur in the context of sustainable management of land and resources. In relation to proposed development within and around racecourses the draft Plan includes objective RD O15, as follows: Protect the Curragh, Punchestown, and Naas racecourses from any development that would interfere with their amenity value</p>

		thrives. Submits that by treating visitors to a welcoming and scenic experience, they will return and also act as our ambassadors in promoting these amenities. States that the quality of land in the county is well suited for breeding horses and cannot easily be replicated elsewhere so we need to take care of it.	and qualities while, at the same time promoting the enhancement of facilities as an attraction for visitors/attendees. Chief Executive's Recommendation No change to the Draft Plan.
494	Dr. Noel Cawley and Anita Cawley	<p>The submission welcomes objectives in the Draft Development Plan supporting the equine sector. However, it is stated that Objective RD O13 is not specific enough and the Council should include a policy that will encourage the expansion of the bloodstock industry by protecting their environment by ensuring a quiet, calm and hazard free environment.</p> <p>Additionally, the submission requests an additional and specific policy objective to support Sports Horse Breeding which contributes a significant amount to Kildare's economy annually. It is requested that this policy should be worded 'It is the policy of the Council to support sports horse breeding and thoroughbred breeding operations in Kildare.'</p>	<p>Chief Executive's Response In Policy RD P4, the Draft Plan recognises the importance of supporting and encouraging the continued development of a distinguished bloodstock industry in Kildare. Amendments are however proposed to same as set out below. Policies RD O13, RD O14 and RD O15 ensure that equine development is in appropriate locations and not encroached upon by incompatible developments. These general policies and objectives are considered sufficient for a County Development Plan. Specific impacts of potential developments impinging upon existing stud farm businesses will be examined on a case-by-case basis through the planning application process.</p> <p>Chief Executive's Recommendation In relation to Policy RD P4, see recommendation to Submission No. 509.</p>
259	Mrs de Robeck	<p>The submission relates to Gowran Grange, Swordlestown, Co. Kildare. The submission is made on behalf of the owner of Gowran Grange.</p> <p>There is currently an active planning application, 22/111, for a solar farm to the attendant grounds at Gowran Grange. It is noted the Punchestown Area Community Group was established on 10th March 2022, shortly after this planning application was submitted. There are no details of the</p>	<p>Chief Executive's Response Any future development in the vicinity of the bloodstock industry can be assessed on a case by case basis having regard to the policies and objectives of the Plan in effect at the time. It is accepted that an objective that requires a calm, quiet and hazard – free environment is vague in a planning context and may be interpreted as precluding any form of development in the vicinity of the bloodstock industry. It is considered that RD O13 is sufficient.</p>

		<p>members of this group and whether their interest is confined to residents or includes commercial interests. The group has made a number of submissions to other chapters of the draft CDP. There is a concern that the group is interfering in the rights of the current owner of Gowran Grange in order to hinder the planning application.</p> <p>It is noted that the submission from The Group requests an extension of the wording of objective RD O13 to read as follows: Encourage the expansion of the bloodstock industry by appropriately protecting the environment and amenity value of rural areas from encroachment by urban sprawl and incompatible development and to protect the environment of the bloodstock industry which requires a calm, quiet and hazard-free environment for the proper welfare of horses and for the proper functioning of the industry.</p> <p>The submission states that the correct balance is currently achieved in the Draft Plan through policies RD P3 and RD P4 and objective RD O13, without the requirement for amendments or additions.</p> <p>The Draft Plan rural policies and objectives towards the equine industry and renewable energy production, as currently proposed, provides an appropriate policy framework to manage the balance that needs to be achieved through the development management process.</p>	<p>The Council is not in a position to speculate on the reasons for the establishment of the Punchestown Area Community Group. It should also be noted that the council cannot comment on Pl. Ref. 22/111, which is an active planning application.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
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FORESTRY			
147	National Peatlands Park Group	<p>RD O20: Encourage public and private owners to allow / provide public access to forests for recreational and amenity use e.g., walking, biking and equine trails to enhance health and wellbeing with due consideration to sensitive areas for wildlife conservation and subject to compliance with the relevant environmental legislation.</p> <p>RD O22: Facilitate tourism infrastructure and visitor services including tourism accommodation at appropriate locations in forest estates with due consideration to sensitive areas for wildlife conservation and subject to compliance with the relevant environmental legislation.</p>	<p>Chief Executive's Response</p> <p>The suggested amendments to RD O20 and RD O22, requesting additional reference to wildlife conservation and environmental legislation, are noted. All projects are subject to screening for Appropriate Assessment and Environmental Impact Assessment. The Wildlife Acts (which are summarised in Section 12.3.4 for information) forms separate legislation in this regard. Furthermore, Objective LR O38 refers to the consideration and protection of the biodiversity value of all sites in the development of outdoor recreational facilities including greenways through the preparation of an Ecological Impact Assessment which shall guide the location and design of such facilities.</p>
			<p>Chief Executive's Recommendation</p> <p>No change to the Draft Plan.</p>
405	Kildare Climate Action Linkage Group	<p><u>Forestry</u></p> <p>Request the amendment of RD O20 as follows: Encourage public and private owners to allow / provide public access to forests for recreational and amenity use e.g., walking, biking and equine trails to enhance health and wellbeing with due consideration to sensitive areas for wildlife conservation and subject to compliance with the relevant environmental legislation.</p> <p>Request the amendment of RD O22 as follows: Facilitate tourism infrastructure and visitor services including tourism accommodation at appropriate</p>	<p>Chief Executive's Response</p> <p>In relation to RD O20 and RD O22, see response to Submission No. 147.</p> <p>In relation to the suggestion that the Council should seek partners for the establishment of grant funding for an indigenous nursery stock sector, the Council unfortunately does not have the resources to commit to undertaking such a project at this time but would support and facilitate the development of such a facility as a community enterprise.</p> <p>While there are many policies within the plan encouraging the planting of native species, sourcing plants of native</p>

		<p>locations in forest estates with due consideration to sensitive areas for wildlife conservation and subject to compliance with the relevant environmental legislation.</p> <p>Suggests the insertion of the following actions to support the Kildare Nursery Stock sector: Additional Action - To provide support for an indigenous nursery stock sector through actively seeking partners for the establishment of grant funding by the end of 2023, for the production of bare root tree/shrub stock of local provenance and origin.</p> <p>Additional Action - To require that any native tree plantings planted through Council funded Woodland planting schemes be of native provenance and origin by 2024 (and preferably local provenance and origin by 2027).</p>	<p>origin and provenance as appropriate are considered not to be practical in all cases.</p> <p>Chief Executive’s Recommendation Add an additional objective in Section 13.7.2: Support and facilitate, the establishment of a community run nursery to grow native plants, at an appropriate location.</p>
468	Ann Behan	<p>With respect to Forestry, best practices must ensure protection of designated habitats and species, the genetic integrity of native plants, and minimization of the risk of importation of pests and diseases, particularly harmful micro-organisms.</p> <p>Amend RD O20 to include the wording “with due consideration to sensitive areas for wildlife conservation and subject to compliance with the relevant environmental legislation” after health and wellbeing.</p> <p>Amend RD O22 to include the wording “with due consideration to sensitive areas for wildlife conservation and subject to compliance with the</p>	<p>Chief Executive’s Response While there are many policies within the plan encouraging the planting of native species it is not always appropriate to do so in all settings. Many non-native tree species can also have benefits for pollinators.</p> <p>In relation to RD O20 and RD O22, see response to Submission No. 147.</p> <p>In relation to the suggestion that the Council should seek partners for the establishment of grant funding for an indigenous nursery stock sector, the Council unfortunately does not have the resources to commit to undertaking such a project at this time but would support and facilitate the development of such a facility as a community enterprise.</p>

		<p>relevant environmental legislation” after forest estates.</p> <p>Having regard to forestry targets for 2030, it places the Nursery Stock Industry at the centre of achieving this level of planting. Two additional actions are proposed: Add an action “To provide support for an indigenous nursery stock sector through actively seeking partners for the establishment of grant funding by the end of 2023, for the production of bare root tree/shrub stock of native provenance and origin.”</p> <p>Add an action “To require that any native tree plantings planted through Council funded Woodland planting schemes be of native provenance and origin by 2024 (and preferably local provenance and origin by 2027)”.</p>	<p>While there are many policies within the plan encouraging the planting of native species, sourcing plants of native origin and provenance as appropriate are considered not to be practical in all cases.</p> <p>Chief Executive’s Recommendation Add an additional objective in Section 13.7.2: Support and facilitate, the establishment of a community run nursery to grow native plants, at an appropriate location.</p>
PEATLANDS			
421	Bord na Mona (BNM)	<p>It is suggested that text in Section 9.8 be amended as follows: ‘The Council recognises the potential of industrial peatlands in relation to renewable energy, industrial development, ecosystems, biodiversity (re-wetting, re-wilding) and carbon sequestration as well as tourism, amenity, recreation and after uses with job opportunities.’</p>	<p>Chief Executive’s Response It is agreed that this part of Section 9.8 should be expanded to reflect the multi-faceted nature and potential of peatlands.</p> <p>Chief Executive’s Recommendation Amend sentence in Section 9.8 as follows: The Council recognises the potential of industrial peatlands in relation to a variety of uses and functions including re-wetting, re-wilding, carbon sequestration, renewable energy, biodiversity, tourism, amenity, recreation and other appropriate after-uses with job opportunities.</p>

421	Bord na Mona (BNM)	<p>Further information is required to clarify what is meant by 'it is expected that 50% of the Peatland Area will remain free from any development'. This could be interpreted in many ways. A Local Authority or any government body cannot constrain bogs from amenity, rehabilitation works or any other future land use developments in this manner. This conflicts with policies relating to Strategic Energy Zones, Green Infrastructure Plans etc. Similar text is used in Chapter 9: RD O28 references supporting 'the sustainable re-use of circa 30-50% of cutaway boglands for economical purposes', whereas RD O29 references supporting 'the development of renewable energy (wind and solar) on a percentage/ no more than 50% of former industrial peatlands/cutaway bogs'.</p> <p>Clarification is needed regarding what is meant by 'development' and what 'peatland area' means.</p>	<p>Chief Executive's Response</p> <p>The reference in the plan to a potential 50% 'limit' of development on peatlands derives, in part, from the EU Biodiversity Strategy target of 30% land cover for nature by 2030, as expressed in target LR T1 of the draft plan. The multi-faceted function, importance and potential of cutaway peatlands is acknowledged and addressed throughout the plan. Furthermore, it is acknowledged in the Plan that the Bog of Allen itself represents a unique opportunity for nature based solutions on a grand scale to address the national biodiversity crisis and climate change mitigation.</p> <p>The reference to a 50% limit on development has also been raised in other submissions. The Office of the Planning Regulator welcomes Objective RD O29. Other submissions suggest a higher percentage (e.g. 80%) would be more appropriate.</p> <p>Taking on board the issues raised in this submission, and other, regarding interpretation, it is considered appropriate to delete the sentence 'it is expected that 50% of the Peatland Area will remain free from any development' from Section 12.14.6.5 to avoid ambiguity (see Chapter 12) and to amend objectives RD O28 in Chapter 9 to bring clarity to the issue. The intention of these objectives is to facilitate the sustainable and appropriate re-use of cutaway bogs for economic uses including inter alia renewable energy, amenity and tourism related projects (i.e. up to 50% of cutaway peatlands) whilst also protecting and providing for biodiversity, re-wetting, re-wilding and carbon sequestration (50% +). It is also considered appropriate to replace RD O29 with a new objective to provide for a biodiversity-led approach to the development of the cutaway peatlands.</p>
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			<p>Chief Executive’s Recommendation Amend RD O27 as follows: Encourage the re-wetting, restoring and/or re-wilding of former cutaway bogs and peatlands with an emphasis on promoting maximising biodiversity and carbon sequestration to account for approximately 50% of cutaway bogs. Such projects shall be subject to Appropriate Assessment; shall have regard to any hydrological connection shared with a European Site and their qualifying interest species; shall not adversely affect drainage of surrounding lands; and shall account for any potential likely significant effects and provide mitigation and monitoring where appropriate.</p> <p>Amend RD O28 as follows: Work with all relevant stakeholders including Bord na Mona to support the sustainable re-use and development^[1] of circa 30-approximately 50% of cutaway boglands for economical purposes, including <i>inter alia</i> renewable energy (wind and solar) in appropriate locations, subject to relevant environmental assessments.</p> <p>Replace RD O29 with the following new objective: Proposals brought forward for any development on the county’s cutaway peatlands shall be accompanied by a biodiversity profile of the landholding, setting out how the proposed development was formulated having regard to the following step by step, biodiversity-led process: 1. Identification of areas of greatest ecological value.</p>
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^[1] ‘Development’ will be defined as that area that includes all structures, pylon bases, foundations, roads in, on or crossing over the land, the area beneath any turbine blades and all lands measured from the outer edge of a turbine blade to the next or adjoining turbine blade where the distance is not greater than 1 km. Greenways/peatways/trailways/bridle ways or amenity spaces will not be included.

			<p>2. Identification of areas of greatest carbon sequestration value.</p> <p>3. Identification of areas of amenity value and potential, and incorporation of the Green Infrastructure Strategy (see Section 12.14.5).</p> <p>4. Identification of the subject site as a percentage of the overall landholding and justification for the proposed use having regard to Objective RD O28.</p>
552.	Department of Housing, Local Government and Heritage	In relation to Objective RD O27 ‘Encourage the re-wetting, restoring and/or re-wilding of former cutaway bogs and peatlands with an emphasis on promoting biodiversity and carbon sequestration’, the Department considers that special consideration should be given to larger bogs. In the long term these larger sites would provide greater stability for wildlife populations and have a greater ability to sustain biodiversity such as Kilberry Bog.	<p>Chief Executive’s Response Objective RD O27 includes larger sites. See the proposed amendment of RD O27 in response to Submission No. 421</p> <p>Chief Executive’s Recommendation Regarding RD O27, see recommendation to Submission No. 421.</p>
552.	Department of Housing, Local Government and Heritage	<p>Regard to Objectives RD O28 and RD O29. The potential for renewable energy projects on cutaway peatlands is considered within a number of national strategies and plans such as the National Peatlands Strategy 20158 (NPS), the National Planning Framework (NPF) 2040 and the Regional Spatial and Economic Strategies for the Eastern and Midland Region.</p> <p>These plans and strategies recognise the need to develop a long term strategic plan for cutaway and cutover peatlands and are committed to the preparation of a comprehensive after-use framework for peatland.</p> <p>In the absence of a comprehensive after use framework for peatlands including required</p>	<p>Chief Executive’s Response The Department’s concerns in relation to prematurity are noted. The Draft Plan recognises the importance and potential of cutaway peatlands for both development and rehabilitation purposes. It is considered appropriate to amend objectives RD O28 and RD O29 to bring more clarity to this issue. Please see response to Submission No. 421 (Bord na Mona).</p> <p>Chief Executive’s Recommendation See recommendation to Submission No. 421.</p>

		environmental assessments, the Department suggests that it may be premature to allocate a specific percentage of former industrial peatlands/cutaway bogs to renewable energy and economic development in the CDP.	
552.	Department of Housing, Local Government and Heritage	<p>The ecological importance and potential carbon sink of cutaway and cutover boglands should also be recognised. The importance of these degraded ecosystems in providing some critical ecosystem services needs to be acknowledged. Cutover bogs should be identified for immediate management interventions to prevent further degradation, particularly the ongoing loss of their carbon store.</p> <p>Include an objective: In deciding on the most appropriate afteruse of cutaway peatlands, the council should consider encouraging, where possible, the return to a natural functioning peatland ecosystem.</p>	<p>Chief Executive's Response Agreed. The ecosystem services value of degraded bogs is recognised. The most appropriate after use of cutaway bogs should consider natural regeneration in the first instance.</p> <p>Chief Executive's Recommendation Add the following objectives to Section 9.8: New objective: Recognise the importance of cutover and cutaway bogs in providing some critical ecosystem services such as ecological importance and potential carbon sinks. Cutover bogs should be identified for immediate management interventions to prevent further degradation, particularly the ongoing loss of their carbon store.</p> <p>New objective: Encourage, where possible, the return to a natural functioning peatland ecosystem in the first instance.</p>
172.	Umerus Community Development Peatlands (UCDCLG)	<p>Request that the following new text is inserted into Section 9.1: Kildare is well positioned as a gateway county to the Midland Peatlands and the West from Dublin to contribute more to the tourism sector with the development of Greenways, Blueways, Peatways and the potential of a National Peatlands Park on former industrial cutaways providing an alternative eco-tourism and activity based experience.'</p> <p>With regard to objective RD O11 the submission requests that the text be amended to reference the</p>	<p>Chief Executive's Response It is agreed that Section 9.1 should be amended to include reference to the potential of a National Peatlands Park.</p> <p>It is agreed that reference to the County Biodiversity Action Plan should be updated in RD O11. However, the Actions of the Just Transition Plan 2022 are already supported in objective EC O56.</p> <p>In relation to RD O20 and RD O22, See response to Submission No. 147.</p>

		<p>updated County Biodiversity Plan and include reference to the Local Just Transition Plan (2022).</p> <p>The submission requests that objective RD O20 be amended as follows: RD 020: Encourage public and private owners to allow / provide public access to forests for recreational and amenity use e.g., walking, biking and equine trails to enhance health and wellbeing with due consideration to sensitive areas for wildlife conservation and subject to compliance with the relevant environmental legislation.</p> <p>The submission requests that objective RD O22 be amended as follows: RD O22: Facilitate tourism infrastructure and visitor services including tourism accommodation at appropriate locations in forest estates with due consideration to sensitive areas for wildlife conservation and subject to compliance with the relevant environmental legislation.</p>	<p>Chief Executive's Recommendation Amend Section 9.1 as follows: Kildare is well positioned to contribute more to the tourism sector with the development of Greenways, Blueways, Peatways and the potential of a National Peatlands Park providing an alternative eco-tourism visitor experience.</p> <p>Amend RD O11 as follows: Support the implementation of the objectives identified in the County Biodiversity Action Plan 2009-2014 (or as updated) and any relevant local action plan.</p> <p>In relation to RD O20 and RD O22, See recommendation to Submission No. 147.</p>
413.	Kildare Public Participation Network	<p><u>Background</u> Proposed additional text in the fourth paragraph of section 9.1, as follows: ...this plan to help Ireland reach its climate targets particularly in relation to food security carbon storage, provision of renewable energy, reducing emissions, protection of water bodies and increasing biodiversity.</p> <p>Proposed additional text in the sixth paragraph of section 9.1, as follows: The agri-food, forestry, and tourism sectors play a significant role in Ireland's rural economy. Kildare is well positioned as a gateway county to the</p>	<p>Chief Executive's Response The request to insert additional text in the fourth paragraph of section 9.1 is accepted.</p> <p>The request to insert additional text in the sixth paragraph of section 9.1 is noted. For further information please, see response to Submission No. 172.</p> <p>Chief Executive's Recommendation Amend the fourth paragraph of section 9.1 as follows: ...the period of this plan to help Ireland reach its climate targets particularly in relation to food security, carbon storage, provision of...</p>

		Midland Peatlands and the West from Dublin, to contribute more to the tourism sector, with the development of Greenways, Blueways, Peatways and the potential of a National Peatlands Park on former industrial cutaway bog providing an alternative eco-tourism and activity-based experience.	Regarding the sixth paragraph of Section 9.1, see recommendation to Submission No. 172.
468	Ann Behan	<p>Qualify abbreviation of C&D in the second sentence of the second paragraph in section 9.1 to include Construction & Demolition.</p> <p>Amend the fourth paragraph of section 9.1 to include “food security” prior to carbon storage.</p> <p>Amend the second sentence in the sixth paragraph of section 9.1 to read as follows “Kildare is well positioned as a gateway county to the Midland Peatlands and the West from Dublin, to contribute more to the tourism sector, with the development of Greenways, Blueways, Peatways and the potential of a National Peatlands Park on former industrial cutaway bog providing an alternative eco-tourism and activity-based experience”.</p>	<p>Chief Executive’s Response The requests to insert additional text in the second paragraphs of section 9.1 is accepted.</p> <p>Regarding the proposed change to the fourth paragraph, see response to Submission No. 413.</p> <p>The request to insert additional text in the sixth paragraph of section 9.1 is noted, see response to Submission No. 172.</p> <p>Chief Executive’s Recommendation Amend the second paragraph of section 9.1 as follows: ...natural resources – ranging from extractive industry, quarrying, in-fill with Construction & Demolition (C&D) waste, concrete...</p> <p>In relation to the fourth paragraph, see recommendation to Submission No. 413.</p> <p>Regarding the sixth paragraph of Section 9.1, see recommendation to Submission No. 172.</p>
405	Kildare Climate Action Linkage Group	<p><u>Background</u> Proposed additional text in the second paragraph of section 9.1: ...ranging from extractive industry, quarrying, in-fill with Construction & Demolition (C&D) waste, concrete batching plants, diversification of uses...</p>	<p>Chief Executive’s Response Regarding the proposed changes to the second paragraph, see response to Submission No. 468.</p> <p>Regarding the proposed change to the fourth paragraph, see response to Submission No. 413.</p>

		<p>Proposed additional text in the fourth paragraph of section 9.1: ...to help Ireland reach its climate targets particularly in relation to food security, carbon storage, provision of renewable energy, reducing emissions, protection of water bodies and increasing biodiversity.</p> <p>Proposed amendment of the sixth paragraph of section 9.1: The agri-food, forestry, and tourism sectors play a significant role in Ireland's rural economy. Kildare is well positioned as a gateway county to the Midland Peatlands and the West from Dublin, to contribute more to the tourism sector, with the development of Greenways, Blueways, Peatways and the potential of a National Peatlands Park on former industrial cutaway bog providing an alternative eco-tourism and activity-based experience. to contribute more to the tourism sector with the development of greenways, blueways, and peatways providing an alternative visitor experience.</p>	<p>The request to insert additional text in the sixth paragraph of section 9.1 is noted, see response to Submission No. 172.</p> <p>Chief Executive's Recommendation Regarding the second paragraph, see recommendation to Submission No. 468.</p> <p>In relation to the fourth paragraph, see recommendation to Submission No. 413.</p> <p>Regarding the sixth paragraph of Section 9.1, see recommendation to Submission No. 172.</p>
432	West Kildare SMART Rural Alliance (SRA)	<p>The submission requests the following new objective to be inserted after objective RE O127: Support the West Kildare SMART Rural Alliance and access for peatland communities to the European Network for Rural Development's Smart Village initiative in conjunction with Offaly County Council, Laois County Council, Leader companies in each county, and all other relevant stakeholders.</p>	<p>Chief Executive's Response It is considered appropriate to add a new objective in the Plan in support of the EU Action for Smart Villages initiative that was launched by the European Commission in 2017.</p> <p>Chief Executive's Recommendation Add a new objective to Section 9.3: Support the European Network for Rural Development's Smart Villages initiative to improve economic performance and quality of life in rural areas through digital and social</p>

		<p>Note: The following documents are attached to the submission:</p> <ul style="list-style-type: none"> • A Smart Strategy for the Peatland Communities of North-West Kildare (2022-2027) • Draft Map of the Smart Village Network – Incorporating proposed National Peatlands Park, Blueways, Greenways, Tourism Attractions & Trails. 	<p>innovation in co-operation with West Kildare SMART Rural Alliance and all other relevant stakeholders.</p>
172.	Umerus Community Development Peatlands (UCDCLG)	<p>Requests the insertion of additional text after the first sentence of the third paragraph of section 9.8: 'The cessation of peat extraction by BNM provides tangible opportunities for West Kildare as a gateway county to the Midland Peatlands and the West. The potential of a National Peatlands Park and the development of the Blueway can greatly assist a Just transition for communities in the area and lead to successful economic regeneration and a sustainable local economy. The creation of a successful community-led tourism destination supported by Kildare County Council, Failte Ireland and other stakeholders following the Blueway and encompassing peatland areas to the west as part of a National Peatlands Park has the potential to offer the visitor a unique experience to get "lost in wilderness" in a relaxed environment away from urban life. The Council recognises that the development of a range of outdoor activities based around our natural amenities of bogs, canals and rivers and the discovery of the area's natural and built heritage would significantly support the future growth of tourism in Kildare and the midlands.'</p>	<p>Chief Executive's Response</p> <p>The additional suggested text for Section 9.8 is noted. To reflect the multi-faceted importance of peatlands, and to align with the NPF and RSES, it is agreed that some changes should be made to section 9.8 to reflect that tourism and biodiversity can be facilitated within the peatlands.</p> <p>It is agreed to include a reference to peatlands rehabilitation and sustainable peatland related tourism in Policy RD P1.</p> <p>See response to Submission No. 432 in relation to the Smart Village initiative.</p> <p>Chief Executive's Recommendation</p> <p>Regarding section 9.8, see recommendation to Submission No. 421.</p> <p>Amend RD P1 as follows: Support and promote rural enterprises and encourage appropriate expansion and diversification in areas such as sustainable agriculture, forestry, peatlands, peatlands rehabilitation and sustainable peatland related tourism, food, crafts, renewable energy at suitable locations in the county, particularly where they contribute to a low carbon and</p>

		<p>Submission refers to Policy RD P1 and states it needs to be more specific with peatlands. Proposes the following additional text: 'peatlands rehabilitation and sustainable peatland related tourism'</p> <p>Submission refers to Policy RD 08 and states that it needs to include more detail including the following additional text:continued roll out of the National Broadband Scheme and initiatives such as the EU Smart Villages Initiative.</p>	<p>resilient economy.</p> <p>See recommendation to Submission No. 432 in relation to the Smart Village initiative.</p>
181	Lullymore Heritage & Discovery Park CLG	<p>Requests the insertion of additional text after the first sentence of the third paragraph of section 9.8: The cessation of peat extraction by BNM provides tangible opportunities for West Kildare as a gateway county to the Midland Peatlands and the West. The potential of a National Peatlands Park and the development of the Blueway can greatly assist a Just Transition for peatland communities and lead to economic regeneration and a sustainable local economy. The creation of a successful community-led tourism destination supported by Kildare Offaly and Laois County Councils, Failte Ireland and other stakeholders following the Blueway and encompassing peatland areas to the west as part of an inter county National Peatlands Park has the potential to offer the visitor a unique experience to get “lost in wilderness” in a relaxed environment away from urban life. The Council recognises that the development of a range of outdoor activities based around our natural amenities of bogs, canals and rivers and the discovery of the area’s natural and</p>	<p>Chief Executive’s Response Regarding section 9.8 and RD P1, see response to Submission No. 172.</p> <p>See response to Submission No. 432 in relation to the Smart Village initiative.</p> <p>Chief Executive’s Recommendation Regarding section 9.8, see recommendation to Submission No. 421.</p> <p>Regarding RD P1, see recommendation to Submission No. 172.</p> <p>See recommendation to Submission No. 432 in relation to the Smart Village initiative.</p>

		<p>built heritage would significantly support the future growth of tourism in Kildare and the midlands.</p> <p>Suggested change to RD P1; add the following text with regards peatlands in the policy. “peatlands rehabilitation and sustainable peatland related tourism”</p> <p>Suggested change to RD 08: ...continued roll out of the National Broadband Scheme and initiatives such as the EU Smart Villages Initiative.</p>	
181	Lullymore Heritage & Discovery Park CLG	<p>Additional text under 9.1 Background proposed: Kildare is well positioned ‘as a gateway Peatlands and the west (sic) from Dublin to contribute more to the tourism sector with the development of Greenways, Blueways, Peatways and the potential of a National Peatlands Park on former industrial cutaways providing an alternative eco-tourism and activity based experience’.</p> <p>Suggests amending RD O11 as follows: Support the implementation of the objectives identified in the reviewed County Biodiversity Plan and the West Kildare Local Just Transition Plan 2022.</p>	<p>Chief Executive’s Response Regarding Section 9.1 and RD O11, see response to Submission No. 172.</p> <p>Chief Executive’s Recommendation Regarding Section 9.1 and RD O11, see recommendation to Submission No. 172.</p>
181	Lullymore Heritage & Discovery Park CLG	<p>Suggested amendment to RD O31 reason cited is that collaboration between stakeholders and use of latest reports will lead to best results. Support the development of a National Peatlands Park in co-operation with Bord Na Mona, NPWS, Inland Fisheries Ireland, local community groups and other relevant stakeholders as per recommendation 9 of the BOGLAND Report from the EPA in 2011 and action A28 of the National</p>	<p>Chief Executive’s Response Agreed.</p> <p>Chief Executive’s Recommendation Amend RD O31 as follows: Investigate the feasibility of the development of a Peatland National Park in co-operation with Bord Na Mona, NPWS Support the development of a National Peatlands Park in co-operation with Bord Na Mona, NPWS, Inland Fisheries</p>

		Peatland Strategy 2014 and subsequent reports such as the Local Just Transition Plan for West Kildare 2022.	Ireland, local community groups and other relevant stakeholders as per recommendation 9 of the BOGLAND Report from the EPA in 2011, and action A28 of the National Peatland Strategy 2014 and the Local Just Transition Plan for West Kildare 2022.
405	Kildare Climate Action Linkage Group	<p>Bogs and Peatlands Suggests inserting the following addition paragraph into section 9.8: The National Peatlands Park and development of the Blueway demonstrates great potential to tangibly assist a Just Transition for local communities, leading to successful economic regeneration and a sustainable local economy.</p> <p>The Council (together with Failte Ireland and other stakeholders) will actively support community-led tourism initiatives encompassing the Blueway and peatland areas to the west as part of a National Peatlands Park. This has the unique potential to offer the visitor a relaxed “wilderness” environment.</p> <p>The Council recognises that the development of a range of outdoor activities based around our natural amenities of bogs, canals and rivers and the discovery of the area’s natural and built heritage could significantly support the future growth of tourism in Kildare and the midlands.</p> <p>Suggests the amendment of RD P7 as follows: RD P7 - Support the appropriate and sensitive diversification of former cutaway and degraded peatlands...</p>	<p>Chief Executive’s Response The additional suggested text for Section 9.8 is noted. To reflect the multi-faceted importance of peatlands, and to align with the NPF and RSES, it is agreed that some changes should be made to section 9.8 to reflect that tourism and biodiversity can be facilitated within the peatlands.</p> <p>Agree, in part to amend RD P7 as suggested.</p> <p>The requested additional policy to conserve and protect peatlands is not accepted. It is considered that there are already a comprehensive range of objectives and an action in the Plan with respect to the protection and conservation of peatlands, including Objectives EC O54, BI O33, LR O11, LR O62, RD O27 and Action BI A22.</p> <p>The requested additional policy to support sustainable tourism and infrastructure for peatland communities is not accepted as it is considered that there is already a comprehensive range of policies and objectives which support tourism development opportunities in Kildare’s peatlands including RE P19, RE O125 – RE O127.</p> <p>In relation to RD O29, the reader is advised to see the response to Submission No. 421.</p> <p>See response to Submission No. 181 in relation to RD O31.</p>

		<p>Suggests the insertion of the following two additional policy statements: Additional Policy - <i>Conserve and protect, where possible, all intact peatlands (bogs and fens), and encourage ecologically informed restoration where appropriate on damaged peatlands.</i></p> <p>Additional Policy - <i>To support sustainable tourism and infrastructure for peatland communities.</i></p> <p>It is submitted that RD O29 lacks clarity and suggests that it be replaced with the following objective: RD O29 - <i>Support Consider the development of renewable energy (wind and solar) on a percentage/no more than 50% of former industrial peatlands/cutaway bogs, in appropriate locations, subject to relevant environmental assessments. an area no more than 10% of total peatlands, subject to the conservation of landscape scale continuous boglands such as the Allen-Lullymore Bog group.</i></p> <p>Suggests the amendment of RD O31 as follows: RD O31 – <i>Investigate the feasibility of Support the development of a Peatland National Park in co-operation with Bord Na Mona, NPWS, local community groups and other relevant stakeholders as per recommendation 9 of the BOGLAND Report from the EPA in 2011 and action A28 of the National Peatland Strategy 2014.</i></p>	<p>Chief Executive's Recommendation Regarding section 9.8, see recommendation to Submission No. 421.</p> <p>Amend RD P7 as follows: Support the appropriate and sensitive diversification of former cutaway peatlands, whilst ensuring the protection of their ecological, archaeological, cultural, and educational significance in line with the National Peatlands Strategy (DAHG 2015), the National Raised Bog Special Area of Conservation Management Plan 2017-2022 and the Peatlands & Climate Change Action Plan 2030.</p> <p>In relation to RD O29, see recommendation to Submission No. 421.</p> <p>See recommendation to Submission No. 181 in relation to RD O31.</p>
468.	Ann Behan	<p>Fens, along with raised and blanket bogs are peatland systems. These are unique habitats, which have been impacted by drainage in recent</p>	<p>Chief Executive's Response The additional suggested text for Section 9.8 is noted. To reflect the multi-faceted importance of peatlands, and to</p>

	<p>years. There is no reference to these peatland systems in this chapter. Additional paragraphs are proposed after the third paragraph in section 9.8:</p> <p>“The National Peatlands Park and development of the Blueway demonstrates great potential to tangibly assist a Just Transition for local communities, leading to successful economic regeneration and a sustainable local economy”</p> <p>“The Council (together with Failte Ireland and other stakeholders) will actively support community-led tourism initiatives encompassing the Blueway and peatland areas to the west as part of a National Peatlands Park. This has the unique potential to offer the visitor a relaxed “wilderness” environment.”</p> <p>“The Council recognises that the development of a range of outdoor activities based around our natural amenities of bogs, canals and rivers and the discovery of the area’s natural and built heritage could significantly support the future growth of tourism in Kildare and the midlands”.</p> <p>It is submitted that RD O28 lacks clarity and should be deleted or re-written. A few questions are raised including what does economic purposes mean? What is the basis of a 30-50% sustainable re-use of cutaway boglands? And surely, all re-use development of cutaway boglands should be sustainable?</p> <p>It is submitted the RD O29 lacks clarity and should be replaced with more specific objectives. A series of questions are again posed in relation to the</p>	<p>align with the NPF and RSES, it is agreed that some changes should be made to section 9.8 to reflect that tourism and biodiversity can be facilitated within the peatlands.</p> <p>See response to Submission No. 421 in relation to RD O28 and RD O29.</p> <p>See response to Submission No. 181 in relation to RD O31.</p> <p>Chief Executive’s Recommendation Regarding section 9.8, see recommendation to Submission No. 421.</p> <p>See recommendation to Submission No. 421 in relation to RD O28 and RD O29.</p> <p>See recommendation to Submission No. 181 in relation to RD O31.</p>
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		<p>meaning of certain parts. While it is stated that the figure proposed is arbitrary and should be revised down or deleted, it is also stated that the objective is inconsistent with policy for other extractive industries, such as mining and quarrying. It is also suggested renewable technologies should be supported outside of peatland areas.</p> <p>Amend RD O29 to “Consider the development of renewable energy (wind and solar) on an area no more than 10% of total peatlands, subject to the conservation of landscape scale continuous boglands such as the Allen-Lullymore Bog group.”</p> <p>Amend RD O31 and replace “Investigate the feasibility of” with “Support” and include the words “local community groups” after NPWS.</p>	
147.	National Peatlands Park Group	<p>Insert the following amendments to the text: Background 9.1; Kildare is well positioned as a gateway and destination county for the Midland Peatlands, to contribute more to the tourism sector with the development of Greenways, Blueways, Peatways and the potential of a National Peatlands Park on former industrial cutaways providing an alternative eco-tourism and activity based experience.</p> <p>RD P1: Support and promote rural enterprises and encourage appropriate expansion and diversification in areas such as sustainable agriculture, forestry, peatlands rehabilitation and sustainable peatland related tourism, food, crafts, renewable energy at suitable locations in the county, particularly where they contribute to a low carbon and resilient economy.</p>	<p>Chief Executive’s Response Regarding Section 9.1, see response to Submission No. 172.</p> <p>Regarding RD P1, see response to Submission No. 172.</p> <p>Chief Executive’s Recommendation Regarding Section 9.1, see recommendation to Submission No. 172.</p> <p>Regarding RD P1, see recommendation to Submission No. 172.</p>

147	National Peatlands Park Group	<p>Bogs and Peatlands 9.8; Peatlands form a distinctive aspect of Kildare’s landscape... The cessation of peat extraction by BNM provides tangible opportunities for West Kildare as a gateway county to the Midland Peatlands and the West. The potential of a National Peatlands Park and the development of the Blueway can greatly assist a Just transition for communities in the area and lead to successful economic regeneration and a sustainable local economy. The creation of a successful community-led tourism destination supported by Kildare County Council, Fáilte Ireland and other stakeholders following the Blueway and encompassing peatland areas to the west as part of a National Peatlands Park has the potential to offer the visitor a unique experience to get “lost in wilderness” in a relaxed environment away from urban life. The Council recognises that the development of a range of outdoor activities based around our natural amenities of bogs canals and rivers and the discovery of the area’s natural and built heritage would significantly support the future growth of tourism in Kildare and the midlands.</p> <p>RD P7: Reference to the IPCCs is missing with respect to the Peatlands and Climate Action Plan 2030.</p> <p>RD O27; Encourage the re-wetting, restoring and/or re-wilding of former cutaway bogs and peatlands with an emphasis on promoting biodiversity, healthy rivers, improving water quality and carbon sequestration.</p>	<p>Chief Executive’s Response Regarding section 9.8 and RD P1, see response to Submission No. 172.</p> <p>In relation to the reference to IPCCs in Policy RD P7, it is unclear whether the submission is referring to the Irish Peatlands Conservation Council or to the Intergovernmental Panel on Climate Change. In either case, no change is recommended.</p> <p>The proposed changes to RD O27 are not accepted. See the proposed amendment of RD O27 in response to Submission No. 421</p> <p>In relation to RD O28 and RD O29, the reader is advised to see the response to Submission No. 421.</p> <p>It is agreed to amend RD O31 as suggested.</p> <p>Chief Executive’s Recommendation Regarding section 9.8, see recommendation to Submission No. 421.</p> <p>Regarding RD O27, see recommendation to Submission No. 421.</p> <p>In relation to RD O28 and RD O29, see recommendation to Submission No. 421.</p> <p>Regarding RD O31, see recommendation to Submission No. 181.</p>
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		<p>RD O28 should be deleted as any proposed development will be subject to relevant Environmental Impact Assessment. The 30-50% use is arbitrary and should be consistent with new benchmark proposals for post-industrial sites for the extractive industries of elsewhere in the plan where 80% of post-industrial extractive sector will be returned to nature and 20% for continued economic use.</p> <p>RD O29 – is this 50% of each bog or 50% of the total peatlands area, i.e.s over 5000ha? This figure is arbitrary and should be revised down or deleted. Amend RD O29 to read as follows: ‘Consider the development of renewable energy (wind and solar) on an area no more than 20% of total peatlands subject to the conservation of landscape scale continuous boglands such as the Allen-Lullymore Bog group’.</p> <p>Amend RD O31 to read as follows: Support the development of a Peatland National Park in co-operation with Bord Na Mona, NPWS, Inland Fisheries, local community groups and other relevant stakeholders as per recommendation 9 of the BOGLAND Report from the EPA in 2011 and action A28 of the National Peatland Strategy 2014 and subsequent reports such as the Local Just Transition Plan for West Kildare.</p>	
518	Strategic Power Projects Limited	Objective RD O29 is referenced, and it is submitted the inclusion of 50% of boglands should not be to the detriment of providing solar development on other viable greenfield areas where grid connection or engineering solutions are more feasible.	<p>Chief Executive’s Response Regarding objective RD O29, see response to Submission No. 421.</p> <p>Chief Executive’s Recommendation Regarding objective RD O29, see recommendation to Submission No. 421.</p>

558	Irish Wind Energy Association	<p>The submission states that the interpretation of Objective RD O29 is ambiguous. For example, due to the spacing of wind turbines at up to c.800m centres, the infrastructure on a wind farm would occupy 15-25% of the total site area leaving greater than 50% underdeveloped. Also, is the aspiration to retain 50% of all the former industrial peatlands as undeveloped in the context of renewable energy or is it 50% of those in appropriate locations only. The submission states that all of the industrial peatland cutaway areas could be considered for wind energy projects subject to the findings of environmental studies and environmental impact assessment.</p>	<p>Chief Executive's Response Regarding objective RD O29, see response to Submission No. 421.</p> <p>Chief Executive's Recommendation Regarding objective RD O29, see recommendation to Submission No. 421.</p>
470	IPCC	<p>County Kildare is home to a vast array of peatland types which need recognition in terms of their biodiversity, conservation and natural history. The County should use this resource sensitively and promote all the tourism opportunities possible.</p> <p>Amend Section 9.1 as follows: The agri-food, forestry, and tourism sectors play a significant role in Ireland's rural economy. Kildare is well positioned to contribute more to the tourism sector with the development of a National Peatlands Park being a focal point for the greenways, blueways, and peatways providing an alternative eco-tourism visitor experience celebrating the recovering biodiversity.</p> <p>Amend Section 9.8 as follows: and a number of visitor attraction centres around the bogland heritage such as Lullymore.</p>	<p>Chief Executive's Response Regarding Section 9.1, see response to Submission No. 172.</p> <p>Two Actions in this draft plan support the development of the National Peatlands Park including EC A7 in Chapter 7 'Energy & Communications' and BI A22 in Chapter 12 'Biodiversity and Green Infrastructure'.</p> <p>The submission states the BOGLAND Report (EPA, 2011) shows that unless peatland is rehabilitated/restored correctly they will not withstand the climatic changes we are facing. The sites not fully rehabilitated will revert back to carbon sources as we feel the dryer summer and wetter winters. We need to maximise the biodiversity and climate change mitigation potential of peatlands.</p> <p>Regarding RD O27, see recommendation to Submission No. 421.</p>

		<p>There are also many sites that are not protected that will be recognised within the plan, such as the sites listed within the Bog of Allen Heritage Survey and the Kildare Wetland Survey. With the end of industrial peat extraction, the CDP will move forward with the creation of a National Peatlands Park linking them with environmental corridors. This will bolster tourism opportunities while being sensitive to the needs of biodiversity and conservation. This will offer visitors a unique experience and provide a gateway to the peatlands of the Midlands.</p> <p>The National Peatland Strategy 2014 which set targets for the re-use of cutaway bogs in terms of....</p> <p>The submission states the BOGLAND Report (EPA, 2011) shows that unless peatland is rehabilitated/ restored correctly they will not withstand the climatic changes we are facing. The sites not fully rehabilitated will revert back to carbon sources as we feel the dryer summer and wetter winters. We need to maximise the biodiversity and climate change mitigation potential of peatlands.</p> <p>Amend Objective RD O27 as follows: Encourage the re-wetting, restoring and/or re-wilding of former cutaway bogs and peatlands with an emphasis on maximising biodiversity and carbon sequestration.</p>	<p>See response to Submission No. 421 in relation to RD O28.</p> <p>Agree, in part to amend RD O31 as suggested.</p> <p>Chief Executive's Recommendation Regarding Section 9.1, see recommendation to Submission No. 172.</p> <p>Regarding RD O27, see recommendation to Submission No. 421.</p> <p>See recommendation to Submission No. 421 in relation to RD O28.</p> <p>Regarding RD O31, see recommendation to Submission No. 181.</p>
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		<p>Request that Objective RD O28 be amended to remove “for economical purposes” as it is vague and conflicts with the objective within the plan for 30% of land to be designated for biodiversity and conservation.</p> <p>Amend objective RD O31 as follows: Investigate the feasibility of the development of a National Peatlands Park in co-operation with Bord Na Mona, NPWS, Environmental Non-Governmental Organisation, local community groups and other relevant stakeholders as per recommendation 9 of the BOGLAND Report from the EPA in 2011 and action A28 of the National Peatland Strategy 2014.</p>	
576	County Kildare Leader Partnership (CKLP)	<p>Add new Objective as follows: (Note the submission refers to a new objective RE P8. However, there is already an objective RE P8 in the Draft Plan). The proposed new objective is as follows: ‘Promote the development of the SMART Village process in the county building on the work of the recently formed West Kildare Smart Rural Alliance (SRA) and support SMART Strategy for the Peatland Communities of West Kildare developed by them.’</p> <p>Amend RD O29 as follows: Support Consider the development of renewable energy (wind and solar) on a percentage/no more than 50% of former industrial peatlands/cutaway bogs, in appropriate locations, subject to relevant environmental assessments and the development of eco-based tourism in peatland areas linking in</p>	<p>Chief Executive’s Response See response to Submission No. 432 in relation to the Smart Village initiative.</p> <p>See response to Submission no. 421 in relation to RD O29.</p> <p>See response to Submission no. 181 in relation to RD O31.</p> <p>Chief Executive’s Recommendation See recommendation to Submission No. 432 in relation to the Smart Village initiative.</p> <p>See recommendation to Submission No. 421 in relation to RD O29.</p> <p>See recommendation to Submission No. 181 in relation to RD O31.</p>

		<p>with the development of the Blueway and Greenways.</p> <p>Amend RD O31 as follows: Investigate the feasibility of Support the development of a Peatland National Park in co-operation with Bord na Mona, NPWS and other relevant stakeholders as per recommendation 9 of the BOGLAND Report from the EPA in 2011 and Action A28 of the National Peatland Strategy 2014.</p>	
432	West Kildare SMART Rural Alliance (SRA)	<p>The submission requests the following change to the last line of paragraph five in section 9.1: Kildare is well positioned to contribute more to the tourism sector with the development of greenways, blueways, peatways and a National Peatlands Park on former industrial cutaways providing an alternative eco-tourism and activity-based experience.</p> <p>The submission requests the following change to RD O11: Support the implementation of the objectives identified in the updated and current County Biodiversity Plan and the West Kildare Local Just Transition Plan 2022.</p> <p>The submission requests the following change to RD O31: Support the development of a Peatland National Park in co-operation with Bord Na Mona, NPWS, Inland Fisheries, local community groups and other relevant stakeholders as per recommendation 9 of the BOGLAND Report from the EPA in 2011 and action A28 of the National</p>	<p>Chief Executive's Response Regarding Section 9.1, see response to Submission No. 172.</p> <p>Regarding RD O11, see response to Submission No. 172.</p> <p>See response to Submission no. 181 in relation to RD O31.</p> <p>Chief Executive's Recommendation Regarding Section 9.1, see recommendation to Submission No. 172.</p> <p>Regarding RD O11, see recommendation to Submission No. 172.</p> <p>See recommendation to Submission No. 181 in relation to RD O31.</p>

		Peatland Strategy 2014 and subsequent reports such as the Local Just Transition Plan for West Kildare.	
472	Keep Ireland Open	<p>The submission recommends inclusion of the following additional objective in Chapter 9: Work with relevant agencies such as EMRA, BnM, the NPWS, Coillte and adjacent councils to prepare a comprehensive after use framework plan for large cutaway bog sites and associated workshops, office buildings and industrial sites which provide or future sustainable environmental needs and are a significant resource for amenities when peat harvesting finishes.</p> <p>The submission recommends the inclusion of an additional objective in Chapter 9 as follows; Resource EU and national funding to support projects which assist the transition of industrial peatlands to sustainable after uses.</p> <p>The submission recommends the inclusion of additional objectives in Chapter 9 as follows; Support the implementation of any relevant recommendations in the National Peatlands Strategy 2015 and any subsequent revisions/strategies and the implementation of the National Raised Bog Special Area of Conservation Management Plan 2017-2022 and the restoration works which will be a positive conservation measure.</p> <p>Work with partners and stakeholders to progress the development of the Mid-Shannon Wilderness Park and Biosphere.</p>	<p>Chief Executive's Response The proposed additional objective to prepare an after-use framework plan is accepted.</p> <p>KCC's recently published 'Local Just Transition Plan for West Kildare' identifies actions and projects to support and advance sustainable social, economic, and environmental development in the transition to a low carbon future in the West Kildare region. Section 44 of that Plan addresses funding in detail. Objective EC O56 of the CDP supports the implementation of the Local Just Transition Plan.</p> <p>Edit Policy RD P7 to include reference to the National Raised Bog Special Area of Conservation Management Plan 2017-2022.</p> <p>The development of the Mid-Shannon Wilderness Park and Biosphere as this does not fall within the scope of this Plan.</p> <p>The importance of raised bogland as a major natural, archaeological and amenity resource in the county is recognised.</p> <p>Planning permission requirements are not within the scope of the Draft Plan.</p> <p>Chief Executive's Recommendation Add a new objective to section 12.11: Work with relevant agencies such as EMRA, BnM, the NPWS, Coillte and adjacent councils to prepare a comprehensive after use framework plan for large cutaway bog sites and associated workshops, office buildings and</p>

	<p>The submission recommends the inclusion of the following text in Section 9.8: The Council recognises the importance of raised bogland as a major natural, archaeological and amenity resource and will liaise with the relevant Government departments and NGOs to try to secure the conservation of original peatland areas.</p> <p>The submission recommends an additional objectives in Chapter 9 as follows; Protect, conserve and manage the character, appearance of ecological and archaeological heritage and amenity values of peatland landscapes and historic/ancient walkways through bogs by promoting high environmental standards.</p> <p>The submission recommends a new objective in Section 9.8 as follows; Protect peatlands from inappropriate development having regard to their visual sensitivity value.</p> <p>The submission recommends a new objective in Section 9.8 as follows: Ensure that peatland areas which are designated (or proposed for designation) as NHAs, SA Cs or SPAs are conserved for their ecological, archaeological and archaeological significance.</p> <p>The submission recommends a new objective in Section 9.8 as follows; Planning permission will be required where the area impacted by works relating to the drainage or reclamation of wetlands exceeds 0.1 ha or where such works may have a significant effect on the environment.</p>	<p>industrial sites which provide for future sustainable environmental needs and are a significant resource for amenities when peat harvesting ends.</p> <p>Amend RD P7 as follows: Support the appropriate and sensitive diversification of former cutaway peatlands, whilst ensuring the protection of their ecological, archaeological, cultural, and educational significance in line with the National Peatlands Strategy (DAHG 2015), the National Raised Bog Special Area of Conservation Management Plan 2017-2022 and the Peatlands & Climate Change Action Plan 2030.</p> <p>Include additional text in Section 9.8: The Council recognises the importance of raised bogland as a major natural, archaeological and amenity resource and will liaise with the relevant Government departments and NGOs to try to secure the conservation of original peatland areas.</p> <p>Add a new objective to section 12.11: Protect, conserve and manage the character and appearance of ecological and archaeological heritage and amenity values of peatland landscapes and historic/ancient walkways through bogs, by promoting high environmental standards.</p> <p>Add a new objective to section 9.8: Protect peatlands from inappropriate development having regard to their visual sensitivity value.</p> <p>Add a new objective to section 9.8: Ensure that peatland areas which are designated (or proposed for designation) as NHAs, SACs or SPAs are</p>
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			conserved for their ecological and archaeological significance.
280	Stephen James Byrne	This document must take account of apparent ongoing artificial pumping of peat silt laden water from recovering BNM bogs in parts of the county, which harms vegetation	<p>Chief Executive's Response Such a matter is outside the scope of the Draft Plan. Notwithstanding same there is no confirmation that such artificial pumping of peat silt is actually taking place or that it is harmful to vegetation if it is taking place.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
AGRICULTURE & RURAL RELATED MATTERS			
468	Ann Behan	The first two paragraphs in section 9.4.1 are referred to, which refers to Food Vision 2030. It is submitted that the high court has granted leave to challenge the Governments Agriculture Strategy – Food Vision 2030. In addition, the NPWS warned before approval of the strategy that it could not be certain that it would not affect legally protected European habitats or halt / reverse current trends in relation to emissions, biodiversity decline and water quality to which the agri-food sector is a major contributor. The EPA has issued repeated warnings on agricultural intensification in Ireland, asserting that the continued expansion of the sector is unjustifiable if Ireland is to meet legally binding commitments under EU law.	<p>Chief Executive's Response It is considered that until such time as the courts decide The Food Vision 2030 Strategy is still relevant and therefore the information contained in it can be referred to in the Draft Plan.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
405	Kildare Climate Action Linkage Group	Agri Food Sector The submission highlights the introduction of section 9.4.1 and requests that the following is noted:	<p>Chief Executive's Response It is considered that until such time as the courts decide The Food Vision 2030 Strategy is still relevant and therefore the information contained in it can be referred to in the Draft Plan.</p>

		<ul style="list-style-type: none"> • The High Court has granted Friends of the Irish Environment leave to challenge the Government's Agriculture Strategy – Food Vision 2030. • The National Parks & Wildlife Service (NPWS) warned before the approval of Food Vision 2030 that it was not possible to conclude with any certainty that Food Vision 2030 would not adversely affect legally protected European habitats or “urgently halt and reverse current trends in relation to emissions, biodiversity decline and water. • The Environmental Protection Agency (EPA) has issued repeated clear warnings on agricultural intensification in Ireland. • Article 17 on the Status of EU Protected Habitats and Species in Ireland recognised that over 70% of these protected habitats are impacted by pressures relating to agricultural practices. 	<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
465	Ann Behan	<p>Amend RD P1 and insert “rehabilitation and sustainable peatland related tourism” after the word peatlands.</p> <p>Reference is made to RD O6, and it is submitted that this objective does not align with the gravity of the biodiversity crisis. It is asked what is meant by ‘biodiversity’? and what does supporting the restoration, preservation, and enhancement of ecosystems dependent on agriculture and forestry mean?</p> <p>The objective should be reworded to actively enforce the protection and conservation of protected sites, ensure the identification and</p>	<p>Chief Executive's Response Regarding RD P1, see response to Submission No. 172.</p> <p>See the response to Submission No. 413 in relation to objectives RD O6.</p> <p>See response to Submission No. 432 in relation to the Smart Village initiative.</p> <p>In relation to the proposed change to Table 9.1, While there are many policies within the plan encouraging the planting of native species, sourcing plants of native origin and provenance as appropriate are considered not to be practical in all cases.</p>

	<p>protection of existing high nature value habitats in natural and semi-natural areas, support the restoration of degraded agricultural and woodland ecosystems through sound ecological practices and seek to protect existing native biodiversity by using locally sourced native planting material of native provenance and origin.</p> <p>Amend RD O8, to include “and initiatives such as the EU Smart Villages Initiative” after National Broadband Scheme.</p> <p>Amend fifth bullet point in table 9.1 to include the wording “of native provenance and origin” after native species.</p> <p>The most recent report on the status of EU protected habitats and species in Ireland found only 15% to be in a favourable condition, while it was recognised that over 70% of protected habitats were impacted by agricultural practices. Considering climate change and biodiversity loss crises it is requested that RD P2 be amended to “support sustainable agriculture and a sustainable agri-food sector in County Kildare”.</p> <p>Amend wording of RD O9 to “Encourage the development of environmentally sustainable agricultural practices, to ensure that the quality of the natural environment (watercourses, wildlife habitats, and high nature value habitats) are maintained and protected from the threat of pollution and drainage, to support the conservation of native biodiversity and the achievement of climate targets”.</p>	<p>Regarding RD P2, it is considered RD O9 provides sufficient support for sustainable agricultural practices.</p> <p>In relation to RD O9 it is considered that there is sufficient protection contained in objective IN O52 (Chapter 6) which seeks to protect water quality from pollution by agricultural sources while promoting the use of good farming practices. An additional objective is also not considered necessary as RD O9 already contains the proposed wording.</p> <p>Agreed to amend RD O11 as amendment refers to that objective and not RD O12 as stated. See response to Submission No. 172.</p> <p>In relation to provision of organic agriculture it should be noted the statutory elements and remit of the Development Plan are set out clearly in the Planning and Development Act 2000, as amended. In preparing the Development Plan, planning authorities must exercise caution not to inappropriately stray into the operation of other statutory codes and regulatory regimes that relate to the development sector, but are outside the remit of a county or city development plan. This is applicable to policy or objectives for non-planning functions governed by other legislation and regulations.</p> <p>Chief Executive’s Recommendation Regarding RD P1, see recommendation to Submission No. 172.</p> <p>See recommendation to Submission No. 413 in relation to objectives RD O6.</p>
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		<p>Add an objective to “Ensure that agricultural development does not impinge on the visual amenity of the countryside”.</p> <p>It is submitted that the County Biodiversity Plan is out of date since 2014, and a new one is to be published in 2022. Considering this, RD O12 should be revised / amended as follows “implement the objectives identified in the County Biodiversity Plan 2009-2014 or any subsequent update, any relevant local action plans, and the Local Just Transition Plan 2022”.</p> <p>It is also suggested to add a further objective considering the EU goal that 25% of agricultural land is organic by 2030 to read “Encourage the development of organic agriculture in County Kildare to achieve the EU goal that 25% of agricultural land is organic by 2030”.</p>	<p>In relation to the Smart Village initiative, see recommendation to Submission No. 432.</p> <p>Regarding RD O11, see recommendation to Submission No. 172.</p>
405	Kildare Climate Action Linkage Group	<p>Request the amendment of RD P2 as follows: Support the future and continued development of sustainable agriculture and the a sustainable agri-food sector in County Kildare.</p> <p>Request the amendment of RD O9 as follows: Encourage the development of environmentally sustainable agricultural practices, to ensure that development does not impinge on the visual amenity of the countryside and that the quality of the natural environment (watercourses, wildlife habitats and areas of ecological importance high nature value habitats) are restored, is maintained and protected from the threat of pollution to support the achievement of climate targets.</p>	<p>Chief Executive’s Response Regarding RD P2, it is considered RD O9 provides sufficient support for sustainable agricultural practices.</p> <p>In relation to RD O9 and the proposed additional objective, see response to Submission No. 465.</p> <p>Regarding RD O11, see response to Submission No. 172.</p> <p>In relation to the proposed additional objective related to the development of organic agriculture, it is considered to be outside of the scope of this Plan, which is primarily a land use plan.</p> <hr/> <p>Chief Executive’s Recommendation</p>

		<p>Requests the following additional objective: Ensure that agricultural development does not impinge on the visual amenity of the countryside.</p> <p>Request the amendment of RD O11 as follows: Support the implementation of Implement the objectives identified in the County Biodiversity Plan 2009-2014 (insert new dates), and any relevant local action plans, and the Local Just Transition Plan 2022.</p> <p>Considering the EU goal that 25% of agricultural land is organic by 2030, the following new objective is suggested: Encourage the development of organic agriculture in County Kildare to achieve the EU goal that 25% of agricultural land is organic by 2030.</p>	Regarding RD O11, see recommendation to Submission No. 172.
552.	Department of Housing, Local Government and Heritage	Nitrogen deposition is one of the leading causes of global decline in biodiversity alongside changing land use and climate	<p>Chief Executive's Response Comments are noted.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
244	Conor and Jane Horan	Agricultural lands should be protected for the sole use of growing crops and raising livestock as it is a key contributor to the economy and the future food supply chain is especially important in times of global uncertainty.	<p>Chief Executive's Response Using agricultural lands for food production is supported by a whole host of policies and objectives in section 9.4 of Chapter 9 'Our Rural Economy' and in section 4.19 of Chapter 4 'Agriculture'. It would not be considered appropriate or reasonable to only ever permit agricultural related uses on lands currently used for agricultural purposes. The Draft Plan must balance the needs of, inter alia, rural based industries including agriculture but also related to the bloodstock industry as well as housing and employment at appropriate locations, in accordance with the policies and objectives of the Draft Plan, while all the while being cognisant of the significant number of</p>

			landscape designations at a local, national and international level.
			Chief Executive's Recommendation No change to the Draft Plan.
576	County Kildare Leader Partnership (CKLP)	<p>Add the following references to Planning Policy of Chapter 9.</p> <ol style="list-style-type: none"> 1. Refer to the EU long term 'Vision for Rural Areas' and the national 'Rural Development Programme 2014-2022' in the Planning Context Section. 2. Refer to the local and Rural Development Strategy developed to cover 2014-2022 and the future strategy which will be developed to cover 2023-2027. See Our Rural Future – Rural Development Policy 2021-2025. 3. Refer to the LEADER Programme, delivered by CDLK as an Implementing partner with KCC and the LCDC as a key component in rural development in the county. <p>Amend RD P1 Working closely with the LEADER Programme, support and promote rural enterprises and...</p> <p>Amend RD O1 In conjunction with the LEADER Programme encourage the development of appropriately...</p> <p>Amend RD O3 In partnership with the County Kildare LEADER Partnership provide training and capacity building to promote resource efficiency and support the shift...</p> <p>Amend RD O4</p>	<p>Chief Executive's Response Nos. 1 and 2 are referenced in Section 9.2 of the Draft Plan.</p> <p>Having regard to this submission as a whole it is considered more appropriate to include an overarching Core Strategy objective in Chapter 2 as set out below.</p> <p>Chief Executive's Recommendation Include a new objective in Chapter 2 (Core Strategy) to read as follows: Support the implementation of LEADER Programmes which aim to deliver a range of rural enterprise, social inclusion and community development initiatives in County Kildare.</p>

		<p>Working closely with the LEADER Programme, encourage and facilitate the sensitive re-use of...</p> <p>Amend RD O10</p> <p>Alongside the LEADER Programme, facilitate the development of alternative farm enterprises, and...</p>	
555	Irish Solar Energy Association	<p>In relation to RD O6, the submission notes that ground mounted solar developments provide an excellent opportunity to enhance biodiversity above and beyond typical agricultural land use.</p> <p>In relation to RD O29, the submission notes that the inclusion of 50% of boglands should not be to the detriment of providing solar development on other viable green field areas of the rural environment where for example grid connection or engineering solutions may be more feasible.</p>	<p>Chief Executive's Response In relation to RD O6, see response to Submission No. 555 in Chapter 7 [related to updated solar energy policy].</p> <p>In relation to RD O29, see response to Submission No. 421.</p> <p>Chief Executive's Recommendation In relation to RD O6, see recommendation to Submission No. 555 [related to updated solar energy policy].</p> <p>In relation to RD O29, see recommendation to Submission No. 421.</p>
494	Dr. Noel Cawley and Anita Cawley	<p>The submission refers to an article in the Farming Independent (08/03/2022) which stated that only 23% of Irelands' land is suitable for tillage. This prime agricultural land needs to be protected from inappropriate developments. An Foras Taluntas (Teagasc predecessor) National survey classify the lands as part of the rich and valuable Elton grass attracting many horse breeders.</p> <p>The submission therefore requests a specific policy regarding the preservation of prime agricultural land for food production to be included in the County Development Plan.</p>	<p>Chief Executive's Response Using agricultural lands for food production is supported by a whole host of policies and objectives in section 9.4 of Chapter 9 'Our Rural Economy' and in section 4.19 of Chapter 4 'Agriculture'. It would not be considered appropriate or reasonable to only ever permit agricultural related uses on lands currently used for agricultural purposes. The Draft Plan must balance the needs of, inter alia, rural based industries including agriculture but also related to the bloodstock industry as well as housing and employment at appropriate locations, in accordance with the policies and objectives of the Draft Plan, while all the while being cognisant of the significant number of landscape designations at a local, national and international level.</p>

			Chief Executive's Recommendation No change to the Draft Plan.
210	Naas Action Group	<p>This submission focuses on actions that can be implemented in Naas and the surrounding area:</p> <p>Agri Food Policy Given the war in Ukraine and the looming food crisis and climate change it is tipping the world towards mass hunger. Therefore, the best and most productive land in Ireland must be reserved for food production.</p> <p>The submission suggests the inclusion of the following policy 'to ensure the preservation of prime agricultural land for food production.'</p>	<p>Chief Executive's Response The economic value of agriculture and the need to protect productive agricultural land from inappropriate industrial, commercial or residential development is recognised in the Draft Plan (Section 4.19 refers). The Plan states that important areas for future development include the agri-food and horticulture sectors, both of which represent higher value-added activity than traditional agricultural enterprises. Section 9.4.1 Agri -Food Sector contains a policy under RD P2 to support the future and continued development of agriculture and the agri-food sector in County Kildare. Similarly, Objective RE O83 states that the Council will maximise the ability of communities to be self-sufficient in food production. It is considered that the Plan therefore sufficiently recognises the importance of the agri-food sector.</p> <p>The Draft Plan must balance the needs of, inter alia, rural based industries including agriculture but also related to the bloodstock industry as well as housing and employment at appropriate locations, in accordance with the policies and objectives of the Draft Plan, while all the while being cognisant of the significant number of landscape designations at a local, national and international level.</p>
			Chief Executive's Recommendation No change to the Draft Plan.
503	Evelyn Cullen	The submission refers to a recent article in the Farming Independent (08/03/2022) which stated that only 23% of Irelands' land is suitable for tillage. Suggests that there is a need to protect agricultural land from inappropriate development	<p>Chief Executive's Response See response to Submission No. 494.</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 494.</p>

		<p>such as solar energy use. States that Kildare's soil types contribute significantly to high yielding crops and top-quality grass, which attracts many horse breeders to the area. It is submitted that these soil types should be reserved for food production.</p> <p>Requests that a specific policy regarding the preservation of prime agricultural land for food production be included in the Draft Plan to state: 'It is the policy of the Council to ensure the preservation of prime agricultural land for food production'.</p>	
205	Ballyburn Sustainable Agri-Food Enterprise Hub Or BEET Ireland	<p><u>Potential Enterprise Hub</u> Sugar Beet Ireland DAC (BEET Ireland) own a site at Ballyburn Upper, Castledermot, Co. Kildare (see extract no. 1 below). Part of the site is currently the subject of extraction of sand and gravel and these lands will revert to the ownership of BEET Ireland following extraction works and land restoration. BEET Ireland state they have extensive experience in the agri-food and agri-engineering sectors in Ireland and they wish to create a new sustainable agri-food enterprise hub at Ballyburn Upper. They expect such a development will generate strong regional economic benefits for South Kildare and become a new driver for innovations in the arable sector against the ongoing challenges and opportunities presented by the post Brexit market and climate change targets.</p> <p>This submission puts forward the case such a regional hub would be in line with International, National, Regional and County Council policies,</p>	<p>Chief Executive's Response The Council welcomes such an enterprise. As stated in the submission the Draft Development Plan has a number of policies, objectives and actions which support a Sustainable Agri-Food Enterprise Hub, subject to a number of considerations. The main objective supporting such a proposal is RD 010 in Chapter 9 'Our Rural Economy'. It is therefore considered a specific objective in this circumstance is not necessary in this instance.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

		<p><i>The subject lands represent a valid proposition for an agri-enterprise development to create a new sustainable agri-food enterprise hub at Ballyburn Upper. Development proposals associated with the landholding will be expected to present and generate strong regional economic benefits for South Kildare and become a new driver for innovations in the arable sector.</i></p> <p><i>The Council will favourably consider proposals for the development of a new sustainable agri-food enterprise hub as merits its well-connected rural location and where the subject site's specific location offers amenity, environmental and economic advantage. Any future proposals will be assessed taking account of:</i></p> <ul style="list-style-type: none"> <i>The contribution of the proposed development to the county's economy;</i> <i>The contribution of the proposed development to the county's environment and the principles of sustainable development;</i> <i>Assessment of any potential environmental effects; and</i> <i>National & Regional planning policy and objectives.</i> <p><i>The Council will normally permit proposals for such employment generating and agri-technology innovation development where it can be demonstrated that the development complies with the relevant development standards and is not detrimental to residential amenity or to environmental quality.</i></p>	
113	Health Service Executive	It is stated that the council should engage with the agricultural sector and promote sustainable farming practices within the county. Policies to reduce GHG from agricultural practices should be implemented as well as the impact of intensive agricultural practices on the status of water quality which should be monitored and assessed.	<p>Chief Executive's Response Objective RD O9 in Chapter 9 encourages the development of environmentally sustainable agricultural practices and Objective IN O52 in Chapter 6 seeks to protect water quality from pollution by agricultural sources while promoting the use of good farming practices.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
195	Elizabeth Cullen	Considering the biodiversity and climate crises, our needs need to be met locally. The Council should assist with this by facilitating local markets. Reference is made to RD O12 which encourages farmers markets for the sale of locally produced goods, however it is requested that more detail is provided on how farmers markets will be organised and what supports are available for farmers and organisers.	<p>Chief Executive's Response The Draft Plan is a land use plan and as such any details in relation to the organisation of farmers markets or any available supports are outside the scope of the Draft Plan.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
266	Irish Farmers Association	It is suggested that a 200m2 limit for enterprises in rural areas is quite small and encouraging larger enterprises into new serviced sites is not appropriate in some cases as many agri-	<p>Chief Executive's Response The purpose of table 9.1 is to provide protections for rural areas, the rural economy and rural enterprises from inappropriate levels of development. Enterprises with a</p>

		<p>merchants are in rural areas and they could be affected if scaling up. Such enterprises are not always suited to town settings. The importance of agriculture and food security at national and EU level is emphasised due to the Russian invasion.</p> <p>Furthermore, it is submitted that in relation to the re-wetting of bogs there should be an objective to ensure same does not interfere with existing drainage of surrounding lands.</p>	<p>floor area more than 200m² are considered to be more appropriate in serviced / built up areas with greater access to infrastructure.</p> <p>Objective RD O27 encourages the re-wetting of bogs, it is considered appropriate to provide additional wording to ensure drainage of surrounding lands is not interfered with.</p> <p>Chief Executive's Recommendation Regarding RD O27, see recommendation to Submission No. 421.</p>
364	Ursula King	<p>KCC should actively support and encourage sustainable agricultural practices in Kildare to protect our soils and water bodies. KCC should also actively support local food production that reduces fossil fuel usage in transport and contributes to future food security.</p>	<p>Chief Executive's Response Objective RD O9 in Chapter 9 'Our Rural Economy' encourages the development of such sustainable agricultural practices.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
503	Evelyn Cullen	<p>The submission refers to the need to protect agriculture and the agri-food sector in Kildare as this underpins our food security into the future.</p> <p>Refers to Policy RD P2 in Chapter 9, which seeks to "support the future and continued development of agriculture and the agri-food sector in County Kildare".</p> <p>States that a specific policy regarding the preservation of prime agricultural land for food production be included in the CDP 2023-2029.</p>	<p>Chief Executive's Response The Draft Plan acknowledges that over the past number of years there has been a significant fall off in agricultural employment in the County, which is indicative of the changing nature of the rural economy. The Draft Plan recognises that the Agri-food sector plays an increasingly crucial role in the rural economy and in the development of the county in general.</p> <p>As stated in the submission, the Draft Plan contains a Policy (RD P2) which seeks to support the future and continued development of the agriculture and agri-food sector in the county. This is supported by Objective RD O10, which seeks to facilitate the development of alternative farm enterprises, and appropriate small-scale start-up rural enterprises in the countryside with the intention to supplement existing farm incomes e.g. converting farm buildings to other farm-based activities</p>

			<p>such as agri-food, tourism, crafts, and energy whilst balancing this with the need to protect, promote, and enhance the viability and environmental quality of the existing rural economy and agricultural land. In addition, it is an objective to encourage farmers markets for the sale of locally produced goods at appropriate locations in the towns and villages across the county (RD O12).</p> <p>It would not be considered appropriate or reasonable to only ever permit agricultural related uses on lands currently used for agricultural purposes. The Draft Plan must balance the needs of, inter alia, rural based industries including agriculture but also related to the bloodstock industry as well as housing and employment at appropriate locations, in accordance with the policies and objectives of the Draft Plan, while all the while being cognisant of the significant number of landscape designations at a local, national and international level.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
518	Strategic Power Projects Limited	<p>Policy RD P1 and objective RD O2 are supported. The importance of the rural environment in helping Kildare work towards the renewable energy and net zero targets cannot be overstated. It is vital that there is a presumption in favour of ground mounted solar and associated technologies such as battery storage in the rural environment, especially where there is access to the grid.</p> <p>Objectives RD O6 and RD O7 are also supported. It is submitted that solar farms are suitable in rural areas and can enhance biodiversity with lands being untouched for over 25 years, while water quality will be improved as chemical pesticides and fertilisers are not used on the lands.</p>	<p>Chief Executive's Response While acknowledging the need to increase production of renewable energy in Kildare, other factors need to be considered during the assessment of applications such as environmental impact and protections, landscape sensitivity, natural and built heritage constraints. It is therefore not appropriate to favourably consider Solar PV above other issues. Each development proposal will be assessed on its own merits. However, it should be noted that there is an action (EC A3), to prepare and implement an overall Renewable Energy Strategy for the County in accordance with the current Climate Change Adaptation Strategy for Kildare. On completion, this document will provide further guidance on suitable locations for renewable energy developments such as Solar PV.</p>

			Chief Executive's Recommendation No change to the Draft Plan.
472	Keep Ireland Open	<p>The submission recommends in Section 9.4.1 to include additional text: Commonage and other rough grazing land should be regarded primarily as an important recreational, environmental and amenity resource.</p> <p>The submission recommends an additional objective to preserve the open character of commonage land and other hill land and secure access over paths and tracks through consensus with landowners</p> <p>The submission recommends in Section 9.4. the inclusion of additional objectives.</p> <ul style="list-style-type: none"> • Recognise and support the role of farmers as custodians of the natural resources of the countryside and of rural landscapes. • Promote, at national level, the adoption of a Land Use Strategy. • Protect and conserve rural amenities, archaeological features and natural heritage, landscape, natural waters, watercourses, wildlife habitats, conservation areas, areas of ecological importance and the environment generally, from adverse impacts of agricultural practices and development particularly in high amenity areas. Ensure that they don't have an undue negative impact on the visual/scenic amenity of the countryside or impinge thereon and identify mitigating measures where required. Integrate into the landscape. 	Chief Executive's Response The Kildare County Development Plan is the Land Use Strategy for the county. Chapters 11 and 12 contain policies that seek to protect built and natural heritage during the course of development. Chapter 12 Policy BI P7 and Objectives BI O5-BI O7 all consider the implementation of the Habitats Directive in relation to planning applications. Throughout the Draft plan there are various policies that are concerned with considering the environment and environmental protection in the assessment of planning applications. The EU Biodiversity Strategy for 2030 is referred to in Chapter 12 and policies contained in the chapter seek to implement the actions of the Biodiversity Strategy. The EU nature restoration targets and plan has not been developed. Policy RD P6 seeks to increase forest cover in the county at appropriate locations while protecting sensitive landscapes, water bodies, special areas of conservation and amenity areas. There are no identified AONB (Areas of Outstanding Natural Beauty) in Kildare. Additional objectives are recommended for inclusion in the Plan with amendments. The addition of a new sub section is not agreed. Section 9.3 states, in general, existing commercial or industrial

	<ul style="list-style-type: none"> Prohibit the intrusion of development along public walking routes, particularly those in scenic areas so that development doesn't impinge on or have negative impact on these routes particularly at lakeshores, river banks or other places of natural beauty or recreational activity and those in scenic and high amenity areas and along inland waterways. Maintain and enhance the standing of the rural environment through application of the EU Habitats Directive. Ensure the highest standards of environmental protection in assessing planning applications. <ul style="list-style-type: none"> Ensure that development is in compliance with the EU "A Farm Fork Strategy" 2020 and EU Nature Restoration Plan in the EU "Biodiversity Strategy for 2030- Bringing nature back into our lives. <p>The submission recommends in Section 9.7 the inclusion of additional objectives.</p> <ul style="list-style-type: none"> Retain existing rights of way and identify them and established walking routes before planting commences and maintain them as rights of way/walking routes. Ensure that existing public rights of way, traditional walking routes are not obstructed. Ensure that development is appropriate in scale and character and does not have a negative visual impact on the countryside including public access, rights of way, traditional walking routes and recreational facilities or cause degradation of wildlife habitats, nature conservation areas or areas of ecological importance. 	<p>activities in towns and villages will not be permitted to relocate to the countryside or to un-serviced rural areas. It is agreed to include a new objective as below.</p> <p>Chief Executive's Recommendation Include additional text in Section 9.4.1: Commonage and other rough grazing land should be regarded primarily as an important recreational, environmental and amenity resource.</p> <p>Include an additional objective in Section 9.4.1: Preserve the open character of commonage land.</p> <p>Include additional text in Section 9.4: The plan recognises and supports the role of farmers as custodians of the natural resources of the countryside and of rural landscapes.</p> <p>Include the following new objectives in Section 9.7: New objective: Ensure that existing public rights of ways and walking routes are not obstructed during the planting of forests.</p> <p>New objective: Ensure that development is appropriate in scale and character and does not have a negative visual impact on the countryside including public access, rights of way, walking routes and recreational facilities or cause degradation of wildlife habitats, nature conservation areas or areas of ecological importance.</p> <p>New objective: Recognise the potential of forestry including Coillte's "open forest" policy and protect and encourage access to forestry and woodlands (including private forestry) in co-operation with all relevant stakeholders for walking routes, long-distance and looped</p>
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		<ul style="list-style-type: none"> • The Council in assessing development proposals will seek to ensure that: <ul style="list-style-type: none"> a) Landscapes of scenic value are not unduly eroded. b) Areas with environmental and archaeological protections are safeguarded. c) A mixture of broadleaf and conifer species should be planted where possible so as to support a variety of flora and fauna species and to enliven forestry landscapes. d) Promote the avoidance of deforestation or commercial afforestation within Natura 2000 sites unless directly linked to the management of the site for its qualifying interests. • Promote the avoidance of deforestation or commercial afforestation within Euro Sites unless directly linked to the management of the site for its qualifying interests. • No new or replacement coniferous forests will be allowed on summits generally above 250 meters. • Protect the unspoiled rural landscape of Areas of Outstanding Natural Beauty from inappropriate development for the benefit of future generations. • Manage, maintain, enhance, preserve, promote, encourage and facilitate, as far as practicable, the preservation, proper provision and retention of the existing network of native ancient woodlands and semi- natural woodlands of amenity value especially broadleaf species for their contribution to landscape character. • Recognising the potential of forestry including Coillte's "open forest" policy, protect and 	<p>walks, mountain trails, nature trails, bridle paths, orienteering and hiking.</p> <p>Include a new objective in Section 4.2: 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.</p>
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		<p>encourage access to forestry and woodlands (including private forestry) for in co-operation with stakeholders for walking routes, long-distance and looped walks), mountain trails, nature trails, bridle paths, orienteering and hiking.</p> <p>The submission recommends including an additional sub section: Commercial Developments in the Countryside. Development must be limited to areas of low environmental sensitivity. Ensure that economic development that is urban in nature should be located in urban areas.</p>	
413.	Kildare Public Participation Network	<p><u>Rural Economy and Rural Enterprise</u> Suggested the following additions to objective RD O6:</p> <ul style="list-style-type: none"> • Actively enforce the protection and conservation of protected sites (SACs, SPAs, NHAs and pNHAs). • Ensure the identification and protection of existing high nature value habitats in natural and semi-natural areas. • Support the restoration of degraded agricultural and woodland ecosystems, through sound ecological practices. • Any 'enhancements' of ecosystems will seek to protect existing native biodiversity by using locally sourced native planting material of native provenance and origin. <p>Requests inserting the following additional text into objective RD O8:</p>	<p>Chief Executive's Response The proposed additional provisions to RD O6 relating to the protection and conservation of nature and ecosystems is not accepted. Inserting the requested additional text in this objective would constitute unnecessary duplication as Chapter 12: Biodiversity and Green Infrastructure (in particular) already contains sufficient provisions to ensure the safeguarding of nature.</p> <p>See response to Submission No. 432 in relation to the Smart Village initiative.</p> <p>While there are many policies within the plan encouraging the planting of native species, sourcing plants of native origin and provenance as appropriate are considered not to be practical in all cases.</p> <p>In relation to the banning of the use of peat-based horticulture products, such a matter is outside the scope of a Development Plan, which is primarily a land use plan.</p>

	<p>...continued roll out of the National Broadband Scheme and initiatives such as the EU Smart Villages Initiative.</p> <p><u>Horticulture</u> Proposes the following additional actions: New action: To require that any native plantings planted through Council funded planting schemes be of native provenance and origin by 2024 (and preferably local provenance and origin by 2027).</p> <p>New action: To require that any native plantings for green infrastructure or nature-based solution planting schemes be of native provenance and origin by 2024 (and preferably local provenance and origin by 2027).</p> <p>New action: To require that any native planting for biodiversity initiatives be of native provenance and origin by 2024 (and preferably local provenance and origin by 2027).</p> <p>New action: To ban the use of peat-based horticulture products in Council funded planting schemes by the end of this Development plan.</p> <p><u>Forestry</u> Submission proposes inserting additional text into the objectives set out below: RD O20: Encourage public and private owners to allow / provide public access to forests for recreational and amenity use e.g., walking, biking and equine trails to enhance health and wellbeing with due consideration to sensitive areas for</p>	<p>In relation to RD O20 and RD O22, See response to Submission No. 147.</p> <p>Regarding section 9.8, see response to Submission No. 172.</p> <p>The requested additional policy to support sustainable tourism and infrastructure for peatland communities is not accepted as it is considered that there is already a comprehensive range of policies and objectives which support tourism development opportunities in Kildare's peatlands including RE P19, RE O125 – RE O127.</p> <p>Agree, in part to amend RE P7 as suggested.</p> <p>The requested additional policy to conserve and protect peatlands is not accepted. It is considered that there are already a comprehensive range of objectives and an action in the Plan with respect to the protection and conservation of peatlands, including Objectives EC O54, BI O33, LR O11, LR O62, RD O27 and Action BI A22.</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 432 in relation to the Smart Village initiative.</p> <p>Please refer to Submission no. 472 (Keep Ireland Open) for recommendation wherein two new objectives are proposed.</p> <p>In relation to RD O20 and RD O22, See recommendation to Submission No. 147.</p>
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	<p>wildlife conservation and subject to compliance with the relevant environmental legislation.</p> <p>RD O22: Facilitate tourism infrastructure and visitor services including tourism accommodation at appropriate locations in forest estates with due consideration to sensitive areas for wildlife conservation and subject to compliance with the relevant environmental legislation.</p> <p>Proposes the following additional action: New action: To require that any native tree plantings planted through Council funded Woodland planting schemes be of native provenance and origin by 2024 (and preferably local provenance and origin by 2027).</p> <p><u>Bogs and Peatlands</u> Suggests inserting the following addition paragraph into section 9.8: The National Peatlands Park and development of the Blueway demonstrates great potential to tangibly assist a Just Transition for local communities, leading to successful economic regeneration and a sustainable local economy. Kildare County Council (together with Failte Ireland and other relevant stakeholders) will actively support community-led tourism initiatives encompassing the Blueway and peatland areas to the west as part of a National Peatlands Park. This has the unique potential to offer the visitor a relaxed “wilderness” environment. Kildare County Council recognises that the development of a range of outdoor activities based around our natural amenities of bogs, canals and rivers and</p>	<p>Regarding section 9.8, see recommendation to Submission No. 421.</p> <p>Amend RD P7 as follows: RD P7: Support the appropriate and sensitive diversification of former cutaway peatlands, whilst ensuring the protection of their...</p>
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		<p>the discovery of the area's natural and built heritage could significantly support the future growth of tourism in Kildare and the midlands.</p> <p>Suggests the following new policy: To support sustainable tourism and infrastructure for peatland communities.</p> <p>Requests the insertion of additional text into policy RD P7: Support the appropriate and sensitive diversification of former cutaway and degraded peatlands, whilst ensuring the protection of their...</p> <p>Proposes additional policy set below, as follows: New policy: Conserve and protect, where possible, all intact peatlands (bogs and fens), and encourage ecologically informed restoration where appropriate on damaged peatlands.</p>	
405	Kildare Climate Action Linkage Group	<p><u>Horticulture</u> To actively support and promote a local indigenous horticulture sector, the submission suggests the insertion of the following additional actions and objective:</p> <p>Additional Action - To provide support for an indigenous nursery stock sector through actively seeking partners for the establishment of grant funding by the end of 2023, for the production of bare root tree/shrub stock of local provenance and origin.</p> <p>Additional Action - To require that any native plantings planted through Council funded planting schemes be of native provenance and origin by</p>	<p>Chief Executive's Response In relation to the suggestion that the Council should seek partners for the establishment of grant funding for an indigenous nursery stock sector, the Council unfortunately does not have the resources to commit to undertaking such a project at this time but would support and facilitate the development of such a facility as a community enterprise.</p> <p>While there are many policies within the plan encouraging the planting of native species, sourcing plants of native origin and provenance as appropriate are considered not to be practical in all cases.</p> <p>In relation to supporting research for alternatives to horticultural peat and the banning of the use of peat-based</p>

		<p>2024 (and preferably local provenance and origin by 2027).</p> <p>Additional Action - To require that any native plantings for green infrastructure or nature-based solution planting schemes be of native provenance and origin by 2024 (and preferably local provenance and origin by 2027).</p> <p>Additional Action - To require that any native planting for biodiversity initiatives be of native provenance and origin by 2024 (and preferably local provenance and origin by 2027).</p> <p>Additional Action - To actively support research, along with stakeholder, for example NUIM, for alternatives to horticultural peat. o https://www.iucn-uk-peatlandprogramme.org/news/peat-free-horticulturereality-and-opportunity</p> <p>Additional Action - To ban the use of peat-based horticulture products in Council funded planting schemes by the end of this Development plan.</p> <p>Additional objective - To support and encourage local Horticultural Food Producers, with a particular emphasis on supplying local markets with organically produced food.</p>	<p>horticulture products, such matters are outside of the scope of a Development Plan, which is primarily a land use plan.</p> <p>Section 9.6 of the plan sufficiently supports horticultural practices. Supply with respect to local markets is outside the scope of a County Development Plan.</p> <p>Chief Executive's Recommendation Add an additional objective in Section 13.7.2: Support and facilitate, the establishment of a community run nursery to grow native plants, at an appropriate location.</p>
468	Ann Behan	<p>Given that green infrastructure and nature-based solutions (SuDs) are central to the Plan, it potentially places the horticulture industry at the centre of many themes. Due to increased consolidation within the industry and increased demand for the planting of native plants, there is</p>	<p>Chief Executive's Response In relation to the suggestion that the Council should seek partners for the establishment of grant funding for an indigenous nursery stock sector, the Council unfortunately does not have the resources to commit to undertaking such a project at this time but would support and facilitate</p>

	<p>an opportunity to actively support an indigenous, locally based horticulture sector, providing for local employment. The severe challenges faced by the sector in relation to peat availability must be acknowledged. In this regard RD O18 and RD O19 are welcomed. However, the following five actions are suggested:</p> <p>Add an action “to provide support for an indigenous nursery stock sector through actively seeking partners for the establishment of grant funding by the end of 2023, to produce bare root tree/shrub stock of native provenance and origin”.</p> <p>Add an action “to require that any native plantings, planted through Council funded planting schemes be of native provenance and origin by 2024 (and preferably local provenance and origin by 2027).”</p> <p>Add an action “to require that any native plantings, for green infrastructure or nature-based solution planting schemes, be of native provenance and origin by 2024 (and preferably local provenance and origin by 2027).”</p> <p>Add an action “to require that any native planting for biodiversity initiatives be of native provenance and origin by 2024 (and preferably local provenance and origin by 2027).”</p> <p>Add an action “to ban the use of peat-based horticulture products in Council funded planting schemes by the end of this Development Plan.”</p>	<p>the development of such a facility as a community enterprise.</p> <p>While there are many policies within the plan encouraging the planting of native species, sourcing plants of native origin and provenance as appropriate are considered not to be practical in all cases.</p> <p>In relation to the banning of the use of peat-based horticulture products, such a matter is outside the scope of a Development Plan, which is primarily a land use plan.</p> <p>Section 9.6 of the plan sufficiently supports horticultural practices. Supply with respect to local markets is outside the scope of a County Development Plan.</p> <p>Chief Executive’s Recommendation Add an additional objective in Section 13.7.2: Support and facilitate, the establishment of a community run nursery to grow native plants, at an appropriate location.</p>
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		The plan provides an opportunity to actively support locally based horticultural food outputs. An additional objective is proposed “to support and encourage local Horticultural Food Producers, with a particular emphasis on supplying local markets with organically produced food.”	
405	Kildare Climate Action Linkage Group	<p>Proposed amendment of Policy RD P1: ...in areas such as sustainable agriculture, forestry, peatlands, rehabilitation and sustainable peatland related tourism, food, crafts, renewable energy...</p> <p>Requests the rewording of Objective RD O6 to reflect the following:</p> <ul style="list-style-type: none"> Actively enforce the protection and conservation of protected sites (SACs, SPAs, NHAs and pNHAs). Ensure the identification and protection of existing high nature value habitats in natural and semi-natural areas. Support the restoration of degraded agricultural and woodland ecosystems, through sound ecological practices. Any ‘enhancements’ of ecosystems will seek to protect existing native biodiversity by using locally sourced native planting material of native provenance and origin. <p>Request the amendment of RD O8 as follows: Promote the provision of broadband and other communications infrastructure in rural areas of the county through supporting the continued roll out of</p>	<p>Chief Executive’s Response Regarding RD P1, see response to Submission No. 172.</p> <p>See the response to Submission No. 413 in relation to objectives RD O6.</p> <p>In relation to the Smart Village initiative, see response to Submission No. 432.</p> <p>Chief Executive’s Recommendation Regarding RD P1, see recommendation to Submission No. 172.</p> <p>See recommendation to Submission No. 413 in relation to objectives RD O6.</p> <p>In relation to the Smart Village initiative, see recommendation to Submission No. 432.</p>

		the National Broadband Scheme and initiatives such as the EU Smart Villages Initiative.	
598	Friends of Harristown Commons	The submission recommends policy RD P1 is edited to include text: ...particularly where they contribute to a low carbon and resilient economy not at protected sites or sites of national importance.	<p>Chief Executive's Response Not agreed. It is considered that there are sufficient policies and objectives in the Draft Plan to address the concerns raised, particularly in Chapter 12 where there are numerous objectives to protect designated sites throughout the county.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
EXTRACTIVE INDUSTRY			
395	Geological Survey of Ireland (to be read in conjunction with Dept. Environment, Climate & Communications submission, same number, submitted together)	The submission commends the inclusion of RD O33 and the reference of Geological Heritage Guidelines under RD O38.	<p>Chief Executive's Response Noted.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
16	SLR Consulting Ireland on behalf of Roadstone Ltd.	Socio-economic potential and benefits of the quarry and extractive industry The submission welcomes the preamble under Section 9.9 but highlights the potential to further acknowledge the socio-economic potential and benefits of the quarry and extractive industry.	<p>Chief Executive's Response While the socio-economic potential and benefits of the extractive industry are recognised in the Plan, it is considered appropriate to expand upon this issue in Section 9.9 of the Plan.</p> <p>It is noted that the publication appended to the submission is highlighting the need for Government to prepare national</p>

		<p>It is stated that the Draft CDP should acknowledge that aggregate resources are not evenly distributed across the country or county and can only be worked where they occur naturally. As well as providing essential building materials for the construction industry, aggregate resources are also essentially a finite resource, in that, once extracted they cannot be replaced.</p> <p>The publication appended to the submission titled 'Essential Aggregates – Providing for Ireland's Needs to 2040' has also been noted wherein the objective is to highlight to Government the need for a national planning policy for aggregates, which will underpin regional and local planning policy in order to ensure the sustainable supply of aggregates for Project Ireland 2040 and beyond.</p>	<p>planning policy for aggregates. Any such guidance will be taken into account as part of the preparation of the various land use plans in Kildare either at a County Development Plan or Local Area Plan level, as appropriate at the time.</p> <p>Chief Executive's Recommendation Amend Section 9.9 as follows: Mineral resources are generally located within the rural area. Reserves of suitable material are finite and the nature of the extractive industry is such that the industry must be developed where the resource occurs. The industry can have damaging environmental effects and permission will only be granted where the council is satisfied that residential and natural amenities will be protected, pollution will be prevented, and aquifers and ground water safeguarded.</p> <p>Whilst the environment must be protected, it is also important to ensure the availability of adequate supplies of aggregates and to facilitate the exploitation thereof are available to meet the future needs of the county and region in line with the principles of sustainable development and environmental management. Aggregate resources are important to the general economy with over 500 active quarries nationally in 2018, directly employing over 5,000 people. The industry provides a valuable source of employment in some areas of the county with 26 active quarries noted by the council throughout Kildare in 2019, while a further 14 quarries had limited activity. The and the sector is vital to ensure provision of raw materials for the construction industry to facilitate the building of residential units, health care facilities, education facilities, social infrastructure and physical infrastructure which will to accommodate the existing and anticipated population</p>
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			growth in the county and region over the lifetime of the Plan and beyond.
16	SLR Consulting Ireland on behalf of Roadstone Ltd.	It is submitted that the effect and implications of RD O36 of the Plan be assessed in accordance with the required number of quarry related operation vehicles.	<p>Chief Executive's Response Noted. The review of the Development Contribution Scheme is due to take place later this year (2022). It is considered more appropriate to address the concerns raised through the review of this Scheme.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
16	SLR Consulting Ireland on behalf of Roadstone Ltd.	<p><u>Rehabilitation of disused quarries and extractive sites</u> It is submitted that an after-use policy could encourage the rehabilitation of disused quarries and extractive sites, to include for backfilling with inert soil and stone, subject to site characteristics, demand and appropriate planning and environmental considerations.</p>	<p>Chief Executive's Response Noted. It is considered appropriate to amend objective RD O39 in Section 9.9.1 to address the issues raised.</p> <p>Chief Executive's Recommendation Amend RD O39 as follows: Ensure the satisfactory and sensitive re-instatement and/or re-use of disused quarries and extraction facilities, where active extraction use has ceased. Future uses should include amenity, recreation and biodiversity areas, and shall be informed by an assessment of the specific site/lands and shall be subject to an ecological impact assessment or other environmental assessments as appropriate. Proposals for futures uses, infill of these areas should be agreed with the Planning Authority through the development management process. Where it is proposed to reclaim, regenerate or rehabilitate old quarries by filling or re-grading with inert soil or similar material, or to use worked-out quarries as disposal locations for inert materials, the acceptability of the proposal shall be evaluated against the criteria set out in Section 15.9.6 of this Plan. The Council will resist development that would significantly or unnecessarily alter</p>

			the natural landscape and topography, including land infilling/ reclamation projects or projects involving significant landscape remodelling, unless it can be demonstrated that the development would enhance the landscape and / or not give rise to adverse impacts.
405	Kildare Climate Action Linkage Group	<p>Given the acknowledged Biodiversity Crisis and a shortage of experienced field biologists nationally, the submission suggests the following amendments to RD O34:</p> <ul style="list-style-type: none"> • A detailed landscaping plan to be submitted indicating proposed screening for the operational life of the site. The predominant use of native plant species of native provenance and origin in the proposed landscaping plan will be expected. • Detailed landscaping and quarry restoration plans. Habitats and species surveying shall be carried out by a suitably experienced botanist/ecologist and shall influence the restoration plan for the site. <p>Suggests the amendment of RD O39 as follows: RD O39 - ...Future uses should include amenity, recreation and biodiversity areas and shall be informed by an assessment of the specific site/lands. These assessments will include the expertise of a suitably qualified and experienced botanist/ecologist. Proposals for futures uses/infill of these areas should be agreed with the Planning Authority through the development management process.</p>	<p>Chief Executive's Response While there are many policies within the plan encouraging the planting of native species, sourcing plants of native origin and provenance as appropriate are considered not to be practical in all cases.</p> <p>Regarding the proposed inclusion of reference to '...suitably qualified and experienced botanist/ecologist', please note the proposed amendment of RD O39 in response to Submission No. 16 above.</p> <p>Chief Executive's Recommendation Regarding RD O39, see recommendation to Submission No. 16 above.</p>
468	Ann Behan	Considering the Biodiversity crisis and a shortage of experienced field biologists nationally additional wording is proposed for RD O34.	Chief Executive's Response While there are many policies within the plan encouraging the planting of native species, sourcing plants of native

		<p>Amend fourth bullet point in RD O34 to include “of native provenance and origin” after native plant species.</p> <p>Amend fifth bullet point in RD O34 to include “by a suitably experienced botanist/ecologist” after the words carried out.</p> <p>Objectives RD O39 and RD O40 are welcomed, and it is hoped this approach will guide objectives for all post-industrial sites of extractive industries, including peatlands. However, an additional sentence is proposed for inclusion in RD O39 after the second sentence to read “These assessments will include the expertise of a suitably qualified and experienced botanist/ecologist”.</p>	<p>origin and provenance as appropriate are considered not to be practical in all cases.</p> <p>Regarding the proposed inclusion of reference to ‘...suitably qualified and experienced botanist/ecologist’, please note the proposed amendment of RD O39 in response to Submission No. 16 above.</p> <p>Chief Executive’s Recommendation Regarding RD O39, see recommendation to Submission No. 16 above.</p>
16	SLR Consulting Ireland on behalf of Roadstone Ltd.	<p>Strengthen policy provisions in relation to identifying and protecting aggregate reserves in the county</p> <p>The submission highlights the UK Government’s Guidance on planning for mineral extraction in the plan making and the application process. In accordance with the guidance document, its suggested that the CDP highlights areas containing proven deposits on an appropriate map, in order to protect them from the future development of incompatible land use. The Plan should ensure that the extraction of aggregates can take place in suitable locations where the resource exists.</p>	<p>Chief Executive’s Response It is not considered necessary to map. The Draft Plan includes a number of objectives related to the extractive industry. Planning applications to open new reserves or intensify existing reserves will be considered on a case by case basis having regard to the objectives of the Draft Plan.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
351	Eco Advocacy	<p>The submission questions whether any strategic environmental assessment (SEA) was conducted as part of the County Development Plan (CDP)</p>	<p>Chief Executive’s Response The objective of Strategic Environmental Assessment (SEA) is to provide a broader approach to environmental</p>

		<p>which takes an overall look at where aggregates and sustainable energy is to come from. States that experience has shown that applications for individual solar installations and wind farms are looked at in isolation and not as a whole when at the same time deep-bore geothermal has been ignored.</p>	<p>assessment of development plans, local area plans and regional spatial and economic strategies. A formal process of SEA is being undertaken as an integral part of the preparation of this Plan, pursuant to the requirements of the EU SEA Directive (2001/42/EEC) and the Planning and Development (SEA) Regulations 2004 (as amended).</p> <p>This then provides a framework for environmental impact assessment (EIA) of projects when assessing planning applications for developments such as solar energy and wind farm developments.</p> <p>It should be noted that as part of the preparation of the Draft Plan, Kildare County Council retained the services of a specialist consultancy firm to prepare both the Strategic Environmental Assessment and Appropriate Assessment that accompany the Draft Plan.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
350	Lorraine Benson	<p>This submission relates to the development of bogs, Special Amenity Area Orders for wetland or peatland sites, establishment of a Water Quality Task Force and biodiversity in post-industrial extractive industry sites.</p> <p>Chapter 9 (Our Rural Economy) The submission states that the commitment to set aside 80% for biodiversity and nature recovery in post-industrial extractive industry sites is welcome.</p> <p>The submission also states that 50% of bogs for development is wrong and will lead to further habitat destruction, fundamental alteration of the</p>	<p>Chief Executive's Response The concerns raised regarding the potential negative impacts of development on peatlands are noted. Reference to the development of '50%' of cutaway peatlands was included in the draft plan to limit development, rather than as a target. Having considered many submissions received on this issue, it is considered more appropriate to take a biodiversity-led approach to planning for the sustainable re-use of the county's cutaway peatlands. In this regard, please see the response to Submission No. 421 and the suggested changes to Section 9.8 and Section 12.14.6.5 of the Plan.</p> <p>It should be noted that protections are afforded in other areas of the plan notably within section 7.12.7 and</p>

		hydrological integrity of the peatland, diminish water quality and increase the risk of flooding.	<p>objective EC O54 which requires an ecological impact assessment to be carried out and submitted with any planning application for energy infrastructure projects on bog / peatlands. Further protections are afforded to habitats and species in section 12.7.1.</p> <p>There is also an objective (IN O32) within section 6.7 which is to recognise the important role of natural boglands and other wetland areas in flooding patterns. Development in these areas shall therefore be subject to a Flood Risk Assessment in accordance with the relevant guidance.</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 421.</p>
234.	Lorraine McNamara	<p>The submission relates to the extractive industry in the county which the submitter notes is a popular area for quarry operators due to its proximity to County Dublin.</p> <p>It is stated that from looking at the Council's own documents, Kildare has over 70+ active quarries. Whilst the submission acknowledges that quarrying is necessary for the greater good queries are raised in relation to the control measures KCC can apply around the operating of quarries where conditions of planning are not being complied with. The submission asks how many abandoned quarries there are in the county and raises issues in relation to a particular operator where a number of planning conditions were not complied with. It is stated that only after a local group raised this issue was a warning letter issued to the operator and that the operator is quarrying away without planning permission.</p>	<p>Chief Executive's Response The contents of the submission have been noted. It is considered that the issues that are raised in this submission relate to the day-to-day management and resourcing issues surrounding planning compliance and enforcement, and therefore are outside the remit of the draft County Development Plan. It should be noted however, that the Council uses its powers as provided for under the Planning and Development Act 2000, as amended, to ensure the compliance of conditions and to advance enforcement proceedings when deemed necessary.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

		States that their main objective is how can the Council implement an extractive industry friendly policy when KCC seem to be wholly under resourced to ensure that planning conditions are being complied with or does Kildare County Council not have the internal procedures in place to monitor the compliance to the conditions it sets. Concludes by stating that it is no longer acceptable to say the operators are responsible for adherence to planning conditions and asks if KCC can elaborate on how they plan to manage the whole area around the extractive industries?	
256	Ballyshannon Action Group	<p><u>Climate</u> It is contended that favourable protections are afforded to the extractive industry. These provisions / protections are outdated and inconsistent with the more progressive climate policies contained in other sections of the Plan. It is requested that the protections provided for the extractive industry be removed / altered in favour of protections for communities, sustainable development, and biodiversity. Extractive industries have a negative impact on other industries such as equine, tourism, and hospitality.</p> <p>The words 'extractive industry' should be removed from the first line of paragraph four in section 9.1, as it is considered that the extractive industry will not help Kildare reach targets in relation to climate change as there is no direct monitoring of quarries in Kildare to quantify the impact of this carbon heavy business on the county and its climate action target.</p>	<p>Chief Executive's Response Protections for the extractive industry are required to ensure adequate supplies of aggregates are available to meet the future needs of the county and the region. The sector is vital to ensure provision of raw materials for the construction industry to facilitate the building of infrastructure which will accommodate anticipated population growth in the county and region. Adequate supplies are based on demand in the county and the region to facilitate the construction of infrastructure.</p> <p>The extractive industry along with many other sectors has a role to play in helping Kildare reach targets in relation to climate change, through reducing emissions from HGV / machinery fleet, using greener technologies in the extraction of materials, and the provision of green infrastructure on extraction sites. Furthermore, Objective RD O40 should also be noted where a minimum of 80% of the quarry area must be provided for environmental benefit, biodiversity and re-wilding with respect to quarry remediation.</p>

		<p>Paragraph two of section 9.9 is referred to and it is requested that more information be given on what constitutes 'adequate supplies' and it is contended that the inclusion of the extractive industry as a 'valuable source of employment' should be removed. In line with the Climate Action Plan, the preference must be to create quality jobs in low carbon enterprises and greener business.</p> <p>It is further contended that RD O37 regarding protection of quarries from inappropriate development should be removed.</p>	<p>In addition, it should be noted that the industry does provide a valuable source of employment in some areas of the county.</p> <p>Chief Executive's Recommendation No change to the Draft Plan</p>
256	Ballyshannon Action Group	<p><u>Prime agricultural land</u> Reference is made to the agri-food sector and policy RD P2. It is stated that Kildare soil is some of the best in Ireland. An area in south Kildare (Ballyshannon) is referred to which will potentially be quarried having been used as tillage for generations. It is strongly suggested that the CDP protect land for production of food rather than for aggregate resources. A policy is proposed "to favour the use of prime agricultural lands for that purpose, i.e., agricultural use in preference to other forms of development and to only seek work aggregates from lands that have limited agricultural value"</p>	<p>Chief Executive's Response Given the scale of coverage in the county, and in the absence of relevant criteria, prime agricultural lands are not identified in the Draft Plan. However, the plan does include provisions to ensure protection of the countryside in section 3.13 – Sustainable Rural Housing and in section 9.3 – Rural Economy and Enterprise where commercial / industrial and some larger rural based enterprises are encouraged in towns and villages close to services and infrastructure rather than in the countryside unless there is dependence of an existing local resource of source material that is required for the activity or service.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
256	Ballyshannon Action Group	<p><u>Measuring extraction from quarries</u> The wording of policy RD P8 assumes that measures are in place to detail / record the level of extraction within Kildare and the destination of such products. There is no measurement of same or monitoring process to provide this information. Therefore, the policy cannot be realised until such measurements and monitoring of the extractive</p>	<p>Chief Executive's Response Planning applications for extractive industries are required to include details of total and annual tonnage of extracted aggregates. Conditions are then attached with permissions to ensure the levels of extraction permitted are not exceeded. However, it is not a planning function to monitor levels of extraction, this is done through environmental licensing procedures. Should the planning authority be</p>

	<p>industry in the county are established. It is contended that the demand for products from some of the largest extractive companies operating in Kildare are not being driven by the needs of the region but from other areas including the UK.</p> <p>There should be strict carbon budgets on every active quarry in Kildare and a quantum of extraction agreed with the council on a yearly basis. There should also be a requirement for quarries to provide yearly figures on where demand is coming from for products taken from Kildare to ensure a sustainable and circular approach to the use of Kildare’s finite resources. In addition, the council should use greener, low carbon materials in their public contracts.</p> <p>It is proposed to amend RD P8 to read as follows “support and manage the appropriate future development of Kildare’s natural aggregate resources in appropriate locations to ensure adequate supplies are available to meet the future needs of the county (not region) in line with the principles of sustainable development and environmental management and ensure that operators live up to their promises to remediate sites when extraction has ceased.”</p> <p>The council needs to set up an enforcement taskforce to ensure every quarry in the county is meeting required regulations and conditions with respect to its operation.</p>	<p>notified of a quarry having breached a condition of their planning permission the matter will be investigated by the enforcement team and actions taken, as appropriate.</p> <p>In relation to amending policy RD P8 it is not appropriate to only use aggregates in Kildare. The wider region also needs to be facilitated as other neighbouring counties may not have the resources to ensure provision of materials for the construction of necessary infrastructure. In addition, operators are required to provide a financial bond to ensure the satisfactory reinstatement of the site following completion of extraction and the payment of an adequate contribution towards the upgrading or repair of the local road network. Objective RD O35 also requires a bond (cash deposit or other security acceptable to the planning authority) to ensure the satisfactory completion and restoration of the site.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
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256	Ballyshannon Action Group	<p><u>Bonds / Levies</u> It is contended that a further policy must be created to ensure all financial contributions by the extractive industry are paid without compromise. It is proposed to amend objective RD O35 by including that “the bond must be of sufficient value to ensure that no profit is made by the operator from land that is not restored to the state outlined in the applications granted”.</p> <p>It is also proposed to amend text to objective RD O39 including the wording “a bond must be taken by the council from the operator to ensure that no profit is made from a site where agreed re-instatement does not take place. The bond must be forfeited if the operator applies for extension of the quarry after the agreed initial period.”</p>	<p>Chief Executive’s Response It is the right of all applicants to contest / appeal financial contributions should they believe the relevant amount has not been calculated using the correct measures. The value of the bond is determined by the Planning Authority to ensure it will adequately cover the cost of restoration works should the operator not carry out these works in accordance with the conditions of their planning permission.</p> <p>The purpose of the bond is to ensure re-instatement works are carried out in accordance with conditions of the planning permission which includes a comprehensive site restoration plan and / or after-use strategy (RD O34) as submitted with the application. Should extraction work continue after the expiration of a permission planning enforcement can then act. If an application is submitted for an extension of the timeframe, the amount of the bond can be reviewed as part of the conditions to the new permission should the extension be granted.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
256	Ballyshannon Action Group	<p><u>Statutory Bodies / Public</u> Objective RD O38 should include additional text which is to “have regard to the opinions given by the statutory bodies in planning applications such as Inland fisheries, An Taisce, NRA, HSE and to the quantum of local support or objection to applications for the development. “</p>	<p>Chief Executive’s Response Planning officers are legislatively required to have regard to the opinion of statutory bodies and observations from the public for all applications. However, the quantum of opinions/submissions is not necessarily a good measure for gauging if an application should obtain planning permission.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>

256	Ballyshannon Action Group	<p>Quarry Remediation</p> <p>It is requested that the first paragraph of section 9.9.1 be removed as it is a blatant attempt to sell quarries as being somehow good for the environment. Biodiversity must be prioritised in more positive ways elsewhere in the Plan.</p> <p>It is further requested objective (RD O40) be removed as remediation of a quarry must ensure that 100% of the land is put back how it was or given back to nature. Allowing 20% to remain in use as a quarry is highly inappropriate.</p>	<p>Chief Executive's Response</p> <p>Biodiversity is prioritised in many areas of the Plan. The Draft Plan has a full Chapter (Chapter 12) dedicated to Biodiversity and Green infrastructure, wherein there are a variety of policies, objectives, and actions that promote biodiversity. It is not the intention of the Plan to "sell" quarries, but it is acknowledged that they play a vital role and are necessary to provide materials for the building of housing, roads, and other infrastructure.</p> <p>In relation to objective (RD O40) it should be noted that following extraction the landscape is altered and cannot be put back as it was. However, Objective RD O39 ensures the sensitive re-instatement and / or re-use of quarries. Future uses should include amenity, recreation and biodiversity areas. While a minimum of 80% of the site is to be given back to nature for environmental benefit.</p> <p>With reference to the 20% as raised in the submission it should be noted that a minimum of 80% of the area is required to be provided for environmental benefit, biodiversity and re-wilding.</p> <p>Chief Executive's Recommendation</p> <p>No change to the Draft Plan.</p>
406	Annette Delaney	<p>The area around Kilcullen has become a focus of the extractive industry. There are sufficient quarries to supply the needs of the county and region and no further permission should be granted. Re-using building waste should eliminate the need for more quarries.</p> <p>Greenfield sites should be given added protection from quarrying.</p>	<p>Chief Executive's Response</p> <p>The comments of the submission are noted. Section 15.9.6. of the Draft Plan states that the Council favours the use of existing licensed quarries over proposals for extraction from greenfield sites. The assessment of applications relating to the extractive industry will be carried out in accordance with the Ministerial Guidelines on Quarries and Ancillary Activities Guidelines 2004, which provides for a national approach to the extractive industry. These Guidelines provide for a myriad of best practice</p>

		<p>The submission states that they would like to see the continuous and regular monitoring of the operation of quarries. The submission requests that the following should be checked regularly; amount of material extracted, where it is used, noting it should not be exported, the haul routes that are being used, that subcontracted vehicles are not used, condition of road network, air quality, noise pollution and water quality.</p> <p>A levy should be paid to the Council like the Aggregate Levy in the UK.</p> <p>The submission requests that the extractive industry should be more transparent in their operation, carry out regular monitoring and provide funding to the Council to carry out independent monitoring.</p>	<p>measures to ensure that the environmental issues associated with quarrying can be mitigated and controlled through the planning system. Regard will also be had to the EPA's publication - Environmental Management in the Extractive Industry (2006).</p> <p>The Guidelines require the monitoring of quarrying activities, (blast, noise, surface water, groundwater, traffic) and the monitoring data is available through the local planning authority offices. As per the Guidelines the environmental monitoring can be carried out either by the developer, by agreed independent specialists, or by the planning authority at the developer's expense.</p> <p>In respect of the deterioration of the road network as a result of heavy goods vehicles associated with the extractive activity, the Guidelines provide for the application of a Special Contribution in respect of additional expenditure by the planning authority on the surrounding road network, including additional maintenance costs. A contribution may be required towards the cost of local authority inspections and monitoring.</p> <p>The application of the Aggregate Levy is outside the remit of land use plans and is a decision required by Government.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
472	Keep Ireland Open	<p>The submission recommends the following new objectives in Section 9.8:</p> <ul style="list-style-type: none"> • Applications for new development for aggregate extraction, processing and 	<p>Chief Executive's Response</p> <p>Objective RD O32 seeks to ensure that development for aggregate extraction, processing and associated concrete production does not significantly impact the following:</p>

		<p>associated processes, shall identify existing public rights of way and walking routes which may be impacted on or are adjacent to the development site. They shall be kept free from development as Rights of Way/Walking</p> <ul style="list-style-type: none"> • In assessing applications for new quarries or extension to existing quarries the council will have regard to visual impact on sensitive landscapes. • Assess the impact of proposals for quarry development on nearby eskers with reference to their status or relative importance for amenity and landscape value in the context of the overall esker system. • Include screening proposals. • Applicants must recognise that the aggregates (stone and gravel deposits) and the concrete products industry have a particularly sensitive role. • Only grant planning permission for new buildings or the expansion of existing industrial business enterprises in the countryside where development would not cause a detrimental impact and is compatible with neighbouring land use. Any new buildings will be required to respect the appearance of and character of the landscape. Development will not be acceptable where it is unduly prominent in the landscape, where it results in the build-up of development when viewed with existing and/or approved building or where the impact of ancillary works, including the creation of visibility splays would damage rural character or impact negatively on the environment or which fails to protect Natura Sites, conservation areas, natural 	<ul style="list-style-type: none"> - Special Areas of Conservation (SACs) - Special Protection Areas (SPAs) - Natural Heritage Areas (NHAs) - Other areas of importance for the conservation of flora and fauna. - Zones of Archaeological Potential. - The vicinity of a recorded monument. - Sensitive landscape areas as identified in Chapter 13 of this Plan. - Scenic views and prospects. - Protected Structures. - Established rights of way and walking routes. <p>Section 9.3 Rural Economy and Enterprises address the locating of business in the countryside. The policies and objectives in this section consider scale, type of industry, sensitive reuse, siting of new buildings etc</p> <p>Objective RD O2 addresses the types of rural industry to be located in the countryside.</p> <p>Chief Executive's Recommendation No change to the draft plan.</p>
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		<p>heritage or fails to protect or is injurious to amenities(including visual amenities). Buildings should be kept simple and finished with material appropriate to rural settings and should reflect the size, scale, nature and pattern of development in the area. Buildings of excessive height will not be permitted and should be sited to make use of existing hedgerows and topography to provide natural screening,</p> <p>OR</p> <ul style="list-style-type: none"> • Only grant planning permission for a building in the countryside where the development would not cause a detrimental impact or erode rural character. New buildings will not be acceptable where they are unduly prominent in the landscape, where they result in the build-up of development when viewed with existing and/or approved buildings or where the impact of ancillary works, including the creation of visibility splays would damage rural character. 	
GENERAL			
472	Keep Ireland Open	The submission supports the following policies, objectives, and actions: Forestry, Objectives RD O20, RD O24 to RD O26; Bogs and Peatlands, Policy RD P7 and Objectives RD O27 and RD O31, Mineral Resources & Extractive Industry, Objectives RD O32. RD O34, RD O36, RD O40	<p>Chief Executive’s Response Noted and welcomed.</p> <p>Chief Executive’s Recommendation No change to draft Plan.</p>

CHAPTER 10 – COMMUNITY INFRASTRUCTURE & CREATIVE PLACES			
Sub No.	Name	Summary of Issues Raised	Chief Executive’s Responses & Recommendations
BACKGROUND			
413	Kildare Public Participation Network	<p><u>Background</u> Submission suggests inserting the following text in the introduction: The provision of adequate and suitably located community, leisure and cultural facilities are critical infrastructure to support our towns and villages. These services significantly enhance the quality of life of the citizens of Kildare and enhances the attractiveness of Kildare as a place to visit. While Kildare has a wide range of community services and facilities, the county’s young and growing population is placing considerable pressure on these services in many areas. The Kildare Age Friendly Strategy 2019-2021 reports that the ageing of the population from this point onwards will represent one of the most significant demographic and societal developments and challenges that Ireland has encountered. It is anticipated that by 2031, 16% of the population of County Kildare will be over the age of 65 years, with this rate increasing to 21% by 2040. Therefore, the aging population of Kildare presents an additional pressure on these services in many areas.</p>	<p>Chief Executive’s Response The request to include the additional text is not accepted as it is considered that the contextual issues raised in the proposed text are sufficiently covered in Sections 10.8.1 and 10.8.3 of the draft Plan.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>

LOCAL CONTEXT			
576	County Kildare Leader Partnership (CKLP)	<p>CKLP welcomes the references to the SICAP Programme and to the Kildare Integration Strategy in Chapter 10 of the Draft Plan.</p> <p>Amend Section 10.3 as follows;</p> <ul style="list-style-type: none"> - 'The Social Inclusion Community Activation Programme (SICAP) 2018-20222023' - 'Kildare Integration Strategy 2014-20192021-2026' 	<p>Chief Executive's Response</p> <p>Agreed.</p>
			<p>Chief Executive's Recommendation</p> <p>Amend Section 10.3 as follows:</p> <ul style="list-style-type: none"> - 'The Social Inclusion Community Activation Programme (SICAP) 2018-20222023' - 'Kildare Integration Strategy 2014-20192021-2026'
435	Kildare Children & Young Peoples Services Committee	<p>Specific reference should also be made to Kildare CYPSC's 3-Year Plan: Kildare Children & Young Peoples Plan (CYPP) 2019-2021 (and any subsequent versions) under Section 10.3 Local Context.</p>	<p>Chief Executive's Response</p> <p>Reference is made to the 'Kildare Children and Young People's Plan (CYPP) 2019-2021' in section 10.8.1. It is noted that the Council will work closely with CYPSC to implement actions and address key priorities outlined in the CYPP 2019-2021.</p>
			<p>Chief Executive's Recommendation</p> <p>Amend section 10.3 as follows:</p> <ul style="list-style-type: none"> - Kildare Children and Young People's Plan (CYPP) 2019-2021 (or any subsequent replacement) <p>Amend last paragraph of section 10.8.1 as follows: Kildare Children and Young People's Plan 2019-2021 (or any subsequent replacement) that respond to children and young peoples needs in the County.</p>
KILDARE LCDC & KILDARE LECP 2016-2021			
413.	Kildare Public Participation Network	<p><u>Kildare LCDC and Kildare LECP 2016-2021</u></p> <p>Requests that as Kildare PPN and the Kildare Volunteer Centre are two separate independent</p>	<p>Chief Executive's Response</p> <p>The requests in relation to objective SC O4 are accepted.</p>

		structures the wording of objective SC O4 be amended as follows: SC O4: Support, promote and encourage community engagement in local decision making through the Kildare Public Participation Network Structure and promote volunteerism by supporting the work of the Kildare Volunteer Centre.	Chief Executive's Recommendation Replace SC O4 with the following objective: Support and encourage community engagement in local decision making through the Kildare Public Participation Network structure and promote volunteerism by supporting the work of the Kildare Volunteer Centre.
435	Kildare Children & Young Peoples Services Committee	The submission primarily refers to chapter 10, however, it is stated that the comments are pertinent to all sections of the plan. Kildare CYPSC are supportive of the stated aim in chapter 10 and welcomes the acknowledgement of Kildare CYPSC as a key partner in realising the goals of the plan in the context of children, young people. Acknowledging the specific needs of our young population in the plan is positive. It is requested that specific reference is made to the National Policy Framework for Children & Young People: Better Outcomes, Brighter Futures 2014-2020 (and any subsequent updated strategy) under Section 10.2 National & Regional Policy Context to highlight the commitment to responding to needs of children & young people in Kildare.	Chief Executive's Response The documents referred to in section 10.2 are planning policy documents and guidance. Therefore, it is not appropriate to include the above mentioned document in this section. Furthermore, the document is referenced in the Kildare Local Economic and Community Plan (LECP) and it is an objective (SC O1) in section 10.5 to promote the sustainable development of community services and infrastructure in the county in accordance with the objectives and actions set out in the Kildare LECP 2016-2021 (or any subsequent replacement). Chief Executive's Recommendation No change to the Draft Plan.
SOCIAL INCLUSION, SPATIAL JUSTICE AND COMMUNITY DEVELOPMENT			
435	Kildare Children & Young Peoples Services Committee	The Plan would benefit from a clear statement of commitment in relation to the voice of children and young people in decision making and acknowledge that the Lundy Model of Participation underpins the plan. This is a commitment to engaging with young people on an ongoing basis. The inclusion of a specific reference to Comhairle na Nóg as the key	Chief Executive's Response The Draft Plan includes an objective (SC O19) under section 10.7 which is to "work with all target groups, including young people, older people, people with disabilities, migrants, ethnic minorities, including the Traveller Community, to advance and encourage their full participation in society"

		representative structure for young people in the county and as a named partner would further highlight the commitment to youth participation and build on the positive work already undertaken by the Council in relation to youth engagement (i.e., outdoor teen space in Celbridge).	<p>Chief Executive's Recommendation Amend SC O19 as follows: Work with all target groups, including young people (Comhairle na nÓg), older people, people with disabilities, migrants, ethnic minorities, including the Traveller Community, to advance and encourage their full participation in society.</p>
GROUPS WITH SPECIFIC DESIGN/PLANNING NEEDS			
538	Senator Mark Wall	The submission requests Kildare County Council to provide a youth space in every village and town.	<p>Chief Executive's Response The draft plan includes Action SC A5 to carry out an audit of leisure facilities across the County including Kildare County Council facilities to provide standards on the basic level of social infrastructure provision based on population thresholds and reasonable travel times to services and to put in place provisions for additional facilities where deficiencies are identified.</p> <p>In addition to the above, there is an action (SC A2) in the Draft Plan, to prepare Social Infrastructure Audits as part of the suite of mandatory Local Area Plans to identify gaps/deficiencies in community facilities and services including the mapping of existing community, educational, sporting, childcare, and healthcare facilities and to zone sufficient lands to accommodate identified requirements. Having regard to the above, it is not considered that any further changes to the Plan are necessary.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
276.	County Kildare	Submission requests that reference to Policy SC P5 be amended to include the Irish Wheelchair Association Best Practice Guidelines.	<p>Chief Executive's Response Request is accepted.</p>

	<p>Access Network</p>		<p>Chief Executive’s Recommendation Amend SC P5 as follows: Ensure all buildings, public and open spaces and recreational and amenity areas are accessible for people with disabilities, having regard to the Building Regulations, the objectives of ‘Building for Everyone’ (National Disability Authority), and ‘Access for the Disabled’ (nos. 1 to 3) (National Rehabilitation Board), and the Irish Wheelchair Association Best Practice Guidelines: Designing Accessible Environments.</p>
<p>413.</p>	<p>Kildare Public Participation Network</p>	<p><u>Children and Young People</u> Requests additional text be included in action SC A5, as follows: SC A5: Carry out an audit of leisure facilities across the County including Kildare County Council facilities to provide standards on the basic level of social infrastructure provision based on population thresholds and reasonable travel times to services and put in place provisions for additional facilities where deficiencies are identified. To be fully completed by the end of this plan.</p> <p>Submission proposes additional actions, as follows: New action: To compile an up-to-date, publicly accessible Property Interest Register during the course of this Development plan to inform and facilitate community-led initiatives for children and young people on suitable state-owned sites.</p> <p>New action: Actively target and engage with owners of Vacant Sites to incentivise the provision of centrally located youth cafes.</p> <p>Requests additional text be included in action SC A10, as follows:</p>	<p>Chief Executive’s Response The request for additional text in action SC A5 is accepted.</p> <p>The request relating to the development of publicly accessible Property Interest Register is not accepted. Such a proposal is outside the remit of a Development Plan, which is primarily a land use plan and the publication of any data-gathered could have the potential to raise substantial privacy / data protection (GDPR) issues.</p> <p>The request to include a new action to actively target and engage with owners of Vacant Sites to incentivise the provision of youth cafes is not accepted. Such an action is considered to be overly specific. It is also considered that sufficient support for such community facilities is already provided by Action UD A5 and Objective SC O12.</p> <p>The additional text requested in relation to SC A10 is accepted.</p> <p>Chief Executive’s Recommendation Amend SC A5 as follows: Carry out an audit of leisure facilities across the County, within the lifetime of the Plan, including in Kildare County Council owned/operated facilities to provide standards on the basic level of social infrastructure provision based on population thresholds and reasonable travel times to services</p>

		<p>SC A10: Develop and maintain a directory of universally accessible recreational areas, sports and play facilities, community facilities and tourist attractions, throughout the county insert and develop additional facilities, where there is an identified need, in conjunction with the KCC Access Officer. Publish said accessibility directory online, through the medium of an interactive map, ensuring it's accessible for all users.</p>	<p>and put in place provisions for additional facilities where deficiencies are identified.</p> <p>Amend SC A10 as follows: Develop and maintain a directory of universally accessible recreational areas, sports and play facilities, community facilities and tourist attractions, throughout the county and develop additional facilities, where there is an identified need, in conjunction with the Kildare County Council Access Officer and to publish the accessibility directory online, through the medium of an interactive map, subject to resourcing and data protection (GDPR) requirements.</p>
405	Kildare Climate Action Linkage Group	<p>Suggests the amendment of SC A5 as follows: Carry out an audit of leisure facilities across the County including Kildare County Council facilities to provide standards on the basic level of social infrastructure provision based on population thresholds and reasonable travel times to services and put in place provisions for additional facilities where deficiencies are identified. This audit will be completed by the end of 2024.</p> <p>Suggests the following additional actions: To compile an up-to-date, publicly accessible Property Interest Register during the course of this Development plan to inform and facilitate community-led initiatives for children and young people on suitable state-owned sites.</p> <p>Additional action - Actively target and engage with owners of Vacant Sites to incentivise the provision of centrally located youth cafes.</p> <p>Additional action - To compile an up-to-date, publicly accessible Property Interest</p>	<p>Chief Executive's Response See response to submission 413</p> <p>Chief Executive's Recommendation See recommendation to submission 413</p>

		<p>Register, in partnership with the Land Development Agency (LDA) during the course of this Development plan to inform and facilitate identification of state-owned sites to provide for elderly care and support facilities.</p> <p>Additional action - Actively target and engage with owners of Vacant sites as part of the review of Local Area Plans to identify and incentivise elderly care and support facilities.</p>	
468	Ann Behan	<p>Action SC A5 is welcomed, however, it is submitted that actions need to be time-bound to reflect SMART goals. It is requested that SC A5 is amended to include “This audit will be completed by the end of 2024”.</p> <p>Add an action to “interrogate the Property Interest Register and Land Development Agency (LDA) maps, and to work in partnership with the LDA to identify state owned sites to facilitate community-led initiatives for children and young people in their localities”.</p> <p>Add an action “To compile an up-to-date, publicly accessible Property Interest Register during the course of this Development plan to inform and facilitate community-led initiatives for children and young people on suitable state-owned sites”</p> <p>Add an action “Actively target and engage with owners of Vacant and Derelict sites to incentivise the provision of centrally located youth cafes”.</p> <p>Objectives SC O33 to SC O39 are commended.</p>	<p>Chief Executive’s Response See response to submission 405</p> <p>Chief Executive’s Recommendation See recommendation to submission 405</p>

		<p>Add an action to “interrogate the Property Interest Register and Land Development Agency (LDA) maps, and to work in partnership with the LDA to identify state owned sites in urban centres to provide elderly care and support facilities within walking distance of shops and services and public transport along the lines of McAuley Place, Naas”</p> <p>Add an action “To compile an up-to-date, publicly accessible Property Interest Register, in partnership with the Land Development Agency (LDA) during the course of this Development plan to inform and facilitate identification of state-owned sites to provide for elderly care and support facilities”</p> <p>Add an action “Actively target and engage with owners of Vacant sites as part of the review of Local Area Plans to identify and incentivise elderly care and support facilities.”</p>	
435	Kildare Children & Young Peoples Services Committee	<p>There are significant deficits in relation to physical premises for young people and the community. This is limiting services abilities to respond to the needs of communities. There are many examples of this such as voluntary / community groups which are paying substantial funds to private landlords, services operating from old prefabs, youth group meeting upstairs over a pub, sports clubs with no access to toilets / changing facilities, and counselling services reduced due to inadequate space to meet young clients. Linked to this is the importance of securing community gain from private developments via contributions or other appropriate means to address deficits.</p>	<p>Chief Executive’s Response</p> <p>The Draft Plan includes a range of objectives to increase the provision of community facilities that are flexible to cater for a variety of users including young people. These are outlined throughout various sections of Chapter 10 and include SC O11 to facilitate the provision of childrens play and teen space facilities, SC O25 to integrate where possible and practical, the design of youth space facilities as part of all newly planned and proposed extensions to community facilities, SC O27 to make available / lease, vacant or unused council owned buildings / land to community groups, youth groups and clubs, and SC O83 which requires childcare facilities to incorporate a flexible design approach whereby their use could be adapted for evening uses such as a youth facility.</p>

		<p>There is a need for greater co-ordination and investment in data gathering and analysis to facilitate inter-agency planning across the range of statutory and community / voluntary organisations in Kildare. There is an opportunity to build on the work commissioned by the Council for the development of the LECP via AIRO. A countywide approach to data and evidence gathering / analysis under the guidance of the Council would provide significant benefits for our residents.</p> <p>The proposed objectives and actions to support the development of childcare and community infrastructure are welcomed. Key to delivery is a robust, transparent system with effective procedures to ensure compliance / enforcement.</p>	<p>Regarding community gain via contributions, it should be noted the development contribution scheme is due for review. Levies for community facilities will be addressed as part of this process.</p> <p>There are a variety of objectives in the Draft Plan to ensure that up to date, relevant data is available to identify deficiencies in community infrastructure. These include SC O3 which is to utilise the Kildare LECP Baseline Report (2015), and any subsequent update of this evidence base, SC O15 which requires residential schemes of 20 units or more to submit a social infrastructure audit to determine capacity and deficits in such infrastructure, SC O16 to ensure that the data provided is verified by service providers, while it is an action (SC A2) to prepare social infrastructure audits as part of the suite of mandatory local area plans to identify gaps/deficiencies in community facilities, which includes the mapping of existing facilities.</p> <p>In relation to the delivery of childcare and community infrastructure, where conditioned as part of a permitted development, the Council's building control unit monitors compliance while the enforcement team investigates issues with non-compliance when identified.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
EDUCATION			
565	Department of Education & Skills	<u>Potential Educational requirements arising from the Draft plan</u>	<p>Chief Executive's Response The school requirements for the additional projected population growth for the CDP plan period are noted and</p>

	<p>The Department notes the growth scenario contained in the Plan, the NPF Implementation Roadmap population projections and Kildare’s settlements located within the MASP. In estimating future school requirements, the Department has regard to this longer-term growth framework, as population and housing targets are the key driver in considering likely school place requirements.</p> <p>The Department uses a number of parameters to determine future needs, acknowledging potential for differing scenarios (household sizes, demographic profiles, housing delivery rates). The existing network of schools in Co Kildare comprises 101 primary schools, 30 post-primary schools (two of which are fee paying and one of these schools is boarding only) and 4 special schools. Requirements at primary level are currently assessed on 11.5% of population and 25 students per classroom. Post-primary requirements are assessed at 7.5% of population numbers.</p> <p>The following recommendations are made for the settlements regarding potential increase in school place requirements arising from the growth projections of the Plan for the plan period and taking into account inter alia planned school capacity, underlying demographic trends and the national planning framework.</p> <p>Naas - The potential increase could necessitate the provision of another primary school. This requirement has been identified by the Department since 2018 and the Department is actively seeking a</p>	<p>acknowledged as being prepared having regard to Table 2.8 of the CDP. This is considered a reasonable and rational approach. The following comments relate to the specific settlements addressed in the submission:</p> <ul style="list-style-type: none"> • In the recently adopted Naas Local Area Plan 2021-2027, sites have been zoned ‘Community & Education’, to accommodate an additional primary and a post-primary school. • The additional school requirements for Maynooth and Kildare Town will be brought forward during the preparation of the upcoming Local Area Plans for these settlements, where Social Infrastructure Audits will be carried out and sites zoned ‘Community & Education’ accordingly. • The need to secure a site for Educate Together National School in Leixlip is noted. The CDP includes objectives supporting the Department of Education and Skills in identifying sites for schools (SC O65) and the expansion of existing schools (SC O72) which are relevant in this regard. • For the towns of Newbridge, Athy, Celbridge, Kilcock, Monasterevin, Clane, Sallins and Kilcullen, existing schools are zoned ‘Community & Education’ within their respective Local Area Plans. This zoning objective allows existing facilities to be expanded where feasible. As these Local Area Plans are reviewed during the CDP period, and Social Infrastructure Audits are carried out to inform each individual LAP, the Planning Department will liaise with the DES to ensure school provision is satisfactorily addressed. • Volume 2 of the CDP includes zoning maps for Kill, Prosperous, Rathangan, Castledermot and Derrinturn, in which existing schools are zoned accordingly. Primary schools within the Villages are also identified in Volume 2.
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	<p>site for this school at present. At post-primary level, the Department suggests it would be prudent to zone a suitably located site for a future post-primary school, in addition to the recently completed Naas Community College, and as communicated to the Council during the Naas Local Area Plan process.</p> <p>Maynooth - An additional primary school may be required and a suitable site should be zoned accordingly. At post-primary level it is anticipated that the existing facilities will meet the increase in school place requirements.</p> <p>Leixlip - At primary level, the potential increase can be met by existing facilities. There is a requirement to identify a permanent location for Leixlip ETNS and that process is ongoing. At post-primary level it is anticipated that the existing facilities will meet the increase in school place requirements.</p> <p>Newbridge - At primary level and post-primary level, the level of potential increase can be met by existing facilities.</p> <p>Kildare Town - At primary level, the potential increase could be met by a minor expansion of existing facilities (if required). A decision has been taken to replace and expand the Curragh post-primary school with a new 1,000 pupil school to cater for demand in the Kildare and Newbridge school planning areas. This school is to be located in Kildare Town. At post-primary level, taking account of the relocation and expansion of the Curragh Post-Primary School, it is anticipated that</p>	<p>Potential future expansion of these schools if/when required is provided for by objective SC O72.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
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	<p>the level of potential increase in school place requirements will be met by the two schools.</p> <p>Athy - At primary level and post-primary level, the potential increase can be met by existing facilities.</p> <p>Celbridge - At primary level and post-primary level, the potential increase can be met by existing facilities, or a minor expansion thereof if required.</p> <p>Kilcock - The Co. Meath Development Plan 2020-2026 contains a primary school site within the Kilcock Environs. The Department requested this in order to meet a potential school requirement to serve newly establishing neighbourhoods in Kilcock. At primary level and post-primary level, the potential increase can be met by existing facilities, or a minor expansion thereof if required. A new school is to be provided in the adjoining settlement of Enfield for the recently established Enfield Community College. This will alleviate school place pressure in Kilcock.</p> <p>Monasterevin - At primary level and post-primary level, the potential increase can be met by existing/new facilities. Two new school building projects are currently underway: a new building for the post-primary school and a new building to accommodate an amalgamation of two of the primary schools.</p> <p>Clane - At primary level and post-primary level, the potential increase can be met by existing facilities. It should be noted that plans are underway to expand the post-primary school in the nearby settlement of</p>	
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	<p>Prosperous which will alleviate school place pressure in Clane.</p> <p>Sallins - At primary level, the potential increase can be met by existing facilities. There is no post-primary provision currently.</p> <p>Kilcullen - At primary level, the potential increase could be met by the existing facility (or a small expansion thereof, if required) and at post-primary level, the existing school will meet the potential increase.</p> <p>Kill - At primary level, the potential increase can be met by existing facilities. There is no post-primary provision currently.</p> <p>Prosperous - At primary level, the potential increase could be met by the existing facility (or a small expansion thereof, if required). At post-primary level, there are plans to significantly expand the school, which will meet the potential increase in school place requirements in Prosperous and the wider catchment served by the school.</p> <p>Rathangan - At primary level, the potential increase can be met by the existing facilities. At post-primary level, the Department anticipates a potential increase in school place requirements which should be capable of being met by the existing facility (or a minor expansion thereof if required).</p> <p>Castledermot - At primary level and post-primary level, the potential increase can be met by existing facilities.</p>	
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		<p>Derrinturn - At primary level, the potential increase can be met by the existing facility. At post-primary level, the requirements of Derrinturn were taken into account by the Department in their consideration of the Offaly County Development Plan. It is anticipated that the schools in Edenderry will meet a potential increase in school place requirements arising from the increased population of Derrinturn in the draft plan.</p> <p>Villages - At primary level, the increased school place requirement in the villages is capable of being met by the existing school network in the villages. At post-primary level, the requirements of the villages were considered in the context of assessing post-primary school place requirements in the nearby towns.</p>	
565	Department of Education & Skills (DES)	<p>The Department welcomes a number of objectives pertaining to community infrastructure: SC O6, SC O10, SC O65, SC O70, SC O72.</p> <p>The Department does not support Objective SC O75 and requests that it be removed. This objective seeks to put secondary schools in appropriate small towns/villages, however, a post-primary school has to deliver at a certain scale in order to provide subject choice. This would not be practical to provide in every small town or village.</p> <p>The Department's strong preference is to more intensively develop the existing school network where possible to meet the increased school place requirements. In this regard, the protection of the</p>	<p>Chief Executive's Response The Departments' support for the stated objectives is noted. Whilst it was not the intention of objective SC O75 to deliver post-primary schools in every small town/village, the concern from the Department is noted. It is considered appropriate to delete this objective, as objective SC O65 already supports the Department of Education's School Building programme by actively identifying sites for primary and post-primary schools at suitable locations, based on forecast need, which could include small towns or villages as the need arises. Furthermore, objective SC O72 is to continue to facilitate the re-development and expansion of existing schools.</p> <p>Chief Executive's Recommendation Delete objective SC O75 of the Plan.</p>

		existing schools and any land buffers around them to enable their expansion is critical.	
565	Department of Education & Skills	This submission has focused on demographic requirements and for this reason did not identify any specific requirements for a special school(s). However, if a specific need arises the Department will contact the Council in this regard.	<p>Chief Executive's Response</p> <p>The Plan acknowledges that there are currently four special schools (with 270 students enrolled for the 2020/21 academic year) located in Celbridge, Newbridge, Kill and The Curragh. It is considered that the overarching objectives supporting the Department of Education and Skills in identifying sites for schools (SC O65) adequately provides for this situation should the need for an additional special school arise.</p> <p>Chief Executive's Recommendation</p> <p>No change to the Draft Plan.</p>
282	Department of Further and Higher Education, Research, Innovation and Science	The Department of Further and Higher Education, Research, Innovation and Science is a key stakeholder in the provision of new education and training in the community in the correct locations to promote lifelong learning and social mobility. In this regard the submission welcomes Objective SC P12 in Chapter 10 'Community Infrastructure and Creative Places', where co-operation will be required between the Department of Further and Higher Education, Research, Innovation and Science (DFHERIS) and the Local Authority in relation to the provision of suitable tertiary education facilities in County Kildare.	<p>Chief Executive's Response</p> <p>Noted.</p> <p>Chief Executive's Recommendation</p> <p>No change to the Draft Plan.</p>
533	Cill Dara Le Gaeilge	<p><u>Oideachas</u></p> <p><i>Leanuint le dul i ngleic leis An Roinn Oideachais agus Scileanna chun tacú leis an bhfás in oideachas trí Ghaeilge agus freastal ar an éileamh ar oideachas trí Ghaeilge laistigh den chontae. Ba</i></p>	<p>Freagairt an Phríomhfheidhmeannaigh:</p> <p><i>Is é an Roinn Oideachais atá freagrach as áiseanna agus seirbhísí oideachais a sholáthar. Mar sin féin, tá polasaí (SC P12) chun leanúint le oibriú leis an Roinn Oideachais agus údarás oideachais eile chun soláthar áiseanna bhun-oideachais, meán-oideachais agus breisoideachais a chur</i></p>

		<p><i>cheart don Chomhairle tuairimí an phobail a chur san áireamh maidir le h-oideachas trí Ghaeilge agus bunú scoileanna nua.</i></p> <p>Education To continue to engage with the Department of Education and Skills to support the growth in Irish medium education and meet demand within the county. The Council should take the views of the community into account regarding Irish-medium education and the establishment of new schools.</p>	<p><i>chun cinn agus tacú leo, chun riachtanais éagsúla pobal a léiriú.</i></p> <p>Chief Executive's Response Responsibility for delivery of education facilities and services lies with the Department of Education. However, there is a policy in the Draft Plan (SC P12) to continue to work with the Department of Education and other education authorities to promote and support the provision of primary, post-primary, and further education facilities in the County to reflect the diverse needs of communities.</p> <p>Moladh an Phríomhfheidhmeannaigh: <i>Gan athrú a dhéanamh ar an Dréacht-Phlean.</i></p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
171	Mark Bruns	<p>The submission suggests that the number of catholic schools should be reduced and the number of non-religious schools should be increased. The Council should set a goal for any new school to be non-religious and increase the number of non-religious schools to reflect the demographics of the population in Kildare.</p>	<p>Chief Executive's Response See responses to submission no. 533.</p> <p>Chief Executive's Recommendation See recommendation to submission no. 533.</p>
544	Sult na Sollán	<p>Oideachas <i>Téacs molta: "Leanuint le dul i ngleic leis An Roinn Oideachais agus Scileanna chun tacú leis an bhfás in oideachas trí Ghaeilge, agus oibriú leis an Roinn agus an bpobal, ag féachaint le freastal ar an éileamh ar oideachas trí Ghaeilge laistigh den chontae.</i></p>	<p>Freagairt an Phríomhfheidhmeannaigh: <i>Is é an Roinn Oideachais atá freagrach as áiseanna agus seirbhísí oideachais a sholáthar. Mar sin féin, tá polasaí (SC P12) chun leanúint le oibriú leis an Roinn Oideachais agus údarais oideachais eile chun soláthar áiseanna bhun-oideachais, meán-oideachais agus breisoideachais a chur chun cinn agus tacú leo, chun riachtanais éagsúla pobal a léiriú.</i></p> <p>Chief Executive's Response</p>

		<p><i>Ba cheart don Chomhairle tuairimí an phobail a chur san áireamh maidir le h-oideachas trí Ghaeilge, go h-áirithe bunú scoileanna nua.</i></p> <p>Education Proposed text “to continue to engage with the Department of Education and Skills to support the growth in Irish medium education and to work with the Department and the community, looking to meet demand for Irish language medium education within the county.</p> <p>The Council should take the views of the community into account regarding Irish medium education, in particular the establishment of new schools.</p>	<p>Responsibility for delivery of education facilities and services lies with the Department of Education. However, there is a policy (SC P12) to continue to work with the Department of Education and other education authorities to promote and support the provision of primary, post-primary, and further education facilities in the County to reflect the diverse needs of communities.</p> <p>Moladh an Phríomhfheidhmeannaigh: <i>Gan athrú a dhéanamh ar an Dréacht-Phlean.</i></p> <p>Chief Executive’s Recommendation No change to the Draft Plan</p>
526	Conradh na Gaeilge	<p>Oideachas <i>Tá fás i naíonraí, Gaelscoileanna agus Gaelcholáistí timpeall na tíre. Tá sé mar pholasaí anois ag an Roinn Oideachais Gaelscoileanna agus Gaelcholáistí a bhunú i limistéir nach raibh siad iontu cheana. Ba cheart don Phlean Forbartha seo a chur san áireamh agus foirgnimh a aimsiú do scoileanna Gaeilge nua (bunscoileanna agus meánscoileanna) a bheidh á bhunú sa todhchaí.</i></p> <p>Education Irish pre-schools, primary and secondary schools are growing around the country. It is now the policy of the Department of Education to establish primary and secondary schools in places where they have not been before. The Plan should take this into account and find buildings for new Irish (primary and secondary) schools which will be established in the future.</p>	<p>Freagairt an Phríomhfheidhmeannaigh: Oideachas <i>Is é an Roinn Oideachais atá freagrach as áiseanna agus seirbhísí oideachais a sholáthar. Mar sin féin, tá polasaí (SC P12) chun leanúint le oibriú leis an Roinn Oideachais agus údaráis oideachais eile chun soláthar áiseanna bhun-oideachais, meán-oideachais agus breisoideachais a chur chun cinn agus tacú leo, chun riachtanais éagsúla pobal a léiriú.</i></p> <p>Chief Executive’s Response Education Responsibility for delivery of education facilities and services lies with the Department of Education. However, there is a policy (SC P12) to continue to work with the Department of Education and other education authorities to promote and support the provision of primary, post-primary, and further education facilities in the County to reflect the diverse needs of communities.</p>

			<p><i>Moladh an Phríomhfheidhmeannaigh:</i> <i>Gan athrú a dhéanamh ar an Dréacht-Phlean.</i></p> <p>Chief Executive's Recommendation: No change to the Draft Plan.</p>
191	Fergal Reidy	<p>Celbridge: There are too many prefab schools in the county. Celbridge is waiting for 3 new schools. Given the number of houses planned for the town, access to services and facilities such as schools and doctors is likely to become worse. The town is again compared with Trim, which has a fire station, a public pool, and an amenity site for rubbish.</p>	<p>Chief Executive's Response See responses to submission no. 533.</p> <p>Chief Executive's Recommendation See recommendation to submission no. 533.</p>
CHILDCARE FACILITIES			
101	Kildare County Childcare Committee	<p><u>Childcare provision in Kildare</u> The submission welcomes several elements of the Plan including the requirement of building childcare facilities as part of the first phase of housing developments, and provision for outdoor based childcare facilities. It is suggested that outdoor facilities could be additional to indoor services.</p> <p>However, it is requested that the Plan ensure reasonable efforts are made to fit out and rent or sell premises to childcare providers in a timely and affordable fashion.</p> <p>Ideally, the local authority or other public body would manage the building for community use including supporting community childcare provision, which would then allow for changing the use of the premises to other community activities as required over time.</p>	<p>Chief Executive's Response It is outside the scope of the Draft Plan, a land use plan, to prescribe the terms surrounding the fit out, sale, lease, or management of premises. However, the Draft Plan encourages community childcare facilities through social enterprise initiatives (SC O81) and it is proposed that SC O80 is amended to make provision for outdoor facilities in addition to purpose built facilities.</p> <p>With regards to dual usage, it is the intention of Objective SC O79 to ensure that otherwise vacant / unused community premises are made available for childcare purposes rather than making childcare premises available for other uses unless suitable.</p> <p>Furthermore, objective SC O83 ensures flexibility is incorporated into the design of new childcare facilities so that they can be adapted for other community purposes.</p> <p>Chief Executive's Recommendation Amend SC O80 as follows:</p>

		In terms of dual usage of facilities, it is highlighted that this could be difficult in rooms used for childcare during the day and general meeting rooms or similar should be included in buildings for this purpose.	Support the provision of outdoor based childcare services in the county as an alternative, and in addition to providing purpose-built services in appropriate locations with toilet and shelter facilities for mealtimes, rest, etc.”
SOCIAL INFRASTRUCTURE			
529	Consortium of housebuilders	Conventionally, a Social Infrastructure Audit (SIA) is required for larger residential developments, usually with 50 units or more, The DMS requires a SIA to accompany all new residential developments over 20 units	<p>Chief Executive’s Response</p> <p>Social Infrastructure Audits (SIAs) are vital in developing a comprehensive database of available social infrastructure to plan for the sustainable development of communities over the Plan period and beyond. The requirement within the Draft Plan that new residential developments over 20 units rather than 50 units submit a Social Infrastructure Audit shall ensure that deficits in social infrastructure are identified at an early stage. The onus will be on developers to assess the impact of proposed housing schemes on the existing social infrastructure of a given population to be further considered by the Planning Authority at planning application stage. Such information will be a very useful tool to assess where shortfalls currently exist with respect to social infrastructure and more importantly to assess how it is proposed to address such shortfalls (where they arise) as part of any proposed development scheme. Of particular note in this regard is Objective SC O14 (Chapter 10) which ‘require[s] that community facilities are provided in new communities on a phased basis in tandem with the provision of new housing or other large-scale developments. In cases where there is a deficiency of a certain type of infrastructure as part of the development proposal, the frontloading of such infrastructure will be required as part of the first phase of development and must be fully operational prior to the occupation of any residential unit on the subject site. Such deficiencies should be identified in the Social Infrastructure Audit prepared to accompany the planning application’. It is considered</p>

			<p>reasonable and appropriate to further strengthen Objective SC O14 given the current lack of adequate social infrastructure throughout County Kildare, relative to the level of house building that has taken place in the county during the last inter-censal period in particular. This has also been reflected in the significant number of submissions that have been received during the recent public consultation process with respect to the publication of the Draft Kildare County Development Plan.</p> <p>Chief Executive's Recommendation Add the following text to the end of Objective SC O14; <i>'Where the Planning Authority is not satisfied with the information supplied as part of the Social Infrastructure Audit or where inadequate measures are proposed to address any identified shortfalls in social infrastructure as part of a proposed development scheme, a planning application for new housing developments or large-scale developments may not be favourably considered.'</i></p>
410	Celbridge Community Council	<p><u>Community Infrastructure</u> States that objective SC O13 to progress plans for the provision of a regional swimming pool in North Kildare should be qualified to acknowledge that there is a strong case for more than one pool in North Kildare and that the pool needs to be at a location that is easily accessed by public transport from all towns that are intended to be served by the swimming pool (action LR A18).</p> <p>States that objective SC O26 should be more explicit regarding what is meant by "appropriate locations" and what support might be expected for the provision of swimming pools in North Kildare considering objective SC O13.</p>	<p>Chief Executive's Response The request that objective SC O13 be qualified to acknowledge that there is a strong case for more than one pool in North Kildare is not accepted. It is the position of the Council to prioritise the development of a regional swimming pool (singular) within the north of the county over the life of the Development Plan.</p> <p>In relation to the issue of accessibility to public transport for facilities such as swimming pools and multi-purpose sports area hubs, it should be noted that policy SC P1 and objective SC O5 requires that all new social infrastructure such as swimming pools are developed in strategic, sustainable, and accessible locations. This takes into consideration the requirement to implement the 10-minute settlement concept in all settlements (objective UD O3) to ensure that such</p>

	<p>The submission notes examples of why a swimming pool is required in Celbridge and includes an attachment entitled: 'Swimming Pool Access for Residents of the 100 Largest Towns'. Using the Census 2016 results, this document notes that towns in County Kildare like Celbridge (the 21st largest town in Ireland) has no local options for swimming. Notes that the closure of the pool on the St. John of God Campus in Celbridge in 2020 was a major blow to the town.</p> <p>Submits that an objective should be added, to prioritise permeability initiatives to clustered community facilities / multi-purpose hubs and where community and sporting facilities are co-located/adjacent to schools.</p> <p>The submission notes that there is no Family Resource Centre in Celbridge or Maynooth and that objectives should be included to support redress of these deficits.</p> <p>The submission comments that actions SC A11 and SC A17 relating to examining the feasibility of new theatres and museums are vague.</p> <p>Submits that Objective SC O64 to investigate the need for additional or new library services for Celbridge and support the delivery of same where appropriate is welcomed but the submission states such a facility might be co-located with a number of other services where Celbridge has deficits. The request that such a new swimming pool facility be</p>	<p>infrastructure is accessible in terms of walkability/cycling and where present, proximate to public transport nodes.</p> <p>With regard to the issue of permeability initiatives being developed community facilities / multi-purpose hubs and schools, it should be noted that objective TM O17 and TM O18 have been devised to ensure that the layout and design of all new developments is fully permeable for walking and cycling. Furthermore, objective SC O66 ensures that designated sites/new schools are located and designed to promote walking, cycling and the use of public transport and permeability. Individual Local Transport Plans (ABTAs/Transport Strategies) prepared as part of the local area plan-making process will include a suite of measures aimed at enhancing local permeability within individual settlements. Accordingly further objectives on this issue are deemed unnecessary.</p> <p>The request to include an objective which supports the development of Family Resource Centres in Maynooth and Celbridge is not accepted. In this regard, it is noted that the Local Economic and Community Plan (LECP) has already acknowledged and incorporated the requirement to develop 'the Family Resource Centre Programme across Kildare particularly in Kildare Town (Teach Dara) and Celbridge where this need has been identified'. The development of any future family resource centre in Celbridge is also considered to be supported by the provisions of policy SC P2.</p> <p>The comments in relation to actions SC A11 and SC A17 are noted. The purpose of these actions is to provide for strategic and high-level support for the development of such facilities in the north/north-east of the county.</p>
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		developed in a location accessible to public transport is noted.	<p>The request in relation to the co-location of services in addition to new library services supported by objective SC O64 is accepted.</p> <p>Chief Executive's Recommendation Amend SC O64 as follows: To investigate the need for additional or new library services for Celbridge and support the delivery of same where appropriate and to consider the feasibility of co-locating these services with other appropriate community-based services.</p>
520	Newbridge Community Development	Schools should be used as community spaces outside of school hours.	<p>Chief Executive's Response Objective SC O70 in Chapter 10 'Community Infrastructure & Creative Places' allows for the dual use of schools as community and education facilities.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
413.	Kildare Public Participation Network	<p>Requests additional text to be included in objective SC O6, as follows: SC O6: Support and encourage the clustering of community facilities such as community centres, sports and leisure facilities, schools, childcare facilities, resources for the elderly and open spaces to create multi-purpose community hubs.</p> <p>Requests an additional objective as set out below: Support and encourage community involvement in the rehabilitation and restoration of Bord na Mona peatlands and in the planning for the National Peatlands Park, which has the potential to become an important recreational and educational amenity in the County.</p> <p>Requests additional actions as set out below:</p>	<p>Chief Executive's Response The requests in relation to objective SC O6 are accepted, in part.</p> <p>Section 10.6 of the Plan refers to Community Services and Facilities and the objectives included refer specifically to the provision of social infrastructure. It is already an objective of the plan to work with young people to encourage their participation in society (SC O19). This is also addressed in Section 10.8.1 of the Plan.</p> <p>The request to develop a publicly accessible Property Interest Register is not accepted. Such a proposal is outside the remit of the Development Plan, which is primarily a land use plan and publication of any data-gathered could have the potential to raise substantial privacy / data protection (GDPR) issues.</p>

		<p>New action: To compile an up-to-date, publicly accessible Property Interest Register during the course of this Development plan to inform and facilitate community-led social initiatives on suitable state-owned sites.</p> <p>New action: Actively target and engage with owners of Vacant and Derelict sites to incentivise the provision of social infrastructure during the preparation of Local Area Plans.</p> <p>New action: Actively support the establishment of a National Peatlands Park and the implementation of the objectives identified in the West Kildare Just Transition Plan 2022 by bringing all relevant stakeholders together to progress same before the end of 2023.</p>	<p>The request for a new action to target and engage with owners of Vacant and Derelict sites is not accepted as it considered that the issue is sufficiently supported by action UD A5.</p> <p>The Plan contain a number of policies, objectives and actions which support the development of a National Peatland park in the county (Chapter 13 LR O40, Chapter 4 RE O127 and Chapter 7 EC A7). Objective EC O56 is to support the implementation of actions from the 'Local Just Transition Plan'. Action BI A1 is to continue to implement natural heritage actions in inter alia the County Biodiversity Plan and any subsequent plans.</p> <p>Chief Executive's Recommendation Amend SC O6 as follows: Support and encourage the clustering of community facilities such as community centres, sports and leisure facilities, schools, childcare facilities, facilities for older persons, and open spaces to create multi-purpose community hubs.</p>
405	Kildare Climate Action Linkage Group	<p>Submission suggests inserting the following text in the introduction of Section 10.6:</p> <p>While Kildare has a wide range of community services and facilities, the county's young and growing population is placing considerable pressure on these services in many areas. The Kildare Age Friendly Strategy 2019-2021 reports that the ageing of the population from this point onwards will represent one of the most significant demographic and societal developments and challenges that Ireland has encountered. It is anticipated that by 2031, 16% of the population of County Kildare will be over the age of 65 years, with this rate increasing to 21% by 2040 (see Chapter 3). Therefore, the</p>	<p>Chief Executive's Response See response to submission 413</p> <p>Chief Executive's Recommendation See recommendation to submission 413</p>

	<p>aging population of Kildare presents an additional pressure on these services in many areas.</p> <p>Suggests the amendment of SC O6 as follows: Support and encourage the clustering of community facilities such as community centres, sports and leisure facilities, schools, childcare facilities, resources for the elderly, and open spaces to create multi-purpose community hubs.</p> <p>Suggests an additional objective: Support and encourage community involvement in the rehabilitation and restoration of Bord na Mona peatlands and in the planning for the National Peatlands Park, which has the potential to become an important recreational and educational amenity in the County.</p> <p>Suggests the following additional actions: To compile an up-to-date, publicly accessible Property Interest Register during the course of this Development plan to inform and facilitate community-led social initiatives on suitable state-owned sites.</p> <p>Additional action - Actively target and engage with owners of Vacant and Derelict sites to incentivise the provision of social infrastructure during the preparation of Local Area Plans.</p> <p>Additional action - Actively support the establishment of a National Peatlands Park and the implementation of the objectives identified in the West Kildare Just Transition Plan 2022 by bringing</p>	
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		all relevant stakeholders together to progress same before the end of 2023.	
468	Ann Behan	<p>Include additional text after the third sentence of the first paragraph, in section 10. 6 to read as follows “The Kildare Age Friendly Strategy 2019-2021 reports that the ageing population from this point onwards will represent one of the most significant demographic and societal developments and challenges that Ireland has encountered. It is anticipated that by 2031, 16% of the population of County Kildare will be over the age of 65 years, with this rate increasing to 21% by 2040 (see chapter 3). Therefore, the aging population of Kildare presents an additional pressure on these services in many areas.”</p> <p>Amend SC O6 to include “resources for the elderly” after childcare facilities.</p> <p>SC O14, SC O15, and SC O16 are welcomed. However, an additional objective is proposed to “Support and encourage community involvement in the rehabilitation and restoration of Bord na Mona peatlands and in the planning for the National Peatlands Park, which has the potential to become an important recreational and educational amenity in the County”.</p> <p>Add an action to “interrogate the Property Interest Register and Land Development Agency (LDA) maps, to work in partnership with the LDA to identify state owned sites to facilitate community-led social initiatives in their localities”.</p>	<p>Chief Executive’s Response See responses to submissions 405 and 413</p> <p>Chief Executive’s Recommendation See recommendations to submissions 405 and 413</p>

		<p>Add an action “To compile an up-to-date, publicly accessible Property Interest Register during the course of this Development plan to inform and facilitate community-led social initiatives on suitable state-owned sites”</p> <p>Add an action “<i>Actively target and engage with owners of Vacant and Derelict sites to incentivise the provision of social infrastructure during the preparation of Local Area Plans</i>”.</p> <p>Add an action “Actively support the establishment of a National Peatlands Park and the implementation of the objectives identified in the West Kildare Just Transition Plan 2022 by bringing all relevant stakeholders together to progress same before the end of 2023”.</p>	
501	Fiona O’Loughlin	<p>The submission notes the need for a new Primary as well as a Post-Primary School in Newbridge as well as a second playground and the continued development of the Liffey linear park on both sides of the bridge.</p> <p>It is also essential to have the appropriate infrastructural supports as in schools, playgrounds, GPs, transport links and infrastructure throughout the county.</p>	<p>Chief Executive’s Response Existing schools are zoned ‘Community & Education’ within the Newbridge Local Area Plan, where there is provision to expand educational services. However, the provision of educational facilities is outside the scope of Kildare County Council. In this regard, the Planning Department has a Memorandum of Understanding with the Department of Education and Skills and ongoing engagement takes place to pre-empt where educational pressures are expected to arise and to plan accordingly for same. It should also be noted that preliminary work for the Newbridge LAP has now commenced, part of which will involve the undertaking of a Social Infrastructure Audit to identify the existing level of social infrastructure available in the town, relative to its existing and projected population and to identify gaps in such infrastructure. While the Council cannot provide such facilities as GP services for example, it can appropriately zone a sufficient quantum of land to facilitate community services</p>

			<p>such as GPs, childcare facilities and so on. The Plan can also include a number of supporting policies and objectives related to same. It should also be noted that the review of the LECP is due to commence this year which will also form a key part in the identification of gaps in the level of social infrastructure provision in towns throughout Kildare, including Newbridge. A separate public consultation process will be undertaken as part of the review of the LECP.</p> <p>At strategic level, a number of objectives and actions have been included in Chapter 10 of the Draft Plan, which relate specifically to addressing deficiencies in school places, GPs and childcare facilities.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
520	Newbridge Community Development	<p>The following points were raised by membership groups of the Newbridge Forum at a special consultation meeting held in April 2022 and subsequent submissions to the steering group.</p> <p>The County Development Plan should be mindful of young people in the earlier stages of the process and more facilities are needed for these young people, which are a rising demographic in Newbridge.</p> <p>The Plan must be mindful of the changing, specific needs and demands on services that result from the need to welcome new communities and refugees into our towns and villages.</p> <p>There is a huge lack of sufficient sporting facilities and universal access in the county at present.</p>	<p>Chief Executive's Response Newbridge has its own statutory Local Area Plan. All matters relating to insufficient facilities can be considered as part of the review of the Newbridge Local Area Plan and its associated Social Infrastructure Audit, preliminary work for which is already underway. Furthermore, it should be noted that the review of the LECP is also underway which will focus on the identification of the necessary supporting infrastructure for the citizens of County Kildare. An implementation and monitoring framework will form a part of the LECP.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

		<p>A new Local Area Plan and Social Infrastructure Audit is required for Newbridge.</p> <p>There should be a stronger obligation on private developers to provide appropriate community facilities. Specific quantifiable Community Gain should be a requirement in the approval of large developments.</p> <p>Newbridge should be presented as a pilot for childcare provision in conjunction with partners such as the Newbridge Family Resource Centre (NFRC). The NFRC is currently over capacity and more facilities are required.</p> <p>It is noted attached to this submission is a document entitled Newbridge Forum – Terms of Reference May 2021 which describes the groups membership.</p>	
53	Gerard Delaney	<p>The submission refers to Newbridge and raises concerns in relation to the provision of school places, GP places, community and childcare facilities and amenities, specifically in relation to the need for a playground and youth facilities.</p>	<p>Chief Executive’s Response</p> <p>It is acknowledged that the lack of community facilities in Newbridge is a concern. It should be noted that as part of the review of the Newbridge Local Area Plan that a Social infrastructure Assessment (SIA) will be undertaken, which will look at the level of existing service provision in Newbridge relative to the existing and projected population and identify any specific shortfalls that need to be addressed.</p> <p>This submission has also been forwarded to the Local Economic Community Plan (LECP) team so that it can be considered as part of the review of the LECP.</p> <p>Furthermore, a number of objectives and actions have been included in Chapter 10 of the Draft Plan, which relate specifically to addressing deficiencies in school places, GPs and childcare facilities. Proposals relating to playgrounds,</p>

			<p>youth facilities, public swimming pool, bmx / quad track and other amenities within Newbridge are noted, however as outlined above, it is considered more appropriate that such detailed proposals be considered as part of the emerging Newbridge Local Area Plan and associated land use zonings.</p>
			<p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
547	Siobhan Parker	<p>The excessive level of housing developed has not been supported by additional services such as schools, GPs, and youth centres. A youth centre has been invoked in strategies for many years and never materialised. Leaving voluntary groups to shoulder the burden and allowing market forces to fill the gap is cynical and damaging.</p> <p>Reference is made to the Corporate Plan 2010-2024, where it is noted that Kildare is one of the fastest growing and youngest population centres in the country, and the plans’ commitment to meet Kildare’s housing needs while supporting quality of life in new communities. It is submitted that the Council is not managing the current population and providing houses without the appropriate level of physical and social infrastructure will lead to societal problems.</p> <p>Newbridge has not been designated a key town. Given its population size, this needs to be re-considered.</p>	<p>Chief Executive’s Response Projects specific to Newbridge will be reviewed / addressed in the Newbridge Local Area Plan. Submissions in relation to development of such infrastructure can be made when the next Draft Newbridge LAP is published. However, there are a range of objectives contained in chapter 10 of the Draft Plan which support the provision of social infrastructure in general. These include SC O5, which is to protect and enhance existing social infrastructure/community facilities and increase the provision as required in accessible and sustainable locations including the development of new and expansion of existing facilities and services. There is also an objective (SC O14) to require that community facilities are provided in new communities on a phased basis in tandem with the provision of new housing or other large-scale developments.</p> <p>Furthermore, social infrastructure audits (see section 15.5.1) are required to be submitted with development proposals for large scale developments (i.e., over 20 residential units or in the case of commercial 2,000 square meters). These audits will determine if the community facilities in the area are sufficient to provide for the needs of the future residents. Where deficits exist, the applicant shall propose measures within the development proposal to address same and / or may be required by the Planning Authority to contribute towards developing such infrastructure in the area by means</p>

			<p>of conditions to the permission through the development contribution scheme. In cases where social infrastructure deficits are not addressed, permission may be refused. The audit will include details of education, health, childcare, recreation, and community facilities. It should be further noted that the Council will continue to prepare social infrastructure audits as part of the suite of mandatory LAPs to identify gaps / deficiencies as per action SC A2.</p> <p>Regarding the designation of Newbridge as a key town, it should be noted key towns are identified at a regional level by the Eastern Midlands Regional Assembly (EMRA). The Council made representations in relation to the designation of Newbridge as a key town during the Regional and Spatial Economic Strategy (RSES) process and will continue to do so, during the review of this strategy.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
173	Mark Bruns	<p>Northeast Kildare receives very little funding for recreational facilities in comparison to other areas of Kildare. This heavily populated area lacks recreational facilities for the young population. There should be an action to investigate the provision of an indoor swimming pool and / or ice-skating rink in Northeast Kildare.</p>	<p>Chief Executive's Response The Draft Plan includes an objective (SC O13) under section 10.6 which is to progress plans for the provision of a regional swimming pool in North Kildare. There is also an objective (SC O64) under section 10.11, to investigate the need for additional or new library services for Celbridge and to support the delivery of same.</p> <p>In addition, section 13.7 includes actions such as (LR A15) to refurbish the existing playground in the Leixlip Amenities Centre and (LR A17) to develop an outdoor teen facility in Celbridge as a pilot scheme to inform the development of other play facilities in County Kildare.</p>

			<p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
301	In Sync Youth & Family Services	<p>The submission outlines a profile of services, makes a note of the demographics within Kildare such as the rapid rate of population growth, the highest rate of young people (0-24 years) in the country and highlights that given this profile, demand for child and youth services is set to grow.</p> <p>It is noted that a deficit exists in Kildare for suitable, accessible, quality, and affordable facilities for young people and children and for youth and family services. Funding for services is low by comparison with other regions. A significant amount of public funding is spent on private rented business premises to provide services to the community. This results in the scarce funding going to private landlords rather than on the development of sustainable community facilities. In this regard Kildare must aim to do better.</p> <p>A variety of objectives are welcomed, such as SC O1, SC O5, SC O7, SC O10, SC O12, SC O25 and SC O27. If these objectives were acted upon it would go a long way to addressing some of the deficits in youth and community facilities. SC O10 which is to support and encourage the co-location and sharing of educational, community, and sporting facilities for non-school purposes is something that could be achieved in the early stages of the Plan.</p> <p>However, there are other parts that need to be addressed such as transport and services. In the absence of physical infrastructure, people are too reliant on limited transport infrastructure to access</p>	<p>Chief Executive’s Response The positive comments in relation to the Plan and the objectives in Chapter 10 are welcomed. It should be noted that an Implementation and Monitoring Framework forms Appendix 12 of the Draft Plan, and provides a means to measure the achievement of objectives and actions with responsible departments and stakeholders named, being accountable for delivering same.</p> <p>Regarding public transport and affordability of same it should be noted that there are a range of policies and objectives within chapter 5, to improve public transport infrastructure including other forms of transport such as cycling and walking infrastructure / links. In this regard, objective SC O22 within section 10.7 is referred to, which is to ensure, where feasible, that facilities and services are located close to identified areas of deprivation, public transport links, and on walking and cycling routes to encourage use and participation.</p> <p>Finally, the Draft Plan is a land use plan and does not address items such as the cost of public transport, or provision of additional community facilities, however, the Local Economic and Community Plan which is due for review in the coming months is considered a more appropriate forum for addressing such issues.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>

		<p>services. The limited options along with the cost are significant barriers to accessing services. The cost of transport is a huge challenge to limited project budgets.</p> <p>Increasing service provision without parallel investment in human resources will result in those facilities being idle for too long. The intentions of the plan are commended but the plan needs action and resourcing.</p>	
276.	County Kildare Access Network	<p>Submission requests the amendment of objective SC O13 as follows: SC O13: Progress plans for the provision of a regional swimming pool in North Kildare that is fully accessible in conjunction with other relevant bodies.</p> <p>Submission requests the amendment of objective SC O17 as follows: SC O17: To encourage and facilitate, where appropriate, the introduction of accessible amenities in parks and other suitable locations, which may include outdoor gyms and adult exercise equipment.</p> <p>Submission requests the amendment of objective SC O29 as follows: SC O29: In addition, all parking spaces for the disabled shall be suitably marked both on the ground and as clearly visible vertical signs.</p> <p>Requests policy SC P17 to be amended as follows: SC P17:and support inclusive community development...</p> <p>Requests objective SC O105 to be amended as follows:</p>	<p>Chief Executive's Response The request to amend objectives SC O13, SC O17, SC O29 (a typographic error) and SC O105 is accepted.</p> <p>The request to amend policy SC P17 is accepted.</p> <p>Chief Executive's Recommendation Amend SC O13 as follows: Progress plans for the provision of a regional swimming pool in North Kildare that is fully accessible in conjunction with other relevant bodies.</p> <p>Amend SC O17 as follows: To encourage and facilitate, where appropriate, the introduction of accessible amenities in parks and other suitable locations, which may include outdoor gyms and adult exercise equipment.</p> <p>Amend objective SC O29, as follows: both on the ground and as by clearly visible vertical signs.</p> <p>Amend SC P17 as follows: Support the provision of sustainable social, cultural and community facilities and events in each Municipal District as a mechanism to promote and support inclusive community</p>

		SC O105: Support social, inclusive , community and cultural events in the county...	<p>development, healthy lifestyles, training, education, and recreational opportunities.</p> <p>Amend SC O15 as follows: Support inclusive social, community and cultural events in the county, such as outdoor concerts and annual festivals at appropriate locations and at an appropriate type and scale, in accordance with planning regulations and health and safety requirements.</p>
520	Newbridge Community Development	Better access and advertising of mental health services should be provided.	<p>Chief Executive's Response Objective SC O91 in Chapter 10 'Community Infrastructure and Creative Places' supports the increased provision of sufficient and accessible mental health services at appropriate locations across the county. It is outside the scope of either the County Development Plan or the Council however to provide such services.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
290	Newbridge Family Resource Centre	<p>The submission supports the aim of Chapter 10 in the Draft Plan which conforms with their vision. It further agrees with the idea of working closely with stakeholders to facilitate provision of community infrastructure.</p> <p>Objectives in the NPF and RSES are referred to in relation to social inclusion and the provision of community facilities and services. Family Resource Centres in Kildare believe they have an important role in creating infrastructure such as childcare, education and health facilities / services.</p> <p>The role of Newbridge Family Resource Centre (NFRC) is outlined which includes serving the entire</p>	<p>Chief Executive's Response The work of the NFRC is acknowledged, however the Draft Plan supports all such groups / organisations within the county and therefore it is not appropriate to identify individual community groups / organisations. The Newbridge Local Area Plan which is due for review will address more localised issues such as supporting NFRC and facilitating additional community facilities in the town. The Local Economic and Community Plan (LECP) is also due for review and is more appropriate for addressing issues such as community staffing, supports, and services.</p> <p>Support for local community groups is generally outlined in section 10.9 of the Draft Plan, where it is policy (SC P9) to work with statutory bodies, such as the Local Community</p>

	<p>community. However, it is restricted in its ability to do this due to the growing population, an ever-expanding town, and restricted funding, while only having a single campus with a significant portion of its buildings beyond economic repair. The CDP should be specific in identifying partners that can support this plan through financial and other supports.</p> <p>The Dara Park NFRC Campus in Newbridge is a community facility, located beside a public park that is a focal point for locals. Recently the NFRC invested in the development of a sensory garden. With minimum investment the public park could be as important to the community as the Linear Park in town.</p> <p>Building facilities on the Dara Park Campus require major works to allow current activities to continue. By specifically identifying NFRC and supporting it within the CDP will allow NFRC to carry out its work and allow services from the campus to expand in line with the needs of the growing population.</p> <p>As the Dara Park Campus is not within 10-minutes of the newer residential areas there is a need for NFRC to expand services closer to these areas. The Liffey Hall is identified as a suitable location for a community hub as it is accessible to the newer communities in the town. NFRC are interested in being involved in the management of such a facility to ensure community organisations have access. If the CDP specifically mentions NFRC and other such organisations as important partners to the council the outcome for communities will be advantageous.</p>	<p>Development Committee (LCDC) and other agencies including voluntary groups to counter disadvantage and social exclusion, to secure improvements in the quality of community facilities and to promote equality of access to public and social services for all members of the community.</p> <p>There are several objectives to support this policy including SC O43 which is to assist community and voluntary groups in developing and enhancing facilities to meet the needs of the entire community, and SC O44, which is to facilitate the development of new facilities in built up areas close to walking, cycling and public transport infrastructure. While there is also an objective (SC O45) to facilitate the expansion of existing facilities to cater for the needs of community groups and the growing population in Kildare.</p> <p>Another notable objective regarding community facilities is SC O12 which is to investigate the feasibility of making available suitable unused council owned brownfield sites and buildings for community groups on a temporary or long-term lease basis.</p> <p>In relation to developers providing and owning community buildings, it should be noted that Objective SC O14 requires community facilities to be provided in new communities on a phased basis in tandem with the provision of housing. If a deficiency is identified the frontloading of such infrastructure will be required as part of the first phase of development. Such deficiencies should be identified in the Social Infrastructure Audit prepared to accompany the application. The Council is not a childcare provider and does not manage childcare facilities currently however, the provision and management of same may be further considered as part of the review of the LECP.</p>
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	<p>Developers of new housing developments should play a greater role in developing community facilities as well as green areas in their estates. Such facilities can be used by organisations such as NFRC. It is understood creche facilities are provided in some instances however, the building remains in the ownership of the developer. These should come under the ownership of the council and responsibility could be devolved to relevant organisations.</p> <p>NFRC work in partnership with many organisations and their model of work should be supported in the CDP and piloted as a way of working throughout the county.</p> <p>It is suggested that an infrastructure plan be developed that has good models of community infrastructure for private builders to work from. This could be a way of leveraging community spaces / facilities for growing towns.</p> <p>As Newbridge is not designated a Key Town despite having the largest population in the county the CDP should ensure that funding opportunities are supported for the development of community spaces in the town to compensate for its current designation.</p> <p>Supporting Newbridge in the CDP is vital to improve on the delivery of what is set out in Chapter 10. Reference is made to a lack of infrastructure in the community such as insufficient childcare and afterschool facilities, using unsuitable premises and paying private rental for use of premises.</p>	<p>Finally, in relation levies, the development contribution scheme is due for review. Levies for community facilities will be addressed during this process.</p> <p>Chief Executive's Recommendation No change to the Draft Plan</p>
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		It is suggested using levies from the economic corridor between Newbridge and Naas to deliver much needed social and community infrastructure in Newbridge.	
354.	Naoise O'Cearúil	<p>Submission states that with the need for additional housing both nationally and in Kildare, that it is vital that sufficient land is zoned for housing. Also submits that critical services should be available for the increasing population. Notes that in cases where there is a lack of the services, as set out below, the Council should liaise with government departments to ensure that they are delivered in tandem with new housing:</p> <ul style="list-style-type: none"> • Adequate childcare places • Adequate primary and post primary places • Adequate ASD and additional need educational units in schools • Space on the GP list • For towns and villages with a population of over 10,000 people; a Primary Care Unit • Playgrounds • Community Centre for all towns and villages of over 10,000 people 	<p>Chief Executive's Response</p> <p>Chapter 10 Community Infrastructure and Creative Places contains a range of objectives, including SC O1, SC O2, SC O3, and SC O5, all of which seek to ensure that community and social infrastructure is delivered in tandem with the delivery of new housing. Furthermore, it is noted that in settlements which are the subject of local area plans, the preparation of such plans now includes the undertaking of a Social Infrastructure Audit (SIA). The audit examines the current context of a settlement with respect to infrastructure provision and identifies the future requirements of a town, making recommendations on priority areas for investment within the plan area. The local area plan will then contain several safeguards, as outlined by a specific phasing and infrastructural schedule for new residential development, to ensure that the specific infrastructural needs, as outlined in the SIA, are provided for.</p> <p>It should be noted that it is beyond the remit of the Council to provide for some of the specific areas of social infrastructure mentioned in the submission, including General Practitioners and additional need education assistants. While statutory land use plans may provide for site-specific objectives relating to the development of schools and primary care units, they cannot mandate their construction and delivery. It is noted however, that the Council liaises closely with key service providers, including the Department of Education (with whom it has a Memorandum of Understanding) to ensure that the demand for primary and secondary school places is met in our settlements. With regards to playgrounds, it is an</p>

			<p>objective of the draft Plan (LR O73) to implement the Kildare Play Strategy (2018-2028) which seeks to meet the play and recreational needs of children and young people in the county. On the issue of childcare provision, objective SC O78 of the draft Plan seeks to ensure childcare facilities are 'delivered in new communities prior to or in tandem with phase 1 of any residential or commercial development and are fully operational prior to the occupation of any residential units within the subject site.'</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
<p>434.</p>	<p>Maynooth Community Council</p>	<p><u>Community Centre</u> States that the most requested piece of infrastructure that is missing in Maynooth is a Community Centre and notes that the objective to provide such facilities is covered in SC O5. Notes the many community groups and organisations in Maynooth have to compete to get access to the existing community space which is limited.</p> <p>Welcomes the current idea is to place a new community centre on the site of the current fire station or nearby on council lands. Notes that this location is in line with objective SC O6 to support and encourage the clustering of community facilities. Submission however, requests a specific objective or action to progress the plan for a new community centre in Maynooth.</p> <p><u>Community Creche</u> Submits that Maynooth has a major crisis with the provision of creche places meaning that parents/guardians must travel far afield to get</p>	<p>Chief Executive's Response The request for specific pieces of social and community infrastructure to be located/developed in Maynooth is acknowledged. It should be noted that the function of the County Development Plan is to provide an overarching strategic level of support to the provision of community infrastructure across the county. It is the role of a local area plan to identify in greater detail potential site-specific objectives regarding the location of individual pieces of infrastructure such as community centres and swimming pools and to zone lands appropriately for such uses, particularly where walking, cycling and use of public transport (either available or planned) are encouraged. In this regard, the preparation of a new local area plan for Maynooth forms part of the Council's work programme for 2022. As part of the plan-making process a Social Infrastructure Audit (SIA) will be undertaken to examine the current context with respect to social infrastructure provision in Maynooth and requirements of the town in order to make recommendations on priority areas for investment within the Plan area that will contribute to improving quality of life of residents.</p>

	<p>suitable places for children. Welcomes objective SC O81 which supports the development of community childcare facilities throughout Kildare and proposes Maynooth as a very appropriate location. States that an idea was raised to house a community creche in a new Community Centre which would be very locationally beneficial and in line with objective SCO7.</p> <p><u>Performing Arts Centre</u> Welcomes the inclusion of the action SC A11 to examine the feasibility of identifying a location for a performing arts space/theatre in Northeast Kildare and would like to propose Maynooth as a suitable location. Notes that the Assembly Hall in the former Maynooth Post Primary school (MPPs) was built through fund-raising and is in fact the property of the community of Maynooth. Submits this facility could make an excellent venue for performing arts. Further submits that the performing arts centre could also be part of a new community centre in Maynooth.</p> <p><u>Lack of GPs</u> Notes the shortage of capacity in the town relating to GPs and states that the existing GPs in the town can no longer take any new patients and people must travel to other towns such as Clane and even Tallaght. Notes objective SC O88 to support the provision of primary care centres and GP practices within existing settlements and submits that this needs to be acted upon in Maynooth.</p> <p><u>Primary Care Centre</u> Notes objective SC O88 refers also to the provision of primary care centres. States that from HSE</p>	<p>Regarding the provision of sports facilities, it should be noted that Action 16 of the Open Space and Outdoor Recreation Strategy (Appendix 3) provides for the following: 'To proactively seek suitable sites within the Key Towns of Naas and Maynooth for the provision of Municipal Sporting Facilities where shared amenities are provided for sports clubs and the general public.' It is considered that this action merits inclusion as an objective of the draft Plan so that it can be taken into full consideration in the preparation of the Maynooth Local Area Plan.</p> <p>The provision of GPs and the creation of a full time Garda Station in Maynooth are issues that fall outside the scope and remit of this land use plan. However, the availability of the GPs in the town will be assessed as part of the Social Infrastructure Audit to be conducted by the Council as part of the local area plan-making process for Maynooth and lands shall be appropriately zoned to accommodate such services where it is found that additional lands are required for such purposes.</p> <p>Chief Executive's Recommendation Add an additional objective after SC O10: To proactively seek suitable sites within the Key Towns of Naas and Maynooth for the provision of Municipal Sporting Facilities where shared amenities are provided for sports clubs and the general public.</p>
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		<p>correspondence it is understood that the new centre for Maynooth was at the site selection stage in February. It is requested that this plan be progressed to help alleviate the problem.</p> <p><u>Swimming Pool</u> Welcomes objective SC O13 and the associated action to progress plans for the provision of a regional swimming pool in North Kildare. Suggests that the pool be sited in Maynooth and the application for funding of a joint facility in Maynooth University, made under the Large-Scale Sports Infrastructure Scheme, which is currently under appeal, be pursued further. Submits that the co-locating with the university helps to ensure high usage at any time of day and aligns with objective SC O10.</p> <p><u>Sports Facilities</u> Notes that Maynooth has some excellent sports facilities. However, states that it is still necessary to drive to neighbouring towns for training. Submits that it is time for the town to have its own facilities along the lines of Leixlip Amenities, either separate or co-located with a community centre.</p> <p><u>Full time Garda station</u> Submits that despite Maynooth being a Key Town with 15,000 students it still does not have a full time Garda Station. States that this needs to be addressed as the town and university develops in size and number.</p>	
538	Senator Mark Wall	The submission requests the zoning of at least 12 acres of land for sports/ recreational use and at least	<p>Chief Executive’s Response The Kildare Open Space Strategy (Appendix 3) was prepared to inform the Draft Plan which provided an evidence base for</p>

		<p>5 acres for community gardens in all towns and villages with a population greater than 5,000.</p>	<p>the key recommendations arising from same and these have now been transposed into the Draft Plan.</p> <p>While the Draft Plan is a strategic policy document the detail of its proposals could also be picked up through the preparation of the 12 statutory LAPs for Kildare for which a separate public consultation process will take place. In addition, there is an action (SC A2) in the Draft Plan, to prepare Social Infrastructure Audits as part of the suite of mandatory Local Area Plans to identify gaps/deficiencies in community facilities and services including the mapping of existing community, educational, sporting, childcare, and healthcare facilities and to zone sufficient lands to accommodate identified requirements.</p> <p>It should also be noted that the Draft Plan includes Objective LR O86 in support of the development of allotments and Action SC A5 to carry out an audit of leisure facilities across the County including Kildare County Council facilities to provide standards on the basic level of social infrastructure provision based on population thresholds and reasonable travel times to services and to put in place either the mechanisms for the provision of or the actual provision of additional facilities where deficiencies are identified.</p> <p>Having regard to the above, it is considered that the issues raised in the submission are adequately addressed in the Plan. It is however considered appropriate to move Action SC A5 to a more suitable section in Chapter 10 of the Plan.</p> <p>Chief Executive's Recommendation To move SC A5 from Section 10.8.1 to Section 10.6 of the Plan.</p>
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538	Senator Mark Wall	<p>The submission requests an action in the plan that states Kildare County Council will work with any sports club to identify and zone appropriate lands to accommodate growth in numbers and/or the relocation of existing sports pitches.</p>	<p>Chief Executive’s Response</p> <p>The first National Strategic Outcome of the National Planning Framework relates to compact growth and the Development Plan will endeavour to ensure that the settlement and growth strategy for the County will be directed where possible to the existing built-up areas of settlements. In applying this approach, alongside the various other components in the Development Plan, the aim is to strive towards the delivery of connected neighbourhoods and the 10-minute settlement concept within the urban settlements. The central idea of 10-minute settlements is to create integrated communities that provide high quality and safe links to amenity areas. Essentially, the concept provides for settlements to be designed to reduce the overall need to travel while also allowing for sustainable transport options (walking and cycling) to become realistic and convenient alternatives to the car for short trips, therefore reducing carbon emissions. It should therefore be noted that the Plan strongly resists the relocation of sports facilities to outside the core areas of the County’s towns and villages.</p> <p>The Draft Plan includes an objective (LR O75) under section 13.7.5 to “Liaise with sporting organisations to ensure that where possible the needs of sports clubs and the communities are met in the provision of quality facilities in line with the vision and objectives of the National Sports Policy, 2018-2027.”</p> <p>In addition to the above, there is an action (SC A2) in the Draft Plan, to prepare Social Infrastructure Audits as part of the suite of mandatory Local Area Plans to identify gaps/deficiencies in community facilities and services including the mapping of existing community, educational,</p>
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			<p>sporting, childcare, and healthcare facilities and to zone sufficient lands to accommodate identified requirements. Having regard to the above, it is not considered that any further changes to the Plan are necessary.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
538	Senator Mark Wall	The submission requests Kildare County Council to continue to support the re-use of old school and community buildings for the benefit of the community.	<p>Chief Executive's Response While Chapter 10 currently includes Objectives SC O52, Objective SC O12 and Action SC A3, it is considered appropriate to amend SC A3 to include disused school buildings.</p> <p>Chief Executive's Recommendation Amend SC A3 as follows: Undertake to prepare an audit of community and disused school buildings in villages and rural settlements...</p>
LIBRARY SERVICES			
413.	Kildare Public Participation Network	<p><u>Library Services</u> Submission recognises the valuable services that the Kildare library service provides to people in Kildare and requests that an additional objective is added to the CDP to further expand the library service to establish a 'Library of Things', where members of the public can borrow items that may only be needed occasionally e.g. carpet cleaner, sewing machine, gazebo.</p>	<p>Chief Executive's Response The request is not accepted as it is considered to be an operational matter for Kildare Library and Arts Service and consequently outside the remit of this land use plan.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
ARTS AND CULTURE			

544	Sult na Sollan	<p><u>Úsáid na Gaeilge a normalú sa phobal</u> <i>Ba cheart don Chomhairle glacaint le Gaeilge a spreagadh i ghnáth-imeachtaí agus féilte pobail. Ba cheart tacú le grúpaí pobail agus eagraithe a ghlacann isteach imeachtaí Gaeilge agus/nó dá-teangacha ina gcláir. Ba cheart go mbeadh úsáid leathan agus méadú ar infheictheacht na Gaeilge a spreagadh larnach i luachana agus polasaithe na Comhairle.</i></p> <p><u>Normalise use of the Irish language in the community</u> The Council should encourage the adoption of the Irish language in mainstream community events and festivals. Support should be provided for community groups and organisers that incorporate Irish language and/or bilingual events in their programmes. Encouraging widespread use and increased visibility of the Irish language should be central to Council values and policies.</p>	<p>Freagairt an Phríomhfheidhmeannaigh: <i>Tacaíonn Polasaí SC P17 le áiseanna agus imeachtaí inbhuanaithe sóisialta, cultúrtha agus pobail a sholathar i ngach Ceantar Bardasach, mar chóras chun cur chun cinn agus tacaíocht a thabhairt d'fhorbairt pobail, saol sláintiúil, oiliúint, oideachas agus deiseanna áineasa.</i></p> <p>Chief Executive's Response Policy SC P17 supports the provision of sustainable social, cultural and community facilities and events in each Municipal District as a mechanism to promote and support community development, healthy lifestyles, training, education, and recreational opportunities.</p>
			<p>Moladh an Phríomhfheidhmeannaigh: <i>Gan athrú a dhéanamh ar an Dréacht-Phlean.</i></p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
544	Sult na Sollan	<p>Deiseanna agus spás a sholáthar don Ghaeilge <i>Ba cheart don Chomhairle fás agus úsáid na Gaeilge a chur chun cinn laistigh de Chill Dara, agus raon de dheiseanna agus spásanna do dhaoine sa Chontae chun Gaeilge a fhoghlaim a sholáthar. Ba cheart deiseanna foghlama a chur ar fáil sa rang agus ar-líne.</i></p> <p><u>Provide opportunities and space for Irish language</u> The Council should promote the growth and use of Irish within Kildare and provide a variety of opportunities and spaces for people in the county to learn Irish. Learning options should be made available via classroom and online learning.</p>	<p>Freagairt an Phríomhfheidhmeannaigh: <i>Tugann Aidhm SC A54 in Alt 10.10 tacaíocht agus cur chun cinn do spásanna nó ionaid cultúrtha, Gaeilge agus ealaíona breise thar Chill Dara, agus tacaíonn sí le deiseanna sealadacha nó 'tob-dheiseanna' de réir mar a n-éiríonn siad.</i></p> <p>Chief Executive's Response Objective SC O54 in Section 10.10 supports and promotes additional cultural, Irish language and arts spaces or centres throughout Kildare and supports temporary or 'pop-up' opportunities as they arise.</p>
			<p>Moladh an Phríomhfheidhmeannaigh: <i>Gan athrú a dhéanamh ar an Dréacht-Phlean</i></p>

			<p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
544	Sult na Sollan	<p><u>Gaeilge</u> <i>Moltar an téacs seo leanas a chur isteach: “Leanúint le tacú le Gaeilge mar chuid d’ár bhféiniúlacht, agus mar teanga beo laistigh den chontae, agus chun roghanna a fheidmiú chun teanga agus cultúr na Gaeilge a chur chun cinn trí pholasáí, plean teanga agus gníomhartha”</i></p> <p><i>Ba cheart go nglacfadh an Comhairle príomh-ról i bhforbairt phlean cúig-bliana 2023-2028 don Ghaeilge. Moltar seo chun gur féidir leis an Comhairle tacú gníomhach a thabhairt do phleananna teanga do limistéir éagsúla roimh na limistéir seo a ainmniú le stádas ‘Líonra’. Tá próisis gníomhacha pleanála teanga ag An Nás / Na Sollain agus Maigh Nuad.</i></p> <p><u>Irish Language</u> The following text is proposed to be included “to continue supporting Gaeilge as part of our identity and as a living language within the county and to implement options to promote Irish language and culture through policy, a language plan, and actions.</p> <p>The Council should play a leading role in the development of the 2023-2028 five-year plan for the Irish language. This is recommended so the Council can actively support language plans for select areas before those areas are designated with Líonra status. Sallins / Naas and Maynooth have active language planning processes.</p>	<p>Freagairt an Phríomhfheidhmeannaigh: <i>Baineann an Dréacht-Phlean le h-úsáid talún, seachas bheith mar ionstraim chun dul i ngleic le pleananna teanga. Ba cheart tabhairt faoi deara, áfach, go dtugann Aidhm SC A57 in Alt 10.10 tacaíocht agus spreagadh do ghrúpaí pobail agus iad ag lorg Líonra Gaeilge dá gceantar.</i></p> <p>Chief Executive’s Response The Draft Plan is a land use plan and is not an instrument to address language plans. However, it should be noted that Objective SC O57 in Section 10.10 supports and encourages community groups in their pursuit of Líonra Gaeilge (Irish Language Network) for their area.</p> <p>Moladh an Phríomhfheidhmeannaigh: <i>Gan athrú a dhéanamh ar an Dréacht-Phlean.</i></p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>

533	Cill Dara Le Gaeilge	<p><u>Pleananna Gaeilge:</u> <i>Déan Gaeilge a chur chun cinn trí pholasaí, plean teanga agus gníomhartha. Ba cheart go nglacfaidh an Comhairle príomh-ról i bhforbairt phlean cúig-bliana 2023-2028 don Ghaeilge, agus tacú gníomhach a thabhairt do phleananna teanga do limistéir éagsúla roimh na limistéir seo a ainmniú le stádas ‘Líonra’.</i></p> <p><u>Deiseanna agus spás a sholáthar don Ghaeilge:</u> <i>Déan fás agus úsáid na Gaeilge a chur chun cinn i gCill Dara, agus raon de dheiseanna agus spásanna do dhaoine sa Chontae chun Gaeilge a fhoghlaim a sholáthar. Ba cheart deiseanna foghlama a chur ar fáil sa rang agus ar-líne.</i></p> <p><u>Gaeilge sa Phobal:</u> <i>Tabhair cur chun cinn agus tacaíocht do, agus féach le forbairt ar, Líonraí Gaeilge Chill Dara, ag comh-obriú le grúpaí pobail sna ceantair sin.</i></p> <p><i>Féach le deiseanna chun tacaíocht breise a thabhairt d’úsáid na Gaeilge laistigh de sráidbhailte uirbeacha laistigh de cheantair ainmnithe Líonra.</i></p> <p><i>Tacaigh le Gaeilge a chur chun cinn, agus le tionscnaimh chun Líonraí Gaeilge nua a bhunú sa chontae.</i></p> <p><i>Tugtar na moltaí a léirítear thuas chun leas a bhaint as an struchtur nua a n-áirítear in Act na Gaeltachta 2021 maidir le líonraí Gaeilge. B’fhéidir go mbeidh deiseanna ar fáil do bailte / sráidbhailte éagsúla i gCill Dara chun Líonraí nua a bhunú.</i></p>	<p><i>Freagairt an Phríomhfheidhmeannaigh</i></p> <p><u>Pleananna Gaeilge</u> <i>Baineann an Dréacht-Phlean le h-úsáid talún, seachas bheith mar ionstraim chun dul i ngleic le pleananna teanga. Ba cheart tabhairt faoi deara, áfach, go dtugann Aidhm SC A57 in Alt 10.10 tacaíocht agus spreagadh do ghrúpaí pobail agus iad ag lorg Líonra Gaeilge dá gceantar.</i></p> <p><u>Deiseanna agus spás a sholáthar don Ghaeilge:</u> <i>Tá soláthar foghlama sa rang agus ar-líne lasmuigh de théarmaí tagartha an Phlean Forbartha. Maidir le spásanna a sholáthar, tugann Aidhm SC A54 in Alt 10.10 tacaíocht agus cur chun cinn do spásanna nó ionaid cultúrtha, Gaeilge agus ealaíona breise thar Chill Dara, agus tacaíonn sí le deiseanna sealadacha nó ‘tob-dheiseanna’ de réir mar a n-éiríonn siad.</i></p> <p><u>Gaeilge sa Phobal:</u> <i>Tá tacaíocht do phobail Ghaeilge sa Dréacht-Phlean cheana féin. Tugann Aidhm SC A57 in Alt 10.10 “tacaíocht agus spreagadh do ghrúpaí pobail agus iad ag lorg Líonra Gaeilge dá gceantar”.</i></p> <p><i>Tá tacaíocht tugtha d’úsáid na Gaeilge in áiteanna eile sa Phlean, trí ainmniú ar eastáit cónaithe agus ar aghaidheanna siopaí. Mar sin féin, baineann Plean Forbartha an Chontae le h-úsáid talún, agus, mar sin, tá cur chun cinn don Ghaeilge agus bunú Líonraí Gaeilge nua lasmuigh de scóip an Dréacht-Phlean.</i></p> <p>Chief Executive’s Response <u>Irish Language Plans</u> The Draft Plan is a land use plan and is not an instrument to address language plans. However, it should be noted that Objective SC O57 in Section 10.10 supports and encourages</p>
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	<p><u>Irish Language Plans</u> Promote Irish language and culture through policy, a language plan, and actions. The Council should play a leading role in the development of the 2023-2028 five-year plan for the Irish language, and actively support language plans for select areas before they are designated with Lónra status.</p> <p><u>Provision of opportunities and space for Irish Language</u> Promote the growth and use of Irish in Kildare and the provision of a variety of opportunities and space for people in the county to learn Irish. Learning options should be made available via classroom learning and online.</p> <p><u>Irish Language in the Community</u> Promote, support, and seek the development of Kildare’s Irish Language Networks (Lónraí) in co-operation with community groups in those areas.</p> <p>Explore opportunities for supporting greater use of the Irish language within selected urban villages within nominated Lónra areas.</p> <p>Support the promotion of the Irish language and support initiatives to establish new Irish language networks (Lónraí) in the county.</p> <p>The recommendations outlined are proposed to make use of the new structure included in the Gaeltacht Act 2021 in relation to Irish language networks. Opportunities to set up new designated Lónra areas may be available for several towns / villages in Kildare.</p>	<p>community groups in their pursuit of Lónra Gaeilge (Irish Language Networks) for their area.</p> <p><u>Provision of opportunities and space for Irish Language</u> Provision of online and classroom learning falls outside the remit of the Development Plan. Regarding the provision of spaces, Objective SC O54 in section 10.10 supports and promotes additional cultural, Irish language and arts spaces or centres throughout Kildare and supports temporary or ‘pop-up’ opportunities as they arise.</p> <p><u>Irish Language in the Community</u> The Draft Plan already includes support for Irish language communities. Objective SC O57 in Section 10.10 “<i>supports and encourages community groups in their pursuit of Lónra Gaeilge (Irish Language Network) for their area</i>”.</p> <p>The use of the Irish language is supported elsewhere in the Plan through the naming of residential estates and on shopfronts. See Sections 4.7, 15.4.15, and 15.14. However, the County Development Plan is a land use plan and as such the promotion of the Irish language and the establishment of new Irish language networks are outside the scope of the Draft Plan.</p> <p><i>Moladh an Phríomhfheidhmeannaigh:</i> <i>Gan athrú a dhéanamh ar an Dréacht-Phlean.</i></p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
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526	Conradh na Gaeilge	<p><u>Gaeilge</u> <i>Is í aidhm an aighneacht seo go n-iarrfar go mbeidh pobal labhartha na Gaeilge i gCill Dara san áireamh sa Phlean. Tá ról ríthábhachtach ag Comhairle Contae Chill Dara maidir le cur chun cinn na Gaeilge, agus ba cheart go mbeadh ról aici maidir le cosaint, caomhnú agus fás do phobal labhartha na Gaeilge sa chontae. Is tríd an bPlean gur féidir díriú ar sin.</i></p> <p><i>Déantar tagairt do sonraí ó Dhaonáirimh 2011 agus 2016 maidir le líon na gcainteoirí laethúla Gaeilge i gCill Dara (taobh amuigh den chóras oideachais). Déantar comparáidí freisin le limistéir Gaeltachta. Tugtar faoi deara go raibh méadú ar an líon i 2016 ó 2011. Mar sin féin, ní raibh seo ar aon dul le fás dhaonra agus meastar go raibh laghdú ar cóimheas na gcainteoirí. Moltar gur cheart iniúchadh a dhéanamh ar seo le feiceáil an bhfuil aon ghníomhaíochtaí á dhéanamh ag an gComhairle ag cruthú seo.</i></p> <p><i>Maiadir le daoine a labhrann Gaeilge sa chóras oideachais, ta dhá ghrúpa ann (daltaí agus múinteoirí). Is iad na daltaí an daonra is mó sna chainteoirí laethúla, agus mar sin is comhartha é seo nach bhfuil an méid sin de pháistí á dtógáil trí Ghaeilge. Ba cheart breathnú ar ghníomhaíochtaí a chuirfidh fás le cainteoirí laethúla sa chóras oideachais agus laistigh de.</i></p> <p><u>Irish Language</u> The purpose of the submission is to request that the Irish-speaking population in Kildare is considered in the Plan. The Council has a key role in promoting</p>	<p><u>Freagairt an Phríomhfheidhmeannaigh</u> <u>Gaeilge</u> <i>Baineann an Dréacht-Phlean le h-úsáid talún, seachas bheith mar ionstraim chun dul i ngleic nó scrúdú a dhéanamh chun líon na gcainteoirí Gaeilge a mhéadú. Ba cheart tabhairt faoi deara, áfach, go dtugann Aidhm SC A57 in Alt 10.10 tacaíocht agus spreagadh do ghrúpaí pobail agus iad ag lorg Líonra Gaeilge dá gceantar.</i></p> <p>Chief Executive's Response <u>Irish Language</u> The Draft Plan is a land use plan and is not an instrument to address or examine activities to increase the number of Irish speakers. However, it should be noted that Objective SC O57 in Section 10.10 supports and encourages community groups in their pursuit of Líonra Gaeilge (Irish Language Network) for their area.</p> <p><u>Moladh an Phríomhfheidhmeannaigh:</u> <i>Gan athrú a dhéanamh ar an Dréacht-Phlean.</i></p> <p>Chief Executive's Response No change to the Draft Plan.</p>
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		<p>Irish and should have a role in the protection, conservation and growth for the Irish-speaking community in the county. This can be targeted in the Plan.</p> <p>Reference is made to census data from 2011 and 2016 regarding the number of daily Irish speakers in Kildare (outside of the education system). Comparisons are also made with Gaeltacht areas. It is noted that the number increased in 2016 from 2011. However, this was not in line with population growth therefore it is considered the ratio of speakers has reduced. It is submitted that this should be investigated to see if any actions of the Council prove this.</p> <p>Regarding those speaking Irish within the education system there are two groups (pupils and teachers). Pupils make up the greater part of the population of daily speakers and so this is an indication that fewer children are being raised through Irish. Activities which increase daily speakers within the education system and outside of it should be examined.</p>	
526	Conradh na Gaeilge	<p><u>Lárionad don Ghaeilge</u> <i>Ba chóir lárionad Gaeilge a bhunú i gCill Dara, go mbeidh pobal na Gaeilge in ann a úsáid mar thearmann teanga. Tá samplaí in áiteanna mar Béal Feirste agus Doire. Is áit é gur féidir siopa leabhair, bialann agus amharclann a bheith ann. Is féidir ranganna Gaeilge, ciorcail comhrá, clubanna óige agus imeachtaí sóisialta a eagrú ann a chuirfidh borradh leis an nGaeilge sa chontae</i></p>	<p>Freagairt an Phríomhfheidhmeannaigh: <u>Lárionad don Ghaeilge</u> <i>Tugann Aidhm SC A54 in Alt 10.10 tacaíocht agus cur chun cinn do spásanna nó ionaid cultúrtha, Gaeilge agus ealaíona breise thar Chill Dara, agus tacaíonn sí le deiseanna sealadacha nó 'tob-dheiseanna' de réir mar a n-éiríonn siad.</i></p>

		<p><u>Irish Centre</u> An Irish Centre should be established in Kildare, which the Irish speaking community could use as a language centre. There are examples in places like Belfast and Derry. Such a facility could have a bookshop, restaurant, and a theatre. Irish classes, conversation circles, youth clubs and other social events could take place there and give leverage to Irish in the county.</p>	<p>Chief Executive's Response: <u>Irish Centre</u> Objective SC O54 in Section 10.10 supports and promotes additional cultural, Irish language and arts spaces or centres throughout Kildare and supports temporary or 'pop-up' opportunities as they arise.</p>
			<p>Moladh an Phríomhfheidhmeannaigh: <i>Gan athrú a dhéanamh ar an Dréacht-Phlean.</i></p>
			<p>Chief Executive's Response No change to the Draft Plan.</p>
526	Conradh na Gaeilge	<p><u>Éisteachtaí ó Bhéal</u> <i>Luaitear Alt 135 (8) (c) den Acht um Pleanáil agus Forbairt 2000, maidir le Éisteachtaí ó Bhéal. Moltar, má iarrtar éisteacht ó bhéal as Gaeilge, gur chóir don Chomhairle aontú le seo, agus daoine cuí a chur ar fáil le Gaeilge don éisteacht.</i></p> <p><u>Oral Hearings</u> Section 135 (8) (c) of the Planning and Development Act 2000 is referred to in relation to Oral Hearings. It is submitted that if an Oral Hearing in Irish is requested, the Council should agree to this, and should supply appropriate persons, with Irish, for the hearing.</p>	<p>Freagairt an Phríomhfheidhmeannaigh: <u>Éisteachtaí ó Bhéal</u> <i>Baineann an Dréacht-Phlean le h-úsáid talún, seachas bheith mar ionstraim chun dul i ngleic le Éisteachtaí ó Bhéal. Tá an Bord Pleanála freagrach as Éisteachtaí ó Bhéal a cheadú agus cloífidh an Comhairle le h-aon riachtanais maidir le Éisteachtaí ó Bhéal.</i></p>
			<p>Chief Executive's Response <u>Oral Hearings</u> The Draft Plan is a land use plan and is not an instrument to address Oral Hearings. An Bord Pleanála is responsible for granting Oral Hearings and the Council will comply with any requirements in relation to Oral Hearings.</p>
			<p>Moladh an Phríomhfheidhmeannaigh: <i>Gan athrú a dhéanamh ar an Dréacht-Phlean.</i></p>
			<p>Chief Executive's Response No change to the Draft Plan.</p>
526	Conradh na Gaeilge	<p><u>Baill Foirne a bhfuil Gaeilge acu</u> <i>Ba chóir go mbeidh an Roinn Pleanála in ann seirbhís a chur ar fáil do phobal labhartha na Gaeilge. Bhí súil go mbeadh gach Roinn in ann</i></p>	<p>Freagairt an Phríomhfheidhmeannaigh <u>Baill Foirne a bhfuil Gaeilge acu</u> <i>Baineann an Dréacht-Phlean le h-úsáid talún, agus ní féidir leis dul i ngleic le soláthar foirne / áiseanna sa Chomhairle</i></p>

		<p><i>seirbhís aon le haon a chur ar fáil trí Ghaeilge i saolré Scéime Gaeilge Chomhairle Contae Chill Dara 2018-2021. Tá an tréimhse sin thart anois.</i></p> <p><u>Irish Speaking Staff</u> The Planning Department should be able to provide a service to the Irish-speaking community. It was expected that all Departments would be able to provide one to one service through Irish in the lifetime of Kildare County Councils' Irish Language Scheme 2018-2021. This timeframe has now passed.</p>	<p>Chief Executive's Response <u>Irish Speaking Staff</u> The Draft Plan is a land use plan and cannot address staffing / resources in the Council.</p>
			<p><i>Moladh an Phríomhfheidhmeannaigh:</i> <i>Gan athrú a dhéanamh ar an Dréacht-Phlean.</i></p> <p>Chief Executive's Response No change to the Draft Plan.</p>
526	Conradh na Gaeilge	<p><u>Ba cheart go mbeadh an PFC le fáil i nGaeilge</u> Ní raibh Plean Forbartha Contae Chill Dara 2017 - 2023 ar fáil i nGaeilge, agus ba cheart go mbeadh, de réir Achta na dTeangacha Oifigiúla 2003. Chomh maith le seo, ní raibh aon tagairt don Ghaeilge nó do phobal labhartha na Gaeilge sa Phlean reatha.</p> <p>Níl an Dréacht-Phlean Forbartha 2023-2029 ar fáil i nGailge, agus ba cheart seo a réiteach láithreach de bharr gur sárú Acht na dTeangacha Oifigiúla é. Ba cheart go mbeadh aon cháipéis a chuirtear ar fáil go poiblí sa phróiseas comhairliúcháin seo ar fáil i nGaeilge freisin.</p> <p><u>CDP should be available in Irish</u> The 2017-2023 CDP was not available in Irish and should be in accordance with the Official Languages Act 2003. Additionally, there was no reference to Irish or to the Irish-speaking community in the current plan.</p>	<p>Freagairt an Phríomhfheidhmeannaigh: <u>Ba cheart go mbeadh an PFC le fáil i nGaeilge</u> Déantar tagairt don Ghaeilge sa Dréacht-Phlean in Ailt 4.7, 10.10, 15.4 and 15.14. Meastar go bhfuil aon ábhar eile a éiríonn laismuigh de scóip Phlean Forbartha an Chontae, toisc go mbaineann sé, den chuid is mó, le úsáid talún.</p> <p>Dá ainneoin sin, áfach, ba cheart tabhairt faoi deara go bhfuair an Chomhairle measúnú ó chomhlacht aistriúcháin maidir le h-aistriú an Dréachtphlean (a chuimsíonn Imleabhar 1 (17 Caibidil), Imleabhar 2 (a bhaineann le láithreáin críosaithe agus ainmnithe) agus 12 Aguisín). Measadh go dtógfadh sé idir cheithre agus chúig mhí chun an iomlán thuas a aistriú. De bharr na h-amlínte diana reachtúla a bhaineann le Plean Forbartha a dhéanamh de reir an Achta um Pleanáil agus Forbairt 2000 (arna leasú), níorbh fhéidir an aistriúchán a ailíniú le foilsiú an Dréachtphlean.</p> <p>Chief Executive's Response <u>CDP should be available in Irish</u> The Draft Plan refers to the Irish Language in sections 4.7, 10.10, 15.4 and 15.14. Any other matters arising are</p>

		<p>The Draft Development Plan 2023-2029 is not available in Irish, and this should be rectified immediately as it contravenes the Official Languages Act. Any document made available publicly in this consultation process should also be available in Irish.</p>	<p>considered to be outside the scope of the County Development Plan, which is primarily a land use plan.</p> <p>Notwithstanding same however it should be noted that the Council did receive an estimation from a translation company with respect to the translation of the Draft Plan (which comprises Volume 1 (17 chapters), Volume 2 (relating to zoned and designated sites) and 12 no. Appendices). The minimum time it was estimated to take to translate all of the above was between four and five months. Due to the strict, legislative timelines associated with the making of a Development Plan in accordance with the Planning and Development Act 2000 (as amended), it was not possible to align the translation with the Draft Plan publication.</p>
			<p><i>Moladh an Phríomhfheidhmeannaigh:</i> <i>Gan athrú a dhéanamh ar an Dréacht-Phlean.</i></p> <p>Chief Executive's Response No change to the Draft Plan.</p>
405	Kildare Climate Action Linkage Group	<p>Suggests the following additional objectives:</p> <p>Support the development and implementation of language plans in Gaeltacht Language Planning Areas, Gaeltacht Service Towns and Irish Language Networks.</p> <p>Support and collaborate with all of the statutory development agencies, especially Údarás na Gaeltachta, to achieve sustainable development in the Kildare Gaeltacht while protecting and promoting the Irish language as the first community language of the area.</p> <p>Support meaningful awareness of language requirements for new communities and also the deaf</p>	<p>Chief Executive's Response The Draft Plan is a land use plan and is not an instrument to address language plans. However, it should be noted that Objective SC O57 in Section 10.10 supports and encourages community groups in their pursuit of Líonra Gaeilge (Irish Language Network) for their area.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

		communities in the region, provide linguistic support at public meetings, and provide linguistic support in future decision making, where relevant, to the population affected.	
538	Senator Mark Wall	<p>The submission requests the following to be considered as part of the final plan:</p> <ul style="list-style-type: none"> • Include as an objective in the plan to raise awareness of the success of local artists/musicians from Kildare. • Supporting the positive Made of Athy project and asking that this be expanded and used as a template for other parts of the county. 	<p>Chief Executive’s Response Raising awareness of the success of local artists/musicians is outside the scope of the Draft Plan.</p> <p>In relation to the Made of Athy project, it should be noted that Objective RE O95 supports the expansion and development of tourism in Kildare, by investigating the feasibility of key tourism opportunities, including the Made of Athy Trail which directly relates to the Made of Athy programme. It is therefore considered that RE O95 adequately addresses the request as raised in this submission.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
223	Colm Walsh	The development plan should have an objective that promotes and supports more awareness of the successes of local artists/musicians and the success of the county’s diaspora particularly those from working class or non-traditional creative backgrounds.	<p>Chief Executive’s Response A County Development Plan is a land use plan and it is therefore outside of the scope of the Draft Plan to include the requested objective. It is suggested that any such objective would be more appropriately addressed through the Local Economic and Community Plan (LECP). The LECP identifies objectives and actions for strengthening economic and community development in the county. The LECP 2016-2021 is currently being reviewed and the public’s views and suggestions will be invited as part of the review process. The Draft Plan supports the LECP and any subsequent replacement under policy SC P1 in Chapter 10 ‘Community Infrastructure and Creative Places’.</p>

			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
287	Arts Council	The Kildare Arts Strategy (An Arts Strategy for Kildare County Council 2018-2022) is much more comprehensive on how the arts will be provided throughout the county.	<p>Chief Executive's Response The County Development Plan is primarily a land use plan however this Draft Plan supports strategies such as the 'Short Grass Stories: An Arts Strategy for Kildare 2018-2022' and the 'Kildare - Culture and Creativity Strategy 2018-2022' in paragraph 10.10 of Chapter 10 'Community, Infrastructure and Creative Places'.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
287	Arts Council	Policies and objectives in Chapter 10 'Community, Infrastructure and Creative Places' are not specific and require more detail on how deficiencies in arts and cultural facilities will be identified, how existing facilities will be enhanced and how the feasibility of new facilities will be calculated.	<p>Chief Executive's Response The Draft Plan is a high-level land use plan within which, Strategies such as the 'Short Grass Stories: An Arts Strategy for Kildare 2018-2022' and the 'Kildare - Culture and Creativity Strategy 2018-2022' are supported.</p> <p>However, it should be noted, that at a local level, through the Local Area Plan process, the Forward Planning Section of Kildare County Council prepares Social Infrastructure Assessments (SIA) which are undertaken as a key evidence base document to inform the emerging Local Area Plans. The SIAs take account of existing social and community infrastructure, including the arts and, where deficiencies are found to arise, detailed policies and objectives are proposed in the Draft Local Area Plan to address same. It should also be noted that Draft Local Area Plans undergo a statutory period of public consultation after which further changes can be made to the LAPs prior to their adoption by the elected members.</p>

			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
PEATLANDS			
181	Lullymore Heritage & Discovery Park CLG	A new objective is suggested after SC O18: Support and encourage community and schools' involvement in the rehabilitation, restoration of former industrial peatlands and in the planning for future recreational amenity.	<p>Chief Executive's Response Section 10.6 of the Plan refers to Community Services and Facilities and the objectives included refer specifically to the provision of social infrastructure. It is already an objective of the plan to work with young people to encourage their participation in society (SC O19). This is also addressed in Section 10.8.1 of the Plan.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
181	Lullymore Heritage & Discovery Park CLG	A new action is suggested after SC A4: Support the establishment of an inter county National Peatlands Park and the implementation of the objectives identified in the West Kildare Just Transition Plan 2022 and objectives in the new County Biodiversity Plan.	<p>Chief Executive's Response The Plan contain a number of policies, objectives and actions which support the development of a National Peatland park in the county (Chapter 13 LR O40, Chapter 4 RE O127 and Chapter 7 EC A7). Objective EC O56 is to support the implementation of actions from the 'Local Just Transition Plan'. Action BI A1 is to continue to implement natural heritage actions in inter alia the County Biodiversity Plan and any subsequent plans.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

BURIAL GROUNDS			
413.	Kildare Public Participation Network	<p><u>Places of Worship/Burial Grounds</u> Submission proposes inserting additional text into action SC A22, as follows: SC A22: To undertake an audit of all burial facilities within the county within the lifetime of this plan in order to: (i) Determine the available remaining capacity of all burial facilities. (ii) Identify where extensions to existing burial facilities could be accommodated where facilities are at or close to capacity, having regard to any site restrictions. (iii) Actively pursue lands to accommodate additional burial facilities whether by way of extension or new sites, subject to appropriate environmental assessments and considerations.</p>	<p>Chief Executive's Response The request in relation to places of worship is accepted.</p>
			<p>Chief Executive's Recommendation Amend SC A22 as follows: To undertake an audit of all burial facilities within the county within the lifetime of the County Development Plan, in order to: (i) Determine the available remaining capacity of all burial facilities. (ii) Identify where extensions to existing burial facilities could be accommodated where facilities are at or close to capacity, having regard to any site restrictions. (iii) Actively pursue lands to accommodate additional burial facilities whether by way of extension or new sites, subject to appropriate environmental assessments and considerations, and to appropriately zone lands for the accommodation of burial facilities.</p>
468	Ann Behan	<p>It is important that there is clarity in attempting to achieve SMART goals. In the circumstances the first line of action SC A22 should be amended to include "<i>within the lifetime of this plan</i>" after the word county. It is further submitted that the third bullet point in action SC A22 is incomplete.</p>	<p>Chief Executive's Response See response to submission 413 above.</p>
			<p>Chief Executive's Recommendation See recommendation to submission 413 above.</p>
405	Kildare Climate Action Linkage Group	<p>Suggests the amendment of SC A22 as follows: SC A22 - To undertake an audit of all burial facilities within the county <i>within the lifetime of this plan</i> in order to: (i) <i>Determine the available remaining capacity of all burial facilities.</i></p>	<p>Chief Executive's Response See response to submission 413</p>
			<p>Chief Executive's Recommendation See recommendation to submission 413</p>

		<p>(ii) <i>Identify where extensions to existing burial facilities could be accommodated where facilities are at or close to capacity, having regard to any site restrictions.</i></p> <p>(iii) <i>Actively pursue lands to accommodate additional burial facilities whether by way of extension or new sites, subject to appropriate environmental assessments and considerations., and</i></p> <p>It is noted that the third point is incomplete.</p>	
11	Hazel Whiteley	<p><u>Newbridge: Columbarium wall in Newbridge Cemetery</u> There is consensus that a columbarium wall in Newbridge Cemetery would be beneficial. This would address space / land saving and the diverse needs of a growing population.</p>	<p>Chief Executive’s Response There is an objective within the Draft Plan to “facilitate the use of environmentally sound burial options such as Columbarium Walls, in appropriate locations”. The Council is in the process of designing and installing Columbarium Wall facilities for Newbridge as well as a number of other locations throughout County Kildare including Derrinturn, Donaghcumper, Rathangan, Monasterevin and Athy</p> <p>Chief Executive’s Recommendation Add an action to Section 10.16 of the Plan: Provide Columbarium Wall facilities in Derrinturn, Donaghcumper, Newbridge, Rathangan, Monasterevin, and Athy.</p>
552	Department of Housing, Local Government and Heritage	<p><u>Places of worship/burial grounds</u> Replace SC O97 with the following objective: To protect historic graveyards, in co-operation with the National Monuments Service, Department of Housing, Local Government and Heritage, including through the avoidance of extensions to them that would have an inappropriate level of impact on sub-surface archaeological remains or on their setting or amenity and, in that regard, as an alternative to extensions to historic graveyards to endeavour to</p>	<p>Chief Executive’s Response All recommendations agreed. Historic graveyards can be important wildlife refuges and contain significant archaeology and as such should be managed in a correct manner.</p> <p>Chief Executive’s Recommendation Replace SC O97 with the following objective: Protect historic graveyards, in co-operation with the National Monuments Service, Department of Housing, Local Government and Heritage, including through the avoidance of</p>

		<p>find alternative locations where additional land for burial is considered necessary.</p> <p>Add new objective, as follows: To ensure that historic graveyards in the ownership or care of the local authority are managed and maintained in accordance with appropriate conservation standards and that local communities involved in care and maintenance of historic graveyards receive appropriate advice regarding such standards.</p>	<p>extensions where such extensions would have an inappropriate level of impact on sub-surface archaeological remains or on their setting or amenity and, in that regard, as an alternative to extensions to historic graveyards to endeavour to find alternative locations where additional land for burial is considered necessary.</p> <p>Insert a new objective under section 10.16: Ensure that historic graveyards in the ownership or care of the local authority are managed and maintained in accordance with appropriate conservation standards and that local communities involved in the care and maintenance of historic graveyards receive appropriate advice in relation to management and maintenance.</p>
HEALTHY COMMUNITIES			
113	Health Service Executive	<p>There are 3 recommendations in relation to food and waste which include developing programmes to support healthy lifestyles and prevent obesity, implementing a strategy looking at food poverty to ensure healthy food choices are available to all, and implementing measures to tackle food waste.</p>	<p>Chief Executive’s Response In relation to providing healthy food choices and tackling food waste it should be noted that the Draft Plan is a land use plan and is not the appropriate document to address such issues. However, there are many initiatives to promote active travel, as well as objectives (including SC O94) to support the goals in the Healthy Ireland Strategic Action Plan 2021-2025 and supporting the work of Kildare Sports Partnership (SC O8 and SC O9).</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
GENERAL			

331	Fionnuala Corcoran	There is no reference in the Plan to disaster planning or community resilience building. It is suggested the Plan should include an objective to support towns and communities in carrying out disaster planning and in preparing longer term plans for resilient sustainable communities.	<p>Chief Executive's Response The comments are noted however this is considered outside the remit of a land use plan.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
147	National Peatlands Park Group	<p>Insert a new objective, SC O19, which should read as follows; 'Support and encourage community involvement in the rehabilitation, restoration of Bord na Mona peatlands and in the planning for future recreational amenity.'</p> <p>Insert a new Action, SC A5, which should read as follows; 'Support the establishment of a National Peatlands Park and the implementation of the objectives identified in the West Kildare Just Transition Plan 2022 and objectives in the new County Biodiversity Plan.'</p>	<p>Chief Executive's Response See responses to submission no. 413.</p>
			<p>Chief Executive's Recommendation See recommendations to submission no. 413.</p>

CHAPTER 11 – BUILT & CULTURAL HERITAGE			
Sub No.	Name	Summary of Issues Raised	Chief Executive's Response & Recommendations
BUILT HERITAGE			
552	Department of Housing, Local Government and Heritage	<p>Amend Section 11.1 General Heritage: to insert purple text:</p> <p>County Kildare has a rich and diverse heritage, which includes landscapes, countryside, archaeological sites (both terrestrial and underwater) and the built environment of towns and villages. Heritage is integral to the identity of any county. It provides the county with a strong sense of place, character and distinctiveness. Heritage protection is an integral part of sustainable development, it has environmental and quality of life benefits and also brings significant economic benefits. In 2022, the Government published the new National Heritage Plan - Heritage Ireland 2030 which is built around a vision of our heritage – in all its forms – being at the very centre of local and national discourse, valued by all and cared for and protected for future generations.</p>	<p>Chief Executive's Response All recommendations agreed.</p> <p>Chief Executive's Recommendation Amend 11.1 County Kildare has a rich and diverse heritage, which includes landscapes, countryside, archaeological sites (both terrestrial and underwater) and the built environment of towns and villages. Heritage is integral to the identity of any county. In 2022, the Government published the National Heritage Plan which set out strategies for the conservation and management of our heritage. A key element of both plans is an enhanced role for local authorities in heritage awareness and management, to be given effect through the preparation and implementation of County Heritage Plans. This Plan is currently being revised by the Department of Housing, Local Government and Heritage. the new National Heritage Plan - Heritage Ireland 2030 which is built around a vision of our heritage – in all its forms – being at the very centre of local and national discourse, valued by all and cared for and protected for future generations.</p>
552.	Department of Housing, Local Government and Heritage	The newly launched National Policy on Architecture, 'Places for People', will promote public engagement with architecture. The Department would appreciate if the Kildare County Development Plan could express the Local	<p>Chief Executive's Response The council welcomes the newly launched National Policy on Architecture, 'and reference to it will be included in the draft plan.</p> <p>Chief Executive's Recommendation</p>

	<p>Authority's support for the implementation of this national policy</p> <p>Insert 11.14.4 National Policy on Architecture, 'Places for People', will promote public engagement with architecture, empower the architectural profession (especially within the public service), raise design quality, and improve data and research on our built environment. It will outline the need to support architects and built environment professionals to work together to achieve a high-quality living environment for everyone, bringing economic, social and environmental benefits to cities, towns, and rural communities across Ireland through the delivery of sustainable, high-quality buildings and public spaces.</p> <p>Insert New Policy AH O41 Support the implementation of the National Policy on Architecture, 'Places for People' prepared by the Department of Housing, Local Government and Heritage</p> <p>Amend Section 11.17 Built Vernacular Heritage Vernacular architecture is generally, defined as the homes and workplaces of the general population built by local people using local materials and, most importantly, drawing on longstanding tradition. This is in contrast to formal architecture, such as the grand estate houses of the gentry, churches ... of thatched roofs in the county is increasing and every effort will be made by the Council to encourage and</p> <p>Amend Objective AH O50: Resist the demolition of built vernacular heritage, in particular thatched ...</p>	<p>Insert 11.14.4 National Policy on Architecture, 'Places for People', will promote public engagement with architecture, empower the architectural profession (especially within the public service), raise design quality, and improve data and research on our built environment. It will outline the need to support architects and built environment professionals to work together to achieve a high-quality living environment for everyone, bringing economic, social and environmental benefits to cities, towns, and rural communities across Ireland through the delivery of sustainable, high-quality buildings and public spaces.</p> <p>Insert new objective after AH O40 Support the implementation of the National Policy on Architecture, 'Places for People' prepared by the Department of Housing, Local Government and Heritage</p> <p>Amend Section 11.17 Built Vernacular Heritage Vernacular architecture is generally, defined as the homes and workplaces of the general population built by local people using local materials and, most importantly, drawing on longstanding tradition. This is in contrast to formal architecture, such as the grand estate houses of the gentry, churches ... of thatched roofs in the county is increasing and every effort will be made by the Council to encourage and</p> <p>Amend Objective AH O50: Resist the demolition of built vernacular heritage, in particular thatched ...</p>
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		<p>Amend Objective AH O53: ... Understanding, Minding and Handling of our Built Heritage (2021)</p> <p>Amend Objective AH O55 Preserve the character, including original building features or materials, such as windows, doors, roof coverings and setting (e.g. gates, gate piers, boundary treatments, courtyards etc.) of vernacular buildings, where deemed appropriate by the planning authority. Proposals for extensions to historic or vernacular buildings should not erode the setting and design qualities of the original structure and should be in proportion or subservient to the existing building</p>	<p>Amend Objective AH O55 Preserve the character, including original building features or materials, such as windows, doors, roof coverings and setting (e.g. gates, gate piers, boundary treatments, courtyards etc.) of vernacular buildings, where deemed appropriate by the planning authority. Proposals for extensions to historic or vernacular buildings should not erode the setting and design qualities of the original structure and should be in proportion or subservient to the existing building</p>
221.	Office of Public Works (OPW) Heritage Services Unit	<p>The submission by the OPW outlines observations from the Heritage Services Unit on the draft CDP. The submission notes that the OPW are a prescribed authority in relation to the preparation and making of the development plan under the Planning and Development Act, as amended.</p> <p>Castletown House and Demesne/Parklands Notes that the House and parkland is under the management of the OPW. Notes its highest value as a combine cultural, amenity and biodiversity asset of the county. Refers to its connections with the adjacent areas of Donaghcumper and St. Wolstan's and states that these areas provide a 'Liffey Valley' designed landscape to Castletown.</p> <p>The OPW welcomes the inclusion of the objective AH O22 which safeguards Castletown House and environs as shown on the map contained in the chapter, and also</p>	<p>Chief Executive's Response Amend Objective AH O23</p> <p>Chief Executive's Recommendation Amend last bullet point in Objective AHO 23 as follows;</p> <ul style="list-style-type: none"> Views from the main avenue to, and across, the river towards Castletown, and up and down the river to Celbridge and New Bridges'. <p>Include additional objective: Require that planning applications in proximity to 'Views to be Preserved' are accompanied by a Visual Impact Assessment</p>

		<p>safeguards the amenities of the Wonderful Barn and adjacent buildings.</p> <p>In relation to Objective AH O23 the OPW welcomes this objective but suggests that a sentence of the objective be amended to include the following text (in bold):</p> <p>‘Views from the main avenue to, and across, the river towards Castletown, and up and down the river to Celbridge and New Bridges’</p> <p>In order to avoid development that could detract from the axial/reciprocal “Views to be Preserved” contained in the ‘Protected Area Castletown – Donaghcumper Map’ (Map Ref. V1-11.14), the OPW requests the inclusion of a further objective in the development plan to strengthen this protection as follows;</p> <p>‘Require that planning applications in proximity to ‘Views to be Preserved’ are accompanied by a Visual Impact Assessment.’</p>	
164	Philip O’Reilly	<p>Tipperkevin is an area of significant historical interest. There was a church and a graveyard on the lower commons. The graveyard is still there and investigation would reveal the remains of the ancient church which stood beside the graveyard.</p>	<p>Chief Executive’s Response There are several Sites and Monuments recorded in the Record of Monuments and Places as established under section 12 of the National Monuments (Amendment) Act, 1994 in the Tipperkevin rural area.</p> <p>Objectives AH O2 – AH 010 of the Draft Plan shall protect the archaeological heritage of Tipperkevin from any adverse impacts.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
598	Friends of Harristown Commons	<p>The submission requests that structures identified in the submission to be included on the RPS</p>	<p>Chief Executive’s Response The location of those structures listed in this submission is unclear and so cannot be considered</p>

		<ul style="list-style-type: none"> • Two water pumps • Extensive stone Walls on LR044 	<p>further at this stage. However, the submitter is invited to contact the Council's Planning Department separately, to identify where the listed structures are located so that the merits of including these structures on the Record of Protected Structures can be further investigated.</p> <p>Chief Executive's Recommendation No change to the Draft Plan</p>
308	Irene O'Neill	The submission notes that the Naas Harbour is shown as designated within the Naas Conservation Area.	<p>Chief Executive's Response An Architectural Conservation Area (ACA) is a place, area, group of structures or townscape that is of special architectural, historical, archaeological, technical, social, cultural, or scientific interest, or that contributes to the appreciation of a Protected Structure. The Naas Harbour has a special historical significance to the town of Naas and therefore is included as part of the ACA.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
293	Dermot Rowan	The author is the owner of a protected structure in Co. Kildare. The submission notes that when the property was added to the Record of Protected Structures in 1991 the owner at the time was never notified. It is noted that the grant system is inadequate, and the available grant would only offset 4.4% of the required renovation costs.	<p>Chief Executive's Response The submission correctly states the grant system is severely lacking in terms of funding available for owners of protected structures.</p> <p>It is acknowledged that the available grants for owners of protected structures may be limited however the BHIS and HSF built heritage funding schemes, run by the Department of Housing, Local Government and Heritage in association with Local Authorities, assists owners of heritage structures, including those on the local authorities' Record of Protected Structures, to meet their obligations to care for their properties.</p> <p>In early May 2022, a review of the BHIS / HSF grant system was undertaken by the Department of Housing,</p>

			<p>Local Government and Heritage to evaluate the efficiency and effectiveness of the two grant schemes. Local Authority officials were invited to critique the existing grant system and suggested improvements. Kildare Architectural Conservation Department issued a comprehensive response highlighting issues such as including insufficient funding allocation to each property. The submitter will be updated on outcomes from the grant system review.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>																
328	Teresa Bourke	<p>The submitter states that the historic sites listed in Table 1 should be preserved to ensure the future enjoyment of same. Images of some structures are included to illustrate their importance.</p> <table border="1"> <thead> <tr> <th>Historic Site/local features</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td>St James Church</td> <td>Coughlanstown West</td> </tr> <tr> <td>Coughlanstown East Cross</td> <td>Coughlanstown East</td> </tr> <tr> <td>Harristown Castle</td> <td>Harristown</td> </tr> <tr> <td>St Patricks Church</td> <td>Boundary of Harristown Demesne</td> </tr> <tr> <td>Stone abutments of old railway bridge</td> <td>Harristown</td> </tr> <tr> <td>Stone abutments of old railway bridge</td> <td>Coughlanstown West</td> </tr> <tr> <td>Disused Masonry Railway Bridge over Liffey</td> <td>Harristown</td> </tr> </tbody> </table>	Historic Site/local features	Location	St James Church	Coughlanstown West	Coughlanstown East Cross	Coughlanstown East	Harristown Castle	Harristown	St Patricks Church	Boundary of Harristown Demesne	Stone abutments of old railway bridge	Harristown	Stone abutments of old railway bridge	Coughlanstown West	Disused Masonry Railway Bridge over Liffey	Harristown	<p>Chief Executive's Response The exact locations for the sites listed above are not included with the submission, therefore it cannot be determined if they are listed on the Record of Monuments and Places or the Record of Protected Structures. Listing same in these documents which are appended to the Draft Plan offers legislative protection to ensure their preservation.</p> <p>While the listing of Protected Structures is the responsibility of the local authority and its elected members, the listing of Recorded Monuments is the responsibility of the National Monuments Service.</p> <p>However, it should be noted that there is an action (AH A8) in the Draft Plan, to review and amend on an ongoing basis the Record of Protected Structures and make additions, deletions, and corrections as appropriate over the period of this Plan. While there is also an action (AH A12) to carry out an audit of all historic rail and road bridges, and disused railway lines in Kildare and liaise with stakeholders regarding the management, maintenance, and enhancement of same.</p>
Historic Site/local features	Location																		
St James Church	Coughlanstown West																		
Coughlanstown East Cross	Coughlanstown East																		
Harristown Castle	Harristown																		
St Patricks Church	Boundary of Harristown Demesne																		
Stone abutments of old railway bridge	Harristown																		
Stone abutments of old railway bridge	Coughlanstown West																		
Disused Masonry Railway Bridge over Liffey	Harristown																		

			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
288	Sutton House Hospitality trading as Barberstown Castle	<p>The submission notes that Carton House has its own objective and puts forward a similar objective is required for Barberstown Castle Hotel.</p> <p>The agent submits a new objective as follows: Recognise the sensitive and unique quality of Barberstown Castle as a tourism facility of national significance and to ensure that its integrity is protected. The Council will support and encourage further appropriate development of the tourism and recreational facilities at Barberstown Castle, having regard to its status as a castle of national heritage importance.</p>	<p>Chief Executive's Response Barberstown Castle is listed as a Protected Structure RPS No. B10-08 in Appendix 6 and there are a number of Policies, Objectives and Actions that ensure such heritage assets are protected, conserved and managed for future generations. While Barberstown Castle is listed a Protected Structure it is not considered equivalent to either Castletown House or Carton House, both of which are internationally renowned for their architectural features and surrounding demesne landscapes.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
475	June Stuart	<p>The author of the submission is a resident of Celbridge. It is noted that Castletown House and Demesne, in addition to the River Liffey, provide exceptional amenities and an attractive location in which to reside. It is acknowledged that heritage related aims and objectives of the current draft County Development Plan (CDP) are supported.</p> <p>The author highlights errors in the draft CDP where AH 023 should read as follows; '...Axial views between the Castletown House and the Conolly's Folly, Obelisk.'</p>	<p>Chief Executive's Response Noted and agreed</p> <p>Chief Executive's Recommendation To amend the first bullet point within Objective AH 023 as follows;</p> <ul style="list-style-type: none"> • Axial views between the Castletown House and the Conolly's Folly, Obelisk
222	David Wright	<p><u>Preserving canal architecture</u></p> <p>Care should be taken to preserve the character of the banks of the canals feeders/branches and their associated architecture. It should be noted there are a number of buildings along the canal that could be brought into public use via long leases for Community, Youth and 'Men's Sheds groups</p>	<p>Chief Executive's Response Objective AH 040 in Chapter 11 'Built and Cultural Heritage' ensures the Council will co-operate with Waterways Ireland in the maintenance and enhancement of the Royal Canal and Grand Canal and associated structures/features. Furthermore, Objective AH 035 in Chapter 11 'Built and Cultural Heritage' promotes the maintenance and appropriate re-use of</p>

			buildings of architectural, cultural, historic and aesthetic merit.
			Chief Executive's Recommendation No change to the Draft Plan.
445	IWAI Kildare	Objective AH O40 is referred to and IWAI welcomes the opportunity to work with stakeholders to ensure any new crossings across canals do not impede the passage of boats navigating the waterways. It is also noted that Naas Harbour is in the Naas Conservation area.	Chief Executive's Response In relation to AH O40 the objective states that the Council will co-operate with Waterways Ireland in the management, maintenance and enhancement of the Royal Canal and Grand Canal and associated structures and features. It is proposed to amend TM O89 (Chapter 5) in order to ensure that stakeholders are consulted.
			Chief Executive's Recommendation No change to the Draft Plan.
515	Meath County Council	In relation to Protected Structures, the submission notes that objective AH O24 contained in Chapter 11 states that the views of Carton Demesne should be maintained as well as the character of this historic landscape.	Chief Executive's Response The comments of the submission relating to the built heritage are noted.
			Chief Executive's Recommendation No change to the Draft Plan.
465	Johnstown Community Association	It is vital that Johnstown is designated as an Architectural Conservation Area urgently, due to increasing development pressure.	Chief Executive's Response Action AH A18 is to investigate the designation of further ACAs at appropriate locations throughout the county, which includes Johnstown. Designation of additional ACAs in the county will be decided upon on completion of the relevant investigative work.
			Chief Executive's Recommendation No change to the Draft Plan.
433	John Lawler	That the water tower on private lands at the Hill of Caragh be retained and listed as a protected structure.	Chief Executive's Response The comments in the submission, which state that a water tower on private lands at the Hill of Caragh be retained and listed as a protected structure are noted. Action (AH A8) in the Draft Plan, states it is an action of the Council to; Review and amend on an ongoing basis the Record of Protected Structures and make

			<p>additions, deletions and corrections as appropriate over the period of this Plan.'</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
169	Mark Bruns & Barnhall Meadows Residents	<p>The submission contends that the Wonderful Barn has been neglected by the Council, and the conservation plans for it are not sufficient such as AH O22 which merely states "safeguard the amenities of the Wonderful Barn including the adjacent amenities". It is further stated that it is paramount for the Council to develop this site by investing in the restoration of structures that are falling apart, making the land accessible to the public, providing bins around the site, removing graffiti from buildings, and making the land a tourist attraction.</p>	<p>Chief Executive's Response In addition to AH O22, the Draft Plan includes other objectives and actions which relate to the Wonderful Barn under section 4.27 such as Objective RE O145 which protects and promotes key sites and tourist facilities in the north of the county including the Wonderful Barn and Action RE A7 which is to prepare an integrated public amenity park and tourism destination at the Wonderful Barn and associated lands, to be informed by a detailed conservation and management plan. This action is also repeated in Chapter 13, LR A22.</p> <p>Furthermore, the Wonderful Barn is also listed as a Protected Structure (B11-15) in Appendix 2 of the Draft Plan which provides protection for listed buildings through legislation outlined in the Planning and Development Act, 2000 (as amended).</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
559	Newbridge Community Development	<p>There is an opportunity to include an objective regarding the protection and promotion of the Sligh Dala at Great Connell, via Connell Ford and beyond, as a significant historical and heritage location for the town of Newbridge and the wider area. opportunities to link this with Dun Ailline, Kilcullen and The Curragh be explored.</p>	<p>Chief Executive's Response The Draft Kildare County Development Plan does not include any specific links to historic Newbridge as Newbridge has its own statutory Local Area Plan. This matter can be considered as part of the review of the Newbridge Local Area Plan, preliminary work for which is already underway.</p>

		<p>Would like to see protections extended to what is left of the Barracks structure in Newbridge - Barrack Gate Athgarvan Road, The Watering Gates and walls in the vicinity, Bord Na Mona HQ building.</p>	<p>In relation to the Barracks structures in Newbridge, the Architectural Conservation Department is currently undertaking a review of the surviving former Barracks in Newbridge with a view to potentially including same on the Record of Protected Structures (RPS). Buildings and structures considered to be of special interest from an architectural, historical, archaeological, artistic, cultural, scientific, social or technical point of view will be proposed for inclusion on the RPS following this review.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
472	Keep Ireland Open	<p>The submission supports the following policies, objectives, and actions; Archaeological Heritage, all policies, objectives, and actions; World Heritage, Policy AH P4 and Objective AH O16, Architectural Heritage Policy AP6 and Objectives AH O18, AH O 22 to AH O24, AH O 28 and AH O40; Architectural Conservation Areas, all policies and objectives</p> <p>The submission recommends that Section 11.2 Archaeological Heritage should be repositioned to after Section 11.9 Conservation Plans.</p> <p>Publish a list with maps of heritage sites which are open to the public and make available on the Council's web-site.</p> <p>The submission recommends an additional objective in Chapter 11: Prepare and implement a strategy for access to heritage routes by identifying, promoting, and supporting the development of a network of walking and cycling routes and heritage trails, with a focus on publicly accessible</p>	<p>Chief Executive's Response The comments in relation to the policies and objectives are noted and welcomed</p> <p>Conservation Plans in this context refers to archaeological conservation plans so the location within Chapter 11 is correct.</p> <p>The matters raised with respect to the maps of heritage sites are outside the scope of a Development Plan.</p> <p>Chapter 13 includes an action to support the preparation and implementation of a County Walking Strategy, within the lifetime of the Plan.</p> <p>Objective AH O30 promote best practice and the use of skilled specialist practitioners</p> <p>Policy AH P1 recognises the value and opportunity of Kildare's unique heritage resource</p>

	<p>heritage sites and attractions in co-operation with community groups, landowners and other stakeholders, incorporating features of heritage interest.</p> <p>The submission recommends an additional objective in Chapter 11; <i>Promote best practice in the conservation and management of heritage resources.</i></p> <p>Promote heritage as a resource that contributes to quality of life.</p> <p>Support the implementation of the Heritage Plan in relation to the promotion and protection of natural heritage.</p> <p>The submission recommends an additional objective in Chapter 11 as follows; <i>The Council will continue to develop a programme of survey and management of Council-owned monuments and structures of historic interest.</i></p> <p>The submission recommends additional objectives in Chapter 11:</p> <ul style="list-style-type: none"> • <i>When dealing with development proposals that would impact upon archaeological sites and or features, there will be a presumption in favour of preservation in situ of archaeological remains and settings in accordance with Government policy.</i> • <i>Support and promote the protection and appropriate management and sympathetic enhancement of archaeological heritage and in particular by implementing the Planning & Development Act</i> 	<p>Objective AH O1 supports the implementation of the County Kildare Heritage Plan 2019-2025 and subsequent heritage plans.</p> <p>Action AH A6 seeks to develop a programme of survey and maintenance of Council-owned monuments and structures of historic interest.</p> <p>Objectives AH O2 to AH O10 consider the management of archaeological heritage during development. All of the objectives proposed in this submission are addressed within these objectives.</p> <p>Actions AH A1 and AH A2 consider access to archaeological heritage. Holy Wells are listed in the RMP sites for Kildare in Appendix 5</p> <p>Agreed include a new action that supports community involvement in the management and conservation of archaeological heritage.</p> <p>Objectives AH O2 to AH O10 consider the management of archaeological heritage during development. All of the objectives proposed in this submission are addressed within these objectives.</p> <p>Reference to the Built & Archaeological Heritage Climate Change Sectoral Adaptation Plan and Biodiversity Climate Change Sectoral Adaptation Plan have been included in the draft plan following a submission from the Department of Housing, Local Government and Heritage.</p>
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		<p>2000(as amended) and the National Monuments Act (as amended).</p> <ul style="list-style-type: none"> • Ensure the support and promote the protection and appropriate management and sympathetic enhancement of archaeological heritage and in particular by implementing the Planning & Development Act 2000(as amended) the National Monuments Act (as amended) and implementation of/he legislative, statutory and policy provisions relevant to the conservation of archaeological heritage • Promote access to historic and archaeological landscapes. <p>The submission recommends an additional objective in Chapter 11 as follows; Encourage and promote the appropriate management and enhancement of archaeological heritage, to include community initiatives.</p> <p>The submission recommends additional objectives in Chapter 11:</p> <ul style="list-style-type: none"> • Protect and preserve insitu all archaeological sites and features of historic interest discovered/identified subsequent to the publication of the RMP. • Protect archaeological sites, their settings and their visual amenities and National Monuments included those listed in the RPM and monuments protected under/subject to Preservation Orders including those in the ownership or guardianship of the State • In assessing development proposals council will consider the following criteria: Development within a 20m radius of a recorded monument will not be permitted and proposed developments within 75m radius will be discouraged. • Protect known and unknown archaeological sites, structures and monuments. 	<p>Holy Wells are listed in the RMP sites for Kildare in Appendix 5 and are protected by policies and objectives that consider RMP sites in the county.</p> <p>The CE has proposed additional objectives in relation to protection of Dun Ailinne. See part 5 of CE report and CE's proposed amendments.</p> <p>Chief Executive's Recommendation To include a new action in Section 11.10 Encourage and promote the appropriate management and enhancement of archaeological heritage, to include community initiatives</p>
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		<ul style="list-style-type: none"> • Require archaeological impact assessments, geophysical surveys, test excavations and monitoring where development proposals involve ground clearance of more than half a hectare, for linear developments over 1 km in length or in proximity to areas with a density of known archaeological monuments and history of discovery, as identified by a licensed archaeologist. • Protect historic and archaeological landscapes from inappropriate development. <p>The submission recommends an additional objective in Chapter 11 as follows; Support the implementation of the Sectoral Adaptation Plans which provides that in some locations, in consultation with landowners, it may be possible to access sites.</p> <p>The submission recommends the inclusion of an additional objective in Section 11.12 as follows; Protect the Outstanding Universal Value of sites (named) included in the tentative list of WHS from inappropriate development.</p> <p>The submission recommends the inclusion of an additional sub section and a new objective, with respect to Mass Rocks and Holy Wells and to include additional objectives to preserve, protect and, where necessary, enhance mass rocks and holy wells.</p>	
472	Keep Ireland Open	<p>The submission recommends the inclusion of a new objective:</p> <p>Development won't normally be permitted unless it doesn't result in damage to sites of nature conservation or important features of archaeological heritage or where it could cause harm to the appearance and character of the landscape and where it can be readily absorbed into its</p>	<p>Chief Executive's Response Chapters 11, 12 and 13 all contain policies that seek to consider the impact of development on the receiving environment which includes sites of nature conservation or important features of archaeological heritage and landscape.</p> <p>Chief Executive's Recommendation</p>

		surroundings by taking advantage of existing vegetation and/or topography, or where enjoyment of the countryside isn't adversely affected by the nature, scale, extent, frequency or timing of the proposed activities including any noise likely to be generated and where ancillary development shall be small in scale, designed to a high standard and be sympathetic to the environment in its setting, layout and landscaping.	No change to draft Plan.
410	Celbridge Community Council	<u>Built Heritage of Celbridge</u> The views from the main avenue to the river towards Castletown, and up and down the river to Celbridge and New Bridges protected by Objective AH O23 are not reflected (i.e., annotated by arrows) in the Castletown Donaghcumper Map in Section 11.14 of the draft Plan	<p>Chief Executive's Response The request to include the views protected under objective AH O23 under Map V1-11.14 is not accepted. Map V1-11.14 relates to objective AH O22 only. It should be noted that the protected views listed under objective AH O23 do not need to be mapped in order to be protected.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
405	Kildare Climate Action Linkage Group	<p>There is a rich music heritage in Kildare which is largely forgotten. The Council should support the study and awareness of Ethnomusicology. The opportunities for community building and income generation from music linked events is yet to be explored in Kildare.</p> <p>The memory of military heritage and music legacy of the British Garrison army included brass bands and a tradition of pantomime. It is submitted that the cultural heritage and creative arts from the Garrison era be celebrated, and oral histories harvested for future generations.</p>	<p>Chief Executive's Response In relation to supporting the study and awareness of Ethnomusicology it should be noted that the statutory elements and remit of the Development Plan are set out clearly in the Planning and Development Act 2000, as amended. In preparing the Development Plan, planning authorities must exercise caution not to inappropriately stray into the operation of other statutory codes and regulatory regimes that relate to the development sector, which are outside the remit of a county or city development plan. This is applicable to policy or objectives for non-planning functions governed by other legislation and regulations, including the matters raised in this part of this submission.</p> <p>Chief Executive's Recommendation No change to the Draft Plan</p>
468	Ann Behan	There is a rich music heritage in Kildare, and this part of heritage is largely forgotten. The council should support	<p>Chief Executive's Response See response to submission 405 above</p>

		<p>the study and awareness of Ethnomusicology. The opportunities for community building and income generation from music linked events is yet to be explored in Kildare.</p> <p>The memory of military heritage and music legacy of the British Garrison army included brass bands and a tradition of pantomime. It is submitted that the cultural heritage and creative arts from the Garrison era be celebrated, and oral histories harvested for future generations.</p>	<p>Chief Executive's Recommendation No change to the Draft Plan</p>
NATURAL HERITAGE			
552.	Department of Housing, Local Government and Heritage	<p>Edit 11.5.2 11.5.2 <i>Heritage Ireland 2030 (2022): Heritage Ireland 2030 is a cross-Government Strategic Policy for Heritage that sets out a framework for the protection, conservation, promotion and management of Ireland's heritage for the next decade and beyond. The Strategy lays out a roadmap for the best possible future for Irish heritage with a joined-up approach at government, stakeholder and community levels. A comprehensive implementation plan is now being developed to deliver on its actions. The principal themes of the strategy are communities, leadership and partnerships, reflecting the importance of ongoing collaboration between government and communities, stakeholders, citizens and local authorities in delivering upon the objectives of this strategy</i></p>	<p>Chief Executive's Response All recommendations agreed.</p> <p>Chief Executive's Recommendation Amend Section 11.5.2 11.5.2 The National Heritage Plan (2002) In 2002, the Government published the National Heritage Plan which set out strategies for the conservation and management of our heritage. A key element of both plans is an enhanced role for local authorities in heritage Heritage Ireland 2030 (2022): Heritage Ireland 2030 is a cross-Government Strategic Policy for Heritage that sets out a framework for the protection, conservation, promotion and management of Ireland's heritage for the next decade and beyond. The Strategy lays out a roadmap for the best possible future for Irish heritage with a joined up approach at government, stakeholder and community levels. A comprehensive implementation plan is now being developed to deliver on its actions. The principal themes of the strategy are communities, leadership and partnerships, reflecting the importance of ongoing</p>

			collaboration between government and communities, stakeholders, citizens and local authorities in delivering upon the objectives of this strategy.
532	Swindon Investment Company Ltd	<p>The submission is on behalf of the Mallaghan family, owners of c.300 acres of Carton Demesne, who are committed to the completion of conservation and restoration work required on their lands whilst implementing previously approved master planning application (REF PL9/5/88418-441/91).</p> <p>Their aims: conservation, protection where appropriate and restoration of Carton Demesnes' woodland and protected structures which will provide public access to existing woodlands through a strategic approach that ensures no piecemeal development.</p> <p>It is noted that conservation measures are funded through appropriate development, which have been outlined in a previously issued masterplan 2020-2035. All proposals formed part of the 1991 application. The subject areas will require the implementation of the recently updated 2019 Woodland Management Plan attached to this submission.</p> <p>It is requested that the Woodland Management Plan 2019 map should replace Map 11.13, which has a number of errors.</p>	<p>Chief Executive's Response The Woodland Management Plan maps requested to be submitted (given the poor quality of those originally submitted) have now been reviewed. While the submitted maps represent part of the woodland area within the Demesne Walls of Carton Demesne it is considered more appropriate to review the entire Demesne landscape with a view to updating Map V1 11.13, as appropriate.</p> <p>Chief Executive's Recommendation To include an action in Section 11.16 (County Houses and Demesnes) as follows; To review and update Map V1 11.13, with respect to the extent of existing woodland within the Demesne Walls of Carton Demesne, during the life of the Plan.</p>
555	Irish Solar Energy Association	Through careful design, solar development can be a positive influence on historic landscapes and assets, through the protection of cultural heritage assets as part of the overall design concept.	<p>Chief Executive's Response Comments are noted.</p> <p>Chief Executive's Recommendation See proposed amendment to section 7.6 as part of response to submission no. 555.</p>
405	Kildare Climate Action	<p>Suggests the amendment of AH O44 as follows:</p> <p>Preserve, protect and where necessary encourage the use of heritage/ traditional varieties of plants and trees (of local</p>	<p>Chief Executive's Response While there are many policies within the plan encouraging the planting of native species it is not always appropriate to do so in all settings. Many non-</p>

	Linkage Group	provenance and origin) that form part of the local/regional biodiversity resource and that contribute to local identity.	native tree species can also have benefits for pollinators. Chief Executive's Recommendation No changes to the Draft Plan.
468	Ann Behan	Objective AH O44 is welcomed. However, an amendment is suggested to include the words "(of local provenance and origin)" after trees.	Chief Executive's Response See response to submission 405 above Chief Executive's Recommendation No changes to the Draft Plan.
ARCHAEOLOGY			
552.	Department of Housing, Local Government and Heritage	<p>Section 11.3: Legislative context: Heading and end of first sentence: 11.3.1 - The correct date range for National Monuments legislation is 1930-2014. Second paragraph: two months, not two weeks' notice must be given.</p> <p>In section 11.3.1, after the first sentence, insert: 'In summary, this provides legal protection for all archaeological objects, wrecks 100 or more years old and for a range of categories of monuments and places. Archaeological objects (which in broad terms includes all moveable objects of archaeological importance) are comprehensively protected under the National Monuments Acts.</p> <p>At the end of section 11.3.2, insert: 'The Planning and Development Acts and Regulations contain further provisions relating to the protection of archaeological heritage in the course of particular planning cases. These include provisions making it clear that imposition of archaeological conditions on grants of planning permission does not create grounds for claims for compensation. Detailed provisions are also included, which ensure that</p>	<p>Chief Executive's Response All recommendations agreed. Except Section 11.4 where it is considered more appropriate to include in Section 11.3.3</p> <p>Chief Executive's Recommendation</p> <p>Amend Section 11.3: 1 National Monuments legislation is 1930—2004-2014. Archaeological heritage is legally protected from unauthorised damage or interference through powers and functions under the National Monuments Acts 1930—2004-2014. In summary, this provides legal protection for all archaeological objects, wrecks 100 or more years old and for a range of categories of monuments and places. Archaeological objects (which in broad terms includes all moveable objects of archaeological importance) are comprehensively protected under the National Monuments Acts</p> <p>Section 12 of the National Monuments (Amendment) Act 1994 requires an</p>

		<p>planning applications for proposed development which would affect sites protected under the National Monuments Acts 1930 to 2014 or archaeological sites in general, are referred to the National Monuments Service.'</p> <p>Section 11.4 International Policy Context: Insert a reference to the Environmental Impact Assessment (EIA) Directive, as follows: 'The EU Directive on EIA (which is given effect to in Irish law through a range of national legislation) clearly requires that EIA includes consideration of impact on archaeological heritage.'</p> <p>Section 11.6 Development Proposals affecting archaeology: The following should be inserted after the third sentence: 'It is important that the archaeological potential of development sites should be addressed early in the design and planning process in order to ensure that archaeological remains are not damaged or destroyed and that completion of projects is not delayed.'</p>	<p>owner/occupier to give two weeks months written notice of proposals to carry out works at or in relation to a recorded monument.</p> <p>Amend Section 11.3: 2 Section 10 of the Planning and Development Act 2000, as amended, sets out a list of mandatory objectives to be included in a development plan. A number of these relate to the conservation of the natural heritage and for the conservation of European sites and any other sites which may be prescribed.</p> <p>The Planning and Development Acts and Regulations contain further provisions relating to the protection of archaeological heritage. These include provisions making it clear that the imposition of archaeological conditions on grants of planning permission does not create grounds for claims for compensation. Detailed provisions are also included, which ensure that planning applications for proposed development which would affect sites protected under the National Monuments Acts 1930 to 2014 or archaeological sites in general, are referred to the National Monuments Service.</p> <p>Insert 11.3.3 Environmental Impact Assessment (EIA) Directive, The EU Directive on EIA (which is given effect in Irish law through a range of national legislation) clearly requires that EIA includes consideration of impact on archaeological heritage</p> <p>Amend Section 11.6 Various types of development can impact on the visual appreciation, setting and amenity of recorded</p>
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			<p>monuments. Such impacts should be adequately assessed and, where possible, eliminated or minimised. It is important that the archaeological potential of development sites should be addressed early in the design and planning process in order to ensure that archaeological remains are not damaged or destroyed, and that completion of projects is not delayed. Previously unidentified archaeological sites may be uncovered during development works, while archaeological deposits that would be damaged by development must be investigated and recorded in great detail'.</p>
552.	Department of Housing, Local Government and Heritage	<p>Amend Objective AH 03 At the start of the objective, insert: 'In co-operation with the National Monuments Service, Department of Housing, Local Government and Heritage ...'</p> <p>Amend Objective AH 03 to insert purple text and/or monitoring and/or underwater archaeological impact assessments for planning applications in areas of archaeological importance and where a development proposal is likely to impact upon in-situ archaeological monuments, their setting and archaeological deposits, based on recommendations of a suitably qualified archaeologist and the Council will seek and have regard to the advice and recommendations of the Department of Housing, Local Government and Heritage.</p> <p>Objective AH 08: At the end of the first sentence, insert: .. and the National Monuments Service, Department of Housing, Local Government and Heritage.</p>	<p>Chief Executive's Response All recommendations agreed.</p> <p>Chief Executive's Recommendation Amend Objective AH 03: In co-operation with the National Monuments Service, Department of Housing, Local Government and Heritage require archaeological impact assessment, surveys, test excavation and/or monitoring and/or underwater archaeological impact assessments for planning applications in areas of archaeological importance and where a development proposal is likely to impact upon in-situ archaeological monuments, their setting and archaeological deposits, based on recommendations of a suitably qualified archaeologist and the Council will seek and have regard to the advice and recommendations of the Department of Housing, Local Government and Heritage.</p> <p>Amend Objective AH 08: Protect historic burial grounds that are recorded monuments and</p>

			<p>encourage their maintenance in accordance with best conservation principles in co-operation with the Historic Monuments Advisory Committee and the National Monuments Service, Department of Housing, Local Government and Heritage. Development may be restricted or conditions requiring substantial excavation may be imposed in and adjacent to former burial grounds.</p>
552.	Department of Housing, Local Government and Heritage	<p>Amend Section 11.2 Insert purple text ... industrial archaeology and underwater sites such as wrecks and objects.</p> <p>Insert into 11.3.1 purple text ... fieldwork, or the discovery of sites underwater). Wrecks over 100 years old and archaeological objects underwater, irrespective of their age or location, are protected under Section 3 of the National Monuments (Amendment) Act 1987. Wrecks that are less than 100 years old and the potential location of wrecks or archaeological objects may also be protected under Section 3 of the 1987 (Amendment) Act by the placement of an underwater heritage order if the wreck, area or object is considered to be of sufficient historical, archaeological or artistic importance to merit such protection. Diving or general interference with any wreck which is more than one hundred years old or an archaeological object which is lying on, in or under the sea bed or on or in land covered by water is prohibited except in accordance with a licence issued by the Minister for Housing, Local Government and Heritage under Section 3 (5) of the Act. A licence is also needed under the same provisions of the Act to survey a wreck or archaeological object or a wreck that is protected by an underwater heritage order.</p>	<p>Chief Executive's Response All recommendations agreed except changes to recommendation for Section 11.5.5. An explanation for the sectoral plans has been included for clarity.</p> <p>Chief Executive's Recommendation Amend Section 11.2 ... industrial archaeology and underwater sites such as wrecks and objects. ...e.g. through ground disturbance, fieldwork, or the discovery of sites underwater).</p> <p>Wrecks over 100 years old and archaeological objects underwater, irrespective of their age or location, are protected under Section 3 of the National Monuments (Amendment) Act 1987. Wrecks that are less than 100 years old and the potential location of wrecks or archaeological objects may also be protected under Section 3 of the 1987 (Amendment) Act by the placement of an underwater heritage order if the wreck, area or object is considered to be of sufficient historical, archaeological or artistic importance to merit such protection. Diving or general interference with any wreck which is more than one hundred years old or an archaeological object which is lying on, in or under the sea bed or on</p>

	<p>Therefore, a licence is required to dive, survey or disturb any protected wreck site or for targeted searches for archaeological objects underwater. The Minister may, at their discretion, grant or refuse to grant a licence and may attach appropriate conditions which are legally binding and specified in the licence.</p> <p>Insert new Section 11.5.5 National Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019): The local authority will co-operate with other agencies in the investigation of climate change on archaeological sites and monuments and to develop suitable adaptation measures to strengthen resilience and reduce the vulnerability of archaeological heritage in line with the National Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019). Development, including infrastructure responding to the mitigation of flooding resulting from climate change can lead to impacts on both recorded and unrecorded archaeological and cultural heritage. The Council will seek to protect, preserve and promote the underwater heritage of County Kildare. Where flood relief schemes are being undertaken the Council will have regard to the Archaeological Guidelines for Flood Relief Schemes (Department of Housing, Local Government and Heritage 2022).</p> <p>Amend Section 11.6 purple text ... proposals close to archaeological monuments, proposals extensive in area (half a hectare or more) or length (1 km or more) or that includes works within rivers or lakes_and development that requires an Environmental Impact Assessment.</p>	<p>or in land covered by water is prohibited except in accordance with a licence issued by the Minister for Housing, Local Government and Heritage under Section 3 (5) of the Act. A licence is also needed under the same provisions of the Act to survey a wreck or archaeological object or a wreck that is protected by an underwater heritage order. Therefore, a licence is required to dive, survey, or disturb any protected wreck site or for targeted searches for archaeological objects underwater. The Minister may, at their discretion, grant or refuse to grant a licence and may attach appropriate conditions which are legally binding and specified in the licence.</p> <p>Include Section 11.5.5 National Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019): The Climate Action and Low Carbon Development Act 2015 required Sectoral plans to be prepared in accordance with Sectoral Planning Guidelines for Climate Change Adaptation (DCCAE, 2018a). In 2019 a National Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage was prepared by the Department of Culture, Heritage, and the Gaeltacht.</p> <p>The local authority will co-operate with other agencies in the investigation of climate change on archaeological sites and monuments and to develop suitable adaptation measures to strengthen resilience and reduce the vulnerability of archaeological heritage in line with the National Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019).</p>
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	<p>especially graveyards and monastic sites, in rivers or lakes, wetlands,</p> <p>..... the preparation of Archaeological Impact Assessments and Underwater Archaeological Impact Assessment</p> <p>11.8 purple text County Kildare's rivers, lakes and wetlands contain many features and finds associated with its underwater heritage, such as walls, fords, stepping-stones and associated archaeological objects and features. Section 3 of the National Monuments (Amendment) Act 1987 makes specific provisions for the protection of shipwrecks and underwater archaeological objects, whereby, all wrecks over 100-years old are legally protected. The Wreck Inventory of Ireland Database (WIID) holds records of over 18,000 known and potential wreck sites and this is used as a tool to help manage and protect historic wrecks. Development in off-shore and coastal waters, tidal estuaries and river areas which have the potential to impact on both known and potential terrestrial and underwater archaeology will require appropriate underwater archaeological assessment and the Council will seek and have regard to the advice and recommendations of the Department of Housing, Local Government and Heritage relating to all developments within these environments.</p> <p>Amend Policy AH P1 purple manage, conserve, promote and protect it, for present and future generations.</p> <p>Amend policy AH P2 purple text archaeological sites and/or subsurface and underwater archaeological remains.</p>	<p>Development, including infrastructure responding to the mitigation of flooding resulting from climate change can lead to impacts on both recorded and unrecorded archaeological and cultural heritage. The Council will seek to protect, preserve and promote the underwater heritage of County Kildare. Where flood relief schemes are being undertaken the Council will have regard to the Archaeological Guidelines for Flood Relief Schemes (Department of Housing, Local Government and Heritage 2022).</p> <p>Amend Section 11.6 ... proposals close to archaeological monuments, proposals extensive in area (half a hectare or more) or length (1 km or more) or that includes works within rivers or lakes and development that requires an Environmental Impact Assessment.</p> <p>especially graveyards and monastic sites, in rivers or lakes, wetlands,</p> <p>..... the preparation of Archaeological Impact Assessments and Underwater Archaeological Impact Assessment</p> <p>Amend 11.8 Underwater archaeology County Kildare's rivers, lakes and wetlands contain many features and finds associated with its riverine underwater heritage, such as walls, fords, stepping-stones and associated archaeological objects and features. Section 3 of the National Monuments (Amendment) Act 1987 makes specific provisions for the protection of shipwrecks and underwater archaeological objects, whereby, all wrecks over 100-</p>
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	<p>Amend Objective AH O2 purple text ... and archaeological interest, including underwater cultural heritage. The Council with the recommendation of the Framework and Principles for the Protection of Archaeological Heritage (1999) and the Council will seek and have regard to the advice and recommendations of the Department of Housing, Local Government and Heritage</p> <p>Amend Objective AH O3: purple text Require archaeological impact assessment, surveys, test excavation and/or monitoring and/or underwater archaeological impact assessments for planning applications in areas of archaeological importance and where a development proposal is likely to impact upon in-situ archaeological monuments, their setting and archaeological deposits, based on recommendations of a suitably qualified archaeologist and the Council will seek and have regard to the advice and recommendations of the Department of Housing, Local Government and Heritage.</p> <p>Amend Objective AH O4: purple text unknown sites, features and objects and areas of underwater archaeological heritage.</p> <p>Amend Objective AH O6: purple text</p> <ul style="list-style-type: none"> • any sites and features of historical and archaeological interest, including underwater cultural heritage and protected wrecks. • any subsurface archaeological features, including those underwater, that may ... <p>Amend Policy AH P5: purple text</p>	<p>years old are legally protected. The Wreck Inventory of Ireland Database (WIID) holds records of over 18,000 known and potential wreck sites and this is used as a tool to help manage and protect historic wrecks. Development in off-shore and coastal waters, tidal estuaries and river areas which have the potential to impact on both known and potential terrestrial and underwater archaeology will require appropriate underwater archaeological assessment and the Council will seek and have regard to the advice and recommendations of the Department of Housing, Local Government and Heritage relating to all developments within these environments.</p> <p>Amend Policy AH P1 underlined text manage, conserve, promote and protect it, for present and future generations.</p> <p>Amend policy AH P2 underlined text archaeological sites and/or subsurface and underwater archaeological remains.</p> <p>Amend Objective AH O2 underlined text ... and archaeological interest, including underwater cultural heritage. The Council with the recommendation of the Framework and Principles for the Protection of Archaeological Heritage (1999) and the Council will seek and have regard to the advice and recommendations of the Department of Housing, Local Government and Heritage</p> <p>Amend Objective AH O3: Require archaeological impact assessment, surveys, test excavation and/or monitoring and/or underwater archaeological impact assessments for planning</p>
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		<p>... items of industrial heritage, riverine heritage and other stand-alone features of ...</p> <p>Amend Policy AH A7: purple text of industrial heritage, riverine heritage and other standalone ...</p>	<p>applications in areas of archaeological importance and where a development proposal is likely to impact upon in-situ archaeological monuments, their setting and archaeological deposits, based on recommendations of a suitably qualified archaeologist and the Council will seek and have regard to the advice and recommendations of the Department of Housing, Local Government and Heritage.</p> <p>Amend Objective AH O4: unknown sites, features and objects and areas of underwater archaeological heritage.</p> <p>Amend Objective AH O6:</p> <ul style="list-style-type: none"> • ... National Monuments (Amendment) Act, 1994 • any sites and features of historical and archaeological interest, including underwater cultural heritage and protected wrecks. • any subsurface archaeological features, including those underwater, that may ... <p>Amend Policy AH P5: ... items of industrial heritage, riverine heritage and other stand-alone features of ...</p> <p>Amend Policy AH A7: of industrial heritage, riverine heritage and other standalone ...</p>
598	Friends of Harristown Commons	Submission states that it is not clear in Section 11.10.1 Urban Archaeological surveys what type of protection is afforded the listed settlements.	<p>Chief Executive's Response Agreed.</p> <p>Chief Executive's Recommendation Amend Section 11.10.1 to include the following text:</p>

			<p>In 1986 an Urban Archaeological Survey of County Kildare was conducted. A number of medieval / early modern towns with known archaeological potential were surveyed and Zones of Archaeological Potential were identified within these towns. These settlements are listed in Table 11.1 and are included in the Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act, 1994.</p> <p>Edit Table 11.1 to include RMP reference numbers.</p> <table border="1"> <thead> <tr> <th>Settlement</th> <th>RMP No</th> </tr> </thead> <tbody> <tr> <td>Ardree,</td> <td>KD035-032001-</td> </tr> <tr> <td>Ardscull</td> <td>KD035-012002-, KD035-012003-</td> </tr> <tr> <td>Athy</td> <td>KD035-022--</td> </tr> <tr> <td>Ballymore Eustace,</td> <td>KD029-011001-</td> </tr> <tr> <td>Castledermot</td> <td>KD040-002----</td> </tr> <tr> <td>Celbridge</td> <td>KD011-012001-</td> </tr> <tr> <td>Clane,</td> <td>KD014-026001-</td> </tr> <tr> <td>Cloncurry</td> <td>KD004-021001-</td> </tr> <tr> <td>Dunmanogue</td> <td>KD039-005-</td> </tr> <tr> <td>Harristown</td> <td>KD029-038001</td> </tr> <tr> <td>Kildare,</td> <td>KD022-029001-</td> </tr> <tr> <td>Kilkea</td> <td>KD037-017----</td> </tr> <tr> <td>Kill,</td> <td>KD019-008001</td> </tr> <tr> <td>Leixlip,</td> <td>KD011-004001-</td> </tr> <tr> <td>Moone</td> <td>KD036-042----</td> </tr> <tr> <td>Naas</td> <td>KD019-030---</td> </tr> <tr> <td>Old Kilcullen,</td> <td>KD028-049----</td> </tr> <tr> <td>Oughterard</td> <td>KD015-007001-</td> </tr> <tr> <td>Rathangan,</td> <td>KD017-044----</td> </tr> <tr> <td>Rathmore,</td> <td>KD020-009001-</td> </tr> </tbody> </table>	Settlement	RMP No	Ardree,	KD035-032001-	Ardscull	KD035-012002-, KD035-012003-	Athy	KD035-022--	Ballymore Eustace,	KD029-011001-	Castledermot	KD040-002----	Celbridge	KD011-012001-	Clane,	KD014-026001-	Cloncurry	KD004-021001-	Dunmanogue	KD039-005-	Harristown	KD029-038001	Kildare,	KD022-029001-	Kilkea	KD037-017----	Kill,	KD019-008001	Leixlip,	KD011-004001-	Moone	KD036-042----	Naas	KD019-030---	Old Kilcullen,	KD028-049----	Oughterard	KD015-007001-	Rathangan,	KD017-044----	Rathmore,	KD020-009001-
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			Silliot Hill	KD022-032
598	Friends of Harristown Commons	Submission states that Harristown occupies a unique position in Irish archaeology and as such development impacts on the sites should be avoided to protect the site.	<p>Chief Executive's Response Not agreed. Harristown is a medieval deserted settlement and is listed in the RMP (KD029-038001) and listed in Appendix 5 of the Draft Plan. Objective AH O6 seeks to protect sites included in the Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act, 1994</p> <p>Chief Executive's Recommendation No change to draft plan.</p>	
598	Friends of Harristown Commons	<p>Submission states that a zone of archaeological potential also exists in the townland of Dunnstown where there are a number of recorded monuments in the vicinity of Dunnstown and a wetland of national ecological importance in close proximity (Harristown Commons).</p> <p>The submission contends that wetland sites are unique historic landscapes which warrant special protective measures and should be acknowledged within Chapter 11.</p>	<p>Chief Executive's Response Agreed. See response to Submission No. 552 (Department of Housing, Local Government and Heritage).</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 552 (the Department of Housing, Local Government and Heritage)</p>	
405	Kildare Climate Action Linkage Group	<p>The submission requests that Plan refer to the Built & Archaeological Heritage Climate Change Sectoral Adaptation Plan prepared under the National Adaptation Framework and to demonstrate how the recommendations are to be implemented in the Development Plan.</p> <p>Additionally, the submission requests that KCC sign up to the Blue Shield Principles to protect cultural and natural heritage.</p>	<p>Chief Executive's Response Agreed. A new subsection will refer to the Built & Archaeological Heritage Climate Change Sectoral Adaptation Plan.</p> <p>An additional action is also proposed in relation to the Blue Shield Principles.</p> <p>Chief Executive's Recommendation Include an addition subsection under 11.5 as follows: 11.5.5 National Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019): The Climate Action and Low Carbon Development Act 2015 required Sectoral plans to be prepared in</p>	

			<p>accordance with Sectoral Planning Guidelines for Climate Change Adaptation (DCCAE, 2018a). In 2019 a National Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage was prepared by the Department of Culture, Heritage, and the Gaeltacht.</p> <p>Add a new action after section 11.9: Explore the feasibility of signing up to the Blue Shield Principles to protect cultural and natural heritage.</p>
468	Ann Behan	<p>The “<i>Built & Archaeological Heritage Climate Change Sectoral Adaptation Plan</i>” (link provided) has not been referred to in section 11.5. It is requested that this be addressed, and to demonstrate how the recommendations are to be implemented in the Development Plan.</p> <p>It is also proposed that the Council sign up to the Blue Shield Principles to protect cultural and natural heritage (link provided) as climate change is and will continue changing Ireland’s heritage. Effective response requires resources, authority, leadership, and information.</p>	<p>Chief Executive’s Response See response to submission 405 above</p> <p>Chief Executive’s Recommendation See recommendation to submission 405 above</p>
CULTURAL HERITAGE			
472	Keep Ireland Open	<p>The submission recommends an additional objective in Chapter 11:</p> <ul style="list-style-type: none"> • Traditional access routes will be designated as public rights of way. In other cases, routes will be acquired by agreement with landowners or by way of compulsory powers. • Designate traditional walking routes to the uplands as public rights of ways. 	<p>Chief Executive’s Response The term ‘traditional access routes’ have not been defined. It is not appropriate to include an ambiguous term in a Development Plan objective. The CDP already contains an Action (LR A8) to review all public rights of way having regard to the Office of the Planning Regulators recent Case Study Paper titled “Public Rights of Way and the Local Authority Development Plan” June 2021 (Survey Report on the Operation of Section 10(2)(o) of the Planning Act), during the lifetime of this Plan.</p>

		<ul style="list-style-type: none"> • Research and map existing network of traditional paths used for leisure purposes to determine their legal status. • Seek to negotiate access to lands for amenity purposes using access agreements, where appropriate and feasible. 	Chief Executive's Recommendation No change to draft Plan.
281	Donal Knight	Local area signage should also contain historical Irish names.	Chief Executive's Response Noted and agreed Chief Executive's Recommendation Amend Action AH A3 in chapter 11 'Built and Cultural Heritage' Creation' as follows; The Council will support and encourage the provision of signage in Irish and English to publicly accessible recorded monuments.
518	Strategic Power Projects Limited	Solar development can be a positive influence on historic landscapes and assets, through the protections of cultural heritage assets as part of the overall design concept. It is compatible alongside cultural heritage features if a design led approach is applied.	Chief Executive's Response Comments are noted. This can be demonstrated and supported with relevant development proposals at application stage. Chief Executive's Recommendation No change to the Draft Plan.
598	Friends of Harristown Commons	The submission requests KCC note the presence of a disused railway line and road bridges on the L6048.	Chief Executive's Response Noted. The Tullow Railway Line is acknowledged in the Draft Plan (12.14.8.10 Disused Tullow Railway Line). Objective LR A11 seeks to investigate the feasibility of developing long distance walking and cycling routes along disused sections of railway lines. Chief Executive's Recommendation No change to the Draft Plan.
526	Conradh na Gaeilge	<u>Irish Language</u> The purpose of the submission is to request that the Irish-speaking population in Kildare is considered in the Plan. The Council has a key role in promoting Irish and should have a role in the protection, conservation and growth for	Chief Executive's Response <u>Irish Language</u> The Draft Plan is a land use plan and is not an instrument to address or examine activities to increase the number of Irish speakers. However, it should be noted that Objective SC O57 in Section 10.10 supports

	<p>the Irish-speaking community in the county. This can be targeted in the Plan.</p> <p>Reference is made to census data from 2011 and 2016 regarding the number of daily Irish speakers in Kildare (outside of the education system). Comparisons are also made with Gaeltacht areas. It is noted that the number increased in 2016 from 2011. However, this was not in line with population growth therefore it is considered the ratio of speakers has reduced. It is submitted that this should be investigated to see if any actions of the Council prove this.</p> <p>Regarding those speaking Irish within the education system there are two groups (pupils and teachers). Pupils make up the greater part of the population of daily speakers and so this is an indication that fewer children are being raised through Irish. Activities which increase daily speakers within the education system and outside of it should be examined.</p> <p><u>Oral Hearings</u> Section 135 (8) (c) of the Planning and Development Act 2000 is referred to in relation to Oral Hearings. It is submitted that if an Oral Hearing in Irish is requested, the Council should agree to this, and should supply appropriate persons, with Irish, for the hearing.</p> <p><u>Irish Speaking Staff</u> The Planning Department should be able to provide a service to the Irish-speaking community. It was expected that all Departments would be able to provide one to one service through Irish in the lifetime of Kildare County Councils' Irish Language Scheme 2018-2021. This timeframe has now passed.</p>	<p>and encourages community groups in their pursuit of <i>Líonra Gaeilge</i> (Irish Language Network) for their area.</p> <p><u>Oral Hearings</u> The Draft Plan is a land use plan and is not an instrument to address Oral Hearings. An Bord Pleanála is responsible for granting Oral Hearings and the Council will comply with any requirements in relation to Oral Hearings.</p> <p><u>Irish Speaking Staff</u> The Draft Plan is a land use plan and cannot address staffing / resources in the Council.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
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CHAPTER 12 – BIODIVERSITY & GREEN INFRASTRUCTURE			
Sub No.	Name	Summary of Issues Raised	Chief Executive's Responses & Recommendations
GREEN INFRASTRUCTURE			
143	Inland Fisheries Ireland (IFI)	<p><u>The Core Areas</u> The submission believes that the Barrow SAC fulfils the criteria for Core Area designation and requests that the Barrow River be included as one of the core areas in the Plan.</p> <p><u>Green Infrastructure Maps</u> It is submitted that the absence of the following important watercourses from the Green Infrastructure maps of County Kildare is a deficiency, and it is requested that the plan be revised to include them:</p> <ol style="list-style-type: none"> 1) the Pluckerstown stream which flows from Pollardstown Fen to the Slate river, 2) the important salmon spawning waters of the Botkoge, 3) the large and extensive network of salmon spawning/nursery waters that makes up the headwaters of the Finnerly river. 4) The Cushina river and Figile river, both important salmon waters, these rivers extend for some considerable distance through Counties Laois and Offaly 5) The Athy stream which represents excellent habitat with the potential for the development of a linear park/wildlife corridor through Athy. 	<p>Chief Executive's Response The Barrow SAC is included on Map V1 – 12.6 in the Draft Plan however it is considered appropriate to include a new sub section in Section 12.14.6 to recognise the importance of the River Barrow.</p> <p>It is considered reasonable to include the identified rivers in the Green Infrastructure maps of County Kildare though it should be noted the Figile river has already been included on the GI maps.</p> <p>Chief Executive's Recommendation Add a new sub-section to Section 12.14.6: The River Barrow The River Barrow SAC is very large and is the most extensive SAC within County Kildare. The River Barrow is the 2nd longest river in Ireland, and this SAC extends over 192 km from the Slieve Bloom Mountains SPA/NHA through 5 counties to the Waterford Estuary SAC. It has significant migrations of a number of fish species between the marine and freshwater habitats and 23 separate habitats/species listed as qualifying interests. It is the only SAC within County Kildare that is specifically designated for salmon, lamprey species and otter.</p> <p>Include the following rivers in the Green Infrastructure maps (Map Ref: V1-12.3 to 12.6) of County Kildare; The Pluckerstown stream which flows from Pollardstown Fen to the Slate river The Botkoge</p>

			Headwaters of the Finney river Cushina river The Athy stream
421	Bord na Mona (BNM)	<p><u>GI Masterplan</u> BNM welcomes Action BI A22 which refers to a Green Infrastructure Masterplan through the BNM lands and continues to support the development of amenity through its peatlands in association with renewable energy projects. The proposal for Ballydermot Wind Farm will include an amenity plan to provide connectivity to the Grand Canal, through Cloncreen Wind Farm, to other amenity facilities in the area and for connectivity through other BNM bogs in the future. The BNM Biodiversity Action Plan supports integration of green infrastructure with future commercial development where appropriate and represents a clear commitment from the company to plan and execute the future use of its peatlands in an ecologically sound manner.</p>	<p>Chief Executive's Response It is preferable that a Green Infrastructure Masterplan, in accordance with BI A22, is prepared and agreed with KCC prior to any planning application for a proposed wind farm at Ballydermot being submitted to An Bord Pleanála.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
443	Clane Community Council	<p><u>GI Concept Map</u> Ensure there is coherence between the Green Infrastructure Concept Map V1-12.3 with the EMRA's RSES Table 7.1 Strategic Natural, Cultural and Green Infrastructure Assets in the Region. New action proposed: To identify and map in detail all areas outlined in the Green Infrastructure Concept Map V1-12.3. New policy proposed: To provide an undisturbed buffer zone of 200m along all peatways.</p>	<p>Chief Executive's Response It is considered that Table 7.1 of the RSES is consistent with the Green Infrastructure Concept Map V1 – 12.3 with the River Liffey, Canals and bogs all included in same.</p> <p>Chief Executive's Recommendation No change to the Draft Plan</p>

		New policy proposed: To provide an undisturbed buffer zone of 100m along all major rivers (Rye, Barrow and Liffey) in the County.	
443	Clane Community Council	<p>To frame Green Infrastructure policy on the development of sustainable transport routes new policies and objectives are proposed.</p> <ul style="list-style-type: none"> - Identify, survey, and protect natural and built heritage in the location and design of all cycle and greenways.’ - Prepare an Ecological Impact Assessment for all walking routes, cycling routes and greenways.’ - Allow for reduced width (less than NTA recommended standards) of cycle and greenways to protect biodiversity rich habitats that occur along their length.’ - Ensure that the preparation of cycleways and pathways take account of built and natural heritage.’ 	<p>Chief Executive’s Response Agreed. Natural and built heritage should be considered in the location and design of all cycle and greenways. It is not always appropriate to adhere to NTA guidelines width in the development of cycle and walking routes in sensitive landscapes and therefore a reduced width may be required.</p> <p>Chapter 13 LR O38 references the requirement to prepare an Ecological Impact Assessment to guide the location and design of such facilities.</p> <p>Chief Executive’s Recommendation Edit Objective LR O37 in Chapter 13 <i>Promote and enhance public access for all to the upland areas, rivers, lakes, and other natural amenities of County Kildare, in conjunction with the relevant landowners and agencies, while protecting environmental sensitivities, and ecological corridors and built heritage.</i></p> <p>New Objective in Section 13.6 <i>Identify and assess the impact of the development of cycle and walkways on built and archaeological heritage in the location and design of all cycleways and greenways.</i></p> <p>New Objective in Section 13.6 <i>To allow for narrower cycleways and greenways when located within highly sensitive ecological areas along the length of the route, as appropriate.</i></p>
472	Keep Ireland Open	The submission supports the following policies, objectives, and actions, Green Infrastructure Objectives B1044	<p>Chief Executive’s Response Noted and welcomed</p> <p>Chief Executive’s Recommendation</p>

405	Kildare Climate Action Linkage Group	<p>The term Green Infrastructure (GI) is noted in section 12.5.2 and it is submitted that there isn't a GI crisis per se, the use of such ill-defined terminology can undermine the value of our high nature value sites.</p> <p>Suggests the amendment of the first paragraph of section 12.14.1: Responding to the Biodiversity Strategy, the EU published 'Building a Green Infrastructure for Europe' (2014) and 'Green Infrastructure: Enhancing Europe's Natural Capital' Strategy (2013), which sets out '(delete) to promote the deployment of Green Infrastructure in the EU in urban and rural areas' (delete).</p> <p><u>Green Infrastructure (GI) - National Policy</u> The submission notes section 12.14.2 and highlights the definition of Green Infrastructure as outlined in the 'Creating Green Infrastructure for Ireland - Enhancing natural capital for human wellbeing' document. It is submitted that Green Infrastructure is ill-defined and there is a high degree of subjectivity in its application. The submitter highlights difficulty in recognising the current system of intensive agriculture as "high quality biodiversity" as this definition suggests. Furthermore, the submission highlights various sections of the Comhar document.</p> <p><u>Green infrastructure general</u> It is submitted that policy BI P11 is ill-defined and highly similar to BI P12. The submission suggests</p>	<p>No change to draft Plan.</p> <p>Chief Executive's Response It is not stated in Section 12.5.2 that there is a green infrastructure crisis.</p> <p>The suggested changes to the first paragraph of Section 12.14.1 are accepted.</p> <p>It is not considered necessary to amend section 12.14.2 with states that the Comhar document proposes an approach and a set of principles that should be followed in Green Infrastructure planning.</p> <p>Agreed to amend BI P11. However, it should be noted it is outside the remit of the Development Plan to provide designations.</p> <p>In relation to Action BI A19 an amendment is not required as there is a further action BI A21 which is to "Complete the mapping of Green Infrastructure for each town and village in County Kildare and to develop specific policies and objectives for each town specifically by incorporating green infrastructure policies and objectives into the various Local Area Plans as they are being prepared." Therefore, it is proposed to delete BI A19 to avoid unnecessary duplication.</p> <p>See response to submission 413 in relation to the proposed changes to policy BI P12.</p> <p>Agreed to include additional text in BI O41.</p> <p>It is considered appropriate to reference 12.14.8.8. as it relates to Peatways. See recommendation to submission No. 421 (Bord na Mona) in relation to RD O28 and RD O29. No change to text in 12.14.6.5.</p>
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	<p>the deletion of BI P11 and the replacement with the following:</p> <p>Identify the key elements of the green infrastructure network in Kildare; designate these as important elements of the County's green infrastructure network; protect the key elements of the green infrastructure network and seek to enhance and expand the County's green infrastructure network, through informed, evidence-based methods, which do not threaten the integrity of existing native biodiversity.</p> <p>It is stated that since a Green Infrastructure network in the county has not been adequately identified, planned and mapped, it cannot be protected and maintained. The amendment of BI A19 is suggested as follows: Identify, map, protect and maintain a Green Infrastructure network in the county.</p> <p><u>Green infrastructure general</u> Suggests the amendment of policy BI P12 as follows: Recognise the importance of Green Infrastructure in Kildare and protect this valued biological resource, the ecosystem services it provides and the contribution to climate resilience. The Council will ensure, as far as is possible, that any future development zonings are carefully considered and managed so they do not negatively impact the integrity and proper functioning of the existing Green Infrastructure network.</p>	<p>It is considered that adequate protection is afforded the wetlands areas with the wording of BI O31 as it currently stands. The proposed amendments are considered overly onerous.</p> <p>See response to submission 413 in relation to the proposed changes to policy BI P13 and the proposed changes to objectives BI O45, BI O46 and BI O47.</p> <p>The proposed change to BI O48 is accepted.</p> <p>It is not considered necessary to amend text at the beginning of policy BI P14 or to amend the text of BI O49 as the proposed text is implicit in the term 'Green Infrastructure'.</p> <p>In relation to the proposed text at the end of Policy BI P14, it should be noted that it is an overarching policy for the sub section titled 'Green Infrastructure within Public Open Spaces and Parks'. It is not considered necessary to amend this policy as suggested. More specific objectives underpinning BI P14 are included with-in this sub section.</p> <p>While there are many policies within the plan encouraging the planting of natives species it is not always appropriate to do so in all settings. Many non-native tree species can also have benefits for pollinators.</p> <p>The wording of objectives BI O49 and BI O50 are considered appropriate. No changes are recommended. It should be noted that an additional objective is proposed regarding high nature value areas under section 12.7.1, see submission number 472 – Keep Ireland Open.</p> <p>It is not considered necessary to amend BI O50 as proposed.</p>
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	<p>The submission notes BI O39 and questions how it is materially different to BI A19.</p> <p>Suggests the amendment of objective BI O41 as follows: Develop a strategy, to identify a series of greenbelt/green spaces (in addition to those identified in this CDP) to retain and protect and act as a buffer between the growing settlements within Kildare during the lifetime of the Plan with particular attention to the undeveloped areas between Celbridge, Leixlip and Maynooth and to collaborate with South Dublin County Council, where appropriate.</p> <p><u>Green infrastructure general</u> Suggests the following deletion in section 12.14.6.5 Bog of Allen (in line with comments made under RD O28 and RD O29 above): A number of proposed long distance peatways that could connect the Royal Canal with the Grand Canal/Barrow Blueway are listed below in Section 12.14.8.8. It is expected that 50% of the Peatland Area will remain free from any development.</p> <p><u>Green infrastructure general</u> Suggests the following amends to section 12.14.6.8 for consistency: This area is proposed for a Peatlands National Park National Peatlands Park, which is supported by the Council.</p> <p><u>Green infrastructure general</u> Amend first bullet points in 12.14.7 as follows:</p>	<p>Chief Executive's Recommendation Amend the first paragraph of section 12.14.1 as follows: Responding to the Biodiversity Strategy, the EU published 'Building a Green Infrastructure for Europe' (2014) and 'Green Infrastructure: Enhancing Europe's Natural Capital' Strategy (2013), which sets out '(delete)to promote the deployment of Green Infrastructure in the EU in urban and rural areas:' (delete).</p> <p>Amend policy BI P11 as follows: Recognise the importance of Green Infrastructure in Kildare and to put measures in place to protect this valued biological resource. Identify and map the key elements of the green infrastructure network in Kildare; and seek to protect, enhance, and expand the County's green infrastructure network, through informed, evidence-based methods, which do not threaten the integrity of existing native biodiversity.</p> <p>See recommendation to submission no. 413 in relation to the proposed changes to policy BI P12.</p> <p>Delete BI A19 "Protect and maintain a Green Infrastructure network in the county"</p> <p>Amend BI O41 to read as follows: Develop a strategy, to identify a series of greenbelt/green spaces (in addition to those identified in this CDP) to retain and protect between the growing settlements within Kildare during the lifetime of the Plan with particular attention to the undeveloped areas between Celbridge, Leixlip and Maynooth and to collaborate with South Dublin County Council, where appropriate.</p> <p>Amend section 12.14.6.8 as follows: This area is proposed for a Peatlands National Peatlands Park, which is supported by the Council.</p>
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	<ul style="list-style-type: none"> • Wetlands [specifically, wetland sites that have been rated A (International), B (National), C+ (County) and C (Local Importance), and D (Local Importance) in the County Kildare Wetland Survey] <p><u>Green infrastructure general</u> Suggests the amendment of policy BI P13 as follows: Recognise the importance of Urban Green Infrastructure in addressing a broad range of urban challenges, such as conserving biodiversity, connecting people with nature, adapting to climate change, supporting the green economy and improving social cohesion; and to seek to protect and enhance this resource, particularly existing semi-natural areas or habitats (such as hedgerows, canals, rivers).</p> <p>Suggests the amendment of objective BI O45 as follows: Ensure that the Green Infrastructure Strategy and Network identified in this County Development Plan and Local Area Plans is used to inform the development management process to ensure that new residential areas, business/ industrial development, tourism and other relevant projects contribute towards the conservation and protection of Kildare’s habitats and species, and the protection, management and enhancement of the existing Green Infrastructure in terms of design, layout and landscaping.</p>	<p>See recommendation to Submission 413 in relation to the proposed changes to policy BI P13 and the proposed changes to objectives BI O45, BI O46 and BI O47.</p> <p>Amend BI O48 as follows: Encourage the use and incorporation of Biophilic design into all new development schemes, increasing proximity of and/or views to nature, landscape and landscape features, in the interests of public health.</p>
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		<p>The submission stated that landscapers are not trained botanists or ecologists; and therefore, suggests amending objectives BI O46 and BI O47 as follows:</p> <p>Identify existing Green Infrastructure at the initial stages of the planning process and to use this information to guide the overall design of an appropriate site layout which is reflected in the developments landscaping plan. The landscaping plan submitted with an application should clearly illustrate how existing Green Infrastructure (particularly semi-natural or high nature value elements) are to be retained, and provide opportunities to create more linkages, have informed and been incorporated into the development, layout and, if appropriate, management proposals. These plans will be reviewed by a suitably qualified ecologist (accessing local and national expertise)</p> <p>Ensure that the design of new development does not cause fragmentation of the Green Infrastructure network (particularly existing semi-natural or high nature value areas).</p> <p>Suggests the amendment of objective BI O48 as follows: Encourage the use and incorporation of Biophilic design into all new development schemes, increasing proximity of and/or views to nature, landscape and landscape features, in the interests of public health.</p>	
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		<p><u>Green Infrastructure within Public Open Spaces and Parks</u> Suggests the amendment of policy BI P14 as follows: Protect (particularly existing semi-natural or high nature value areas) and enhance the Green Infrastructure network throughout the county, having regard to ecologically sound techniques, such as managed rewilding, and utilising plants of local provenance and origin.</p> <p>Suggests the amendment of objective BI O49 as follows: Strengthen ecological networks between urban areas, and protect existing semi-natural or high nature value areas, to create greater linkages to Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional Green Infrastructure network.</p> <p>Suggests the amendment of objective BI O50 as follows: Require multifunctional open space provision within all new developments; this includes provision for ecology of spaces for nature and sustainable water management.</p>	
468	Ann Behan	<p>Policy BI P13 does not distinguish between existing semi-natural areas or high nature value habitats and horticultural / landscape plantings. Failure to understand and acknowledge the significant difference between these elements of GI pose a serious threat to the natural environments and has potential to expedite habitat and species loss.</p>	<p>Chief Executive's Response See response to submission 405 above</p> <p>Chief Executive's Recommendation See recommendation to submission 405 above</p>

	<p>Amend BI P13 to include text “connecting people with nature” after conserving biodiversity. Also add “and to seek to protect and enhance this resource, particularly existing semi-natural areas, or habitats (such as hedgerows, canals, rivers)” after the word’s social cohesion.</p> <p>Increased footfall is impacting on high nature value habitats in Kildare. Amend BI O45 to include highlighted text “Ensure that the Green Infrastructure Strategy and Network identified in this County Development Plan and Local Area Plans is used to inform the development management process to ensure that new residential areas, business/ industrial development, tourism, and other relevant projects contribute towards the conservation and protection of Kildare’s habitats and species, and the protection, management and enhancement of the existing Green Infrastructure in terms of design, layout and landscaping”.</p> <p>It is submitted that not all landscapers are trained botanists or ecologists and therefore objectives BI O46, BI O47, and BI O48 should be amended.</p> <p>Amend BI O46 to include highlighted text “Identify existing Green Infrastructure at the initial stages of the planning process and to use this information to guide the overall design of an appropriate site layout which is reflected in the developments landscaping plan. The landscaping plan submitted with an application should clearly illustrate how existing Green Infrastructure (particularly semi-natural or high nature value elements) are to be</p>	
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	<p>retained, and provide opportunities to create more linkages, have informed and been incorporated into the development, layout and, if appropriate, management proposals. These plans will be reviewed by a suitably qualified ecologist (accessing local and national expertise).</p> <p>Amend BI O47 to include highlighted text “Ensure that the design of new development does not cause fragmentation of the Green Infrastructure network (particularly existing semi-natural or high nature value areas).</p> <p>Amend BI O47 to include highlighted text “Encourage the use and incorporation of Biophilic design into all new development schemes, increasing proximity of and/or views to nature, landscape and landscape features, in the interests of public health”.</p> <p>Amend BI P14 to include highlighted text “Protect (particularly existing semi-natural or high nature value areas) and enhance the Green Infrastructure network throughout the county, having regard to ecologically sound techniques, such as managed rewilding, and utilising plants of local provenance and origin.”</p> <p>Amend BI O49 to include highlighted text “Strengthen ecological networks between urban areas and protect existing semi-natural or high nature value areas, to create greater linkages to Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional Green Infrastructure network.”</p>	
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		Amend BI O50 to include highlighted text “Require multifunctional open space provision within all new developments; this includes provision for ecology of spaces for nature and sustainable water management.”	
468	Ann Behan	<p>The term Green Infrastructure (GI) is noted in section 12.5.2 and it is submitted that there isn't a GI crisis per se, the use of such ill-defined terminology can undermine the value of our high nature value sites.</p> <p>In addition to Comhar, reference is also made to Creating Green Infrastructure for Ireland – Enhancing natural capital for human wellbeing.</p> <p>Reference is made again to the definition of Green Infrastructure, and it is stated that there is no standard definition for same. In addition to the definition outlined above in 12.14.1, two other definitions are quoted.</p> <p>Part of the Comhar document is referenced and the need for local area studies in the context of national or local spatial planning. While NPWS maps of Natura 2000 sites are the most important source of information on Green Infrastructure assets, few local authorities have access to other data sets such as data on rare plants, or results of bat, woodland, and grassland surveys. There is general dissatisfaction with the mechanisms currently available to input biodiversity to spatial plans. The planning process requires a multi-disciplinary team including ecologists, landscape architects, planners, and GIS specialists.</p>	<p>Chief Executive's Response It is not stated in Section 12.5.2 that there is a green infrastructure crisis.</p> <p>See response to submission 405 above</p> <p>Chief Executive's Recommendation See recommendation to submission 405 above</p>


		<p>It is proposed to amend BI P11 as it is very similar to BI P12. Policy should now read “Identify the key elements of the green infrastructure network in Kildare; designate these as important elements of the County’s green infrastructure network; protect the key elements of the green infrastructure network and seek to enhance and expand the County’s green infrastructure network, through informed, evidence-based methods, which do not threaten the integrity of existing native biodiversity”.</p> <p>Amend action BI A19 to include “Identify, map,” before the word protect at the beginning.</p> <p>Amend policy BI P12 to include an additional sentence which reads “The Council will ensure, as far as is possible, that any future development zonings are carefully considered and managed, so they do not negatively impact the integrity and proper functioning of the existing Green Infrastructure network”.</p> <p>Query is raised in relation to objective BI O39, and it is submitted that this is the same as action BI A19.</p> <p>Amend objective BI O41 to include the words “to retain and protect” before the words between the growing settlements.</p> <p>Action BI A22 is welcomed.</p>	
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<p>405</p>	<p>Kildare Climate Action Linkage Group</p>	<p><u>Green Infrastructure and Sustainable Urban Drainage Systems</u> The submission states that it must be clearly understood and acknowledged that ‘nature-based’ solutions, lacking appropriate ecological guidance, may also cause harm and damage to native biodiversity. Furthermore, the submission references the IUCN’s definition for Nature-based solutions.</p> <p>Suggests the insertion of the following additional policy statement: Require that established native vegetation should be left in situ, wherever possible, to intercept, slow down and filter runoff as an integral part of all new development proposals.</p> <p>Suggests the amendment of objective BI O51 as follows: Promote and support the development of Sustainable Urban Drainage Systems (SuDs) such as integrated constructed wetlands, permeable surfaces, filter strips, ponds, swales and basins at a site, district and county level and to maximise the amenity and bio-diversity value of these systems. The first step in this approach will be that existing established native vegetation should be left in situ, wherever possible. Where additional measures are necessary, the preferred option in employing these techniques will be to allow natural recolonization, or at the very minimum, that any plantings arise from locally sourced native material of local provenance and origin.</p>	<p>Chief Executive’s Response In relation to SUDS it should be noted that amendments to sections throughout the Draft Plan are proposed which will now include references to nature based solutions (see response to Observation No. 4 of OPR submission, no. 550).</p> <p>Chief Executive’s Recommendation In relation to SUDS it should be noted that amendments to sections throughout the Draft Plan are proposed which will now include references to nature based solutions (see recommendation to Observation No. 4 of OPR submission, no. 550).</p>
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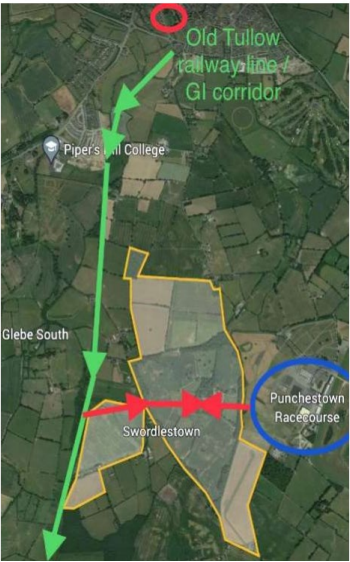
	<p>Suggests the amendment of objective BI O52 as follows: Integrate nature-based solutions and climate change considerations into the design, planning, and implementation of infrastructure provision/ works and development proposals at the earliest possible stage of the design process. Ensure that these solutions do not undermine or pose threats to Kildare’s native biodiversity by primarily employing techniques to allow natural recolonization, or at the very minimum, that any plantings arise from locally sourced native material of local provenance and origin.</p> <p>Suggests the amendment of objective BI O53 as follows: Actively promote and encourage nature-based approaches and green infrastructure solutions as viable mitigation and adaptation measures to surface water management. The first step in this approach will be that existing established native vegetation should be left in situ, wherever possible. Where additional measures are necessary, the preferred option in employing these techniques will be to allow natural recolonization, or at the very minimum, that any plantings arise from locally sourced native material of local provenance and origin.</p> <p>Suggests the amendment of action BI A23 as follows: Showcase good examples of Sustainable Urban Drainage Systems (SuDs) which maximise amenity and biodiversity through the use of systems such as (but not limited to) swales, rain</p>	
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		<p>gardens as part of local authority developments. The first step in this approach will be that existing established native vegetation should be left in situ, wherever possible. Where additional measures are necessary, the preferred option in employing these techniques will be to allow natural recolonization, or at the very minimum, that any plantings arise from locally sourced native material of local provenance and origin.</p>	
468	Ann Behan	<p>Reference is made to the third sentence in the second paragraph of 12.14.11 and it is submitted that nature-based solutions, lacking appropriate ecological guidance, may also cause harm and damage to native biodiversity. The value and need for SuDs are acknowledged, however, any nature-based or green infrastructure solution should be under the guidance of a suitably qualified botanist/ecologist.</p> <p>Include an additional policy “to require that established native vegetation should be left in-situ, wherever possible, to intercept, slow down and filter runoff as an integral part of all new development proposals”.</p> <p>Amend BI O51 to include an additional sentence “The first step in this approach will be that existing established native vegetation should be left in-situ, wherever possible. Where additional measures are necessary, the preferred option in employing these techniques will be to allow natural recolonization, or at the very minimum, that any plantings arise from locally sourced native material of native provenance and origin”.</p>	<p>Chief Executive’s Response See response to submission 405 above</p> <p>Chief Executive’s Recommendation See recommendation to submission 405 above</p>

		<p>Amend BI O52 to include an additional sentence <i>“Ensure that these solutions do not undermine or pose threats to Kildare’s native biodiversity by primarily employing techniques to allow natural recolonization, or at the very minimum, that any plantings arise from locally sourced native material of native provenance and origin”.</i></p> <p>Amend BI O53 to include an additional sentence <i>“The first step in this approach will be that existing established native vegetation should be left in-situ, wherever possible. Where additional measures are necessary, the preferred option in employing these techniques will be to allow natural recolonization, or at the very minimum, that any plantings arise from locally sourced native material of native provenance and origin”.</i></p> <p>Amend BI A23 to include an additional sentence <i>“The first step in this approach will be that existing established native vegetation should be left in-situ, wherever possible. Where additional measures are necessary, the preferred option in employing these techniques will be to allow natural recolonization, or at the very minimum, that any plantings arise from locally sourced native material of native provenance and origin”.</i></p>	
172.	Umerus Community Development Peatlands (UCDCLG)	The Plan should recognise the importance of the nationally important greenways and blueways as presented in the Green Infrastructure Concepts map and identify important clusters of core areas/nodes/stepping-stones which can have strengthened landscape protections in recognition of the importance of peatlands for nature / tourism hubs.	<p>Chief Executive’s Response</p> <p>It is agreed that the Landscape Character Assessment requires updating, and this is reflected in objective LR A1 which is an action of the plan to review and update the LCA within two years of the adoption of the Plan. It is considered appropriate to expand this action so that the LCA review has regard to the Green Infrastructure Strategy.</p>

		<p>The reasons for this are:</p> <ul style="list-style-type: none"> • The peatlands of Kildare in 2004 were largely considered as industrial production areas but have emerged as a major new opportunity for biodiversity. • The construction of the Barrow Blueway and the development in this CDP of a new Green Infrastructure Map which recognises the importance of green and blue corridors joining the core areas and nodes/stepping-stones in the county. • The peatlands nature tourism opportunities identified in the West Kildare Just Transition Plan, the Barrow Blueway Economic Plan, and the Kildare Tourism Strategy. 	<p>Chief Executive's Recommendation Amend Action LR A1 as follows:All landscape character designations will be fully reviewed having regard to updated best practice guidance, LCAs of adjoining Local Authorities and other local relevant considerations, including clusters of biodiversity rich areas and the Council's Green Infrastructure Strategy.</p>
528	Punchestown Area Community Group	<p>Submission by PACG supports the inclusion of the Gowran Grange estate as a stepping-stone within the Green Infrastructure Network. An ecological report has been prepared for the Punchestown Area Community Group by Dr Mary O'Connor as a submission to a planning application. This was included with the submission.</p> <p>The report identifies a number of deficiencies in the Ecological Information submitted with the planning files and seeks to highlight the ecological diversity of the site and its value as a Historical Landscape.</p>	<p>Chief Executive's Response As the Green Infrastructure Network includes gardens surveyed as part of the NIAH Survey of Historic Gardens. Gowran Grange (NIAH Site ID 1985) is already included on Map Ref: V1-12.5 Green Infrastructure Kildare Middle</p>  <p>Chief Executive's Recommendation Amend title of Map Ref V1-12.5 to read 'Middle'</p>

<p>7</p>	<p>Punchestown Area Community Group</p>	<p>Make an addition to the Green Infrastructure Network as outlined in chapter 12 of the dCDP by including the high ecological and diversity value country estate and demesne lands of Gowran Grange in Swordlestown as a 'stepping-stone'.</p> <p><u>Summary of Appendix as below</u></p> <p>It is considered that the dCDP has failed to map out and record some very valuable green infrastructure in the Punchestown area.</p> <p>The dCDP should be amended so that important pieces of green infrastructure are connected and do not end up isolated. Physical connections between the core areas, green corridors and stepping-stones are particularly highlighted.</p> <p>The Punchestown Area Community Group appointed Dr. Mary O'Connor, a professional ecologist, to undertake an analysis of the ecology of the Punchestown area. The report found that the Gowran Grange estate and demesne lands have a very high ecological value and represent a significant site for biodiversity in terms of birds, wildlife and habitats present.</p> <p>It is considered appropriate to add Gowran Grange estate and demesne lands as a 'stepping-stone' to the green infrastructure network. This should be incorporated into the text in section 12.14.7 of the dCDP and included within the Green Infrastructure Concept Map and the Green Infrastructure Kildare Middle Map</p>	<p>Chief Executive's Response</p> <p>It is considered reasonable and appropriate to propose that the subject lands at Gowran Grange are identified as a 'stepping-stone' thereby creating a 'Green Infrastructure' link between the stepping-stone of Punchestown to the east and the disused Tullow railway line to the west.</p> <p>It is acknowledged that the submission seeks to include Gowran Grange as a stepping-stone in Section 12.14.7, however, it is not considered necessary to do so as this section does not list all proposed 'stepping-stones' identified throughout the county. Rather it highlights the various types of areas within the county that are being proposed as stepping-stones.</p> <p>It should also be noted that this Chief Executive's report recommends the inclusion of Gowran Grange House and Demesne onto the Record of Protected Structures. Furthermore, the NIAH reference to the subject lands as a Designed Landscape feature further emphasises the importance of these lands at a local, county and national level.</p> <p>Chief Executive's Recommendation</p> <p>Amend Map Ref. V1-12.3 (Green Infrastructure Concept Map) to show Gowran Grange Demesne as a 'stepping-stone'.</p> <p>Clearly label Punchestown Racecourse on Map Ref. V1-12.3 (Green Infrastructure Concept Map) as a 'stepping-stone'.</p>
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		 <p>See Map above, which identifies the Gowran Grange estate and demesne lands and its connection with the Old Tullow railway line to the west and Punchestown racecourse to the east.</p> <p>The written text of Chapter 12 of the dCDP makes no reference to properties on the NIAH register, which is considered an oversight. Generally, properties on the NIAH register should be designated as 'stepping-stones' in relation to green infrastructure.</p>	
503	Evelyn Cullen	<p>The submission states that Gowran Grange is a very valuable large country estate in terms of its biodiversity value and is home to many protected species and habitats that warrant inclusion as an area of high biodiversity value and inclusion on the Green Infrastructure Network as set out in Chapter 12.</p>	<p>Chief Executive's Response See response to Submission No. 7 above.</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 7 above.</p>

		The submission is accompanied by a Map of Irish Wetlands.	
25	Cathy Meade	<p>A report from the Independent Ecologist Mary O'Connor stated that the Gowran Grange / Swordlestown area should be protected due to its rich biodiversity & heritage.</p> <p>The entire Gowran Grange demesne estate should be added to the Green Infrastructure network and concept map as a 'stepping-stone' or by inclusion in the Development Plan as a County Biodiversity Site.</p>	<p>Chief Executive's Response See responses to Submission No. 7 above.</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 7 above.</p>
167	Mariann Klay	<p>It is suggested that the entire Gowran Grange Estate and its Environs be added to the Green Infrastructure Network and must be protected from development.</p> <p>It is also stated that Sillagh bog alder wetland forest and its surrounding Coillte forest as well as the private forest in Swordlestown South and the Fox Covert Forest of Gowran Grange should be added to the green infrastructure network as they represent important corridors for the movement of wildlife in this area.</p>	<p>Chief Executive's Response See response to Submission No. 7 above.</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 7 above.</p>
485	Royal Institute of the Architects of Ireland	GI options are outlined for incorporation into development plans. Reference is made to key environmental concerns in relation to biodiversity loss and climate change challenges. A range of targets in relation to climate change globally and in Ireland are discussed, these include limiting global warming to 1.5 degrees, and reducing greenhouse gas emissions. It is noted that the insect and bird populations in Ireland are declining with specific reference to 54 Irish bird species on the red list	<p>Chief Executive's Response Within Chapter 12 (Biodiversity and Green Infrastructure) there are a range of policies and objectives in relation to the protection, and enhancement of green infrastructure. Some examples include policy (BI P1) which is to integrate in the development management process the protection and enhancement of biodiversity and landscape features wherever possible, while policy (BI P4) is to ensure that any new development proposal does not have a significant adverse impact, incapable of satisfactory mitigation on plant, animal or bird species which are</p>

	<p>which is the highest status of concern. This represents 26% of the 211 species of Irish birds that were assessed. The red list species are included in a table with the submission.</p> <p>It is submitted that the situation is worse for aquatic life in freshwater bodies due to pollution and habitat degradation, with many waterbodies and lakes noted to be in an unsatisfactory condition or polluted by the EPA. Reference is made to the EPA River Quality Biological Ratings. Ecosystem services are also discussed which includes a definition for same and an image illustrating the link between ecological processes and the benefits that humans derive from ecosystems.</p> <p>The policy context in relation to green infrastructure is outlined. An image is used to illustrate the various pieces of legislation and policies that are of relevant to green infrastructure. A definition for green infrastructure is also given along with a note on the various types of green infrastructure. These include wetlands, rivers and riparian zones, trees, woodlands and hedgerows, grassland, and green roofs / walls. Some of the benefits of green infrastructure are illustrated which include health and wellbeing, tourism, recreation and leisure, flood alleviation and management, along with climate change adaptation and mitigation.</p> <p>A range of green infrastructure tools are outlined and discussed which include Green Space Factor</p>	<p>protected by law. There is also an objective (BI O13) to require all applications for new developments to identify, protect and sensitively enhance the most important ecological features and habitats, and incorporate these into the overall open space network, keeping free from development and to provide links to the wider Green Infrastructure network as an essential part of the design process and by making provision for local biodiversity.</p> <p>Section 15.6.6 of the Draft Plan seeks the integration of varying quantum of land for biodiversity as part of the overall area to be set aside for open space provision as part of development schemes. Chapter 12 however sets out the more detailed policies and objectives regarding same. Pending the completion of the SECAP document that is currently being prepared, specific targets for biodiversity have not been included in the Green Infrastructure chapter.</p> <p>In relation to community participation and raising awareness, the Draft Plan contains a range of objectives and actions to encourage community awareness and participation. Objective BI O4 is to promote increased public participation in biodiversity conservation by supporting and encouraging community-led initiatives such as native tree planting, the removal of invasive species and the continued preparation of Local Biodiversity Actions Plans. There is an action (BI A5) to engage with residents' associations to educate and encourage the roll out of the Pollinator and Biodiversity Plans, specifically working towards less spraying and more pollinator friendly practices. While there is a further action (BI A13) which encourages the awareness and engagement of the public in the identification and submission of trees for consideration for Tree Preservation Orders.</p> <p>It should be further noted there is an action (BI A23) to showcase good examples of SuDS which maximise amenity and biodiversity</p>
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	<p>and Green Points System, The Green Infrastructure Toolkit. These were developed by the City of Malmo with the toolkit adapted in England. Reference is made to Kruise (2011) who outlined the process involved and the results achieved when using the Green Space Factor and the Green Points Systems, the two functions of the GI planning tool.</p> <p>There is clearly a need to recognise and mitigate the dramatic loss of biodiversity degradation and the growing issues relating to climate change. Properly designed GI has a roll to play in addressing these issues. It is submitted that the Plan should develop evidence-based methods as outlined by Kruise (2011) to quantify the amount of green infrastructure that developers need to include in their proposals. Similar approaches should be developed for all LA projects.</p> <p>Develop a communication strategy to raise awareness of the importance of GI and to inform the practical application of GI in development projects. This could include the development of demonstration sites to showcase nature-based solutions with existing land uses.</p> <p>Improve enforcement of planning conditions to ensure GI elements are properly included in new developments.</p> <p>An action plan is required to control and eliminate invasive alien species especially in waterbodies and riparian zones to comply with the Birds and Habitats Regulations.</p>	<p>using systems such as (but not limited to) swales, rain gardens as part of local authority developments.</p> <p>Section 12.12 includes a range of measures in relation to prevention / eradication of invasive species which include objective (BI O35) to require development proposals to address the presence of invasive species and submit a management plan where species exist. It is also an action (BI A17) to prepare a programme of mapping invasive species in the county, while there is an objective (BI O36) to encourage through citizen science the public's awareness in the identification and eradication of invasive species.</p> <p>In relation to wetlands there is a policy (BI P8) to ensure that Kildare's wetlands and watercourses are retained for their biodiversity and flood protection values and maintain good ecological status of wetlands and watercourses in support of the provisions of the Water Framework Directive and Ramsar Convention. There is also an objective (BI O36) to protect wetland sites that have been rated A (International), B (National) C+ (County) and C (Local) importance as identified in the County Kildare Wetlands Survey 2012-2014, (See Tables 12.5 & 12.6).</p> <p>As demonstrated in this response there are a range of objectives to improve biodiversity in Kildare. These are not exhaustive, with a variety of other objectives also cited within chapter 12 to improve biodiversity, including Objective BI O24 which is to have regard to the riparian buffer zones and potential uses as identified in Table 12.4 when considering potential development and proposed development layouts within or adjacent to waterways.</p> <p>Chief Executive's Recommendation No change to the Draft Plan</p>
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		<p>An action plan is also required to ensure the conservation of remaining wetlands, and to identify sites that warrant special protection and to provide data that enables their protection under the Ramsar Convention on Wetlands.</p> <p>A range of measures to improve biodiversity are cited, these include protecting existing wild places (wetlands and riparian zones), eliminating use of chemicals in the vicinity of watercourses, and minimising elsewhere, constructing new ponds and wetlands, creating wildflower meadows, setting ambitious targets for planting native trees and shrubs, and increasing biodiversity on roadside verges by introducing a maintenance regime.</p>	
26	Butterfly Conservati on Ireland (BCI)	<p><u>Green Infrastructure Strategy</u></p> <p>BCI agrees that the Bord na Móna masterplan should include the areas listed in section 12.14.6.5 but “at a minimum.”</p> <p>It is submitted that the following statement in Section 12.14.6.5 does not align with Policies BI P5 and BI P8: “It is expected that 50% of the Peatland Area will remain free from any development.”</p>	<p>Chief Executive’s Response</p> <p>As per objective RE O126, the development of the Peatland Area will be subject to environmental considerations and nature designations, for example, recreational forestry, outdoor pursuits, peatways on the network of bogs and industrial railways and a designation of a National Peatlands Heritage Park.</p> <p>Chief Executive’s Recommendation</p> <p>See recommendation to 421 (Bord na Mona)</p>
221	Office of Public Works (OPW) Heritage Services Unit	<p>In reference to the ‘Green Infrastructure Concept Map’ in Chapter 12 (Map Ref.V1-12-3) Biodiversity and Green Infrastructure of the draft development plan, the submission notes the proposal for ‘green corridors and a ‘stepping-stone’ in the environs of Castletown House. The OPW would welcome an early opportunity to discuss these proposals – which will traverse the demesne/parklands of Castletown House – in greater detail with Kildare County Council.</p>	<p>Chief Executive’s Response</p> <p>The submission is noted however the ‘green corridors and ‘stepping-stones’ as set out in Chapter 12 reflect the importance of particular areas throughout County Kildare, either because of their environmental quality (local native woodlands, bogs, wetlands etc), local amenity value or because of their scale as undeveloped areas such as Coillte forestry plantations. There are no plans to develop these areas. The policies and objectives of the Draft Plan seek to protect and further enhance these areas.</p>

			Chief Executive's Recommendation No change to the Draft Plan
322	Rathangan Tidy Towns	Leaving small pockets of preserved land that are disconnected from each other as referred to in section 12.14.6.5 (Bog of Allen) will not support local biodiversity. Wildlife areas require extensive buffer zones and connections between each other.	Chief Executive's Response In relation to section 12.14.6.5 and smaller left-over areas of prime bogland habitat it is not always possible to provide green infrastructure networks to connect such pockets. However, it is an action (BI A22) to work with Bord Na Mona to prepare a Green Infrastructure Masterplan that will inform the delineation of core areas, stepping-stones, and corridors (long distance peatways) that may also inform the designation of an interconnected Bog of Allen Nature Reserve, Special Amenity Area Order and / or National Peatlands Park.
			Chief Executive's Recommendation No change to the Draft Plan.
317	Bridget Armstrong	The submission supports designation of the canal as a pNHA and the requirement to carry out site-specific flood risk assessments.	Chief Executive's Response The comments are noted.
			Chief Executive's Recommendation No change to the Draft Plan.
259	Mrs de Robeck	<p>The submission relates to Gowran Grange, Swordlestown, Co. Kildare and is made on behalf of the owner of Gowran Grange.</p> <p>A submission has been made to the Draft Plan by the Punchestown Area Community Group which seeks to add the Gowran Grange estate and demesne land to the Green Infrastructure network as a "Stepping-Stone".</p> <p>Gowran Grange House and estate is a private house and property which is not open to the public and would be an inappropriate inclusion amongst the Protected Demesne landscapes listed as Stepping-Stones in the Draft Plan.</p>	Chief Executive's Response 'Stepping-stones' as identified in the Draft Plan are areas that are essential for the migration, dispersal, and genetic exchange of wild species. 'Stepping-stones' are not public thoroughfares. See response to Submission No. 7 above.
			Chief Executive's Recommendation See recommendation to Submission No. 7 above.

		<p>The physical connection that The Group suggests should bisect the Gowran Grange House demesne, thereby allowing public access between Punchestown Racecourse and the greenway, which is impractical, inappropriate and unachievable. There is no logical need for such a connection between Punchestown racecourse and the greenway. The existing public road network and walkways provide sufficient connection between the two if required.</p> <p>Existing wildlife habitats and corridors within the estate will be improved as a result of the proposed solar development. The introduction of public thoroughfares to the estate, as suggested by The Group, would unnecessarily disturb, and threaten the very existence of many existing habitats.</p>	
475	June Stuart	<p>The author highlights errors in the draft CDP where Section 12.14.7 Nodes/Stepping-Stones should read as follows; Protected Demense demesne landscapes such as Carton and Castletown House and attendant demesnes – including the avenues/vistas towards the Wonderful Barn and the Conolly’s Folly, Obelisk.</p>	<p>Chief Executive’s Response Noted and agreed</p> <p>Chief Executive’s Recommendation Amend the 4th bullet point within Section 12.14.7 to read as follows; Protected Demense landscapes such as Carton and Castletown House and attendant demesnes – including the avenues/vistas towards the Wonderful Barn and the Conolly’s Folly, Obelisk</p>
364	Ursula King	<p>KCC should engage with stakeholders and local community groups to promote and develop a National Peatland Park which would ensure peatland habitats, flood mitigation, the locking up of carbon and clean water bodies.</p>	<p>Chief Executive’s Response Two Actions in this draft plan support the development of the National Peatlands Park including EC A7 in Chapter 7 ‘Energy & Communications’ and BI A22 in Chapter 12 ‘Biodiversity and Green Infrastructure’.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>

147	National Peatlands Park Group	The core-corridor-stepping-stone model is welcome. However, each “core” should encompass a landscape scale critical mass of habitats to ensure population recovery and survival, abundance, productivity, genetic diversity, and species richness.	<p>Chief Executive’s Response Section 12.14.5 adequately describes the features of a core area.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan</p>
413.	Kildare Public Participation Network	<p><u>12.14.3 Green infrastructure general</u> Proposes a new definition of Green Infrastructure to replace the one outlined in the first paragraph of section 12.14.3, as follows (new text in purple): Green infrastructure is a strategically planned network of natural and semi-natural areas with other environmental features designed and managed to deliver a wide range of ecosystem services such as water purification, air quality, space for recreation and climate mitigation and adaptation. This network of green (land) and blue (water) spaces can improve environmental conditions and therefore citizens' health and quality of life. It also supports a green economy, creates job opportunities and enhances biodiversity European Commission (2015)</p> <p>Proposes additional text in in section 12.14.3, as follows (new text in purple): Identify the key elements of the green infrastructure network in Kildare; designate these as important elements of the County’s green infrastructure network; protect the key elements of the green infrastructure network and seek to enhance and expand the County’s green infrastructure network, through informed, evidence-based methods, which do not threaten the integrity of existing native biodiversity.</p>	<p>Chief Executive’s Response It is not considered necessary to amend the definition for Green Infrastructure, which is a definition set out in Comhar’s publication ‘Creating Green Infrastructure for Ireland’.</p> <p>It is not considered appropriate to include the proposed additional text as the language used therein read as policy statements and objectives. Policies, objectives, and actions with respect to Green Infrastructure have been included in the Draft Plan in Section 12.14.4.</p> <p>Objective BI O42 requires that all Local Area Plans protect and manage the Green Infrastructure network in an integrated and coherent manner and add additional local Green Infrastructure corridors where possible. It is considered that this objective satisfactorily addresses the concerns raised.</p> <p>The proposed changes to BI P13 and BI O45 are agreed</p> <p>It is not considered necessary to amend either BI O46 or BI O47 as the proposed text is implicit in the term ‘Green Infrastructure’. In relation to qualified ecologists, this is a matter that is outside the scope of the Development Plan, which is primarily a land use plan and therefore cannot be considered as part of the plan making process.</p> <p>Policy BI P14 is an overarching policy for the sub section titled ‘Green Infrastructure within Public Open Spaces and Parks’. It is</p>

	<p>Requests amending action BI A19 (new text in purple), as follows: BI A19: Identify, map, Protect and maintain a Green Infrastructure network in the county.</p> <p><u>12.14.4 Green Infrastructure approach to spatial planning</u> Requests amending policy BI P12 (new text in purple), as follows: BI P12: Recognise the importance of Green Infrastructure in Kildare and protect this valued biological resource, the ecosystem services it provides and the contribution to climate resilience. Kildare County Council will ensure, as far as is possible, that any future development zonings are carefully considered and managed, so they do not negatively impact the integrity and proper functioning of the existing Green Infrastructure network.</p> <p><u>12.14.9 Urban Green Infrastructure</u> Requests amending policy BI P13 (new text in purple), as follows: Recognise the importance of Urban Green Infrastructure in addressing a broad range of urban challenges, such as conserving biodiversity connecting people with nature, adapting to climate change, supporting the green economy, and improving social cohesion and to seek to protect and enhance this resource, particularly existing semi-natural areas or habitats (such as hedgerows, canals, rivers).</p>	<p>not considered necessary to amend this policy as suggested. More specific objectives underpinning BI P14 are included within this sub section.</p> <p>While there are many policies within the plan encouraging the planting of native species it is not always appropriate to do so in all settings. Many non-native tree species can also have benefits for pollinators.</p> <p>In relation to SUDS, it should be noted that amendments to sections throughout the Draft Plan are proposed which will now include references to nature-based solutions (see response to Observation No. 4 of OPR submission, no. 550)</p> <p>Chief Executive's Recommendation <u>Amend Policy BI P13 as follows:</u> Recognise the importance of Urban Green Infrastructure in addressing a broad range of urban challenges, such as conserving biodiversity connecting people with nature, adapting to climate change, supporting the green economy, and improving social cohesion and to seek to protect and enhance this resource, particularly existing semi-natural areas or habitats (such as hedgerows, canals, rivers).</p> <p>BI O45: Ensure that the Green Infrastructure Strategy and Network identified in this County Development Plan and Local Area Plans is used to inform the development management process to ensure that new residential areas, business/ industrial development tourism and other relevant projects contribute towards the conservation and protection of Kildare's habitats and species, and the protection, management and enhancement of the existing Green Infrastructure in terms of design, layout and landscaping.</p>
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	<p>Requests amending the objectives set out below (new text in purple), as follows:</p> <p>BI O45: Ensure that the Green Infrastructure Strategy and Network identified in this County Development Plan and Local Area Plans is used to inform the development management process to ensure that new residential areas, business/ industrial development tourism and other relevant projects contribute towards the conservation and protection of Kildare’s habitats and species, and protection, management and enhancement of the existing Green Infrastructure in terms of design, layout and landscaping.</p> <p>BI O46: Identify existing Green Infrastructure at the initial stages of the planning process and to use this information to guide the overall design of an appropriate site layout which is reflected in the developments landscaping plan. The landscaping plan submitted with an application should clearly illustrate how existing Green Infrastructure (particularly semi-natural or high nature value elements) are to be retained, and provide opportunities to create more linkages, have informed and been incorporated into the development, layout and, if appropriate, management proposals. These plans will be reviewed by a suitably qualified ecologist (accessing local and national expertise)</p> <p>BI O47: Ensure that the design of new development does not cause fragmentation of the Green Infrastructure network (particularly existing semi-natural or high nature value areas).</p>	<p>In relation to SUDS, it should be noted that amendments to sections throughout the Draft Plan are proposed which will now include references to nature-based solutions (see recommendation to Observation No. 4 of OPR submission, no. 550)</p>
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	<p><u>12.14.10 Green Infrastructure within Public Open Spaces and Parks</u> Requests amending policy BI P14 (new text in purple), as follows: Protect and enhance the Green Infrastructure network throughout the county having regard to ecologically sound techniques, such as managed rewilding, and utilising plants of local provenance and origin.</p> <p><u>12.14.11 Green Infrastructure and Sustainable Urban Drainage Systems Policy</u> Requests proposed additional policy statement (new text in purple), as follows: Require that established native vegetation should be left in-situ, wherever possible, to intercept, slow down and filter runoff as an integral part of all new development proposals.</p> <p>Requests amending the objectives set out below (new text in purple), as follows: BI O51: Promote and support the development of Sustainable Urban Drainage Systems (SuDS) such as integrated constructed wetlands, permeable surfaces, filter strips, ponds, swales and basins at a site, district and county level and to maximise the amenity and bio-diversity value of these systems The first step in this approach will be that existing established native vegetation should be left in-situ, wherever possible. Where additional measures are necessary, the preferred option in employing these techniques will be to allow natural recolonization, or at the very minimum, that any plantings arise from locally</p>	
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		<p>sourced native material of native provenance and origin.</p> <p>BI O52: Integrate nature-based solutions and climate change considerations into the design, planning, and implementation of infrastructure provision/ works and development proposals at the earliest possible stage of the design process, ensuring that these solutions do not undermine or pose threats to Kildare’s native biodiversity by primarily employing techniques to allow natural recolonization, or at the very minimum, that any plantings arise from locally sourced native material of native provenance and origin.</p>	
468	Ann Behan	<p>The precise definitions of the term green infrastructure should be included to provide a clear distinction between the two and avoid confusion for the public. The current definition of biodiversity is incomplete and unacceptable. The definitions should be as follows:</p> <p><u>Green Infrastructure</u>: “is a strategically planned network of natural and semi-natural areas with other environmental features designed and managed to deliver a wide range of ecosystem services such as water purification, air quality, space for recreation and climate mitigation and adaptation. This network of green (land) and blue (water) spaces can improve environmental conditions and therefore citizens health and quality of life. It also supports a green economy, creates job opportunities, and enhances biodiversity”.</p> <p>Amendments are proposed to this section. However, they are not clearly set and are not legible.</p>	<p>Chief Executive’s Response See response to submission 413</p> <p>Chief Executive’s Recommendation See recommendation to submission 413</p>

		<p>Reference is made to the definition of Green Infrastructure later in the document. It is submitted that the definition should be “a strategically planned network of natural and semi-natural areas with other environmental features designed and managed to deliver a wide range of ecosystem services. It incorporates green spaces (or blue if aquatic ecosystems are concerned) and other physical features in terrestrial (including coastal) and marine areas. On land, GI is present in rural and urban settings”.</p>	
405	Kildare Climate Action Linkage Group	<p>The terms used in the title of Chapter 12 should be clearly explained and distinguished from the outset, for the following two reasons:</p> <ul style="list-style-type: none"> • Failure to understand that the definition of biodiversity has a genetic component may result in inappropriate green infrastructure ‘enhancement’ practices. • Additionally, the application of green infrastructure principles within urban areas (while they may be beneficial from a social/recreational/educational/climate mitigation perspective) will contribute little to the conservation of rare or threatened species or habitats. <p>The submission proposes the insertion of precise definitions for Biodiversity and Green Infrastructure at the commencement of this chapter:</p> <p>Biodiversity - The variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are</p>	<p>Chief Executive’s Response See response to submission 413</p> <hr/> <p>Chief Executive’s Recommendation See recommendation to submission 413</p>

		<p>part; this includes diversity within species, between species and of ecosystems (Convention on Biological Diversity: Link provided)</p> <p>Green infrastructure - Green infrastructure is a strategically planned network of natural and semi-natural areas with other environmental features designed and managed to deliver a wide range of ecosystem services such as water purification, air quality, space for recreation and climate mitigation and adaptation. This network of green (land) and blue (water) spaces can improve environmental conditions and therefore citizens' health and quality of life. It also supports a green economy, creates job opportunities and enhances biodiversity. (European Union, link provided).</p>	
468	Ann Behan	<p>The precise definitions of the term biodiversity should be included to provide a clear distinction and avoid confusion for the public. The current definition of biodiversity is incomplete and unacceptable. The definition should be as follows:</p> <p>Biodiversity: “The variability among living organisms from all sources including inter alia terrestrial, marine, and other aquatic ecosystems and the ecological complexes of they are part; this includes diversity within species, between species and of ecosystems”.</p> <p>It must be clearly pointed out that Biodiversity operates at 3 levels (genetic, species and ecosystem (habitat) level). There must be protection for genetic integrity of our island adapted populations, all our species, including the legally protected rare and threatened ones, and the functioning habitats which can support these</p>	<p>Chief Executive’s Response See response to submission 405 above</p> <p>Chief Executive’s Recommendation See response to submission 405 above</p>

		species, along with the species that have not yet been identified.	
AMENITY AREAS			
31	Michael Kinnane	<p>Punchestown Racecourse is a central part of the Kildare / Ireland racing community and a significant resource for the whole community.</p> <p>Punchestown Racecourse should be designated as an Area of High Amenity to reflect its importance at a county and national level.</p>	<p>Chief Executive's Response</p> <p>Punchestown along with the Curragh and Naas racecourses are designated as key nodes / stepping-stones in para 12.14.7 of the dCDP.</p> <p>Stepping-Stones are defined under para 12.14.5 of the dCDP as 'smaller geographical areas [that are] either critically important because of their environmental quality (i.e., local native woodlands, intact bogs/peatlands wetlands), local amenity value (i.e., urban parks) or because of their scale as undeveloped areas, such as Coillte forestry plantations.'</p> <p>Map Ref. V1-12.3 and 12.5 identify Punchestown as a 'stepping-stone' though it is noted that Punchestown racecourse is not clearly labelled on Map Ref. V1-12.3.</p> <p>Table 12.5 (County Kildare Wetland Survey Sites) designates Punchestown Racecourse Wetlands as being of international importance.</p> <p>Various objectives contained in Chapter 12 (12.14.4) of the Plan provide protection to the Punchestown racecourse, including Policy BI P12 'Recognise the importance of Green Infrastructure in Kildare and protect this valued biological resource, the ecosystem services it provides and the contribution to climate resilience' and Objective BI O39 "Ensure the protection, enhancement and maintenance of Green Infrastructure in Kildare."</p> <p>Chief Executive's Recommendation</p> <p>To label Punchestown Racecourse on Map Ref. V1-12.3.</p>

			It should also be noted that it is proposed to amend Table 6.1 of the 'Open Space & Outdoor Recreation Strategy' (Examples in County Kildare/National Importance) as follows: The Curragh, Bog of Allen, Irish National Stud and Gardens, (Tully)-, Castletown House & Woodlands and Punchestown Racecourse.
27	Cathy Meade	Punchestown Racecourse is an area of high amenity.	Chief Executive's Response See response to Submission No. 31
		Summary of Appendix Punchestown should be designated in the plan as an area of high amenity both from a racing/event perspective and as a community recreational amenity.	Chief Executive's Recommendation See recommendation to Submission No. 31 above.
308	Irene O'Neill	The submission supports the regeneration of old routes on water and land for recreation use and is encouraged that the Council recognise the opportunities presented by the ceasing of commercial activities and the re-wetting of Bogs.	Chief Executive's Response The contents of the submission are noted.
			Chief Executive's Recommendation No change to the Draft Plan.
GREENWAYS			
28	Cathy Meade	<u>Protection of Greenway routes.</u> Summary of Appendix. The proposed greenway starting from near the Naas lakes and along the old Tullow railway line would be a great addition. The greenway should be designated in a very sensitive manner to ensure minimum disruption to the area.	Chief Executive's Response Greenway routes are protected from adverse development under objective BI O47 of Chapter 12, which ' ensure[s] that the design of new development does not cause fragmentation of the Green infrastructure network. ' An objective already exists in Chapter 4 of the dCDP, which prioritises a Greenway along the former Tullow railway line. RE O134 of Chapter 4 states 'It is an objective of the Council to ' Investigate the feasibility of developing a walkway / cycleway along the former Tullow railway line in Co. Kildare. '

		A new policy objective should be inserted, which states that all designated Greenway routes should be protected and that planning permission for alternative developments will not be permitted along these routes.	An additional objective is not considered necessary.
			Chief Executive's Recommendation No change to the Draft Plan.
542	David Mulcahy Planning Consultant	The river Liffey is arguably the key amenity asset in Kildare but is underutilised in terms of its potential. There should be a policy to provide a greenway along the entire length of the river Liffey connecting into the proposed greenway at Blessington Lakes. Relying on piecemeal applications to secure bits and pieces of the river edge should be abandoned in favour of a clear plan to promote a greenway on this corridor. A map should be included in the CDP identifying this route and that should form the basis of future funding applications. The section along the Liffey Linear Park in Newbridge is cited as an exemplar model.	Chief Executive's Response It should be noted that the Green Infrastructure Concept Map (map ref: 12.3) in Chapter 12 identifies a green corridor(s) along the route of the river Liffey in Kildare. There are a range of objectives in the Draft Plan which support development of recreation areas alongside the river Liffey. These include objective LR O55, which is to facilitate and support the development of a Liffey Valley Linear Park in collaboration with Fingal County Council, South Dublin County Council, relevant government departments, existing landowners, and other relevant stakeholders. There is also an objective (LR O56) to progress the implementation of the following flagship projects identified in the report 'Towards a Liffey Valley Park Strategy' (2006) or any superseding plan, while ensuring that environmental and built heritage sensitivities are not negatively impacted upon. There are numerous other relevant projects proposed including but not limited to the following. <ul style="list-style-type: none"> - Enhancement work of the Celbridge Town Centre, specifically the refurbishment of the pedestrian bridge over the river Liffey adjacent to The Mill building. - The acquisition and development of the Donaghcumper land into a public park with the opportunity to create a linkage with Castletown estate. - Preparation of a Masterplan for the Donaghcumper land. - The development and installation of high-quality interpretative boards in each of the towns and villages along the Liffey from Leixlip to Ballymore Eustace.

			<p>There is also a further objective (LR O57) to investigate the feasibility of; (i) creating a pedestrian link between the Liffey Valley, the Wicklow Mountains, and the Wicklow Way, in consultation with Wicklow County Council, as recommended in the report 'Towards a Liffey Valley Park Strategy'. (ii) The possible expansion of recreational open space at other locations along the river Liffey, all subject to environmental considerations.</p>
			<p>Chief Executive's Recommendation Include an additional action under section 13.6 to read as follows: To progress the implementation of the Liffey Valley Linear Park, prepare a map of the extent of the routes and identity policies that support the development of the linear park for inclusion in relevant Local Area Plans.</p>
DESIGNATED SITES			
515	Meath County Council	<p>Submission notes that there are two designated sites of note which traverse the boundaries of Kildare and Meath County Councils. Notes that the Rye Water Valley/Carton Special Area of Conservation (SAC) and the Royal Canal (cNHA) are referred to in Chapters 12 (and 13). States that the inclusion of the policies seeking to protect and maintain the designated sites as per BI P2 and BI P3 is particularly welcome.</p>	<p>Chief Executive's Response The comments of the submission relating to the environment are noted.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
470	IPCC	<p>There are many biodiversity hotspots which are not designated, and these also need to be protected from developments. Sites listed within the Bog of Allen Heritage Survey or Kildare Wetland Survey should also be incorporated and recognised within any development.</p>	<p>Chief Executive's Response Not agreed. Chapter 12 contains policies and objectives that seek to protect Wetland sites identified in the County Wetland Survey BI O31 to BI 033. BI A7 and BI O14 seek to identify, map, and protect locally important undesignated sites in the county.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan</p>
		<p>Amend EC O2 to include purple text:</p>	

		<p>Adopt an informed and positive approach to renewable energy proposals, having regard to the proper planning and sustainable development of the area, including community, environmental and landscape impacts, and impacts on protected or designated heritage areas / structures. Protecting biodiversity and conservation of un-designated sites is also a priority.</p>	
472	Keep Ireland Open	<p>The submission supports the following policies, objectives, and actions; Policy BI P1, Objectives Bi O1, BI O2 and BI O4 and Action BI A1</p> <p>The submission recommends that Section 12.6 and 12.6.2 be merged and include policy BI P2 and objectives BI O5 and BI O8. The submission recommends combining Natura 2000 sites and NHAs.</p> <p>The submission recommends the inclusion of an additional objective in Section 12.2 to identify and provide appropriate buffer zones between Designated Sites and areas zoned for development</p> <p>The submission recommends the inclusion of additional objectives in Section 12.6.1</p> <ul style="list-style-type: none"> No project giving rise to significant cumulative, direct or secondary impacts on Natura sites due to their size, scale land take proximity resource requirements, emissions, decommissioning of from any other effect shall be permitted on the basis of this plan (either individually or in combination with other plans or projects unless it can be robustly 	<p>Chief Executive’s Response</p> <p>The comments in relation to the policies and objectives are noted. Section 13.6 provides the context for designated sites, both national and international and Section 12.6.2 considers nationally designated sites.</p> <p>To protect the integrity of Natura 2000 sites appropriate buffer zones should be identified between designated sites and areas zoned for development it is considered that a new action be added to the plan</p> <p>Policy BI P2 and Objectives BI O5 to BI O7 seek the protection of Natura 2000 sites in the county and to ensure all proposed development is adequately assessed in accordance with Article 6(3) and Article 6(4) of the Habitats Directive. However, there is no reference in the objective to the Planning and Development legislation.</p> <p>Policy BI P3 and Objectives BI O8 and BI O9 seek the protection of Natural Heritage Areas and to ensure all proposed development is adequately assessed by the provision of an Ecological Impact Assessment (EclA).</p> <p>The implementation of the precautionary principle in relation to proposed developments in environmentally sensitive areas should always be encouraged.</p>

		<p>demonstrated to be in accordance with Art 6(4) of the Habitats Directive and S. 177A of the P and D act (2000-2010) or any superseding legislation of there must be no alternative solution available and imperative reasons of overriding public interest for the plan to proceed and adequate compensatory measures have been identified than can be put in place.</p> <ul style="list-style-type: none"> • Strictly protect, support and maintain the conservation and enhancement of sites as defined in the Planning and Development Acts 2000-2010 (SPAs, SACs) including any additional sites that may be proposed during the lifetime of the plan. Protect Natura 2000 network from plans of development proposals likely to have significant effect on the ecological coherence of integrity of a site. Encourage the retention and management of landscape features of major importance for wild fauna and flora as per Art. 10 of the Habitats Directive • Actively promote the conservation and protection of proposed or designated NHAs and associated habitats. Protect and conserve the character and integrity of designated or proposed NHAs including those that may be identified or notified to the Council Ensure the protection of the ecological, visual, recreational, environmental and amenity values. • Protect the conservation value of SPAs, SA Cs and NHAs identified by the Minister for DAHG and any other sites that may be proposed for designation during the lifetime of this plan. 	<p>Ramsar Sites, Statutory Nature Reserves, Biogenetic Reserves, Wildfowl Sanctuaries should be afforded protection as they are important sites within the county.</p> <p>Access to geological and geo-morphological features of interest should be encouraged and facilitated where practicable.</p> <p>Objectives BI O37 and BI O38 seek to protect Sites of Geological Importance listed in Table 12.7 and the protection from inappropriate development of Geological Natural Heritage Areas that become designated during the lifetime of this Plan.</p> <p>Chief Executive’s Recommendation Include a new action in Section 12.6 as follows. Identify and provide appropriate buffer zones between Designated Sites and areas zoned for development</p> <p>To amend Objective BI O6 as follows. Ensure an Appropriate Assessment Screening, in accordance with Article 6(3) and Article 6(4) of the Habitats Directive, Art 6(4) of the Habitats Directive, Section 177A of the Planning and Development Act (2001-2022) or any superseding legislation and with DEHLG guidance (2009),....</p> <p>Include a new objective in Section 12.5 Apply the precautionary principle in relation to proposed developments in environmentally sensitive areas to ensure that all potential adverse impacts on a designated NHA or Natura 2000 Site arising from any proposed development or land use activity are avoided, remedied, or mitigated.</p> <p>Include a new objective in Section 12.6.2 as follows; Conserve, preserve and protect the integrity of and maintain the favourable conservation value/status within or adjacent to Ramsar Sites, Statutory Nature Reserves, Biogenetic Reserves, Wildfowl</p>
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	<ul style="list-style-type: none"> • Protect, conserve, preserve, enhance, identify and maintain sites of natural heritage importance, in co-operation with relevant stakeholders. Where necessary, restore the integrity of designated or proposed Natura site and NHA Sites, including areas adjacent thereto, designated or proposed under National and European legislation for SA Cs, SPAs and NHAs by resisting development which might damage or be harmful to or result in serious deterioration, dereliction or disturbance of species or which could have a significant adverse effect on the integrity of a site and maintain and develop linkages between them. This protection will extend to any additions or alterations to sites that may arise during the lifetime of this Plan. • Development on or adjacent to a proposed or designated National or European Site will be permitted only where an assessment has been carried out to the satisfaction of the Council in consultation with the NPWS and where the overall integrity of the site will not be compromised or adversely affected. • Restrict/Resist any development in or adjacent to sites which would be harmful to or that would result in a significant deterioration of habitats and/or disturbances of species in proposals for these sites. • Assess all property developments in order to determine if they are likely to impact directly, indirectly or cumulatively on designated sites in accordance with relevant legislation • Maintain the quality and conservation value of designated and proposed SACs, SPAs and 	<p>Sanctuaries, all existing and proposed NHAs. They should be designed and sited so as to minimise their impact on the ecological and landscape values of these sites under National and European legislation and International Agreements.</p> <p>Include a new objective in Section 12.7.1 Conserve and protect habitats and species listed in the Annexes of the EU Habitats Directive (92143/EEC) (as amended), the Birds Directive (20091147/EC), Directive Annex 2, the Wildlife Acts 1976 to 2000, The Wildlife Acts 1976 (as amended) and the Flora Protection Order No 94 of 1999.</p> <p>To include an additional objective in Section 12.13 as follows. Promote, encourage, and support the provision of access to geological and geo-morphological features of interest in cooperation/consultation with landowners (where appropriate/practicable).</p> <p>To include an additional objective in Section 12.13 as follows. Where appropriate support the restoration of Sites of Geological Importance (identified in Table 12.7).</p>
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		<p>NHAs and when assessing development proposals make sure that there are provisions for their protection and enhancement.</p> <ul style="list-style-type: none"> • Only permit development on or adjacent to designated SACs, SPAs, NHAs, Statutory Nature Reserves or those proposed to be designated over the period of the Plan where an appropriate level of assessment can clearly demonstrate that it will have no significant adverse effect on the integrity of the site. • Support and co-operate with statutory authorities and others in support of measures taken to manage proposed or designated sites in order to achieve conservation objectives. <p>The submission recommends the inclusion of additional objectives in Section 12.6.2</p> <ul style="list-style-type: none"> • Restrict development within a pNHA to development that is directly related to the area's amenity potential subject to the protection and enhancement of natural heritage, visual amenities and the landscape. • Protect from inappropriate development and maintain the character, integrity and conservation value of those features or areas of ecological interest listed as pNHAs, or that may be designated during the lifetime of this plan. • Assess all proposed developments in order to determine if they are likely to impact directly, indirectly or cumulatively on designated natural heritage sites in accordance with relevant legislation. • Restrict development in or adjacent to a NHA or a pNHA, unless it can be clearly 	
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	<p>demonstrated that the development will not have a significant adverse effect thereon which could result in their deterioration or which are likely to have a significant adverse effect/impact, direct, indirect or cumulative, on features for which the sites were designated or proposed for designation or which would result in a significant deterioration of habitats or disturbance of species or landscape values</p> <p>The submission recommends the inclusion of additional objectives in Section 12.5</p> <ul style="list-style-type: none"> • Apply the precautionary principle in relation to proposed developments in environmentally sensitive areas to ensure that all potential adverse impacts on a designated NHA or Natura 2000 Site arising from any proposed development or land use activity are avoided, remedied or mitigated. • Impose "Precautionary Principles" which are an integral component of planning policies on environmental and heritage matters. Where uncertainty exists regarding the potential impact of a proposed development on natural heritage, full account shall be taken of these Principles. <p>The submission recommends the inclusion of an additional objective in Section 12.6.2 to conserve, preserve and protect the integrity of and maintain the favourable conservation value/status within or adjacent to Ramsar Sites, Statutory Nature Reserves, Biogenetic Reserves, Wildfowl Sanctuaries, all existing and proposed NHAs. They should be designed and sited so as to minimise</p>	
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	<p>their impact on the ecological and landscape values of these sites under National and European legislation and International Agreements.</p> <p>The submission recommends the inclusion of additional objectives in Section 12.7.1</p> <ul style="list-style-type: none"> • Conserve and protect habitats and species listed in the Annexes of the EU Habitats Directive (92143/EEC) (as amended), the Birds Directive (20091147/EC), Directive Annex 2, the Wildlife Acts 1976 to 2000, The Wildlife Acts 1976 (as amended) and the Flora Protection Order No 94 of 1999. • Ensure that development does not have an impact, incapable of satisfactory avoidance or mitigation on plant, animal or bird species protected by law. <p>The submission recommends an additional objective to promote, encourage and support the provision of access to geological and geomorphological features of interest in cooperation/consultation with landowners (where appropriate/practicable).</p> <p>The submission recommends an additional objective to, where appropriate, restore geological sites.</p> <p>The submission recommends additional objectives:</p> <ul style="list-style-type: none"> • Contribute to the appropriate protection of Geological Sites that become designated during the lifetime of the Plan. 	
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		<ul style="list-style-type: none"> Support the designation of listed sites of geological interest. 	
BIODIVERSITY			
552.	Department of Housing, Local Government and Heritage	<p>The Department welcomes the Strategic Vision for County Kildare, particularly Kildare County Council's pledge to improve the quality of life of all residents by enhancing the County's natural environment for future generations. The Department recognises the council's commitment to providing a healthy natural environment for all.</p> <p>The submission highlights the national and global biodiversity crisis, and that Kildare County Council declared a Climate Change and Biodiversity Loss Emergency in June 2019.</p> <p>Objective 1 of the National Biodiversity Action Plan is to 'Mainstream biodiversity into decision making across all sectors. Kildare County Council should set objectives in the CDP to implement and monitor the actions as set out in the National Biodiversity Action Plan 2017-2021, and any subsequent plan.</p> <p>Objective 1.1.3 of the NBAP requires all Public Authorities and private sector bodies to move towards no net loss of biodiversity. The Department advises the inclusion of a no net loss biodiversity target for all developments, activities, programmes, and plans arising from this CDP.</p>	<p>Chief Executive's Response</p> <p>All recommendations agreed, in part at least, except the following: The recommendation to remove landscape features from Policy BI P1 is not agreed. Often within urban settings landscape features are the only remaining habitats and therefore it is important that they are recognised and retained.</p> <p>It is not agreed to amend Action BI A6 to remove the phrase 'subject to available resources' as all work with the Local Authority is subject to available resources.</p> <p>It is also considered appropriate to replace the existing paragraph 12.5.1 (National Biodiversity Plan) with a paragraph titled 'National Biodiversity Action Plan (NBAP) 2017-2021.</p> <p>Chief Executive's Recommendation Amend 12.3.4 The Wildlife Acts 1976 –2012 to 2021</p> <p>Delete Section 12.5.1 National Biodiversity Plan(s)</p> <p>Ireland's first National Biodiversity Plan was published in 2002. The second National Biodiversity Plan – Actions for Biodiversity 2011-2016 was published in November 2011. The Plan was developed in line with EU and International Biodiversity strategies and policies. It recognised that locally led action is critical in protecting biodiversity and ecosystem services and sets out the measures Ireland should take to ensure its conservation. The third National Biodiversity Action Plan 2017-2021 was published by the</p>

	<p>The Department advises that objectives related to biodiversity and ecosystem conservation, protection, enhancement, and restoration should be separated from objectives related to other matters such as amenity provision and landscape and recommends references to landscape features in Policy BI P1 should be removed.</p> <p>The Submission requested the removal of “wherever possible” in BI P1</p> <p>Amend 12.3.4 Wildlife Acts 1976 – 2012 to reflect the new citing protocol for the acts</p> <p>Amend 12.6.2 Natural Heritage Areas (NHAs) and Nature Reserves Reference to the National Parks and Wildlife Division should be changed to the National Parks and Wildlife Service.</p> <p>Amend Policy BI P3 and Objective BI O8 should refer to both ‘proposed Natural Heritage Areas’ and ‘Natural Heritage Areas.</p> <p>Amend objective BI O12 ‘Possibly require a derogation licence, issued by the DHLGH, in the event of a proposed development impacting on a site known to be a breeding or resting site of species listed in the Habitats Regulations or the Wildlife Acts 1976 -2012’ to reflect legislation correctly</p> <p>Amend Action BI A6 ‘Undertake surveys and collect data to provide an evidence-base to assist the Council in meeting its obligations under Article 6 of the Habitats Directives (92/43/EEC) as</p>	<p>Department of Culture, Heritage, and the Gaeltacht in October 2017.</p> <p>Insert Section 12.5.1 National Biodiversity Action Plan (NBAP) 2017 - 2021</p> <p>The National Biodiversity Action Plan 2017-2021 (NBAP) captures the objectives, targets and actions for biodiversity that will be undertaken by a wide range of government, civil society and private sectors to achieve Ireland’s Vision for Biodiversity, reflecting Objective 1 of the NBAP which is to ‘Mainstream biodiversity into decision making across all sectors.</p> <p>Amend Policy BI P1: Integrate in the development management process the protection and enhancement of biodiversity and landscape features wherever possible, by minimising adverse impacts on existing habitats (whether designated or not) and by including mitigation and/or compensation measures, as appropriate by applying the mitigation hierarchy to potential adverse impacts on important ecological features (whether designated or not), i.e. avoiding impacts where possible, minimising adverse impacts, and if significant effects are unavoidable by including mitigation and/or compensation measures, as appropriate. Opportunities for biodiversity net gain are encouraged.</p> <p>Include a new Objective: Move towards no net loss of biodiversity through strategies, plan, mitigation measures, appropriate offsetting and/or investment in Blue-Green infrastructure.</p> <p>Amend BI A1: Continue to implement natural heritage actions in the County Heritage Plan 2019-2025, the County Biodiversity Plan, the National Biodiversity Action Plan 2017 – 2021 and any subsequent plans, in partnership with the Department of Housing, Heritage and Local Government and Heritage, and relevant stakeholders and the community</p>
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	<p>transposed into Irish Law, subject to available resources', the Department recommends the removal of the phrase 'subject to available resources'. This is in accordance with Objective 1 of the National Biodiversity Plan 2017-2021 to 'Mainstream biodiversity into decision making across all sectors'</p> <p>New objective under 12.7.1 Require all biodiversity data gathered in the preparation of planning applications is made available to the National Biodiversity Data Centre (NDBC).</p> <p>The Department commends Kildare County Council for the inclusion of County Biodiversity Sites and Wetland sites within the CDP.</p> <p>Include additional text (purple) 12.14.4 Green Infrastructure approach to spatial planning people live and work. Existing areas of green infrastructure mostly coincide with important areas for biodiversity and in the main these areas should be avoided, where possible. An intention of route selection should be to examine alternatives to the use of existing Green Infrastructure.</p> <p>Any new walking and cycling trails within existing areas of Green Infrastructure will require environmental assessments to be carried). Transport infrastructure (including walking and cycling trails) provides potential opportunities to act as new Green Infrastructure corridors.</p>	<p>Amend 12.6.2 Natural Heritage Areas (NHAs) and Nature Reserves geological interest. The designation of these sites is the responsibility of the National Parks and Wildlife Division Service of the Department.</p> <p>Amend BI P3: ...Special Protection Areas (SPAs), Natural Heritage Areas (NHAs), proposed Natural Heritage Areas (pNHAs), Ramsar Sites and Statutory Nature Reserves.</p> <p>Amend BI O8: Require the preparation of an Ecological Impact Assessment (EclA) by a suitably qualified professional for proposals for development within or adjacent to a Natural Heritage Area (NHA)/proposed Natural Heritage Areas (pNHA), to ensure the development is designed and sited to minimise its impact on the biodiversity, ecological, geological and landscape value of the site, particularly plant and animal species listed under the Wildlife Acts.</p> <p>Amend objective BI O12: require a derogation licence, where necessary, issued by the DHLGH, in the event of a proposed development impacting on a site known to be a breeding or resting site of species listed in the Habitats Regulations or the Wildlife Acts 1976–2012 Directive (Annex IV species).</p> <p>New objective under 12.7.1: Require all biodiversity data gathered in the preparation of planning applications is made available to the National Biodiversity Data Centre (NDBC).</p> <p>Include additional text 12.14.4 Green Infrastructure approach to spatial planning Many social, economic, and environmental benefits can be achieved especially when the Green Infrastructure is proximate to where people live and work. Existing areas of green infrastructure mostly coincide with important areas for biodiversity and in the main these areas should be avoided, where</p>
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			<p>possible. An intention of route selection should be to examine alternatives to the use of existing Green Infrastructure.</p> <p>Any new walking and cycling trails within existing areas of Green Infrastructure will require environmental assessments to be carried). Transport infrastructure (including walking and cycling trails) provides potential opportunities to act as new Green Infrastructure corridors.</p>
468	Ann Behan	<p>Reference is made to the National Biodiversity Conference to be held in June 2022 under the “Act Now for Nature” theme. The council is asked to join in this theme and undertake changes to achieve the vision in the National Biodiversity Action Plan 2017-2021. A quote from the Minister for Heritage is outlined which notes that many of the protected habitats in Ireland are in poor condition, and 14% of species are endangered. The council needs to use its powers to play a meaningful part in halting biodiversity loss in the county. It is therefore suggested to amend the aim of chapter 12 and include the wording “<i>Employ transformational change to ensure</i>” instead of “<i>To contribute towards</i>” at the beginning of the sentence. Also include additional text “<i>ecologically guided</i>” before Green Infrastructure Network.</p>	<p>Chief Executive’s Response It is not considered necessary to amend the Aim of Chapter 12 which is clear and unambiguous as it is currently drafted. All the policies, objectives and actions as set out in Chapter 12 will contribute to the protection, conservation, and management of the County’s unique biodiversity. Similarly, there are other policies, objectives, and actions in other chapters of the Plan that all aspire to achieving a similar aim including in Chapter 3 (Housing) and Chapter 15 (Development Management Standards) to name but two of these chapters.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan</p>
172.	Umerus Community Development Peatlands (UCDCLG)	<p>Requests that the final line of section 12.5.3 be replaced with the following text (in purple): <i>A new County Kildare Biodiversity Action Plan will be published by 2024.</i></p> <p>A central Kildare resource containing biodiversity aims, objectives and initiatives is essential and that a county biodiversity action plan will illustrate the</p>	<p>Chief Executive’s Response It is agreed that the County Kildare Biodiversity Action plan should be reviewed in the short term, however this is subject to the availability of resources. Having regard to a recent announcement from the Minister for Heritage and Electoral Reform, it is also considered prudent to seek to leverage funding to establish a Biodiversity Officer for KCC.</p>

		large reach, responsibility and accountability of the Council and partner organisations for biodiversity and the protection of nature (27% of land for nature should provide the cornerstone of the Plan with milestones for the achievement of this target).	<p>Chief Executive's Recommendation Amend BI A3: Review the County Kildare Biodiversity Action Plan in the short term during within the lifetime of this Plan and leverage appropriate funding to establish a Biodiversity Officer for Kildare County Council.</p> <p>Amend RD O11: Support the implementation of the objectives identified in the County Biodiversity Action Plan 2009-2014 (or as updated) and any relevant local action plan.</p>
172.	Umerus Community Development Peatlands (UCDCLG)	<p>Submits that this section needs to recognise the importance of floodplains as set out in the detailed Green Infrastructure Map. The floodplain of the Barrow SAC along the Figile River west of Umerus Bog is a critical biodiversity area both recognised by the NPWS and identified by Birdwatch Ireland and includes an array of red-listed species breeding in the area.</p> <p>States that the biodiversity strategy needs to recognise that many threatened species exist in important floodplain areas and these areas should be protected. Submits that the biodiversity strategy also needs to recognise the importance of Coillte forests to create new biodiversity areas. There are opportunities to manage Coillte forests for biodiversity and this should be highlighted in the Development Plan.</p>	<p>Chief Executive's Response It is considered that Objectives BI O28, BI O29 and BI 30 already seek to protect and limit development within floodplains. It is considered that the title for Section 12.10.1 should be expanded to refer to Floodplains and Buffer Zones to reflect this.</p> <p>The biodiversity value of Coillte Woodlands is acknowledged and it is agreed that additional text should be provided in Section 12.9 in this regard (it is noted that Woodlands are considered more extensively in Chapter 13).</p> <p>Chief Executive's Recommendation Amend Section 12.10.1 Riparian zones (Floodplains and Buffer Zones)</p> <p>Amend Section 12.9 Trees, Woodlands and Hedgerows Trees, woodlands and hedgerows make a valuable contribution to the landscape and visual amenity of County Kildare and provide wider environmental benefits that include carbon storage. Forests are acknowledged as important habitats for wildlife and Coillte's forests play a key role in biodiversity protection and enhancement in County Kildare.</p>
181	Lullymore Heritage & Discovery Park CLG	A new Kildare Biodiversity Action Plan is needed and should be published by 2024 and this should be stated in the CDP. It is out of date and the Plan will illustrate the large reach, responsibility and	<p>Chief Executive's Response It is acknowledged in Section 12.5.3 of the Plan that the County Biodiversity Plan 2009-2014 will be reviewed during the lifetime of the CDP. The implementation of all actions is subject to available</p>

		<p>accountability of the Council and partner organisations for biodiversity, healthy rivers, water quality and the protection of nature. The enhanced objective to reach 27% of land for nature should provide the cornerstone of the Plan with milestones for the achievement of this target.</p> <p>It is suggested that a new action be included as follows: Publish updated list of County Biodiversity Sites in the County Biodiversity Action Plan and identify areas including Harristown Common and the Allen-Lullymore Bog Group of sufficient scale as Special Amenity Areas under Ministerial Order.</p> <p>The submission includes an article cited as being from the Irish Examiner Feb 2018 which details eight moths which were thought to be extinct in Ireland being found in Lullymore Heritage and Discovery Park. The last time it was seen was 56 years ago.</p>	<p>resources. It is agreed that this process should include collating a list of County Biodiversity Sites. The consideration of sites for Special Amenity Area Orders (SAAO) is provided for under Section 202 of the Planning and Development Act and may take place outside of the CDP process.</p> <p>Chief Executive's Recommendation To include a new Action under Section 12.5.3 County Kildare Biodiversity Action Plan as follows: Collate and publish a list of County Biodiversity Sites as part of the review of the County Biodiversity Action Plan.</p> <p>Amendment to BI A3 recommended under submission no. 172 regarding Biodiversity Sites and Action Plan.</p>
147	National Peatlands Park Group	<p>RD O11 should be amended to take account of the fact that the County Biodiversity Plan is out of date.</p>	<p>Chief Executive's Response It is agreed that RD O11 should be updated to reflect that the biodiversity plan will be updated. See response to 172 above.</p> <p>Chief Executive's Recommendation See response to 172 above re: RD O11.</p>
147	National Peatlands Park Group	<p>Amend section 12.5.3 to include A new County Kildare Biodiversity Action Plan will be published by 2024. This will provide a central Kildare resource containing biodiversity aims, objectives and initiatives, which is deemed essential.</p>	<p>Chief Executive's Response . See response to submission no. 181 in relation to 12.5.3 and submission no. 172 in relation to BI A3.</p> <p>Chief Executive's Recommendation .</p>

		Amend BI A3 as follows 'Publish a new County Kildare Biodiversity Action Plan by 2024'. Also, insert a new Action after BI A7 as follows; 'Publish updated list of County Biodiversity Sites in the County Biodiversity Action Plan and identify areas including Harristown Common and the Allen-Lullymore Bog Group of sufficient scale as Special Amenity Areas under Ministerial Order.'	See recommendation to submission no. 181 in relation to 12.5.3 and submission no. 172 in relation to BI A3
418.	Kildare Tidy Towns	<p>Biodiversity Loss Submission states that any development such as new houses, industrial complexes and infrastructure can have the potential to have negative impacts on biological diversity. Notes that sensitive development however can enhance biodiversity. Submits that it is critical that the Council considers the points outlined in the submission in light of biodiversity.</p> <p>States that the key areas of concern with regard to biodiversity loss in Co. Kildare include the direct loss of habitats of ecological value which can have significant effects on populations of species dependant on these habitats. In relation to Policy BI P5 it is important that all sites selected as locally important biodiversity sites are given serious consideration in all planning applications to prevent any further loss to biodiversity.</p> <p>Submission states that it is strongly in favour of actions BI A7, BI A8 BI A9 and BI A10.</p> <p>Welcomes that the draft Plan which provides the wetlands listed in their inventory of wetland of biodiversity value in the County will receive special consideration in the planning process. Further</p>	<p>Chief Executive's Response It is considered that recommendations to develop a suite of best practice guidance/toolkit for management of various habitats which occur commonly throughout the County such as small areas of marsh vegetation or ponds would be more appropriately addressed in the forthcoming County Biodiversity Action Plan (BAP). Similarly, the comments in relation to the value on natural regeneration as a method of re-wilding biodiversity sites could also be addressed as part of the County BAP.</p> <p>There are numerous objectives that relate to the National Peatland Park. See response and recommendations with respect to Submission No. 421 (Bord na Mona). Additional wetland surveys can be considered under the new County Biodiversity Action Plan. Hydrologically connected wetland sites will be identified under the action to identify County Biodiversity Sites (Action BI A3 refers).</p> <p>The Biodiversity Crisis is acknowledged in the introduction to Chapter 12 Biodiversity and Green Infrastructure. There are numerous policies, objectives and actions identified in Chapter 12 that relate to the preservation, management and enhancement of biodiversity specifically. There are other references to biodiversity in other parts of the Draft Plan also, including in Chapter 3 (Housing) and Chapter 15 (Development Management Standards) to name but two of these. Notwithstanding same however it is proposed to include a new action and a new objective in Section</p>

	<p>welcomes policy BI P8 along with BI O31, BI O33 and BI O34</p> <p><u>Submission Recommendations</u> Suggests including an action on identifying areas of biodiversity/wildlife hotspots in areas of the county which have high numbers of County Biodiversity Sites in proximity to one another or which are linked through biodiversity corridors, eg. watercourses, significant hedgerows, or marginal habitats.</p> <p>Suggests that the Council considers placing primacy value on natural regeneration as a method of re-wilding biodiversity sites, rather than significant planting activities. As part of this, the submission proposes that the Council develop a suite of best practice guidance/toolkit for management of various habitats which occur commonly throughout the County for example small areas of marsh vegetation or ponds.</p> <p>Also support the development of an ecological hub centred on the National Peatland Park centred on Bord Na Mona lands in west Kildare and that this would support the development of a nationally important biodiversity hub and an exemplar of bogland restoration.</p> <p>Also suggests that the Council conduct a wider survey to include any other wetland sites in the county which may have been missed by the initial surveys of wetland sites and that such sites once included on the list also receive the same</p>	<p>12.8 as set out below to further strengthen the importance of biodiversity in County Kildare.</p> <p>It is considered reasonable to include an action in relation to the development of a suite of Neighbourhood projects as suggested.</p> <p>Areas of hedgerows worthy of protection are identified through habitat mapping and incorporated into the various statutory Local Area Plans. Notwithstanding same however it is proposed to include a new action as set out below.</p> <p>The development of a management strategy for invasive Sika deer is not a matter for the County Development Plan.</p> <p>Large scale strategic developments are required to consider cumulative impacts of the proposed development in light of other projects built or proposed within the zone of influence of the proposed application.</p> <p>Regarding the issue of cumulative impacts and the request that the Council highlight that all developments be considered in the overall context of possible future development, it should be noted that such developments, particularly in the context of larger scale strategic developments would be for sites brought forward as lands zoned within a local area plan, or as part of a masterplan which would be integrated into a local area plan by way of a statutory amendment. Such processes would be subject to a Strategic Environmental Assessment as required by the Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011. Furthermore, as part of a robust evidence-led methodology developed by Kildare County Council for preparing local area plans, all land use zoning proposals are the subject of a series of detailed assessments including, inter alia, an Infrastructural Assessment (Settlement Capacity Audit), a Green Infrastructure Mapping and Habitats Survey exercise, and a</p>
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	<p>consideration in the planning process as the already listed sites.</p> <p>Further suggests that areas where wetland sites are hydrologically linked through ground water or connecting watercourses be identified as wetland hotspots and that their cumulative biodiversity is recognised as important for conservation.</p> <p><u>Habitat Fragmentation</u> Submission notes that issue of habitat fragmentation tend to cause a reduction in biological diversity. There is support for the following Policy, Objectives and Actions of the draft Plan: BI P1, BI O1, BI O2, BI O3, BI O4, BI A1, BI A2, BI A3, BI A4 and BI A5.</p> <p><u>Submission Recommendations</u> Strongly recommends that objective BI O1 includes the following additional text (in purple):</p> <p>'BI O1: In light of the Biodiversity Crisis the Council Require, as part of the Development Management Process, the preparation of Ecological Impact Assessments that adequately assess the biodiversity resource within proposed development sites, to avoid habitat loss and fragmentation and to integrate this biodiversity resource into the design and layout of new development and to increase biodiversity within the proposed development.</p> <p>Also recommends that the Council highlight the equal primacy of the biodiversity crisis with the climate crisis and ensure that equal weight is given</p>	<p>Strategic Flood Risk Assessment, along with SEA and Appropriate Assessment (AA). It is considered that such an approach offers a very high level of protection in terms of in-built avoidance and mitigation measures in the process that either fully addresses or minimise the potential for negative cumulative effects on biodiversity within the county.</p> <p>See responses to submission no. 421 (Bord na Mona)</p> <p>Chief Executive's Recommendation New Action Section 12.8, as follows: To identify biodiversity corridors, watercourses, significant hedgerows, or marginal habitat, between County Biodiversity Sites in order to appropriately landscape same in order to ensure population recovery and survival, abundance, productivity, genetic diversity and species richness.</p> <p>Insert new objective 12.7 Protected Habitats and species outside Designated Areas, as follows: To work with bodies such as the NPWS and National Biodiversity Data Centre to ensure that species for which Kildare is a national stronghold such as Green-Flowered Helleborine Orchid, Yellowhammer and Linnet, which are nationally rare or declining, are supported to flourish and seek to ensure the habitat conditions favourable to such species are retained in the county.</p> <p>New Action in Section 12.9 Trees, Woodlands, and Hedgerows, as follows: Engage with the Forestry Division of the Department of Agriculture, Food, and the Marine to develop a suite of Neighbourhood exemplar projects with local communities throughout Kildare.</p> <p>New Action 12.9 Trees, Woodlands and Hedgerows, as follows: To develop a dataset of best quality hedgerows in the County, i.e.</p>
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	<p>to the protection of biodiversity value in County Kildare as is given to the support for Climate actions and infrastructural development. Submits that we cannot let a rush to mitigate one crisis impact in a significant way on highly vulnerable habitats and networks of habitats.</p> <p><u>Disturbance to Species</u> The submission is supportive of policy BI P4 and objectives BI O10, BI O11, BI O12, and BI O13.</p> <p>Submission supports the following policy, objectives and actions of the draft Plan in relation to the conservation of trees and hedgerows: BI P6, BI O15, BI O16, BI O17, BI O18, BI O20, BI A11, BI A12, BI A13, BI A14, BI A15 and BI A16.</p> <p><u>Submission Recommendations</u> Submits that the Council needs to work with bodies such as the NPWS and the National Biodiversity Data Centre to ensure that species for which Kildare is a national stronghold such as Green-Flowered Helleborine Orchid, the birds Yellowhammer and Linnet, which are nationally rare or declining, are supported to flourish. States that the study of the habitat requirements and behaviour of such species is required in a local context to ensure that habitat conditions favourable to such species are retained in the county.</p> <p>Also recommends engagement with the National Forest Service on developing a suite of Neighbourhood exemplar projects with local communities throughout Kildare.</p>	<p>hedgerow hotspots and ensure ongoing conservation of these biodiverse areas.</p> <p>See recommendations to Submission no. 421 (Bord na Mona)</p>
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		<p>Further recommends the development of a map of areas of best quality hedgerows in the County, i.e. hedgerow hotspots and to ensure ongoing conservation of these biodiverse areas.</p> <p><u>Alien Invasive Plant and Animal Species</u> Submission is fully supportive of the following Policy, Objectives and Action of the draft Plan: BI P9, BI O35, BI O36 and BI A17.</p> <p><u>Submission Recommendations</u> Requests that a management strategy for invasive Sika deer be developed as this species has a significant impact on reforestation, re-wilding initiatives and woodland establishment as there is no natural predator for the species in Ireland.</p> <p><u>Cumulative Impacts</u> Submits that planning authorities must have regard to cumulative impacts on protected sites and species when assessing individual planning applications for developments. Notes also that new development can offer opportunities to create, restore or enhance habitats within a particular area or site i.e. new planting of hedgerows, new wetland features as part of Sustainable Urban Drainage Systems etc.</p> <p><u>Submission Recommendation</u> Recommends that the Council highlight that all developments will be considered in the overall context of possible future development and in</p>	
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		particular in the context of larger scale strategic developments which underpin future development in such areas as for example large sewage infrastructure, transport infrastructure and electric grid infrastructure. These projects while individual in nature can support a multitude of additional add on projects in an area and may need to be considered through higher level Strategic Environmental Assessment.	
443	Clane Community Council	<p>This submission recommends the following amendment is added to the aim of the Biodiversity and Green Infrastructure Chapter.</p> <p>To protect, manage and enhance the County's biodiversity for future generations, including sites designated at national and EU level, protected species, and habitats outside of designated sites, and to promote the development of an integrated Green Infrastructure network in order to improve our resilience to climate change and to enable the role of Green Infrastructure in delivering sustainable communities.</p>	<p>Chief Executive's Response Agreed Local authorities are in a position to protect, manage and enhance the County's biodiversity.</p> <p>Chief Executive's Recommendation Edit Aim of Chapter 12: To protect, manage and enhance the County's biodiversity for future generations, To contributes towards the protection, conservation and management of the County's unique biodiversity including sites designated at national and EU level, protected species and habitats outside of designated sites and to promote the development of an integrated Green Infrastructure network in order to improve our resilience to climate change and to enable the role of Green Infrastructure in delivering sustainable communities.</p>
443	Clane Community Council	<p>Proposed new Action regarding maintenance of public green space: Incorporate areas of reduced mowing into residential green areas and public parks.</p> <p>Proposed new Objective relating to biodiversity enhancement with new development.</p> <p>Require all applications for all developments to identify how they are going to positively contribute to local biodiversity. This may be through a</p>	<p>Chief Executive's Response Agreed with edits. Reduced mowing in public parks is an objective of the council under the Climate Adaptation Plan</p> <p>Chief Executive's Recommendation New Action in Section 13.7: To support sustainable management of our parks and residential areas which will include areas of reduced mowing.</p>

		<p>combination of preserving the existing biodiversity on site, and introducing new features such as swift bricks, bat roosts, peregrine nest boxes, green roofs, and native planting of species of local provenance.</p>	
443	Clane Community Council	<p>Appropriate setback distances should be considered to protect natural amenities from the intensification due to roads and buildings, but also from loss of limited natural riparian habitat to grassland management, pathways, sports pitches, etc.</p> <p>EMRA's RSES sets out "RPO 7.26 Support the development of guidance for assessment of proposed land zonings in order to achieve appropriate riparian setback distances that support the attainment of high ecological status for waterbodies, the conservation of biodiversity and good ecosystem health, and buffer zones from flood plains."</p> <p>Ensure there is policy coherence between chapter 12 Biodiversity and Green Infrastructure, BI O23 Planning for Watercourses in the Urban Environment' (IFI, 2020) and Appendix 3. Zoning descriptions should address protections required to balance development pressures that arise in and along riparian corridors.</p> <p>Proposed edits to Text in Section 12.10.1: Where developments are proposed adjacent to waterways, on private or publicly owned land, the Planning Authority will require a setback distance of an absolute minimum of 10m from the water's edge, however, the actual set-back will be</p>	<p>Chief Executive's Response Table 12.4 of the Draft Plan clearly sets out the recommended riparian buffer zones which has been prepared having regard to 'Planning for Watercourses in the Urban Environment, IFI 2020'.</p> <p>Chief Executive's Recommendation No change to the Draft Plan</p>

		<p>determined by the scale and importance of the River, with up to 100m or more being required along the larger and more important rivers such as the Liffey, Barrow and Boyne (except on town centre/regeneration sites where there is a history of development or where there is a key public infrastructure required for public benefit).</p> <p>Riparian Zones are defined in Planning for Watercourses in the Urban Environment (IFI, 2020) as having three zones, (see Figure 12.2). These zones have distinct characteristics and can facilitate different uses as per Table 12.4. The buffer zone is dependent on the nature and design of the development, with development only occurring within 48m from the water's edge.</p>	
350	Lorraine Benson	<p>The submission states that Kildare has no Special Amenity Area Orders for wetland or peatland sites. It states that there should be a specific new action in the County Development Plan to designate areas such as Harristown Common and the Lullymore-Allen Bog Group where there is already a wealth of scientific data.</p>	<p>Chief Executive's Response</p> <p>It is proposed to add an action to review and update the Kildare Wetland Survey 2012-2014 in section 12.11 of the Plan.</p> <p>There is an action (BI A2) within section 12.5 to carry out habitat mapping on a phased basis and integrate biodiversity considerations and protection measures into the suite of Local Area Plans, while it is also an action (BI A3) to review the County Kildare Biodiversity Plan within the lifetime of this Plan. While there is a further action (BI A4) which is to prepare and roll-out local biodiversity action plans on an annual basis, subject to funding.</p> <p>Chief Executive's Recommendation</p> <p>Add an action under 12.11 to read as follows: Review and update the County Kildare Wetland Survey 2012-2014 during the lifetime of the plan.</p>

413.	Kildare Public Participation Network	<p>Submission proposes amending the Chapter Aim (new text in purple, deleted text crossed-out), as follows:</p> <p>Aim: To contribute towards the protection, conservation and management of the County's unique biodiversity. Employ transformational change to ensure the protection, conservation and management of the County's unique biodiversity, including sites designated at designated sites and to promote the development of an integrated, ecologically guided, Green Infrastructure network, in order to improve our resilience to climate change and to enable the role of Green Infrastructure in delivering sustainable communities.</p> <p>Proposes amendment to definition of biodiversity (in purple), as follows: The variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part; this includes diversity within species, between species and of ecosystems CBD (2006).</p> <p>Submits that it should be clearly pointed out here that Biodiversity conservation operates at 3 levels (genetic, species and ecosystem (habitat) level). Therefore, we must seek to protect:</p> <ul style="list-style-type: none"> • the genetic integrity of our island adapted populations. • all our species, including the legally protected rare and threatened ones. • functioning habitats which can support these species, along with the species we have not yet identified (of which there are many). 	<p>Chief Executive's Response</p> <p>It is not considered necessary to amend the Aim to Chapter 12 which is considered to be clear and unambiguous as it is currently drafted. All the policies, objectives and actions as set out in Chapter 12 will contribute to the protection, conservation, and management of the County's unique biodiversity. Similarly, there are other policies, objectives and actions in other chapters of the Plan that all aspire to achieving a similar aim including in Chapter 3 (Housing) and Chapter 15 (Development Management Standards) to name but two of these chapters.</p> <p>It is considered appropriate to use the International IUCN definition for Biodiversity in the Draft Plan which, in combination with the various policies, objectives and actions of same, emphasise the significance that is attributed to the protection, management and enhancement of biodiversity throughout the county and the willingness of the Council to ensure the continued protection, management and enhancement of same during the life of the Plan and beyond.</p> <p>It is noted that objective BI O7 supports the establishment of conservation measures and the preparation and implementation of management plans for the conservation of Natura 2000 sites by the NPWS.</p> <p>The proposed changes to Section 12.4.1 are agreed</p> <p>In relation to the proposed amendments to Section 12.5.3 it is not considered that the additional text is necessary. All species, habitats and stakeholders are already addressed in this section. It is a specific action (BI A3) to review the County Kildare Biodiversity Plan within the lifetime of this Plan. There are numerous heritage/biodiversity related objectives and actions that have been identified in the Draft Plan all of which will form part of the Heritage Officer's work programme during the life of the Plan</p>
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	<p>12.3.1. EU Habitats Directive It is noted that none of Kildare's Natura 2000 sites currently have management plans in place. This should be clearly stated in Kildare's County Development Plan (United Nations Economic Commission for Europe 1998) and Kildare PPN propose that Kildare County Council urgently engage with NPWS to expedite the formulation and implementation of these management plans for the EU protected sites in Kildare. For example: see Pollardstown Fen: https://www.npws.ie/sites/default/files/protected-sites/natura2000/NF000396.pdf</p> <p>12.4.1 EU Biodiversity Strategy for 2030 Submission requests amending the text in section 12.4.1 (new text in purple), as follows: On 20 May 2020, the Commission adopted an EU Biodiversity Strategy for 2030 (European Commission, 2020). The strategy presents an ambitious agenda to arrest the trend in biodiversity loss with increasing emphasis on ecosystem restoration and transformative change.</p> <p>Submission requests amending the text in section 12.4.1 (new text in purple), as follows: The strategy contains specific commitments and actions to be delivered by 2030:</p> <ul style="list-style-type: none"> • Better respecting nature in public and business decision-making • Ensuring better implementation and tracking of progress • Improving knowledge, financing and investments 	<p>however given the significance attached to the preparation of the Biodiversity Action Plan it is envisaged that this would be completed by 2024.</p> <p>The proposed additional text to BI P1 is not considered necessary as mitigation and/or compensation measures by their nature consider a range of factors including ecology and biodiversity. It should be noted this policy has been amended as part of CE recommendations arising from the AA.</p> <p>In relation to the comments with respect to BI O1, such matters are both procedural and related to human resources both of which are matters which are outside the scope of the Draft Plan.</p> <p>It is considered reasonable to amend BI O2 as proposed.</p> <p>While there are many policies within the plan encouraging the planting of native species it is not always appropriate to do so in all settings. Many non-native tree species can also have benefits for pollinators. It is not considered necessary to include the suggested text in the latter part of BI O4 as the relevant guidance/expertise with respect to the undertaking of BAPs is outside the remit of the Draft Plan though the Draft Plan, as the strategic policy document for the County identifies the undertaking of same as a key priority as set out above.</p> <p>The additional text request for action BI A2 is not accepted. Please refer to Chief Executive's response to submission 210 Naas Action Group for further details.</p> <p>Policy BI P2 is the overarching policy statement for designated sites. Objective BI O7 which supports the establishment of conservation measures and the preparation and implementation of management plans for the conservation of Nature 2000 sites by</p>
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	<ul style="list-style-type: none"> Establishing a larger EU-wide network of protected areas on land <i>and at sea</i> (30%); Launching an EU nature restoration plan; Introducing measures to enable the necessary transformative change; Introducing measures to tackle the global biodiversity challenge. <p><u>12.5.3 County Kildare Biodiversity Action Plan 2009-2014</u></p> <p>Submission proposes amending the text in section 12.5.3, (new text in purple, deleted text crossed out), as follows:</p> <p>The County Biodiversity Plan provides a framework for conserving biodiversity and natural heritage at a local level. It complements the Kildare Heritage Plan by including detailed actions to deliver positive outcomes focused on species and habitats. A key focus of the plan is gathering information on high nature value habitats and threatened species by engaging with local and national experts; and managing the biodiversity resource, education, awareness raising and the promotion of effective cooperation between stakeholders. The County Kildare Biodiversity Plan will be reviewed during the lifetime of this plan.</p> <p>The County Kildare Biodiversity Action Plan will be reviewed and detailed time-bound actions be published by the end of 2023.</p> <p>Submission requests inserting additional text into policy BI P1 (in purple), as follows:</p> <p>Integrate in the development management process the protection and enhancement of biodiversity and landscape features wherever possible, by</p>	<p>NPWS underpins BI P2 and is considered to adequately address the suggested proposed text.</p> <p>In relation to BI O6 and the suggested proposed text for same, any matter of funding and resourcing is outside of the scope of the Draft Plan, which is primarily a land use plan.</p> <p>It is the responsibility of the NPWS to prepare management plans and so it is not appropriate to include the proposed text with respect to BI O7.</p> <p>It is noted BI P2 and BI P3 repeat the same policy statement. this is a typographical error.</p> <p>The proposal is noted. The request relates to a managerial and resourcing issue within Kildare County Council which lies outside the remit of this land use plan.</p> <p>The matter of making publicly available, the mapping of County Biodiversity Sites, is outside the remit of the Development Plan, however this may be considered an appropriate action arising out of the preparation of the County Biodiversity Plan.</p> <p>In relation to Action BI A10 it should be noted that while there are many policies within the plan encouraging the planting of native species it is not always appropriate to do so in urban settings. Many non-native tree species can also have benefits for pollinators.</p> <p>In relation to the proposed new action, this is a matter for the County Biodiversity Plan and as such it is not considered appropriate to include the suggested text as part of the Draft Plan.</p> <p>It is considered that the specifics proposed with regard to Action BI A16 would be more appropriately addressed as part of the County Biodiversity Plan.</p>
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	<p>minimising adverse impacts on existing habitats (whether designated or not) and by including ecologically guided mitigation and/or compensation measures, as appropriate.</p> <p>With regard to object BI O1 which requires the preparation of Ecological Impact Assessments that adequately assess the biodiversity resource within proposed development sites, the submission requests that the specific stakeholders assigned with responsibility for the above are listed and possess the ecological expertise to enable them to assess the Ecological Impact Assessments.</p> <p>Submission proposes amending the text in the objectives set out below, (new text in purple, deleted text crossed-out), as follows: BI O2: Require, wherever possible, Encourage and promote the retention and creation of green corridors within and between built up urban areas and industrial scale developments to protect wildlife habitat value including areas that are not subject to public access.</p> <p>BI O4: Promote increased public participation in biodiversity conservation by supporting and encouraging community-led initiatives such as native tree planting (of native provenance and origin), the removal of invasive species and the continued preparation of Local Biodiversity Actions Plans, guided by appropriate local and national expertise, for settlements in County Kildare.</p> <p>Requests amending action BI A2 (new text in purple, deleted text crossed-out), as follows:</p>	<p>In relation to the request to include additional text to section 12.9.1 an amendment to same is accepted.</p> <p>The Council commits to identifying and mapping County Biodiversity Sites (Action BI A7) and developing management plans for County Biodiversity Sites (Action BI A8). Further detail in relation to both are matters that may be considered as part of the preparation of the County Biodiversity Plan.</p> <p>In the case of the proposed text at the beginning of Action BI A6 it is not considered that the addition of same is necessary. In the case of the proposed text at the end of Action BI A6, such resourcing matters are outside the scope of the Development Plan which is primarily a land use plan.</p> <p>While there are many policies within the plan encouraging the planting of native species it is not always appropriate to do so in all settings. Many non-native tree species can also have benefits for pollinators. In relation to SUDS it should be noted that amendments to sections throughout the Draft Plan are proposed which will now include references to nature based solutions (see response to Observation No. 4 of OPR submission, no. 550)</p> <p>Chief Executive’s Recommendation Amend 12.1: Biodiversity or biological diversity simply refers to the variety of all living things on earth—including people, plants, animals, fungi and microorganisms and the interrelationship between them—variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part; this includes diversity within species, between species and of ecosystems (Convention on Biological Diversity, 1993).</p>
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	<p>Carry out habitat mapping on a phased basis which will incorporate the knowledge of local and national experts. County Kildare will be broken in XX (please insert) units for this purpose and all units will be completed during the lifetime of this plan. Kildare County Council commits to integrating biodiversity considerations and protection measures of high nature value habitats identified by these reports into the suite of mandatory Local Area Plans, and to further develop specific policies and objectives that could be incorporated into council programmes and activities</p> <p><u>12.6.1 Natura 2000 network</u> Submission proposes amending policy BI P2, (new text in purple, deleted text crossed out), as follows: Actively engage with local and national expertise (including NPWS) to assess the current conservation status, and restore, protect and maintain Protect and maintain the favourable conservation status and conservation value of all-natural heritage sites designated or proposed for designation in accordance with European and national legislation and agreements. These include Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Natural Heritage Areas (NHAs), Ramsar Sites and Statutory Nature Reserves.</p> <p>BI O6: Ensure an Appropriate Assessment, in accordance with Article 6(3) and Article 6(4) of the Habitats Directive and with DEHLG guidance (2009), is carried out in respect of any plan or project not directly connected with or necessary to</p>	<p>To amend Section 12.4.1 as follows: '.... trend in biodiversity loss with increasing emphasis on ecosystem restoration and transformative change....'</p> <p>To add three additional bullet points to Section 12.4.1 as follows.</p> <ul style="list-style-type: none"> • Better respecting nature in public and business decision-making • Ensuring better implementation and tracking of progress • Improving knowledge, financing and investments <p>To amend Objective BI O2 as follows. Require, wherever possible, Encourage and promote the retention and creation of green corridors....</p> <p>See recommendation related to Submission no. 210 in relation to BI A2.</p> <p>Delete Policy B1 P3 (Chapter 12) and replace with new policy as set out below. BI P3: Protect and maintain the favourable conservation status and conservation value of all natural heritage sites designated or proposed for designation in accordance with European and national legislation and agreements. These include Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Natural Heritage Areas (NHAs), Ramsar Sites and Statutory Nature Reserves.</p> <p>BI P3 Ensure that any proposal for development within or adjacent to a Natural Heritage Area (NHA), Ramsar Sites and Nature Reserves is designed and sited to minimise its impact on the biodiversity, ecological, geological and landscape value of the site, particularly plant and animal species listed under the Wildlife Acts and the Habitats and Birds Directive including their habitats.</p>
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	<p>the management of a Natura 2000 site to determine the likelihood of the plan or project having a significant effect on a Natura 2000 site, either individually or in combination with other plans or projects and to ensure that projects which may give rise to significant cumulative, direct, indirect or secondary impacts on Natura 2000 sites will not be permitted (either individually or in combination with other plans or projects) unless for reasons of overriding public interest. Given the Council's acknowledgement of the Biodiversity Crisis in 2019, and the most recent Article 17 reporting on EU protected habitats and species, the Council commits to additional funding to appoint an suitably qualified staff member to evaluate Appropriate Assessments contributed as part of development proposals.</p> <p>Submission proposes amending objective BI O7, (new text in purple, deleted text crossed-out), as follows: Urgently advocate for and support the establishment of conservation measures and the preparation and implementation of management plans for the conservation of Natura 2000 sites by NPWS, as required by Article 6(1) of the Habitats Directive.</p> <p>Submission notes that policies BI P2 and BI P3 repeat the same policy statement.</p> <p><u>12.6.2 Natural Heritage Areas (NHAs) and Nature Reserves</u> With regard to Objective BI O8 which requires that the preparation of an Ecological Impact</p>	<p>Insert additional text into the second paragraph of section 12.9.1, as follows: ... This coupled with the fact that two thirds of hedges adjoin intensively managed farmland, means that there are implications for the overall biodiversity potential of the resource. Since the publication of the survey in 2006 Kildare's hedgerows have further deteriorated due to removal for development, over-management and under-management.</p> <p>See recommendation to Observation No. 4 of OPR submission, no. 550)</p>
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	<p>Assessment (EclA) by a suitably qualified professional for proposals for development within or adjacent to a Natural Heritage Area (NHA) the submission requests that the Council appoints a suitably qualified staff member to evaluate Ecological Impact Assessments (EclAs) contributed as part of development proposals.</p> <p><u>12.7.1 Protected Habitats and Species</u> Submission proposes amending policy BI P4 (new text in purple, deleted text crossed out), as follows: Ensure that any new development proposal does not have a significant adverse impact, incapable of satisfactory mitigation on plant, animal or bird species which are protected by law. To inform the planning process, Kildare County Council commits to completing a database of rare habitats and site lists for rare flora and other relevant rare species protected by law over the course of this Development plan.</p> <p>Submission proposes amending policy BI P4 (new text in purple), as follows: To engage with local and national expertise (including NPWS) to Undertake surveys and collect data to provide an evidence-base to assist the Council in meeting its obligations under Article 6 of the Habitats Directives (92/43/EEC) as transposed into Irish Law, subject to available resources. A plan will be formulated before the end of 2022 to provide for the setting aside of resources in a staged manner to ensure that this is completed over the course of the Development Plan.</p>	
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	<p><u>12.8 County Biodiversity Sites</u> Submission proposes amending the actions set out below (new text in purple, as follows: BI A7: Identify and map and make publicly available County Biodiversity Sites in cooperation with the relevant statutory agencies, other relevant groups and the general public, not otherwise protected by legislation.</p> <p>BI A10: Work with Teagasc and landowners throughout the county in order to identify suitable 'Hare's Corner' projects which would create pocket sized habitats in order to enhance biodiversity. Any such projects will seek to protect existing biodiversity by ensuring that any planting 'enhancements' are from locally sourced native material of native provenance and origin.</p> <p>Proposes additional action (in purple), as follows: New action: Publish updated list of County Biodiversity Sites in the County Biodiversity Action Plan.</p> <p><u>12.9.1 Hedgerows</u> Submission requests the insertion of additional text (in purple) into the second paragraph of section 12.9.1, as follows: A survey of Kildare hedgerows was conducted in 2006 (Foulkes, 2006) where the total length of hedgerow in County Kildare was estimated at 10,305km. The average figure for hedgerow density as 5.92 km/km². It is estimated that 1.2% of the county was covered in hedgerows in 2006. County Kildare's hedgerows show a higher degree of fragmentation than those of other counties,</p>	
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	<p>largely due to the high degree of development in rural areas. This coupled with the fact that two thirds of hedges adjoin intensively managed farmland, means that there are implications for the overall biodiversity potential of the resource. Since the publication of Foulkes, 16 years ago, Kildare's hedgerows have further deteriorated due to removal for development, over-management and under-management.</p> <p>Requests the insertion of additional text into action BI A16 (in purple), as follows: Develop a pilot project to demonstrate traditional hedgerow management skills including hedge laying. Engage with developers to encourage traditional hedgerow management to rejuvenate boundary hedges, where appropriate and feasible.</p> <p><u>12.10 Inland Waters: Lakes, Rivers, Streams and Groundwater</u></p> <p>Requests the insertion of additional text into objective BI O29 (in purple), as follows: Ensure the protection, improvement or restoration of riverine floodplains and to promote strategic measures to accommodate flooding at appropriate locations including nature-based solutions, in order to protect ground and surface water quality and build resilience to climate change. Kildare County Council commits to ensuring that the construction SUDS or other nature-based solutions will not contribute to further native biodiversity loss, by requiring that plans submitted at design stage are under the direction of a suitably experienced botanist/ecologist. Additionally, the preferred option in employing these techniques is to allow</p>	
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		natural recolonization, or at the very minimum, that any plantings arise from locally sourced native material of native provenance and origin.	
468	Ann Behan	<p>Ireland has failed to fully implement the Habitats Directive. None of Kildare's Natura 2000 sites have management plans in place. This should be clearly stated in the Plan and the council is asked to urgently engage with NPWS to expedite the formulation and implementation of management plans for EU protected sites in Kildare. Pollardstown Fen is cited as an example.</p> <p>Section 12.5.3 is referenced and it is noted the Kildare Biodiversity Plan expired in 2014. It is submitted that biodiversity plans are designed to ensure that national and international conservation targets can be achieved, while addressing local priorities. A successful plan requires targeted actions and identifiable results. It is asked if there is evidence of any positive outcomes for biodiversity in Kildare from the actions undertaken in the 2009-2014 Biodiversity Plan. It is also asked how the new Kildare Biodiversity Plan will measure the success of measures?</p> <p>Amend section 12.5.3 to include text "<i>on high nature value habitats and threatened species by engaging with local and national experts</i>" after gathering information in the third sentence. Include an additional sentence at the end of paragraph to read "<i>The County Kildare Biodiversity Action Plan will be reviewed, and detailed time-bound actions be published by the end of 2023</i>".</p>	<p>Chief Executive's Response See response to submission 413</p> <p>Chief Executive's Recommendation See recommendation to submission 413</p>

	<p>A resource containing biodiversity aims, objectives and initiatives is essential to illustrates the reach, responsibility and accountability of the council and partner organisations for biodiversity and the protection of nature. The objective to reach 27% of land for nature should provide the cornerstone of the Plan. A published document will inform the public, ensure implementation, and form a tool to keep track of progress.</p> <p>Policy BI P1 is welcomed. An amendment is proposed to include text “ecologically guided” before the word mitigation.</p> <p>Objective B1 O1 is welcomed, however it is asked which council staff will be tasked to assess Ecological Impact Assessments provided by Developers and what ecological expertise they possess?</p> <p>The sentiment in BI O2 is welcomed. An amendment is proposed to include text “Require, wherever possible” at the beginning of the sentence.</p> <p>Objective BI O3 is referred. A range of queries are raised such as what ecological expertise is in this department? What other national biodiversity initiatives will Kildare support? And how will stakeholders evaluate the outcomes of such initiatives?</p> <p>Objective BI O4 is referenced, and it is submitted that increased responsibility is being placed on community groups to carry out Biodiversity actions</p>	
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	<p>as part of grant schemes. An amendment is suggested to include wording “of native provenance and origin” after tree planting and include text “guided by appropriate local and national expertise” after Local Biodiversity Action Plans.</p> <p>Reference is made to BI A1, and it is asked where the evidence base is that previous implementation of the County Biodiversity Plan or the National Biodiversity Action Plan contributed to halting biodiversity loss in Kildare? It is also asked if any reviews of the implementation of these Plans have been conducted?</p> <p>It is submitted that it is futile to carry out habitat mapping proposed in BI A2 without consulting local and national experts or if high nature value habitats continue to be destroyed. Amend BI A2 to read as follows “Carry out habitat mapping on a phased basis which will incorporate the knowledge of local and national experts. County Kildare will be broken in XX (please insert) units for this purpose and all units will be completed during the lifetime of this plan. Kildare County Council commits to integrating biodiversity considerations and protection measures of high nature value habitats identified by these reports into the suite of mandatory Local Area Plans, and to further develop specific policies and objectives that could be incorporated into council programmes and activities”.</p> <p>It is submitted that policy BI P3 is the same as policy BI P2</p>	
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405	Kildare Climate Action Linkage Group	<p><u>County Kildare Biodiversity Action Plan 2009-2014</u> Submission proposes amending the text in section 12.5.3 as follows:</p> <p>The County Biodiversity Plan provides a framework for conserving biodiversity and natural heritage at a local level. It complements the Kildare Heritage Plan by including detailed actions to deliver positive outcomes focused on species and habitats. A key focus of the plan is gathering information on high nature value habitats and threatened species by engaging with local and national experts; and managing the biodiversity resource, education, awareness raising and the promotion of effective cooperation between stakeholders. The County Kildare Biodiversity Plan will be reviewed during the lifetime of this plan. The County Kildare Biodiversity Action Plan will be reviewed and detailed time-bound actions be published by the end of 2023.</p> <p>Suggests the amendment of policy BI P1 as follows:</p> <p>Integrate in the development management process the protection and enhancement of biodiversity and landscape features wherever possible, by minimising adverse impacts on existing habitats (whether designated or not) and by including ecologically guided mitigation and/or compensation measures, as appropriate.</p> <p>With regard to objective BI O1 which requires the preparation of Ecological Impact Assessments that adequately assess the biodiversity resource within proposed development sites, the submission requests that the specific stakeholders assigned</p>	<p>Chief Executive's Response See response to submission 413 in relation to the following proposed amendments:</p> <ul style="list-style-type: none"> Proposed amendment of section 12.5.3 preamble. Proposed amendment of policy BI P1, objective BI O2 and objective BI O4. Comments with respect to BI O1. <p>In relation to the matters raised with respect to the level of ecological expertise available in the Council, such matters are outside the scope of the County Development Plan, which is primarily a land use plan. Chapter 12 includes a number of national biodiversity initiatives that are supported by the Council including, inter alia, Objective BI O3 which actively supports the implementation of initiatives including the All-Ireland Pollinator Plan 2021-2026. It is outside the remit of the County Development Plan to determine how stakeholders will evaluate the outcomes of such initiatives.</p> <p>Regarding BI P7, the statutory elements and remit of the Development Plan are set out clearly in the Planning and Development Act 2000, as amended. In preparing the Development Plan, planning authorities must exercise caution not to inappropriately stray into the operation of other statutory codes and regulatory regimes that relate to the development sector, but are outside the remit of a county or city development plan. This is applicable to policy or objectives for non-planning functions governed by other legislation and regulations.</p> <p>In relation to BI O22 and the suggested proposed text for same, any matter of funding and resourcing is outside of the scope of the Draft Plan, which is primarily a land use plan.</p> <p>See response to submission 413 in relation to the proposed additional text of objective BI O29.</p>
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	<p>with the responsibility for the above are listed and possess the ecological expertise to enable them to assess the Ecological Impact Assessments.</p> <p>Suggests the amendment of objective BI O2 as follows: Require, wherever possible, Encourage and promote the retention and creation of green corridors within and between built up urban areas and industrial scale developments to protect wildlife habitat value including areas that are not subject to public access.</p> <p>Objective BI O3 is referred. A range of queries are raised such as what ecological expertise is in this department? What other national biodiversity initiatives will Kildare support? And how will stakeholders evaluate the outcomes of such initiatives?</p> <p>The submission notes objective BI O4 and the Stakeholder responsibility (Appendix 12) and submits that additional responsibility is increasingly being placed on many highly stretched Local Community Groups to carry out Biodiversity actions as part of any grant schemes. It is suggested to amend BI O4 as follows: Promote increased public participation in biodiversity conservation by supporting and encouraging community-led initiatives such as native tree planting of native provenance and origin, the removal of invasive species and the continued preparation of Local Biodiversity Actions Plans, guided by</p>	<p>Chief Executive's Recommendation See recommendations to submission 413</p>
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	<p>appropriate local and national expertise for settlements in County Kildare.</p> <p>Natura 2000 network The submission notes policy BI P2 and the Stakeholder responsibility (Appendix 12) and questions how this will be achieved given that currently the sites with the highest level of protections in Kildare have no site-specific management plans. The submission also questions if the conservation status of Kildare's natural heritage sites, including the European sites are known and also if the level of expertise is available to guide this policy.</p> <p>Suggests the amendment of policy BI P2 as follows: Actively engage with local and national expertise (including NPWS) to assess the current conservation status, and restore, protect and maintain Protect and maintain the favourable conservation status and conservation value of all-natural heritage sites designated or proposed for designation (and their qualifying interests) in accordance with European and national legislation and agreements. These include Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Natural Heritage Areas (NHAs), Ramsar Sites and Statutory Nature Reserves.</p> <p>The submission note's objective BI O6 and questions what additional level of expertise in KCC will be employed to assess the competence of professional ecologists engaged by developers to carry out Appropriate Assessments (Screening)</p>	
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	<p>and how is available local and national expertise incorporated into these evaluations?</p> <p>Suggests the amendment of objective BI O6 as follows: Ensure an Appropriate Assessment, in accordance with Article 6(3) and Article 6(4) of the Habitats Directive and with DEHLG guidance (2009), is carried out in respect of any plan or project not directly connected with or necessary to the management of a Natura 2000 site to determine the likelihood of the plan or project having a significant effect on a Natura 2000 site, either individually or in combination with other plans or projects and to ensure that projects which may give rise to significant cumulative, direct, indirect or secondary impacts on Natura 2000 sites will not be permitted (either individually or in combination with other plans or projects) unless for reasons of overriding public interest. Given the Council's acknowledgement of the Biodiversity Crisis in 2019, and the most recent Article 17 reporting on EU protected habitats and species, the Council commits to additional funding to appoint an suitably qualified staff member to evaluate Appropriate Assessments contributed as part of development proposals.</p> <p>Suggests the amendment of objective BI O7 as follows: Urgently advocate for and support the establishment of conservation measures and the preparation and implementation of management plans for the conservation of Natura 2000 sites by</p>	
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	<p>NPWS, as required by Article 6(1) of the Habitats Directive.</p> <p>Submission notes that policies BI P2 and BI P3 repeat the same policy statement.</p> <p><u>Inland Waters: Lakes, Rivers, Streams and Groundwater</u></p> <p>The submission notes BI P7 and request the reader to refer to earlier comments in Chapter 6 on restoration of good ecological status by 2027 as per the Water Framework Directive.</p> <p>Suggests the amendment of objective BI O22 as follows: Require the preparation and submission of an Ecological Impact Assessment (EclA) including bat and otter surveys for developments along river or canal corridors. Given the Council's acknowledgement of the Biodiversity Crisis in 2019, the Council commits to additional funding to appoint a suitably qualified staff member to evaluate Ecological Impact Assessments (EclAs) contributed as part of development proposals</p> <p>Suggests the amendment of objective BI O29 as follows: Ensure the protection, improvement or restoration of riverine floodplains and to promote strategic measures to accommodate flooding at appropriate locations including nature-based solutions, in order to protect ground and surface water quality and build resilience to climate change. The Council commits to ensuring that the construction SuDs or other nature-based solutions will not contribute to</p>	
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		<p>further native biodiversity loss, by requiring that plans submitted at design stage are under the direction of a suitably experienced botanist/ecologist. Additionally, the preferred option in employing these techniques is to allow natural recolonization, or at the very minimum, that any plantings arise from locally sourced native material of native provenance and origin.</p>	
468	Ann Behan	<p>Policy BI P2 is referred to and it is noted that responsibility for all actions / objectives outlined under this policy lie with Development Planning and the Environment Department. It is asked how the policy can be achieved when the sites with the highest level of protections have no site-specific management plans? It is also asked what level of expertise the responsible stakeholders have to guide this policy.</p> <p>Amend BI P2 to include text “Actively engage with local and national expertise (including NPWS) to assess the current conservation status, and restore,” at the beginning of the policy.</p> <p>BI O6 is referred to and it is asked what additional level of expertise in the council will be employed to assess the competence of professional ecologists engaged by developers to carry out AA Screening?</p> <p>Amend BI O6 to include text “Given the Councils acknowledgement of the Biodiversity Crisis in 2019, and the most recent Article 17 reporting on EU protected habitats and species, the Council commits to additional funding to appoint a suitably qualified staff member to evaluate Appropriate</p>	<p>Chief Executive’s Response See response to submission 405</p> <p>Chief Executive’s Recommendation See response to submission 405</p>

	<p>Assessments contributed as part of development proposals.”</p> <p>Amend BI O7 to include text “Urgently advocate for and” at the beginning of the objective, as most highly designated sites in Kildare lack management plans.</p> <p>Reference is made to BI P7, and the comments outlined in chapter 6 regarding restoration of good ecological status by 2027 as per the Water Framework Directive.</p> <p>Amend BI O22 to include an additional sentence after canal corridors “Given the Councils acknowledgement of the Biodiversity Crisis in 2019, the Council commits to additional funding to appoint a suitably qualified staff member to evaluate Ecological Impact Assessments (EclAs) contributed as part of development proposals.”</p> <p>Objective BI O29 is noted, and earlier comments in relation to riverine environments in chapter 6 are also referred to. It is suggested to amend BI O29 and include a additional text to read “The Council commits to ensuring that the construction SUDS or other nature-based solutions will not contribute to further native biodiversity loss, by requiring that plans submitted at design stage are under the direction of a suitably experienced botanist/ecologist. Additionally, the preferred option in employing these techniques is to allow natural recolonisation, or at the very minimum, that any plantings arise from locally sourced native material of native provenance and origin.”</p>	
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<p>405</p>	<p>Kildare Climate Action Linkage Group</p>	<p><u>County Kildare Biodiversity Action Plan 2009-2014</u> The submission notes Action BI A1 and questions where the evidence base is that the previous implementation of the County Biodiversity Plan or the National Biodiversity Action Plan contributed to halting biodiversity loss in County Kildare and questions if any reviews of the implementations of these plans in County Kildare have been conducted?</p> <p>Suggests replacing action BI A2 with the following: Carry out habitat mapping on a phased basis which will incorporate the knowledge of local and national experts. County Kildare will be broken into XX (please insert) units for this purpose and all units will be completed during the lifetime of this plan. Kildare County Council commits to integrating biodiversity considerations and protection measures for high nature value habitats identified by these reports into the suite of mandatory Local Area Plans, and to further develop specific policies and objectives that could be incorporated into council programmes and activities.</p> <p>Suggests the following additional action: Expand the extent of the existing in-house capacity of KCC to utilise current GIS technology to access and make available to its planning department, at a formal level, the known and hitherto un-coordinated data relating to the occurrence of rare species of flora and fauna and their supporting habitats.</p>	<p>Chief Executive's Response Action BI A1 will continue to implement natural heritage actions in the County Heritage Plan 2019-2025. It is not stated within this action that biodiversity loss has stopped.</p> <p>The additional text request for action BI A2 is not accepted. See response to submission 210 (Naas Action Group) for further details.</p> <p>In relation to the proposed additional action, it should be noted that any matter of resourcing is outside of the scope of the Draft Plan, which is primarily a land use plan.</p> <p>In relation to BI A3, it should be noted that there are over 1400 objectives in the Draft Plan which are resource dependent. Timeframes for delivery of objectives, actions and targets are set out in Appendix 12.</p> <p>Local Biodiversity Action Plans are of great benefit in raising awareness of biodiversity within urban areas, including with respect to such activities as spraying and inappropriate hedge cutting which can lead to protection of biodiversity within urban areas. No change recommended for BI A4.</p> <p>Regarding BI A5, it is proposed that the Parks Department be added to the list of stakeholders with responsibility for implementation in Appendix 12.</p> <p>Chief Executive's Recommendation See recommendation of Submission no. 210 in relation to BI A2.</p> <p>Amend appendix 12, to include Parks Department as a stakeholder with responsibility to implementing BI A5.</p>
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		<p>Suggests the amendment of action BI A3 as follows: Review the The County Kildare Biodiversity Action Plan within the lifetime of this Plan will be reviewed and detailed time-bound actions be published by the end of 2023.</p> <p>Replace the “Local Biodiversity Action Plans” in BI A4 with “Green Infrastructure Plans” as it is suggested the required knowledge and scientific expertise for developing Biodiversity Action Plans (BAP) cannot be done locally. In addition, many initiatives proposed in local BAPs will likely include imported plantings and could pose a threat to native biodiversity.</p> <p>Reference is made to BI A5, and it is submitted that the biodiversity crisis is not one of gardens, housing estates or roundabouts in urban areas. Less mowing and spraying initiatives are failing in many estates due to an inability to obtain contractors willing to implement no-mow regimes, the lodging of litter in long grass, and the perception that these areas are attracting rodents. The council needs to show leadership on estates managed, regarding mowing regimes and directions on disposal of large amounts of mowed grass. The Parks Department should be listed as a stakeholder here.</p>	
468	Ann Behan	<p>Amend BI A3 to read “<i>The County Kildare Biodiversity Action Plan will be reviewed, and detailed time-bound actions be published by the end of 2023</i>”.</p>	<p>Chief Executive’s Response See response to submission 405 above.</p> <p>Chief Executive’s Recommendation See recommendation to submission 405 above.</p>

		<p>Replace the “<i>Local Biodiversity Action Plans</i>” in B1 A4 with “<i>Green Infrastructure Plans</i>” as it is suggested the required knowledge and scientific expertise for developing Biodiversity Action Plans (BAP) cannot be done locally. In addition, many initiatives proposed in local BAPs will likely include imported plantings and could pose a threat to native biodiversity.</p> <p>Reference is made to BI A5, and it is submitted that the biodiversity crisis is not one of gardens, housing estates or roundabouts in urban areas. Less mowing and spraying initiatives are failing in many estates due to an inability to obtain contractors willing to implement no-mow regimes, the lodging of litter in long grass, and the perception that these areas are attracting rodents. The council needs to show leadership on estates managed, regarding mowing regimes and directions on disposal of large amounts of mowed grass. The Parks Department should be listed as a stakeholder here.</p>	
405	Kildare Climate Action Linkage Group	<p>Submission proposes amending the Chapter Aim as follows: Aim - To contribute towards the protection, conservation and management of the County's unique biodiversity Employ transformational change to ensure the protection, conservation and management of the County's unique biodiversity, including sites designated at designated sites and to promote the development of an integrated, ecologically guided, Green Infrastructure network, in order to improve our resilience to climate change and to enable the role of Green</p>	<p>Chief Executive's Response It is considered that action BI A1 which is to “Continue to implement natural heritage actions in the County Heritage Plan 2019-2025, the County Biodiversity Plan, the National Biodiversity Action Plan 2017 – 2021 and any subsequent plans, in partnership with the Department of Housing, Heritage and Local Government, relevant stakeholders and the community” ensures that any recommendations / actions that follow from the National Biodiversity Plan (2022-2027) when published will be implemented.</p> <p>See response to submission 413 with respect to the remainder of this part of this submission.</p>

	<p>Infrastructure in delivering sustainable communities.</p> <p>It is noted that none of Kildare’s Natura 2000 sites currently have management plans in place. This should be clearly stated in Kildare’s County Development Plan (See Aarhus Convention and access to environmental information: https://ec.europa.eu/environment/aarhus) and it is proposed that Kildare County Council urgently engage with NPWS to expedite the formulation and implementation of these management plans for the EU protected sites in Kildare. For example: see Pollardstown Fen: https://www.npws.ie/sites/default/files/protected-sites/natura2000/NF000396.pdf</p> <p>EU Biodiversity Strategy for 2030 Submission requests amending the text in section 12.4.1 as follows: On 20 May 2020, the Commission adopted an EU Biodiversity Strategy for 2030 (European Commission, 2020). The strategy presents an ambitious agenda to arrest the trend in biodiversity loss with increasing emphasis on ecosystem restoration and transformative change.</p> <p>Submission requests amending the text in section 12.4.1 as follows: The strategy contains specific commitments and actions to be delivered by 2030:</p> <ul style="list-style-type: none"> • Better respecting nature in public and business decision-making • Ensuring better implementation and tracking of progress 	<p>Chief Executive’s Recommendation See recommendation to submission 413</p>
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	<ul style="list-style-type: none"> • Improving knowledge, financing and investments • Establishing a larger EU-wide network of protected areas on land and at sea (30%); • Launching an EU nature restoration plan; • Introducing measures to enable the necessary transformative change; • Introducing measures to tackle the global biodiversity challenge. <p><u>Natural Heritage Areas (NHAs) and Nature Reserves</u></p> <p>The submission notes objective BI O8 and questions the level of expertise of the KCC staff tasked with assessing the competence of professional ecologists engaged by developers to carry out Ecological Impact Assessments (Screening) and also how local and national expertise are incorporated into these evaluations.</p> <p>Suggests the amendment of objective BI O8 as follows:</p> <p>Require the preparation of an Ecological Impact Assessment (EclA) by a suitably qualified professional for proposals for development within or adjacent to a Natural Heritage Area (NHA) to ensure the development is designed and sited to minimise its impact on the biodiversity, ecological, geological and landscape value of the site, particularly plant and animal species listed under the Wildlife Acts. Given the Council's acknowledgement of the Biodiversity Crisis in 2019, the Council commits to additional funding to appoint a suitably qualified staff member to</p>	
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		<p>evaluate Ecological Impact Assessments (EclAs) contributed as part of development proposals.</p>	
468	Ann Behan	<p>Based on the EU Biodiversity Strategy Statement it is proposed to amend section 12.4.1 to include additional text “and transformative change” at the end of the second sentence of the first paragraph.</p> <p>It is also recommended to include the following three bullet points before the four outlined:</p> <ul style="list-style-type: none"> - Better respecting nature in public and business decision-making. - Ensuring better implementation and tracking of progress. - Improving knowledge, financing, and investments. <p>Objective BI O8 is referred to, and it is asked what level of expertise is within the Council to assess the competence of ecologists engaged by developers to carry out Ecological Impact Assessments (Screening). It is also asked how available local and national expertise is incorporated into these evaluations. In this regard an amendment is proposed for BI O8 which is to insert a new sentence after the last one as follows “Given the Councils acknowledgement of the Biodiversity Crisis in 2019, the Council commits to additional funding to appoint a suitably qualified staff member to evaluate Ecological Impact Assessments (EclAs) contributed as part of development proposals.”</p>	<p>Chief Executive’s Response See response to submission 405 above</p> <hr/> <p>Chief Executive’s Recommendation See recommendation to submission 405 above</p>

405	Kildare Climate Action Linkage Group	Reference is made to section 12.5.1 and it is requested that information regarding the 4 th National Biodiversity Plan (2022-2027) is included, and how the recommendations and actions will be implemented during the life of the CDP	<p>Chief Executive's Response It is considered that action BI A1 which is to “Continue to implement natural heritage actions in the County Heritage Plan 2019-2025, the County Biodiversity Plan, the National Biodiversity Action Plan 2017 – 2021 and any subsequent plans, in partnership with the Department of Housing, Heritage and Local Government, relevant stakeholders and the community” ensures that any recommendations / actions that follow from the National Biodiversity Plan (2022-2027) when published will be implemented.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
468	Ann Behan	Reference is made to section 12.5.1 and it is requested that information regarding the 4 th National Biodiversity Plan (2022-2027) is included, and how the recommendations and actions will be implemented during the life of the CDP?	<p>Chief Executive's Response See response to submission 405 above</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
210	Naas Action Group	<p>We are in a biodiversity crisis. The CDP needs to protect our valuable biodiversity. We note and welcome the Council's Policy Objectives at 12.5.3. We also welcome the 5 actions that are set out in the Development Plan, however we feel that BI A2 is not specific enough. Given its significance it should be a SMART goal.</p> <p>It is recommended that Habitat Mapping should be carried out for the entire county during the lifetime of the Plan not just for LAPs. It is suggested that the County is split into units and that each unit is analysed separately, to ensure a comprehensive mapping of habitats throughout the entire county. It is simply not enough to carry out piecemeal habitat</p>	<p>Chief Executive's Response It is not feasible to carry out habitat mapping across the whole county during the lifetime of the plan. Habitat mapping is carried out within LAP boundaries with the specific aim of identifying habitats that may be impacted upon by land use activities as controlled in the relevant LAPs. Habitat mapping within LAPs allows key Green Infrastructure in urban areas to be identified and conserved as towns develop.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

		<p>mapping only in areas defined by local area plans: this mapping should be done for the entire county.</p> <p>Recommended Action: BI A2: It is an action of the Council to carry out habitat mapping on a unit-by-unit basis of the entire county during the lifetime of this Plan. This will identify high nature value areas and important elements to be added to the green infrastructure network. The results of these surveys will allow for integration of biodiversity considerations and protection measures into the suite of mandatory Local Area Plans and to develop specific policies and objectives that could be incorporated into council programmes and activities.</p>	
405	Kildare Climate Action Linkage Group	<p><u>Protected Habitats and species outside Designated Areas</u></p> <p>The submission notes policy BI P4 and the Stakeholder responsibility (Appendix 12) and questions what database exists in KCC of rare habitats or sites for rare species and also what expertise will be employed during the duration of this plan to document such rare habitats and species to ensure that habitats are not further eroded.</p> <p>Suggests the amendment of policy BI P4 as follows: Ensure that any new development proposal does not have a significant adverse impact, incapable of satisfactory mitigation on plant, animal or bird species which are protected by law. To inform the planning process, the Council commits to completing a database of rare habitats and site lists for rare flora and other relevant rare species</p>	<p>Chief Executive’s Response</p> <p>In relation to BI P4, BI O10 and BI O13, the Council commits to identifying and mapping County Biodiversity Sites (Action BI A7) and developing management plans for County Biodiversity Sites (Action BI A8). Further detail in relation to both are matters that may be considered as part of the preparation of the County Biodiversity Plan.</p> <p>In the case of the proposed text at the beginning of Action BI A6 it is not considered that the addition of same is necessary. In the case of the proposed text at the end of Action BI A6, such resourcing matters are outside the scope of the Development Plan, which is primarily a land use plan.</p> <p>Chief Executive’s Recommendation</p> <p>No change to the Draft Plan.</p>

	<p>protected by law over the course of this Development plan.</p> <p>Suggests the amendment of objective BI O10 as follows: Ensure that any new development proposal does not have a significant adverse impact on rare and threatened species, including those protected under the Wildlife Acts 1976 and 2012, the Birds Directive 1979 the Habitats Directive 1992 and the Flora Protection Order species. To inform the planning process, the Council commits to completing a database of rare habitats and site lists for rare flora and other relevant rare species protected by law over the course of this Development plan.</p> <p>Suggests the amendment of objective BI O13 as follows: Require all applications for new developments to identify, protect and sensitively enhance the most important ecological features and habitats, and incorporate these into the overall open space network, keeping free from development and to provide links to the wider Green Infrastructure network as an essential part of the design process and by making provision for local biodiversity (e.g. through provision of swift boxes or towers, bat roost sites, hedgehog highways, green roofs, etc.) To inform the planning process, the Council commits to completing a database of rare habitats and site lists for rare flora and other relevant rare species protected by law over the course of this Development plan.</p>	
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		<p>Suggests the amendment of action BI A6 as follows:</p> <p>To engage with local and national expertise (including NPWS) to undertake Undertake surveys and collect data to provide an evidence-base to assist the Council in meeting its obligations under Article 6 of the Habitats Directives (92/43/EEC) as transposed into Irish Law. A plan will be formulated before the end of 2022 to provide for the setting aside of resources in a staged manner to ensure that this is completed over the course of the Development Plan.</p>	
468	Ann Behan	<p>Policy BI P4 is referred to and it is noted that responsibility for all actions / objectives outlined under this policy lie with Development Planning and the Environment Department. While the policy is welcomed, it is asked what database exists in Kildare Co. Co. of rare habitats or sites for rare species, and flora. It is also asked what expertise will be employed to document rare habitats and species to ensure they are not further eroded.</p> <p>An amendment to BI P4 is proposed which is to add an additional sentence after the last line “To inform the planning process, the Council commits to completing a database of rare habitats and site lists for rare flora and other relevant rare species protected by law over the course of this development plan.”</p> <p>Objective BI O10 is referenced, and it is asked how KCC evaluate whether a site has a rare species of flora or fauna. In the absence of such a register it is submitted a site survey is required for any new development proposal. An amendment to</p>	<p>Chief Executive’s Response See response to submission 405 above</p> <p>Chief Executive’s Recommendation See recommendation to submission 405 above</p>

		<p>BI O10 is proposed which is to include additional text after the last line to read “To inform the planning process, the Council commits to completing a database of rare habitats and site lists for rare flora and other relevant rare species protected by law over the course of this development plan.”</p> <p>The strong statement in BI O13 is welcomed. A minor amendment is proposed which is to include additional text after the last line to read “To inform the planning process, the Council commits to completing a database of rare habitats and site lists for rare flora and other relevant rare species protected by law over the course of this development plan.”</p> <p>Action BI A6 is also welcomed. However, an amendment is proposed which is to include text “To engage with local and national expertise (including NPWS) to” at the beginning of the action. Also remove the words “subject to available resources” in the last line and include a new sentence to read “A plan will be formulated before the end of 2022 to provide for the setting aside of resources in a staged manner to ensure that this is completed over the course of the Development Plan.”</p>	
405	Kildare Climate Action Linkage Group	<p><u>County Biodiversity Sites</u> Suggests the amendment of objective BI O14 as follows: Protect, in co-operation with the relevant statutory agencies and other relevant groups (including local and national experts), sites of local biodiversity</p>	<p>Chief Executive’s Response In relation to the proposed additional text of objective BI O14 it is not considered that the addition of same is necessary.</p> <p>See response to submission 413 in relation to the proposed additional action and the proposed changes to actions BI A7 and BI A10.</p>

		<p>importance (County Biodiversity Sites), not otherwise protected by legislation</p> <p>Suggests the amendment of action BI A7 as follows: Identify and map and make publicly available, County Biodiversity Sites in cooperation with the relevant statutory agencies, other relevant groups (including local and national experts), and the general public, not otherwise protected by legislation.</p> <p>Suggests the amendment of action BI A10 as follows: Work with Teagasc and landowners throughout the county in order to identify suitable 'Hare's Corner' projects which would create pocket sized habitats in order to enhance biodiversity. Any such projects will seek to protect existing biodiversity by ensuring that any planting 'enhancements' are from locally sourced native material of native provenance and origin.</p> <p>Suggests the following additional action: Publish updated list of County Biodiversity Sites in the County Biodiversity Action Plan.</p>	<p>Chief Executive's Recommendation See recommendation to submission no. 413</p>
468	Ann Behan	<p>Amend BI O14 and add text "(including local and national experts)," after wording "other relevant groups".</p> <p>Amend BI A7 to include text "and make publicly available" after the words "identify and map".</p> <p>Amend BI A10 to include an additional sentence after the last line to read "Any such projects will</p>	<p>Chief Executive's Response See response to submission 405</p> <p>Chief Executive's Recommendation See recommendation to submission 405</p>

		<p>seek to protect existing biodiversity by ensuring that any planting ‘enhancements’ are from locally sourced native material of native provenance and origin.”</p> <p>An additional action is proposed to “<i>Publish updated list of County Biodiversity Sites in the County Biodiversity Action Plan</i>”.</p>	
405	Kildare Climate Action Linkage Group	<p><u>County Biodiversity Sites</u> Requests the insertion of additional text into the second paragraph of section 12.9.1: <i>A survey of Kildare hedgerows was conducted in 2006 (Foulkes, 2006) where the total length of hedgerow in County Kildare was estimated at 10,305km. The average figure for hedgerow density as 5.92 km/km². It is estimated that 1.2% of the county was covered in hedgerows in 2006. County Kildare’s hedgerows show a higher degree of fragmentation than those of other counties, largely due to the high degree of development in rural areas. This coupled with the fact that two thirds of hedges adjoin intensively managed farmland, means that there are implications for the overall biodiversity potential of the resource. Since the publication of Foulkes, 16 years ago, Kildare’s hedgerows have further deteriorated due to removal for development, over-management and under-management.</i></p> <p>Requests the insertion of additional text into the fourth paragraph of section 12.9.1: <i>In urban settings trees or groups of trees can contribute significantly to the local landscape or townscape and to the successful integration of new buildings into the landscape. The planting or</i></p>	<p>Chief Executive’s Response See response to submission 413 in relation to the proposed additional text to the second paragraph of section 12.9.1 and the proposed changes to action BI A16.</p> <p>The suggested additional text to the fourth and fifth paragraph of section 12.9.1 is accepted.</p> <p>The suggested additional text to the seventh paragraph of section 12.9.1 and the proposed changes to objectives BI O15 & BI O16 are not accepted. While there are many policies within the Plan encouraging the planting of native species, sourcing plants of native origin and provenance are considered not to be practical or appropriate in all cases.</p> <p>See submission no. 26</p> <p>Chief Executive’s Recommendation See recommendation to submission no. 413 in relation to the second paragraph of section 12.9.1 and the proposed changes to action BI A16.</p> <p>Amend the fourth paragraph of section 12.9.1 as follows: <i>...The planting or retention of mature trees and hedgerows can contribute to amenity and more attractive developments as well as providing important wildlife habitats...</i></p>

	<p>retention of mature trees and hedgerows can contribute to amenity and more attractive developments as well as providing important wildlife habitats. The retention of trees should be considered at the earliest possible design stage in any new or redevelopment proposal.</p> <p>Requests the insertion of additional text into the fifth paragraph of section 12.9.1: Under Section 37 of the Forestry Act 1946, as amended, with certain exceptions, it is illegal to uproot a tree over ten years of age or cut down a tree of any age unless notice of intention to do so has been given in accordance with the Forestry Act. Except for an area located within the boundaries of a town or borough council area, a tree felling licence from the Forest Service of the Department of Agriculture, Food and the Marine is required if it is proposed to fell trees.</p> <p>Requests the insertion of additional text into the seventh paragraph of section 12.9.1: When planting hedgerows, species indigenous to the area (of local provenance and origin, which are not from forestry-selected stock) should be used. The County Kildare Hedgerow Survey (2006) identified the predominant hedgerow species in Kildare. These species are listed in Chapter 16, Development Management Standards.</p> <p>Suggests the amendment of objective BI O15 as follows: Prevent, in the first instance, the removal of hedgerows to facilitate development. Where their removal is unavoidable, same must be clearly and</p>	<p>Amend the fifth paragraph of section 12.9.1 as follows:</p> <p><i>...Except for an area located within the boundaries of a town or borough council area, a tree felling licence from the Forest Service of the Department of Agriculture, and Food and the Marine is required if it is proposed to fell trees.</i></p>
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	<p>satisfactorily demonstrated to the Planning Authority. In any event, removal shall be kept to an absolute minimum and there shall be a requirement for mitigation planting comprising a hedge of similar length and species composition to the original, established as close as is practicable to the original and where possible linking to existing adjacent hedges. Native plants of a local provenance and origin, which are not from forestry-selected stock should be used for any such planting. Removal of hedgerows and trees prior to submitting a planning application will be viewed negatively by the planning authority and may result in an outright refusal.</p> <p>Suggests the amendment of objective BI O16 as follows: Promote the integration of boundary hedges within and along development sites into development design so as to avoid “trapped hedges” located to the boundary of houses within the development layout. Encourage the planting of woodlands, trees and hedgerows as part of new developments and as part of the Council’s own landscaping works using native plants of local provenance and origin which are not from forestry-selected stock.</p> <p>Suggests the amendment of action BI A16 as follows: Develop a pilot project to demonstrate traditional hedgerow management skills including hedge laying. Engage with developers to encourage traditional hedgerow management to rejuvenate boundary hedges, where appropriate and feasible</p>	
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<p>468</p>	<p>Ann Behan</p>	<p>Include additional sentence at the end of the first paragraph in section 12.9.1 to read “<i>Since the publication of Foulkes, 16 years ago, Kildare’s hedgerows have further deteriorated due to removal for development, over-management and under-management.</i>”</p> <p>Include words “<i>and hedgerows</i>” after mature trees in the second sentence of the fourth paragraph in 12.9.1.</p> <p>Include words “<i>Food and Marine</i>” after Department of Agriculture in the second sentence of the fifth paragraph in 12.9.1.</p> <p>Amend the first sentence in the seventh paragraph of 12.9.1 to include text “<i>(of local provenance and origin, which are not from forestry selected stock)</i>” after the wording species indigenous to the area.</p> <p>Amend third sentence of BI O15 to include “<i>and origin, which are not from forestry selected stock</i>” after the word’s local provenance.</p> <p>Amend BI O16 to include text “<i>and origin, which are not from forestry selected stock</i>” after the word’s local provenance.</p> <p>Amend BI A16 to include an additional sentence after hedge laying “<i>Engage with developers to encourage traditional hedgerow management to rejuvenate boundary hedges, where appropriate and feasible</i>”.</p>	<p>Chief Executive’s Response See response to submission 405 above</p> <p>Chief Executive’s Recommendation See recommendation to submission 405 above</p>
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507	Brian McArdle	<p>The submitter states that it should be a requirement to carry out a biodiversity study as part of a planning application for a new development. Further states that the destruction of any hedgerow or tree must be subject to licence, even in urban areas.</p>	<p>Chief Executive's Response Kildare County Council adopted its first Biodiversity Action Plan in April 2009 in accordance with the National Biodiversity Plan. It is noted that Action BI A3 provides that the County Kildare Biodiversity Plan will be reviewed in the short term during the lifetime of this Plan.</p> <p>It is the policy of the Council to integrate in the development management process the protection and enhancement of biodiversity and landscape features where possible, by minimising adverse impacts on existing habitats (whether designated or not) and by including mitigation and/or compensation measures, as appropriate (BI P1). In addition, Objective BI O1 requires, as part of the Development Management Process, the preparation of Ecological Impact Assessments that adequately assess the Biodiversity resource within proposed development sites, to avoid habitat loss and fragmentation, to integrate this biodiversity resource into the design and layout of new development and to increase biodiversity within the proposed development.</p> <p>It is considered that the policies and objectives contained in Chapter 12 of the Draft Plan adequately address the issues raised in the submission.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
26	Butterfly Conservation Ireland (BCI)	<p><u>County Kildare Biodiversity Action Plan 2009-2014</u></p> <p>The submission suggests the following amendments:</p> <ol style="list-style-type: none"> 1) Section 12.5.3 - Remove the sentence: "The County Kildare Biodiversity Plan will be reviewed during the lifetime of this Plan." and 	<p>Chief Executive's Response The review of the County Kildare Biodiversity Action Plan is a priority of the Council. The review process will commence as soon as possible following the adoption of this Plan, subject to the necessary resources being available, during the lifetime of the Plan. It is agreed that Target LR T1 or any amendments to same arising out of the Plan process, should be the cornerstone of the new County Kildare Biodiversity Action Plan.</p>

		<p>replace the sentence with: ‘A new County Kildare Biodiversity Action Plan will be published by 2024.’</p> <p>2) BI A3 remove the sentence: “Review the County Kildare Biodiversity Plan within the lifetime of this Plan.” and replace the sentence with: ‘Publish a new County Kildare Biodiversity Action Plan by 2024.’</p> <p>Furthermore, it is submitted that Target LR T1 to increase the territory designated to nature to 27%, should provide the cornerstone of the new County Kildare Biodiversity Action Plan with milestones for the achievement of this target.</p>	<p>Chief Executive’s Recommendation Amend Chapter 12 as follows;</p> <p>In section 12.5.3, replace “The County Kildare Biodiversity Plan” with “The County Kildare Biodiversity Action Plan”.</p> <p>Amend Action BI A3:</p> <p>Review the County Kildare Biodiversity Action Plan within the lifetime of this Plan having regard to the targets as set out in Chapter 12 with respect to the increase of territory designated to nature.</p>
26	Butterfly Conservation Ireland (BCI)	BCI welcomes the policy and objectives in section 12.6.1 to protect Natura 2000 sites and their environs and the Council’s support for any management plans for European sites.	<p>Chief Executive’s Response The submission is noted.</p> <p>Chief Executive’s Recommendation No changes to the Draft Plan.</p>
26	Butterfly Conservation Ireland (BCI)	<p><u>County Biodiversity Sites</u> The submission is made in relation to the following statement in section 12.8: “Many sites of biodiversity value within the County do not meet the criteria that would enable them to be designated at an international or national level”. It is submitted that the statement is not wholly accurate, as some sites that meet the criteria for designation have been left without formal designation.</p> <p>Action BI A10 is broadly welcomed, however it is submitted that such habitat creation initiatives must apply appropriate design (avoiding</p>	<p>Chief Executive’s Response Having reviewed the submission in relation to the County Biodiversity Sites it is considered appropriate to amend section 12.8 and Action BI A10 to address the concerns raised in the submission.</p> <p>Chief Executive’s Recommendation Amend section 12.8: Many sites of biodiversity value within the County do not meet the criteria that would enable them to be designated at an international or national level. as follows; County Kildare includes a number of sites of biodiversity value that meet the criteria for designation at an international or national level that are not designated sites.</p>

		unsustainable enhancements) and link the habitats with compatible habitats in the wider landscape to avoid the risk of creating ecological traps.	Amend Action BI A10: Work with Teagasc and landowners throughout the county in order to identify suitable, appropriately designed 'Hare's Corner' projects which would create pocket sized habitats that are linked with compatible habitats in the wider landscape in order to enhance biodiversity.
26	Butterfly Conservation Ireland (BCI)	<u>Riparian Zones</u> The policy and objectives stated in Section 12.10.1, and specifically Objective BI O30 are welcomed.	<p>Chief Executive's Response The submission is noted.</p> <p>Chief Executive's Recommendation No changes to the Draft Plan.</p>
233	Nathan Flaherty	Specific areas in all parts of the county should be designated for rewilding to allow natural regeneration to occur.	<p>Chief Executive's Response While the Draft Plan cannot direct private owners in the management of their land with respect to rewilding, it does however manage development on private land and Chapter 12 includes policies and objectives which seek to identify and protect biodiversity of varying degrees of importance.</p> <p>Within Section 12.8.1 in Chapter 12 of the Draft Plan, there is a policy that considers County Biodiversity Sites (BI P5), an objective that seeks to protect them (BI O14) and an action that seeks to identify them (BI A7) and to develop management plans where appropriate (BI A8).</p> <p>Chief Executive's Recommendation No change to the Draft Plan</p>
209	James O'Dwyer	Farmers who develop habitats on their land for endangered species and/or accommodate rare native cattle breeds should be supported	<p>Chief Executive's Response Objective RD O9 in chapter 9 'Our Rural Economy' encourages environmentally sustainable agricultural practices, while objective RD O11 in the same chapter supports the implementation of the County Biodiversity Plan 2009-2014. It is considered that the combination of both objectives supports farmers to accommodate a wide range of flora and fauna. Objectives to support the keeping</p>

			of rare native cattle breeds is outside the scope of the Development Plan, which is a land use plan.
			Chief Executive's Recommendation No change to the Draft Plan
195	Elizabeth Cullen	<p>It is commended that the biodiversity strategy will be reviewed during the lifetime of the plan. The initiative to involve citizens in monitoring invasive species as per objective BI O36 is also welcomed. However, it is not clear how this will be undertaken.</p> <p>It is proposed that each county has a biodiversity officer, that is a qualified ecologist to liaise with NPWS. The role of this officer is further outlined which contains a list of projects and tasks to be undertaken.</p>	<p>Chief Executive's Response</p> <p>Objective BI O36 is to “encourage, through citizen science, the public's awareness in the identification and eradication of invasive species and to provide training with respect to potential threats caused by invasive species, particularly their methods of dispersal and appropriate control and removal measures in association with relevant authorities”. This will be undertaken through the provision of training as outlined within the objective and via an action (BI A17) in the plan which is to prepare a programme of mapping of invasive species in the county.</p> <p>In addition, Kildare County Council has a heritage officer who performs many of the tasks outlined in the submission including liaising with NPWS, planning and other community organisations / stakeholders in matters relating to biodiversity. The matter of employing further resources such as a specific biodiversity officer and ecologist is outside the scope of the Draft Plan.</p>
			Chief Executive's Recommendation No change to the Draft Plan
351	Eco Advocacy	The submission states that Invasive Species should be included in the Draft Plan.	<p>Chief Executive's Response</p> <p>Objective BI O36 seeks to encourage, through Citizen Science, the public's awareness with respect to the identification and eradication of invasive species and to provide training with respect to potential threats caused by invasive species. It is also an action</p>

			of the Plan to map invasive species in the county (Action BI A17 refers).
			Chief Executive's Recommendation
			No change to the Draft Plan.
329	Vanessa Mack	<p>The submission backs the concept of the National Peatlands Park as a very strong response to the climate crisis we are going through and of further developing eco-tourism in the West Kildare area</p> <p>Full support is given to submission KCC-C55-147 as a solution to the biodiversity crisis we are facing.</p> <p>Extreme caution should be taken regarding the provision of wind energy close to areas of conservation.</p> <p>Disjointed pockets of "wildlife" are being proposed instead of having a large superfcy left alone for the conservation of local biodiversity</p>	<p>Chief Executive's Response</p> <p>The issues raised in submission KCC-C55-147 (National Peatlands Park Group) have been assessed by the council in its response to the above submission.</p> <p>Regarding the provision of wind energy close to areas of conservation. Chapter 7 (Energy & Communications) and Appendix 2 (Wind Energy Strategy) of the Draft Plan are clear in the importance of assessing the suitability of wind farms having regard to possible adverse impacts associated with, landscape, wildlife, habitats, designated sites, bird migration paths, etc. etc.</p> <p>In relation to disjointed pockets of "wildlife" being proposed. Section 12.14.6.5 refers to smaller left-over areas of prime bogland habitat where it is not always possible to provide green infrastructure networks to connect such pockets. However, it is an action (BI A22) to work with Bord Na Mona to prepare a Green Infrastructure Masterplan that will inform the delineation of core areas, stepping-stones and corridors (long distance peatways) that may also inform the designation of an interconnected Bog of Allen Nature Reserve, Special Amenity Area Order and / or National Peatlands Park.</p>
			Chief Executive's Recommendation
			No change to the Draft Plan
382	Ruth Murphy	Submission from a member of Kilcock Tidy Towns states that they support	Chief Executive's Response

		<p>all of the comments and suggestions made in the Kildare Climate Action Linkage Group submission and the National Peatlands Park submission to the draft Plan. States that they would like to make the same points, particularly in relation to biodiversity as follows:</p> <ul style="list-style-type: none"> • The need for more ecological expertise in Kildare County Council. • The international IUCN definition of biodiversity needs to be used and clearly distinguished from 'green infrastructure'. • The biodiversity crisis needs to be acknowledged and addressed in the Plan. • Meaningful biodiversity actions need to be informed and implemented across relevant areas in all chapters. 	<p>The need for more ecological expertise in Kildare County Council is noted however this is an operational matter for the Council and falls outside the scope of the County Development Plan which is a land use plan.</p> <p>The use of the IUCN definition for Biodiversity is agreed.</p> <p>Biodiversity is considered across all chapters of the plan. All the objectives, actions and targets listed in the Draft Plan in Appendix 12. A stakeholder(s) is/are identified against each one with responsibility for realising the various objectives, actions and targets either in the short term (1-2 years), medium term (3 -6 years), long term (6 years +) and ongoing (as appropriate).</p>
468	Ann Behan	<p>It is requested that more detail be provided on where the UN Sustainable Development Goals align with the NPF's, NSO's, and what measurable metrics KCC will use to measure SDG progress as part of the CDP delivery? How will the plan ensure that SDGs are applied through the lens of the climate and biodiversity crises, and that SDG8 (Decent Work and Economic Growth) will not be prioritised over others.</p>	<p>Chief Executive's Recommendation</p> <p>Amend 12.1 Biodiversity or biological diversity simply refers to the variety of all living things on earth—including people, plants, animals, fungi and microorganisms and the interrelationship between them. variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part; this includes diversity within species, between species and of ecosystems (Convention on Biological Diversity, 1993).</p> <p>Chief Executive's Response</p> <p>Section 1.6 of the Plan should be noted and stated that 'there is significant alignment between the UN SDGs and the National Planning Framework's National Strategic Outcomes (NSOs) in areas such as climate action, clean energy, sustainable cities and communities, economic growth, reduced inequalities and innovation and infrastructure, as well as education and health.' All objectives, targets and actions in the Draft Plan are referenced in Appendix 12 and assigned an appropriate stakeholder(s) to</p>

			<p>delivery same over the short term (up to 2 years), medium term (3-6 years) and longer term (beyond 6 years) and also on an ongoing basis which will be the case having regard to the nature of some objectives/actions/targets. A progress report on the Draft Plan will be prepared within 2 years of the adoption the Plan (as per a statutory requirement of the Planning Act 2000 (as amended)). It is a function of the Plan to balance all types of development against a significant number of factors including but not limited to climate change and biodiversity.</p> <p>Chief Executive's Recommendation No change to Draft Plan</p>
482	Kilcock 4 Climate Change	<p>The submission states that Kilcock 4 Climate Change is part of the Kildare Climate Linkage Group and supports its submission.</p> <p>The submission states that many areas of the Plan are commendable but falls far short of any meaningful actions that address the Climate crisis and the Biodiversity crisis. Kildare County Council should employ risk analysts to carry out a risk analysis for the County.</p> <p>The submission includes general comments and repeats the submissions made at the pre-draft stage.</p> <p>States that they would like to make the same points, particularly in relation to biodiversity as follows:</p> <ul style="list-style-type: none"> • The need for more ecological expertise in Kildare County Council. • The international IUCN definition of biodiversity needs to be used and clearly distinguished from 'green infrastructure'. 	<p>Chief Executive's Response See response to Submission No. 382 above.</p> <p>Chief Executive's Recommendation See recommendation to Submission No.382 above.</p>

		<ul style="list-style-type: none"> The biodiversity crisis needs to be acknowledged and addressed in the Plan. Meaningful biodiversity actions need to be informed and implemented across relevant areas in all chapters. 	
553	Rosemary Flanagan	This submission supports the comments and suggestions made in Kildare Climate Action Linkage Group submission. There is a requirement for more Ecological Expertise in Kildare County Council.	<p>Chief Executive's Response See response to 382 above.</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 382 above.</p>
553	Rosemary Flanagan	The international IUCN definition of biodiversity needs to be used and clearly distinguished from 'green infrastructure'.	<p>Chief Executive's Response Agreed. See response to Submission No. 382 above.</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 382 above.</p>
497	Niamh Young	<p>The submission supports all the comments and suggestions made in the Kildare Climate Action Linkage Group submission and those in the National Peatlands Park submission. This submission does not copy those full submissions but would like it to be taken that the same points have been made.</p> <p>The submission states the Council needs more ecological expertise.</p> <p>The IUCN definition of biodiversity needs to be used and clearly distinguished from 'green infrastructure'.</p> <p>The Plan needs to acknowledge and address the biodiversity crisis.</p>	<p>Chief Executive's Response The submissions support for all the comments and suggestions made in the Kildare Climate Action Linkage Group and National Peatlands Park submissions are noted. See response to Submission No. 382 above.</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 382 above.</p>

		The submission states that meaningful Biodiversity actions need to be informed and implemented across all areas and chapters of the Plan.	
331	Fionnuala Corcoran	The submission states the Council need more ecological expertise. The IUCN definition of biodiversity needs to be used and clearly distinguished from 'green infrastructure'. The Plan needs to acknowledge and address the biodiversity crisis and climate crisis. The submission states that meaningful Biodiversity actions need to be informed and implemented across the Plan. The Strategic Vision and overall aim of the Plan need to acknowledge and address the biodiversity crisis.	<p>Chief Executive's Response</p> <p>See response to Submission No. 382 above.</p> <p>Chief Executive's Recommendation</p> <p>See recommendation to Submission No. 382 above.</p>
458	Martin Wisley	<p>There is a need for additional ecological expertise within Kildare County Council.</p> <p>The international IUCN biodiversity needs to be used and clearly distinguished from green infrastructure</p> <p>Meaningful Biodiversity actions need to be informed and implemented across relevant areas in all chapters.</p>	<p>Chief Executive's Response</p> <p>See response to Submission No. 382 above.</p> <p>Chief Executive's Recommendation</p> <p>See recommendation to Submission No. 382 above.</p>
408	Creative Rathangan Meitheal (CRM)	Notes the potential for Peatways to link the Royal, Grand and Barrow Blueways to former BnM/ESB communities in West Kildare and beyond and welcomes Kildare County Council's support for the Peatlands Park proposal, which must take account of the need to protect sensitive sites, flora and fauna in areas such as Clonruisk raised bog remnant near Ballydermot BnM works.	<p>Chief Executive's Response</p> <p>The Plan includes an action to review the County Kildare Biodiversity Plan within the lifetime of this Plan (BI A3). It is anticipated that this action will be carried out in the short term, subject to availability of resources.</p> <p>Action LR A1 of the Plan commits to reviewing and updating the County Landscape Character Assessment, within two years of the adoption of the Plan.</p>

		<p>Views the National Peatlands Park, Blueway, Peatways and Greenways as central to delivering a Just Transition in West Kildare and to building the areas reputation as an eco-tourism destination.</p> <p>Requests that the County's Biodiversity Plan and the County's Landscape Character Map (and its impact assessment criteria) be updated as a matter of urgency. States that a failure to update the County's Biodiversity Plan and Landscape Character Plan (and its impact assessment criteria) would fatally undermine the potential of its Core-Stepping-Corridor Green infrastructure strategy.</p>	<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
364	Ursula King	<p>The Biodiversity Crisis should be acknowledged as separate to the Climate Change Crisis. Biodiversity loss is acting out on its own stage, with its own independent set of drivers, and will be further amplified with future climate change. This crisis extends to our water bodies, our soils, various natural and semi-natural habitats, our flora and fauna. It should be recognised that a healthy biodiversity performs multiple functions in mitigating against adverse climate events and is key to our resilience.</p>	<p>Chief Executive's Response Biodiversity and the protection and enhancement of same is one of a number of means by which to address the climate change crisis. Chapter 12 (Biodiversity and Green Infrastructure) includes a number of policies, objectives and actions specifically relating to the issues raised in this submission.</p> <p>Chief Executive's Recommendation No change to the draft Plan.</p>
364	Ursula King	<p>The definition of the word 'Biodiversity' in Chapter 12 is wholly inadequate and not in line with the internationally accepted definition.</p>	<p>Chief Executive's Response Agreed. See response to Submission No. 382 above.</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 382 above.</p>

364	Ursula King	Kildare County Council should commit to employing additional experienced ecological expertise to engage and consult with national experts (including NPWS, NGO groups and independent experts with local knowledge) to guide nature conservation in Kildare and inform Planners, Parks and other departments in KCC on the location and value of certain habitats and species.	<p>Chief Executive's Response</p> <p>While the comments are acknowledged and noted the matter of staff resourcing is outside the scope of this Draft Plan.</p>
			<p>Chief Executive's Recommendation</p> <p>No change to the Draft Plan.</p>
364	Ursula King	KCC should urgently engage with the NPWS to develop and implement management plans for Kildare's Natura 2000 sites and other protected sites in Kildare.	<p>Chief Executive's Response</p> <p>Objective BI O7 in Chapter 12 'Biodiversity & Green Infrastructure' supports the establishment of conservation measures and the preparation and implementation of management plans for the conservation of Natura 2000 sites by the NPWS.</p>
			<p>Chief Executive's Recommendation</p> <p>No change to the Draft Plan.</p>
364	Ursula King	<p>KCC should produce a meaningful Biodiversity Action Plan that implements actions with speed, while continuously evaluating these actions, to ensure that resources are directed appropriately. Historic data must inform any Biodiversity Action Plan.</p> <p>Local Biodiversity Action Plans are also required.</p>	<p>Chief Executive's Response</p> <p>Action BI A3 in Chapter 12 'Biodiversity and Green Infrastructure' commits to a review of the County Kildare Biodiversity Plan within the lifetime of this Plan, while Action BI A4 commits to the continued preparation and roll-out of Local Biodiversity Action Plans on an annual basis, in partnership, where appropriate with LEADER, subject to funding.</p>
			<p>Chief Executive's Recommendation</p> <p>No change to the Draft Plan.</p>
364	Ursula King	KCC should engage with various stakeholders and national experts (including NPWS) to expedite the	<p>Chief Executive's Response</p> <p>There are a number of policies that support the restoration of peatlands and wetlands in Chapter 12 'Biodiversity & Green</p>

		restoration of peatlands and wetlands for tourism initiatives sensitive to these environments.	Infrastructure', including Policy BI P8, Objective BI O31, BI O32, BI O33, BI O34 and BI A22.
			Chief Executive's Recommendation No change to the Draft Plan.
364	Ursula King	Less intensive landscape management practices should be encouraged in urban areas.	Chief Executive's Response Kildare County Council currently encourages less intensive landscape management practices. KCC Parks department is committed to managing public open spaces in a more sustainable manner. This includes reduced mowing of public open spaces and residential areas under the care of KCC. Within the KCC Climate Adaptation Plan there is a commitment to extend the areas where reduced mowing practices are practised. KCC is also involved in a research project with NUI Maynooth to explore natural weed control methods.
			Chief Executive's Recommendation No change to the Draft Plan.
364	Ursula King	KCC should further educate the public on invasive species and their identification and the harm such species could cause to the biodiversity of the county.	Chief Executive's Response Objective BI O36 seeks to encourage, through Citizen Science, the public's awareness with respect to the identification and eradication of invasive species and to provide training with respect to potential threats caused by invasive species. It is also an action of the Plan to map invasive species in the county (Action BI A17 refers).
			Chief Executive's Recommendation No change to the Draft Plan.

361	Jackie Rasmus Member of Kilcock Community Gardens Group	Kildare County Council needs more ecological expertise.	<p>Chief Executive's Response</p> <p>While the matter of staffing and resources is outside the scope of the Draft Plan, it should be noted however, that as part of the preparation of the Draft Plan, Kildare County Council retained the services of a specialist consultancy firm to prepare both the Strategic Environmental Assessment and Appropriate Assessment that accompany the Draft Plan.</p>
			<p>Chief Executive's Response</p> <p>No change to the Draft Plan.</p>
361	Jackie Rasmus Member of Kilcock Community Gardens Group	States that the International Union for Conservation of Nature definition of biodiversity needs to be used and clearly distinguished from 'green infrastructure'.	<p>Chief Executive's Response</p> <p>Agreed. See response to Submission No. 382 above.</p>
			<p>Chief Executive's Response</p> <p>See recommendation to Submission No. 382 above.</p>
361	Jackie Rasmus Member of Kilcock Community Gardens Group	<p>States that the biodiversity crisis needs to be acknowledged and addressed in the Plan.</p> <p>Further states that meaningful biodiversity actions need to be informed and implemented across relevant areas in all chapters.</p>	<p>Chief Executive's Response</p> <p>Section 12.2 of Chapter 12 'Biodiversity and Green infrastructure' outlines the current state of biodiversity in a national context using the 2020 State of the Environment Report written by the Environment Protection Agency. It also acknowledges that a Climate Change and Biodiversity Loss Emergency was declared by the Irish Government in May 2019 following publication of a report by the Intergovernmental Panel on Biodiversity and Ecosystem Service on the state of the world's biodiversity and ecosystem services. Kildare County Council declared a Climate Change and Biodiversity Loss Emergency in June 2019.</p> <p>Chapter 12 recommends several policies, objectives and actions to combat this crisis, including Action BI A3 which commits to a review of the County Kildare Biodiversity Plan within the lifetime of</p>

			<p>this Plan, Action BI A4 which commits to the continued preparation and roll-out of Local Biodiversity Action Plans on an annual basis, in partnership, where appropriate with LEADER, subject to funding, among numerous other initiatives and actions.</p>
			<p>Chief Executive's Recommendation</p> <p>No change to the Draft Plan.</p>
434.	Maynooth Community Council	<p>Notes that speaking at the first Citizens' Assembly on Biodiversity Loss, Professor Robert Watson said that the key factors driving biodiversity loss include land and sea use change, exploitation of natural resources, climate change, pollution, and the introduction of invasive species. States that Prof. Watson said that climate change could become the biggest factor driving biodiversity loss if it is not successfully contained and that the issue of climate change and biodiversity loss must be tackled together. Contends that addressing biodiversity loss should be on equal footing with Climate Action and permeate all actions of the draft plan 2023-2029.</p> <p>Notes that despite the Dáil and the Council declaring a climate and biodiversity emergency in 2019, actions to address the dire state of our biodiversity have been abysmal. Submits that declarations of an emergency must be matched with an emergency response that is ambitious, courageous and transformative and the Council need to take the actions necessary to conserve and protect Kildare's habitats and species and to ensure that there is no further biodiversity loss.</p>	<p>Chief Executive's Response</p> <p>It is considered that the draft Plan places huge emphasis on the need for tangible climate action over the life of the Plan. In this regard, it is noted that the Office of the Planning Regulator (OPR), in its submission to the draft Plan, states that the Council 'is strongly commended for the extent of policy direction and guidance on a wide range of issues in particular those relating... climate action'.</p> <p>The review of the County Kildare Biodiversity Action Plan is a priority of the Council. The review process will commence as soon as possible following the adoption of this Plan. For more information refer to the Chief Executive's Response to Submission No. 26. The new Biodiversity Action Plan will have a key role in implementing the recommendations and actions contained in the National Biodiversity Plan.</p>
			<p>Chief Executive's Recommendation</p> <p>No change to the Draft Plan.</p>

		<p>States that the 4th National Biodiversity Plan (2022– 2027) is now overdue and is expected to be published before the end of 2022. Submission questions how the recommendations and actions outlined in the new National Biodiversity Plan would be incorporated into and implemented by KCC during the lifetime of the Development Plan. Notes that the County Kildare Biodiversity Action Plan 2009-2014 expired 8 years ago and is a very poor reflection on the Council’s ambition for the protection and preservation of our county’s biodiversity.</p>	
507	Brian McArdle	<p>The submission states that Kildare County Council should have a Biodiversity Officer role and preferably an environmental officer in every Municipal District.</p>	<p>Chief Executive’s Response</p> <p>Kildare County Council has a heritage officer who liaises with the NPWS, planning and other community organisations/stakeholders in matters relating to biodiversity. The matter of employing further resources such as a biodiversity officer and environmental officers for each Municipal District is outside the scope of the Draft Plan.</p> <p>It is noted that Action BI A3 provides that it is an action of the Council to review the County Kildare Biodiversity Plan in the short term and seek to establish a Biodiversity Officer for Kildare County Council.</p> <p>It is considered that the provisions of Chapter 12 adequately address the issues raised in the submission.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>

<p>472</p>	<p>Keep Ireland Open</p>	<p>The submission recommends the inclusion of additional objectives in Section 12.7.1</p> <ul style="list-style-type: none"> Identify and protect areas of high nature conservation value and support the landscape features which are of major importance for wild fauna and flora in accordance with Art 10 of the Habitats Directive Protect, and where possible, enhance, wildlife Habitats and landscape features which act as ecological corridor/networks and stepping-stones, such as river corridors, hedgerows and road verges so as to minimise the loss of habitats and features of the wider countryside (such as ponds, wetlands and trees) which are not within designated sites. <p>The submission recommends the inclusion of an additional objective: Consult with the NPWS and take into account their views and any licencing requirements when undertaking, approving or authorising development, which is likely to affect plant, bird or other animal species protected by law.</p> <p>The submission recommends the inclusion of an additional objective to continue to identify & map habitats.</p> <p>The submission supports the following policies, objectives and actions; Protected Habitats and species outside Designated Areas, Policy BIP4, Objectives BI O10, BI O11 & BI O13, Action BI A6, Trees, Woodlands and Hedgerows, Objectives BI 017 & BI O18, Actions BIA 14; Inland Waters:</p>	<p>Chief Executive’s Response</p> <p>Article 10 of the EU Habitats Directive states that Member States shall endeavour in their land use planning and development policies, to encourage the management of features of the landscape which are of major importance for wild flora and fauna.</p> <p>Objective BI O12 considers licence requirements when undertaking, approving, or authorising development, which is likely to affect plant, bird or other animal species protected by law.</p> <p>This objective has been amended by a submission from the Department of Housing, Local Government and Heritage.</p> <p>Action BI A11 supports the identification and mapping of habitats in the county</p> <p>It is considered appropriate to amend Policy BI O7.</p> <p>Objective LR O38 seeks to ensure the biodiversity value of all sites are considered and protected in the development of outdoor recreational facilities.</p> <p>Chapter 12 contains policies and objectives that seek to protect, conserve and enhance natural heritage. Chapter 13 contains policies and objectives that seek to protect landscapes features</p> <p>Chief Executive’s Recommendation</p> <p>To include an additional objective in Section 12.7.1 Identify and protect areas of high nature conservation value and support the landscape features which act as ecological corridors/networks and stepping-stones, such as river corridors, hedgerows and road verges so as to minimise the loss of habitats and features of the wider countryside which are of major</p>
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	<p>Lakes, Rivers, Streams and Groundwater Policy BIP7, Objectives BI 021, BI O22, BI O24 & BI O30</p> <p>The submission recommends the inclusion of an additional objective to recognise and promote inland waters, river corridors, lakes, fens and other water bodies as natural environmental assets.</p> <p>The submission recommends the inclusion of additional objectives:</p> <ul style="list-style-type: none"> • Protect and improve the natural amenity potential and accessibility and work with relevant authorities such as DoEHLG and NPWS to support the development of recreational activities. <p>Development will not be permitted if it materially or detrimentally affects natural conditions</p> <p>The submission recommends the inclusion of additional text: Council recognises the important role of the environment through diversity, quality, integrity and quality of life by promoting the protection, conservation and enhancement of the natural environment as an integral part of all development.</p> <p>Protect, conserve and enhance natural heritage including wildlife (flora and fauna), habitats, landscapes features of importance to wildlife or which play a key role in the conservation and management of natural resources.</p> <p>The submission recommends an additional objective to protect, conserve and enhance natural heritage including wildlife (flora and fauna),</p>	<p>importance for wild fauna and flora in accordance with Article 10 of the Habitats Directive.</p> <p>In relation to consultation with the NPWS see recommendation related to submission from the Department of Housing, Local Government and Heritage.</p> <p>BI P7 Recognise and promote inland waters, natural environmental assets and to protect rivers, streams and other watercourses and, wherever possible, maintain them in an open state capable of providing suitable habitats for fauna and flora while discouraging culverting or realignment.</p> <p>Insert the following text into Section 12.2 Kildare County Council declared a Climate Change and Biodiversity Loss Emergency in June 2019. The Council recognises the important role of the environment through diversity, quality, integrity and quality of life by promoting the protection, conservation and enhancement of the natural environment as an integral part of all development</p>
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		habitats, landscapes features of importance to wildlife or which play a key role in the conservation and management of natural resources.	
TREES & HEDGEROWS			
472	Keep Ireland Open	<p>The submission recommends in Chapter 12 the inclusion of additional objectives.</p> <ul style="list-style-type: none"> • Undertake a survey of trees and woodlands in order to identify groups/stands of trees of value worthy of protection. • Encourage initiatives supporting private and community-driven native tree and woodland planting schemes utilising available funding schemes. • Support the protection and management of the existing network of woodlands and trees of amenity value and/or which contributes to landscape character. • Protect-existing woodlands and trees and substantial areas of deciduous forest which are of amenity value and/or contribute to and interact with their landscape character and ensure that proper provision is made for their protection and management when undertaking, approving or authorising development and seek to interact with the landscape character of forest areas recognising the importance of working with the forest to achieve sustainable development proposals. • Discourage the felling of mature trees. <p>The submission recommends the inclusion of an additional objective in Section 12.9.2 to protect existing woodlands and trees and substantial</p>	<p>Chief Executive’s Response</p> <p>Policy BI A12 seeks to identify trees and stands of trees for inclusion on the TPO.</p> <p>Additional objectives are recommended for inclusion in the Plan with amendments.</p> <p>Existing woodlands and trees and substantial areas of deciduous forest should be retained.</p> <hr/> <p>Chief Executive’s Recommendation</p> <p>To include new objectives in Section 12.9 Trees, Woodlands and Hedgerows</p> <p>Ensure that when considering new forest proposals:</p> <ul style="list-style-type: none"> a) Landscapes of scenic value are not unduly eroded. b) Areas with environmental and archaeological protections are safeguarded. c) A mixture of broadleaf and conifer species are planted where possible so as to support a variety of flora and fauna species and to enliven forestry landscapes. d) Promote the avoidance of deforestation or commercial afforestation within Natura 2000 sites unless directly linked to the management of the site for its qualifying interests. <p>To include a new Action in Section 12.9</p>

		<p>areas of deciduous forest which are of amenity value and/or contribute to and interact with their landscape character and ensure that proper provision is made for their protection and management when undertaking, approving or authorising development and seek to interact with the landscape character of forest areas recognising the importance of working with the forest to achieve sustainable development proposals.</p>	<p>Encourage initiatives supporting private and community-driven native tree and woodland planting schemes utilising available funding schemes.</p> <p>To include a new Objective in Section 12.9 Manage, maintain, enhance, preserve, promote, encourage and facilitate, as far as practicable, the preservation, proper provision and retention of the existing network of native ancient woodlands and semi- natural woodlands of amenity value especially broadleaf species</p> <p>Include a new objective in Section 12.9.2 as follows; Protect existing woodlands and trees and substantial areas of deciduous forest which are of amenity value and/or contribute to and interact with their landscape character and ensure that proper provision is made for their protection and management</p>
507	Brian McArdle	<p>The submission refers to protection of trees and hedgerows in towns and villages and the planting of pocket forests in urban areas to promote biodiversity and carbon capture.</p>	<p>Chief Executive's Response</p> <p>Section 12.14.9 of the Draft Plan provides that urban green infrastructure potentially includes residential gardens, the parkland settings of enterprise parks and employment areas, street verges, open spaces and parks, woodlands, hedgerows, cemeteries and allotments.</p> <p>In Policy BI P13, the Council recognises the importance of Urban Green Infrastructure in addressing a broad range of urban challenges, such as conserving biodiversity, adapting to climate change, supporting the green economy, improving social cohesion and to seek to protect and enhance this resource.</p> <p>Section 12.14.9 contains a number of objectives to ensure that the Green Infrastructure Strategy and Network identified in this County Development Plan and Local Area Plans is used to inform the development management process to ensure that new developments and other relevant projects contribute towards the</p>

			<p>protection, management and enhancement of the existing Green Infrastructure in terms of design, layout and landscaping.</p> <p>It is considered that the provisions of Section 12.14.9 of Chapter 12 adequately address the issues related to urban green infrastructure in the County.</p>
			<p>Chief Executive's Recommendation</p> <p>No change to the Draft Plan.</p>
351	Eco Advocacy	<p>The submission recommends the making of Tree Preservation Orders (TPO) in relation to four sites as follows: Ballyshannon, Kilcullen x 2 Kildoon Wood Eaglehill Wood (maps/locations supplied)</p>	<p>Chief Executive's Response</p> <p>The process for Tree Preservation Orders is set out in Section 205 of the Planning and Development Act 2000 (as amended), which relates to the protection of a tree, trees or woodlands in the interests of amenity or the environment.</p> <p>Objective BI O20 of the Draft Plan protects trees which are the subject of Tree Preservation Orders in County Kildare.</p>
			<p>Chief Executive's Recommendation</p> <p>No change to the Draft Plan, however, the Planning Authority will investigate whether a TPO is warranted at these locations separate to the Development Plan process.</p>
26	Butterfly Conservation Ireland (BCI)	<p>A study is referenced that found increasing the density of hedgerow trees lessens the effects of agricultural intensification.</p> <p>BCI in its submission recommends that the Plan should encourage the retention and appropriate management of extended width margins, and that hedge cutting should be carried out to allow more individual hedgerow trees to grow to maturity.</p>	<p>Chief Executive's Response</p> <p>It is considered necessary to amend the referenced statement in section 12.9.1 and to add a new objective in section 12.9.1 of the Plan to reflect the findings of the referenced study.</p>
			<p>Chief Executive's Recommendation</p> <p>Amend the last sentence of section 12.9.1:</p> <p>These species are listed in Chapter 15, Development Management Standards.</p> <p>Amend the last sentence of the second paragraph of section 12.9.1:</p>

			<p>This coupled with the fact that two thirds of hedges adjoin intensively managed farmland, means that there are implications for the overall biodiversity potential of the resource on farmland without extended field margins.</p> <p>Add a new objective after Objective BI O15:</p> <p>Require the retention and appropriate management of hedgerows, and to require infill planting where possible in order to ensure an uninterrupted green infrastructure network.</p>
613	Philip O'Reilly	The submission contends that the plan should include sustainable guidelines and a method for cutting hedgerows in the county. There is a loss of hedgerow and inappropriate management currently.	<p>Chief Executive's Response</p> <p>While guidelines for the management of hedgerows, is outside the scope of the Draft Plan, Section 12.9.1 addresses the importance of hedgerows in the landscape for biodiversity and ecosystem services. Objectives BI 015 to BI 020 consider the management of hedgerows in developments including the closed season.</p> <p>Chief Executive's Recommendation</p> <p>No change to the Draft Plan.</p>
207	Deirdre Lane	That KCC should champion oak planting and be oak tree protectors.	<p>Chief Executive's Response</p> <p>Noted. The Parks Department of KCC has an ongoing county-wide planting programme in place which includes all native tree species.</p> <p>Chief Executive's Recommendation</p> <p>No change to the Draft Plan.</p>
390	Philip O'Reilly	<p>Ivy weakens trees and there should be a mandatory requirement that ivy is removed from trees and that all trees in the landscape are properly maintained and protected.</p> <p>Include a policy that hedgerows are maintained in the natural form and are not given a short back</p>	<p>Chief Executive's Response</p> <p>It is the policy of the Council to support measures for the prevention and/or eradication of invasive species within the county and the control of noxious weeds (Policy BI P9, refers). It is outside the remit of a strategic land use document for the county to provide for specific measures regarding the removal of ivy and the degree to which hedgerows are cut.</p>

		and sides every year. Include an objective in the plan to control the spread of Ragwort.	
			Chief Executive's Recommendation No change to the Draft Plan.
405	Kildare Climate Action Linkage Group	<p><u>Invasive Species and Noxious Weeds</u> The submission highlights that any kind of a living organism that is not native to an ecosystem may become invasive and that fungi and other microorganisms currently pose a significant threat to forests and trees in Ireland.</p> <p>Requests the amendment of the first paragraph of section 12.12: Invasive species, both invertebrate and plants, which can be plants, animals, fungi or a number of different microorganisms, can represent a major threat to local, regional, and national biodiversity. Terrestrial and aquatic habitats can be negatively affected, resulting in significant damage to the environment and economic interests, such as agriculture, forestry and civil infrastructure.</p> <p>Requests the amendment of the third paragraph of section 12.12: Thistle, Ragwort, Dock, Common Barberry, Male Wild Hop plant & Wild Oat are scheduled as noxious weeds under the Noxious Weeds Act, 1936 and Noxious Weeds (Common Barberry) Order, 1958. Noxious weeds, most of which are native plants of disturbed ground, impact adversely on agriculture. They may compete for space, harbour pests or diseases, or be injurious to livestock or human beings. It is important to note</p>	<p>Chief Executive's Response Agreed to amend part of the first paragraph to include "the" typographical error. It is not considered necessary to include the additional description of invasive species, as reference to invertebrate and plants is considered sufficient.</p> <p>Common Barberry is already referred to in the third paragraph, however it is agreed to amend fourth sentence of the third paragraph to include "<i>some native species are noxious weeds</i>". The proposed additional sentence at the end of the third paragraph is not accepted.</p> <p>In relation to BI O35, it is not considered reasonable to request applicants to survey or address invasive species on lands outside of their ownership or control. No change recommended to this objective.</p> <p>See response to submission no. 413 in relation to the proposed changes to policy BI P9 and action BI A17 and the two proposed additional actions.</p> <p>Chief Executive's Recommendation Amend second sentence of first paragraph in 12.12: Terrestrial and aquatic habitats can be negatively affected, resulting in significant damage to the environment and economic interests, such as agriculture, forestry, and civil infrastructure.</p> <p>Amend fourth sentence of third paragraph in 12.12: It is important to note that, as native species, noxious weeds (<i>some noxious weeds are native species</i>), and as such, are part of</p>

	<p>that, some noxious weeds are native species, and as such, as native species, noxious weeds are part of our natural biodiversity and are utilized by a range of invertebrate and bird species. The management objective for these native species should be control and not complete eradication. The loss of such species will also result in the loss of species that depend on them as a food source. Creeping thistle (<i>Cirsium arvense</i>) for example, is a food plant for over twenty species of butterfly and moth, with four species of moth depending on the genus <i>Cirsium</i> as their sole food plant. Thistle seed is also an important food resource for goldfinch. Ragwort (<i>Senecio jacobea</i>) has four species of moth dependant on it including the day-flying cinnabar moth. Ragwort and thistle are significant sources of nectar for bees.</p> <p>Suggests the amendment of policy BI P9 as follows: Implement and support Support measures for the prevention and/or eradication of invasive species within the county and the control of noxious weeds.</p> <p>Suggests the amendment of objective BI O35 as follows: Require all development proposals to address the presence or absence of invasive alien species on proposed development sites, or in the vicinity of a development site; and (if necessary) require applicants to prepare and submit an Invasive Species Management Plan where such species exist, in order to comply with the provisions of the</p>	<p>our natural biodiversity and are utilized by a range of invertebrate and bird species.</p> <p>See recommendation to Submission 413 in relation to the proposed changes to policy BI P9 and action BI A17 and the two proposed additional actions.</p>
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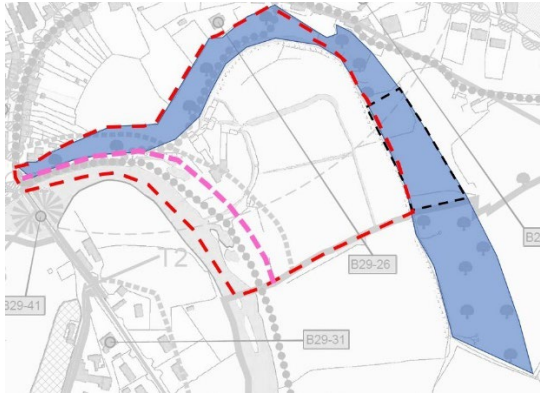
		<p>European Communities (Birds and Natural Habitats) Regulations 2011-2015.</p> <p>Suggests the amendment of action BI A17 as follows: Prepare a programme of mapping of invasive species in the county, including the development of a web portal to allow residents of County Kildare to report invasive species in the County, by the end of 2023.</p> <p>Suggests the following additional actions: It is an action of the Council to determine, as a priority, whether there is a potential threat of invasive species to the protected sites within the County, and to begin a dedicated programme of eradication, beginning with the Natura 2000 sites.</p> <p>It is an action of the Council to begin a dedicated campaign to build awareness of invasive species amongst all residents of the county. Additionally, this programme will provide training to Community Groups on appropriate control and removal measures for responsive species, and will educate and facilitate training on reporting of plant species necessitating herbicide treatment for their removal.</p>	
468	Ann Behan	<p>Reference is made to the first paragraph, under section 12.12, and it is noted that any kind of living organism that is not native to an ecosystem may become invasive. An amendment is proposed to the first sentence of this paragraph to include “which can be plants, animals, fungi, or a number of different micro-organisms” after the word invasive species. Include the word “the” before</p>	<p>Chief Executive’s Response See response to submission 405 above</p> <hr/> <p>Chief Executive’s Recommendation See recommendation to submission 405 above</p>

	<p>environment in the second sentence of the first paragraph.</p> <p>Amend the first sentence of the third paragraph to include “and Noxious Weeds (Common Barberry) Order, 1958” after the Noxious Weeds Act, 1936.</p> <p>Amend the fourth sentence of the third paragraph to include “some noxious weeds are native species, and as such,” before the wording as native species.</p> <p>Amend policy BI P9 and insert words “Implement and” prior to support at the beginning.</p> <p>Amend BI O35 to include the wording “or in the vicinity of a development site” after the words “proposed development sites” in accordance with Regulation 49 of the European Communities (Birds and Natural Habitats) Regulations 2011 to 2015.</p> <p>Reference is made to BI O36, and it is submitted that removal of invasive species may require herbicide control and if pesticides are used in public areas there are several requirements under pesticide legislation that need to be adhered to, including that the pesticide operator should be licensed and trained. A dedicated action plan is needed by the council which could include a web portal to facilitate reporting of harmful invasive species in the county. This would facilitate implementation of a targeted program for eradication of such species. Dun Laoghaire Rathdown Invasive Species Action Plan 2021 is</p>	
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		<p>cited as an example with the aim and objectives of that plan also outlined.</p> <p>Action BI A17 is referred to and it is submitted that it is insufficient given the threat that invasive species pose to biodiversity. A similar roadmap for invasive species control as employed by DLR should be followed.</p> <p>Add a new action “to determine, as a priority, whether there is a potential threat of invasive species to the protected sites within the County, and to begin a dedicated programme of eradication, beginning with the Natura 2000 sites”.</p> <p>Add a new action “to begin a dedicated campaign to build awareness of invasive species amongst all residents of the county. Additionally, this programme will provide training to Community Groups on appropriate control and removal measures for responsive species and will educate and facilitate training on reporting of plant species necessitating herbicide treatment for their removal”.</p>	
26	Butterfly Conservati on Ireland (BCI)	<p>The submission refers to the use of “native plants of local provenance” in Objectives BI O15 and BI O16. It is advised that the Council may need to harvest seed locally for this purpose, or obtain seed certified as being of local provenance from as close as possible to the locality.</p>	<p>Chief Executive’s Response Having reviewed Objectives BI O15 and BI O16 it was found impractical to source plants with local provenance. In relation to the recommendation for KCC to operate a nursery to grow native plants of local provenance, the Council unfortunately does not have the resources to commit to undertaking such a project but would support and facilitate the development of such a facility as a community enterprise.</p> <p>Chief Executive’s Recommendation Delete the following sentence in objective BI O15:</p>

			<p>Native plants of a local provenance should be used for any such planting.</p> <p>Delete the wording of objective BI O16:</p> <p>own landscaping works using native plants of local provenance.</p>
559	Newbridge Community Development	<p>There are no Tree preservation orders (TPO) listed in Newbridge. This suggests that they are being under-utilised as an important means to protect the many mature trees in the town that are under threat from development trends. Examples include trees at Ryston, Bord Na Mona, Newbridge College, College Park, Moorefield Crescent, Moorefield Park and many more. Would like to see a proactive plan for the protection of these trees.</p>	<p>Chief Executive's Response</p> <p>The process for Tree Preservation Orders is set out in Section 205 of the Planning & Development Act 2000 (as amended), which relates to the protection of a tree, trees or woodlands in the interests of amenity or the environment. Objective BI O20 of the Draft Plan protects trees which are the subject of Tree Preservation Orders in County Kildare.</p> <p>Chief Executive's Recommendation</p> <p>No change to the Draft Plan however the Planning Authority will investigate whether TPOs are warranted as suggested separately to the Development Plan process.</p>
26	Butterfly Conservation Ireland (BCI)	<p><u>Native Trees and Shrubs</u></p> <p>The submission offers the following comments and suggested amendments:</p> <ul style="list-style-type: none"> • The content of Soft Landscaping at 15.2.5 regarding tree and hedgerow planting and retention is welcome. • How are planting and tree & hedgerow retention requirements verified? Are enforcement measures taken in the event of non-compliance? • Purging/Common Buckthorn HP and Grey Willow AHDV should be included in Table 0.2 Native Trees and Shrubs. 	<p>Chief Executive's Response</p> <p>The Council welcomes the submission from BCI and acknowledges the request to include Purging/Common Buckthorn HP and Grey Willow AHDV in Table 0.2.</p> <p>In relation to enforcement measures, the Council will take enforcement action in cases of unauthorised development, where it is appropriate to do so, as resources permit, as described in section 15.1.1 of the Plan. The removal of hedgerows and trees prior to submitting a planning application will be viewed negatively by the planning authority and may result in an outright refusal, as outlined in Objective BI O15 of the Plan.</p> <p>Chief Executive's Recommendation</p> <p>Add the following two rows to Table 0.2 in section 15.2.5:</p>

			Common name	Height (max)	Suitable for public open spaces	Suitable for streets and confined spaces	Suitable for tubs, containers and raised beds etc.	Guide to planting: See key below	
			Grey Willow	10m	Yes	No	No	AHDV	
			Purging/ Common Buckthorn	8m	Yes	No	No	HP	
203	Edward Hill	<p>A third / 101 native bee species are being threatened with extinction from habitat loss, habitat fragmentation, lack of forage, pesticides, pests and diseases. They are important for pollinators of crops and native plants.</p> <p>The submission outlines a number of items with regards honeybee colonies managed by beekeepers such as registering and having bees tested with the Department of Agriculture. Overstocking of bees is advised against.</p> <p>The submission states that bees should be located in areas where sufficient forage is available throughout the season.</p> <p>It is stated that it is not unreasonable to suggest that colonies of honeybees in some habitats may</p>	<p>Chief Executive’s Response The submission is noted. However, the matters raised within this submission are considered to be outside the scope of the Draft Kildare County Development Plan 2023-2029 which is a land use plan and does not provide guidance with respect to the location of honeybee hives.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan</p>						

		<p>have potential to affect some of the objectives of the AIPP that KCC actively supports.</p> <p>It is suggested that the Draft Plan should take into account any potentially negative impact the placement of honeybees may have on a habitat. The All-Ireland Pollinator Plan does not recommend keeping honey bees. The submission includes a link from pollinator.ie with the following highlighted:</p> <p>“Honeybees are a managed pollinator and adding new hives to the landscape is not a biodiversity action. They are more like mini-livestock”.</p>	
226	Ciara and Harvey Applebe	<p>A TPO is proposed to preserve mature woodlands adjoining the River Liffey outside of the Ballymore Eustace Village. The below map which was attached to this submission depicts the subject woodland and its context, where the blue hatching identifies the band of mature woodlands, the black dashed line represents the missing tree and woodland preservation objective and the red dashed line represents the Old Mill site.</p> 	<p>Chief Executive’s Response The process for Tree Preservation Orders is set out in Section 205 of the Planning & Development Act 2000 (as amended), which relates to the protection of a tree, trees or woodlands in the interests of amenity or the environment. Objective BI O20 of the Draft Plan protects trees which are the subject of Tree Preservation Orders in County Kildare.</p> <p>Chief Executive’s Recommendation</p> <p>No change to the Draft Plan however the Planning Authority will investigate whether a TPO is warranted at this location separate to the Development Plan process.</p>

PEATLANDS			
421	Bord na Mona (BNM)	<p>It is suggested that buffers would need to be considered for all 'core areas' which would depend on the nature and extent of any development proposal and their associated potential impacts. The following change is suggested:</p> <p>'This masterplan should, at a minimum, include the following 'core areas' – one should centre around Lullymore Heritage Park, Lullybeg Wetlands, Butterfly Reserve, Lodge Bog – with an extensive buffer zone; a second core area would focus on Ballynafagh Bog, Ballynafagh Lake and Hodgestown Bog; a third area would focus on Killinthomas Wood (Coillte owned), Ballydermot Bog East; a fourth would focus on Ummeras'.</p>	<p>Chief Executive's Response</p> <p>It is agreed that each of the 'core areas' referenced in Section 12.14.6.5 should have buffer zones carefully considered as part of the masterplan process.</p>
			<p>Chief Executive's Recommendation</p> <p>Amend Section 12.14.6.5 as follows: This masterplan should, at a minimum, include the following 'core areas' with appropriate buffer zones of scale designed to protect their special interest and setting – one should centre around Lullymore Heritage Park, Lullybeg Wetlands, Butterfly Reserve, Lodge Bog with an extensive buffer zone; a second core area would focus on Ballynafagh Bog, Ballynafagh Lake and Hodgestown Bog; a third area would focus on Killinthomas Wood (Coillte owned), Ballydermot Bog East; a fourth would focus on Ummeras.</p>
421	Bord na Mona (BNM)	<p>Further information is required to clarify what is meant by 'it is expected that 50% of the Peatland Area will remain free from any development'. This could be interpreted in many ways. A Local Authority or any government body cannot constrain bogs from amenity, rehabilitation works or any other future land use developments in this manner. This conflicts with policies relating to Strategic Energy Zones, Green Infrastructure Plans etc. Similar text is used in Chapter 9: RD O28 references supporting '<i>the sustainable re-use of circa 30-50% of cutaway boglands for economical purposes</i>', whereas RD O29 references supporting '<i>the development of renewable energy (wind and solar) on a</i></p>	<p>Chief Executive's Response</p> <p>The reference in the plan to a potential 50% 'limit' of development on peatlands derives, in part, from the EU Biodiversity Strategy target of 30% land cover for nature by 2030, as expressed in target LR T1 of the draft plan. The multi-faceted function, importance and potential of cutaway peatlands is acknowledged and addressed throughout the plan. Furthermore, it is acknowledged in the Plan that the Bog of Allen itself represents a unique opportunity for nature based solutions on a grand scale to address the national biodiversity crisis and climate change mitigation.</p> <p>The reference to a 50% limit on development has also been raised in other submissions. The Office of the Planning Regulator welcomes Objective RD O29. Other submissions suggest a higher percentage (e.g. 80%) would be more appropriate.</p>

		<p><i>percentage/ no more than 50% of former industrial peatlands/cutaway bogs</i>’.</p> <p>Clarification is needed regarding what is meant by ‘development’ and what ‘peatland area’ means.</p>	<p>Taking on board the issues raised in this submission, and others, regarding interpretation, it is considered appropriate to delete the sentence ‘<i>it is expected that 50% of the Peatland Area will remain free from any development</i>’ from Section 12.14.6.5 to avoid ambiguity, and to amend objectives RD O28 and RD O29 in Chapter 9 to bring clarity to the issue. The intention of these objectives is to facilitate the sustainable and appropriate re-use of cutaway bogs for economic uses including <i>inter alia</i> renewable energy, amenity and tourism related projects (i.e. up to 50% of cutaway peatlands) whilst also protecting and providing for biodiversity, re-wetting, re-wilding and carbon sequestration (50% +). It is also considered appropriate to insert a new objective after RD O29 to provide for a biodiversity-led approach to the development of the cutaway peatlands.</p> <p>Chief Executive’s Recommendation Amend Section 12.14.6.5 Bog of Allen <i>A number of proposed long distance peatways that could connect with the Royal Canal with the grand Canal/Barrow Blueway are listed below in Section 12.14.8.8. It is expected that 50% of the Peatland Area will remain free from any development.</i></p> <p>See also Chapter 9 (Peatlands)</p>
143	Inland Fisheries Ireland (IFI)	<p><u>Midlands Peatlands National Park</u> The submission requests a commitment in the Plan that any proposals for a National Peatlands Park will consider the important rivers and populations of native fish and other species, draining the Bog of Allen area.</p>	<p>Chief Executive’s Response It is considered reasonable to include an objective to ensure any proposals for a National Peatlands Park will consider the important rivers and populations of native fish and other species, draining the Bog of Allen area.</p> <p>Chief Executive’s Recommendation Add a new objective after BI O24: <i>Ensure that any proposals for a National Peatlands Park will consider the important rivers and populations of native fish and other species, when draining the Bog of Allen area.</i></p>

280	Stephen James Byrne	<p>Many of the policies and objectives of this chapter contradict the current Windfarm Sensitivity Map in Appendix 2.</p> <p>Stating that only 50% of peatland areas will remain free from development should be omitted from the Plan.</p>	<p>Chief Executive's Response</p> <p>The Draft Wind Energy Strategy set out in Appendix 2 uses the methodology set out in the most recent Draft Wind Energy Development Guidelines (2019). See Section 3 'Methodology' for details. The sieve mapping exercise does not exclude all sensitivities. While part of the county may objectively be considered 'Acceptable in Principle' or 'Open to Consideration' for windfarm development, many site-specific considerations will still apply, see sections 4.2 and 4.3 for details. It should be noted that Section 6 of this Strategy sets out all considerations for Wind Farm Development Planning Applications.</p> <p>In relation to the 50% of peatland areas remaining free from development, see response to Submission No. 421 (Bord na Mona).</p> <p>Chief Executive's Recommendation</p> <p>No change in relation to the Wind Energy Strategy. In relation to the 50% of peatland areas remaining free from development, see response to Submission No. 421 (Bord na Mona).</p>
421	Bord na Mona (BNM)	<p>In Section 12.14.8.8 (Peatways) clarification is needed on what is meant by 'corridor' and 'trail' (and full paragraph).</p> <p>The plan reads that a corridor of 1-2km wide would essentially be sterilised from future development and in some cases, this would also include the trackway depending on the physical nature of the bog and its intended further land use. This would not be practical. This also conflicts with other policies and objectives regarding wind energy development, strategic energy zones, future land use plans and green infrastructure. The designation of corridors (e.g. Corridor No. 1) is within an area where wind energy developments are 'Open for Consideration' in the WES, but text</p>	<p>Chief Executive's Response</p> <p>In Section 12.14.8.8, 'Peatway corridors' are defined as being c. 1km to 2km wide (i.e. 500m – 1000m either side of the railway or pedestrian trail) so to act as substantial landscape corridors. A 'Trail' is the actual pathway, rail line or surface used for walking and/or cycling that is located within the corridor.</p> <p>The Wind Energy Strategy was prepared using the sieve mapping process, outlined in the Wind Energy Guidelines. A Strategy, by its nature, is high-level and provides general guidance for the careful consideration of individual projects at application stage. Not all sensitivities have been screened out using this process. For example, in areas identified as 'Permitted in Principle' and 'Open for consideration' there are rural dwellings dotted throughout, where proposed wind energy developments would not be permitted within 500m of any dwelling. A similar approach will be</p>

		<p>in Section 12.14.8.8 indicates the corridor will be 'free from energy infrastructure such as solar farms and wind turbines'. This conflicts with NPF and RSES which identifies extensive tracts of publicly owned peat extraction areas are suitable for renewable energy.</p>	<p>taken with the Green Infrastructure Strategy, where individual applications will be considered on their merits and proximity to/setbacks from sensitive receptors considered at that stage.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
<p>172.</p>	<p>Umerus Community Development Peatlands (UCDCLG)</p>	<p>Requests that the section be rewritten as follows (text in purple italics): <i>This area is proposed for a Peatlands National Park which is supported by the Council and will form part of the National Peatlands Park.</i></p> <p>Submission requests inserting additional text into Action BI A22, as follows: "<i>Work with Bord Na Mona Coillte, Waterways Ireland and local community and environmental groups to prepare a Green Infrastructure Masterplan that will inform the delineation of core areas, stepping stones and corridors...</i>"</p> <p>It is a key recommendation of the West Kildare Just Transition Plan that a tripartite approach (Kildare County Council/Government agencies/Communities & NGOs) is adopted to plan for the future of the region.</p> <p>Requests that the Green Infrastructure Concept Map be revised to recognise Umerus Peatlands Park as a Core Area consistent with the text in 12.14.6.8 which includes Umerus Bog as a Core Area.</p>	<p>Chief Executive's Response A minor change to the text of Section 12.14.6.8 is agreed.</p> <p>It is agreed that Action BI A22 should be expanded to include reference to the involvements of other stakeholders in the preparation of a Green Infrastructure Masterplan.</p> <p>Umerus Bog is included within the Green Infrastructure Concept Map as a Stepping Stone as this is considered the more appropriate designation, having regard to the criteria set out in Section 12.14. 5 of the Plan.</p> <p>Chief Executive's Recommendation</p> <p>Amend Action BI A22 as follows: <i>"Work with Bord Na Mona and other stakeholders to prepare a Green Infrastructure Masterplan that will inform the delineation of core areas, stepping stones and corridors (long distance peatways) as identified in Sections 12.14.6, 12.14.7 and 12.14.8, that may inform the designation of an interconnected Bog of Allen Nature Reserve, Special Amenity Area Order and/or National Peatlands Park.</i></p> <p>Amend Section 12.14.6.8 Umerus Bog <i>This area is proposed to form part of the for a Peatlands National Peatlands Park, which is supported by the Council.</i></p>

147	National Peatlands Park Group	<p>Amend the text of section 12.14.6.5 to read as follows and are naturally re-wilding and forming very important habitat in the form of species rich open areas or first generation woodland (scrub-woodland comprised of birch, sally, alder, buckthorn including purging buckhorn and pine) that are very rich in species diversity – wild flowers, moths, butterflies, insects, birdlife and mammals.</p> <p>.....a number of proposed long distance peatways that could connect the Royal Canal with the Grand Canal/Barrow Blueway are listed below in Section 12.14.8.8. It is expected that 50% of the Peatland Area will remain free from any development. The sentence in purple should be deleted.</p> <p>The objective of 50% of peatlands to be excluded from development is in conflict with the benchmark set for other extractive industries. The figure of 80% of former quarries for nature should also be used for peat extraction bringing a consistent and predictable after-use planning guideline across all extractive industries (minim, quarrying and peat extraction).</p> <p>Amend the text of section 12.14.6.8, which should read as follows: <i>'This area is proposed for a Peatlands Park which is supported by the Council and will form part of the National Peatlands Park.'</i></p>	<p>Chief Executive's Response The suggested text changes within Section 12 are noted. It is agreed that Section 12.14.6.5 and 12.14.6.8 should be amended for clarity. In relation to the 50% development of Peatlands, the reader is advised to see response to the submission from Bord na Mona (submission no. 421).</p> <p>See response to Submission No. 172 in relation to 12.14.6.8</p> <p>Chief Executive's Recommendation</p> <p>Amend the text of section 12.14.6.5 and are naturally re-wilding and forming very important habitat in the form of species rich open areas or first generation woodland (scrub-woodland comprised of birch, sally, alder, buckthorn including purging buckhorn and pine) that are very rich in species diversity – wild flowers, moths, butterflies, insects, birdlife and mammals.</p> <p>See recommendation to Submission No. 172 in relation to 12.14.6.8</p>
470	IPCC	<p>Amend Section 12.14.6.5 as follows;: A number of proposed long distance peatways that could connect the Royal Canal with the Grand</p>	<p>Chief Executive's Response See response to Submission No. 421 (Bord na Mona)</p>

		Canal/Barrow Blueway are listed below in Section 12.14.8.8. It is expected that 50% of the Peatland Area will remain free from any development.	See response to Submission No. 172 in relation to 12.14.6.8.
		Amend Section 12.14.6.8 to include underlined text: This area is proposed for a Peatlands National Park which will form part of the wider National Peatlands Park, which is supported by the Council.	Chief Executive's Recommendation See recommendation to Submission No. 421 (Bord na Mona) See recommendation to 172 in relation to 12.14.6.8.
468	Ann Behan	Delete last two sentences in 12.14.6.5 in line with comments made under RD O28 and RD O29 above. "A number of proposed long distance peatways that could connect the Royal Canal with the Grand Canal/Barrow Blueway are listed below in Section 12.14.8.8. It is expected that 50% of the Peatland Area will remain free from any development".	Chief Executive's Response It is considered appropriate to reference 12.14.8.8. as it relates to Peatways. See recommendation to Submission No. 421 (Bord na Mona) in relation to RD O28 and RD O29. No change to text in 12.14.6.5. Agreed to amend 12.14.6.8 for consistency with BI A22.
		Amend 12.14.6.8 to read "National Peatlands Park" as opposed to Peatlands National Park for consistency with BI A22.	Chief Executive's Recommendation Amend 12.14.6.8 Ummeras Bog to read as follows: This area is proposed for a National Peatlands National Park, which is supported by the Council
RIVERS, STREAMS, WATERWAYS, WETLANDS & RAMSAR SITES			
421	Bord na Mona (BNM)	A distinction should be made in the Plan between Peatlands and Cutaway Peatlands. Carbon lost to the atmosphere from developing renewable energy projects on cutaway peatland represents a small fraction of the total carbon emissions that will be offset by the proposed development. For example, the volume of CO2 lost to the atmosphere for wind farm projects would be offset within 1-2 years of operation (depending on the fuel source to which it is compared).	Chief Executive's Response It is agreed that a distinction should be made between intact peatlands and cutaway peatlands in the Plan.
			Chief Executive's Recommendation Amend Section 12.11 as follows: Peatland, Wetlands and Ramsar Sites County Kildare contains...recreational opportunities. The drained and degraded bogs go from being carbon sinks to very large carbon sources. The restoration of peatlands to their natural state

			<p>will have benefits in terms of nature conservation, climate change and flood prevention and alleviation.</p> <p>Peatlands are wetlands where the substrate is predominantly peat including bogs which are fed by rain and fens which are fed by ground or surface water. Actively growing, intact, raised bog is an extremely rare habitat. Irish raised bogs are of international importance representing 50% of all the conservation-worthy raised bogs remaining in Europe. Total area of Peat bogs and Moors in County Kildare^[1] is 10,389 ha (6% of Kildare land mass) of which 8.8% are protected.</p> <p>Insert new objectives in Chapter 12 after BI O34 To require the preparation and submission of a Hydrological Report/Assessment for significant developments within and in close proximity to protected raised bogs and to take account of same in the assessment of impacts on the integrity of peatland ecosystems.</p> <p>To work with relevant stakeholders on suitable peatland sites in order to demonstrate best practice in sustainable peatland conservation, management and restoration techniques to promote their heritage and educational value subject to ecological impact assessment and appropriate assessment screening.</p>
143	Inland Fisheries Ireland (IFI)	<p><u>Bog of Allen</u> It is requested that the plan includes a policy to support IFI pilot projects to investigate the incorporation of habitat restoration measures on waters draining the Bog of Allen into flood management schemes.</p>	<p>Chief Executive's Response The submission is noted. It is considered necessary to add a new objective to section 12.12 to reflect the submission.</p> <p>Chief Executive's Recommendation Add a new objective in Section 12.10</p>

^[1] CORINE Landcover 2018

			<p>Support Inland Fisheries Ireland’s pilot projects to investigate the incorporation of habitat restoration measures on waters draining the Bog of Allen into flood management schemes.</p>
<p>413.</p>	<p>Kildare Public Participation Network</p>	<p><u>12.11Wetlands and Ramsar Sites</u> Submission proposes amending the policies set down (new text in purple, deleted text crossed out), as follows: BI P8: Ensure that Kildare’s wetlands and watercourses are retained for their biodiversity and flood protection values and maintain good ecological status of wetlands and watercourses in support of the provisions of the Water Framework Directive and Ramsar Convention. at a minimum to achieve and maintain at least good ecological status for all wetlands and watercourses in the county by, at the latest, 2027 in line with the Water Framework Directive and Ramsar Convention.</p> <p>BI P9: Implement and Support measures for the prevention and/or eradication of invasive species within the county and the control of noxious weeds.</p> <p>Submission proposes amending objective BI O31 (new text in purple), as follows: Protect wetland sites that have been rated A (International), B (National) C+ (County) and C (Local) importance and D (Moderate value, locally important) as identified in the County Kildare Wetlands Survey 2012-2014, (See Tables 12.5 & 12.6).</p> <p>Submission proposes amending action BI A17 (new text in purple), as follows:</p>	<p>Chief Executive’s Response Agreed to amend BI P8 & BI P9. In relation to BI O31 it is considered overly onerous and in appropriate to make the proposed amendments and that adequate protection is afforded the wetlands areas with the wording of BI O31 as it currently stands. In relation to BI A 17 an amendment to the wording proposed is considered more appropriate as set out below. The proposed wording of the first new action is agreed while the proposed wording of the second new action is agreed, in part. Many Natura 2000 sites are in private ownership and under current legislation there is no mechanism for the control of invasive species on private land. The legislation, EC Birds and Natural Habitats Regulations, Article 49 prohibits the introduction, breeding, release or dispersal of certain species but does not require control. KCC can only control species that occur on the land under its control. KCC does seek to control invasive species through the planning process by condition. A new action is however set out as below.</p> <p>Chief Executive’s Recommendation</p> <p>Amend Policy BI P8 as follows; Ensure that Kildare’s wetlands and watercourses are retained for their biodiversity and flood protection values and maintain good ecological status of wetlands and watercourses in support of the provisions of the Water Framework Directive and Ramsar Convention. at a minimum to achieve and maintain at least good ecological status for all wetlands and watercourses in the county by, at the latest, 2027 in line with the Water Framework Directive and Ramsar Convention.</p> <p>Amend Policy BI P9 as follows;</p>

		<p>Prepare a programme of mapping of invasive species in the county including the development of a web portal to allow residents of County Kildare to report invasive species in the County, by the end of 2023.</p> <p>Proposes additional actions (in purple), as follows: New action: It is an action of the Council to determine, as a priority, whether there is a potential threat of invasive species to the protected sites within the County, and to begin a dedicated programme of eradication, beginning with the Natura 2000 sites.</p> <p>New action: It is an action of the Council to begin a dedicated campaign to build awareness of invasive species amongst all residents of the county. Additionally, this programme will provide training to Community Groups on appropriate control and removal measures for responsive species, and will educate and facilitate training on reporting of plant species necessitating herbicide treatment for their removal.</p>	<p>Implement and Support measures for the prevention and/or eradication of invasive species within the county and the control of noxious weeds. Amend Action BI A17 as follows; Prepare a programme of mapping of invasive species in the county and explore the development of a web portal to allow residents of County Kildare to report invasive species in the County, during the lifetime of this Plan.</p> <p>Include a new action in Section 12.12 It is an action of the Council to determine, as a priority, whether there is a potential threat of invasive species to the protected sites within the County, and to begin a dedicated programme of eradication, beginning with the Natura 2000 sites.</p> <p>Include a new action in Section 12.12 It is an action of the Council to begin a dedicated campaign to build awareness of invasive species amongst all residents of the county. Additionally, this programme will provide training to Community Groups on appropriate control and removal measures for responsive species,</p>
405	Kildare Climate Action Linkage Group	<p><u>Wetlands and Ramsar Sites</u> The submission highlights Table 12.5 - County Kildare Wetland Survey Sites - Rating of Importance of Ecological Sites, and suggests the following:</p> <ul style="list-style-type: none"> • Not useful to provide Eastings and Northings in this table. • Web links to the mapping of these sites would be helpful. • Links to the three Wetland Survey Reports provided on the Council's website. 	<p>Chief Executive's Response The matters raised in relation to the Wetlands and Ramsar sites have been noted and such matters will be considered as part of any further update to Table 12.5.</p> <p>In relation to the suggested proposed text for the third paragraph of Section 12.11 and Objective BI O33, any matter of funding and resourcing is outside of the scope of the Draft Plan, which is primarily a land use plan.</p> <p>See response to submission 413 in relation to the proposed changes to Policy BI P8 and Objective BI O31.</p>

	<p>Requests the insertion of additional text into the third paragraph of section 12.11: As developments and forestry tree plantations sited on peatlands have the potential to increase overall carbon losses, potentially undermining expected carbon savings (in the case of renewable energy developments) and damaging rare habitats of European importance, these factors must be considered in any environmental or ecological impact assessment prepared to accompany any planning applications. Given the Council's acknowledgement of the Biodiversity Crisis in 2019, and the most recent Article 17 reporting on EU protected habitats and species, the Council commits to additional funding to appoint a suitably qualified staff member to evaluate Ecological Impact Assessments contributed as part of development proposals.</p> <p>Suggests the amendment of policy BI P8 as follows: Ensure that Kildare's wetlands and watercourses are retained for their biodiversity and flood protection values and maintain good ecological status of wetlands and watercourses in support of the provisions of the Water Framework Directive and Ramsar Convention, and at a minimum to achieve and maintain at least good ecological status for all wetlands and watercourses in the county by, at the latest, 2027 in line with the Water Framework Directive and Ramsar Convention.</p> <p>Suggests the amendment of objective BI O31 as follows:</p>	<p>Chief Executive's Recommendation See recommendation to submission no. 413 in relation to the proposed changes to Policy BI P8 and Objective BI O31.</p>
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		<p>Protect wetland sites that have been rated A (International), B (National) C+ (County) and C (Local) importance and D (Moderate value, locally important) as identified in the County Kildare Wetlands Survey 2012-2014, (See Tables 12.5 & 12.6).</p> <p>Suggests the amendment of objective BI O33 as follows: Ensure that an ecological assessment is undertaken in conjunction with proposals involving drainage or reclamation of wetland identified in Table 12.6. Impact assessment of all developments on peatlands shall consider peatland stability, carbon emissions balance, Hydrology and Ecology. Given the Council's acknowledgement of the Biodiversity Crisis in 2019, and the most recent Article 17 reporting on EU protected habitats and species, the Council commits to additional funding to appoint a suitably qualified staff member to evaluate Ecological Impact Assessments contributed as part of development proposals.</p>	
468	Ann Behan	<p>Amend the first sentence of the third paragraph under section 12.11 to include “and forestry tree plantations” before the wording “sited on peatlands”.</p> <p>An additional sentence is also proposed at the end of the third paragraph to read “Given the Councils acknowledgement of the Biodiversity Crisis in 2019, and the most recent Article 17 reporting on EU protected habitats and species, the Council commits to additional funding to appoint a suitably qualified staff member to evaluate Ecological</p>	<p>Chief Executive's Response See response to submission 405 above</p> <p>Chief Executive's Recommendation See recommendation to submission 405 above</p>

		<p>Impact Assessments contributed as part of development proposals.”</p> <p>Amend policy BI P8 to include additional text after Ramsar Convention to read “and at a minimum to achieve and maintain at least good ecological status for all wetlands and watercourses in the county by, at the latest, 2027, in line with the Water Framework Directive and Ramsar Convention.”</p> <p>Amend BI O31 to include “and D (Moderate value, locally important)” after C (Local) importance.</p> <p>Amend BI O33 to include the word “is” after ecological assessment in the first sentence. It is also proposed to include an additional sentence after the second sentence to read “Given the Councils acknowledgement of the Biodiversity Crisis in 2019, and the most recent Article 17 reporting on EU protected habitats and species, the Council commits to additional funding to appoint a suitably qualified staff member to evaluate Ecological Impact Assessments contributed as part of development proposals.”</p> <p>Provision of Eastings and Northings in table 12.6 is not very useful. A web link to the mapping of these sites would be more helpful. Links to the three Wetland Survey Reports should also be provided on the council’s website.</p>	
468	Ann Behan	Amend first bullet points in 12.14.7 to include [specifically, wetland sites that have been rated A (International), B (National), C+ (County) and C	<p>Chief Executive’s Response</p> <p>It is considered overly onerous and in appropriate to make the proposed amendments and that adequate protection is afforded</p>

		(Local Importance), and D (Local Importance) in the County Kildare Wetland Survey].	the wetlands areas with the wording of BI O31 as it currently stands.
			Chief Executive's Recommendation No change to the Draft Plan.
26	Butterfly Conservation Ireland (BCI)	BCI welcomes Policy BI P8 and Objectives BI O31 to BI O34 and considers that these objectives can best be met by the Council's support for the creation of a new National Peatlands Park.	Chief Executive's Response The submission is noted.
			Chief Executive's Recommendation No change to the Draft Plan.
598	Friends of Harristown Commons	The submission welcomes the recognition of Kildare's wetland and Ramsar Sites in the Plan. The submission states that Policy BI P8 should be expanded to give a more complete picture of the valuable contribution wetlands make to our world including carbon sequestration, cultural services.	Chief Executive's Response Section 12.11 addresses the importance of wetlands to the county.
			Chief Executive's Recommendation No changes to the Draft Plan.
598	Friends of Harristown Commons	The submission proposes the recommendations of the County Kildare Wetland Survey 2012-2014 are addressed in the formulation of policies for the conservation and management of our biodiversity. These include: <ul style="list-style-type: none"> Detailed mapping of the extent of each of the wetland type(s) within each site. Mapping of general site boundaries to ensure conservation of a hydrological connection. Recording of threats to the conservation and future protection of the site, to include restoration suggestions and management priorities and needs. Evaluation of each site on a national scale and ranking of each site in terms of its 	Chief Executive's Response The recommendations referred to in the submission (from 2012 Wetland survey) have been addressed in subsequent Wetland surveys (2013, 2014 Wetland Surveys) The main recommendation of the submission, The sites which are listed as being of county importance (C+) or of high value, local importance (C) and of moderate value, local importance (D) should be highlighted and included county development plans , has been addressed in Section 12.11
			Chief Executive's Recommendation Include new action in Section 12.11 To run a public awareness campaign related to the diverse and valued wetland resource of the county, to include, inter alia, the provision of important ecosystem services.

		<p>suitability and priority for designation within the NHA and/or SAC process.</p> <ul style="list-style-type: none"> • Datasets developed during the current study should be updated as new information becomes available. • Extra resources should be put towards enforcing regulations preventing damage to wetland sites throughout County Kildare. • A public awareness campaign should be run to inform the diverse wetland resource of the county and the value of this resource through, amongst other things, the provision of important ecosystem services. • Where a development could adversely affect a wetland - through water abstraction, infilling, drainage, etc. a site visit should be conducted by a suitably qualified ecologist to determine if the area supports a wetland of conservation interest. • Sites which are listed as being of county importance (C+) or of high value, local importance (C) and of moderate value, local importance (D) should be highlighted and included in any recommendations made under the County Biodiversity Action Plan or included in Local Area Plans, county development plans or other planning strategies legislation. • Recommendations for the recognition and listing of sites should be made on a regular basis as further information on the wetland resource of County Kildare becomes known. • Council staff should be aware of a variety of issues regarding wetland when assessing 	<p>Include new action in Section 12.11</p> <p>Provide training for Local Authority staff on wetland issues when assessing development proposals and planning applications</p>
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		<p>development proposals and planning applications including:</p> <ul style="list-style-type: none"> - The need for an appropriate buffer zone surrounding wetland sites. - The importance of hydrogeology in how wetland sites function and how indirect impacts on a wetland system can be caused by activities occurring at some distance from the wetland. - The cumulative effect of seemingly isolated losses of wetland habitats across the county on the county resource. - The loss of wetland habitats, as a result of fragmentation of sites and impacts on wetland hydrology. - The ecological value of wetland habitats adjacent to, and fringing lakes and ponds. The ecological value of large areas of reed and tall sedge swamps, rivers and river flood plains in controlling and reducing the impacts of flooding events. - The wetland fauna, some of which are listed on Annex II of the Habitats Directive, found in the county wetlands and the potential impacts on these species as well as their habitats. - The limited coverage provided in the initial NPWS NHA survey- this was never a comprehensive survey of the entire county- many sites of high nature conservation value. - The potential value of wetland sites which are outside statutory designated 	
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		<p>areas and the need for adoption of a precautionary approach when assessing applications that may impact on same.</p> <ul style="list-style-type: none"> - The role that the wetland resource plays in combating global warming. 	
598	Friends of Harristown Commons	<p>The submission proposes</p> <ul style="list-style-type: none"> (i) Explanation for “cNHA” in Table 12.6. (ii) Do cNHAs other than wetlands exist in County Kildare, and should they be listed in the County Development Plan? (iii) Include cNHA Section 12. 7 Protected Habitats and Species Outside Designated Areas. This may afford them interim protection while they are progressed through the designation process. (iv) Include a statement of the Local Authority's commitment to engagement with NPWS, in order to expedite the designation process for these "Candidate NHAs". 	<p>Chief Executive's Response</p> <ul style="list-style-type: none"> (i) Agreed (ii) There are no other cNHA sites in County Kildare at present (iii) The wetland sites have been included in Section 12.11 of the Plan with supporting policies and objectives to protect them. (iv) The Council will support the designation of wetland (cNHA) sites in the county however the designation of same is a matter for the NPWS. <p>Chief Executive's Recommendation</p> <p>Include definition in footnotes in Section 12.11.</p> <p>Candidate Natural Heritage Area (cNHA) is the name given to wildlife sites that are proposed by the NPWS and by third parties for consideration as NHAs. The cNHA sites have no legal protection until they are within the formal NHA designation process.</p> <p>Include an additional objective in Section 12.8.1</p> <p>Support the designation of County Biodiversity Sites, as NHA or SAC where appropriate.</p> <p>Also, see recommendations to Submission No. 598 above in relation to new actions in Section 12.11</p>
598	Friends of Harristown Commons	<p>In recent times, ecological surveillance reports (Irish Semi-Natural Grassland Survey 2010 and Kildare Wetlands Survey 2012-2014) refer to the</p>	<p>Chief Executive's Response</p> <p>Agreed</p>

		area north of the road as "Harristown Common", while the area south of the road is referenced as "Dunshane Common". This submission advocates that the name "Harristown Common" should continue to be used to describe this wetland site in its entirety, both north and south of the road.	Chief Executive's Recommendation Amend Table 12.6 Harristown Commons North Harristown Commons South (Dunshane Common)
598	Friends of Harristown Commons	Harristown Common likely contains at least 3 examples of Annex 1 priority habitats under the EU Habitats Directive, namely Alkaline Fen 1[7230), Molinia Meadows (6410) and Petrifying Springs (7220). A breeding population of the Annex II protected <i>Euphydrys aurinia</i> (1065) and the possibility of Annex II protected <i>Vertigo geyeri</i> (1013) are other indicators of the requirement for a Special Area of Conservation (SAC). A variety of other species have been identified on and around Harristown Common. These include a number of Annex IV and Annex V species, at least 5 Red Listed bird species, 4 Red listed Butterfly and 1 Red Lister bryophyte species.	Chief Executive's Response Noted Chief Executive's Recommendation No change to draft plan.
167	Mariann Klay	There are many natural ponds and wetlands which are not listed on the 2012-2014 wetland survey of Kildare. Reference is made to a report commissioned by the PuncHESTOWN Area Community Group, that documents watercourses and wetlands of a high biodiversity value and need protection. In this regard it is requested that the survey of Kildare wetlands be updated to include all ponds and wetlands in the area and that all are worthy of protection during these times of unprecedented biodiversity loss.	Chief Executive's Response The Draft Plan does not identify all green infrastructure within the county. However, there are several objectives within Chapter 12 notably (BI O40) which supports the development of a regional green infrastructure strategy and Objective BI O42 requires all Local Area Plans to protect and manage the Green Infrastructure Network and add additional local corridors where possible. In addition, there is an action (BI A21) to complete the mapping of Green Infrastructure for each town and village in Kildare. Chief Executive's Recommendation Add an objective in Section 12.11 to read as follows: Review and update the County Kildare Wetland Survey 2012-2014 during the life of this Plan.

390	Philip O'Reilly	Consideration of rewatering the Ballinafad Reservoir to enhance the existing amenity of the Grand Canal.	Chief Executive's Response Ballynafagh Bog and Blackwood Feeder is a Special Area of Conservation (SAC). As Ballynafagh Lake is designated for the vertigo snail and is found in areas along the Blackwood Feeder and given that the feeder has been filled in places it is unlikely that any proposal to rewater the area would be acceptable.
			Chief Executive's Recommendation No change to the Draft Plan.
315	Seamus Dolan	The submission agrees with HO P28 regarding the canals' designation as a proposed NHA.	Chief Executive's Response The comments are noted.
			Chief Executive's Recommendation No change to the Draft Plan.
445	IWAI Kildare	IWAI welcomes the opportunity to work with stakeholders to ensure any new crossings across canals do not impede the passage of boats navigating the waterways.	Chief Executive's Response Agreed, it is proposed to amend two related objectives in Chapter 12 as set out below.
			Chief Executive's Recommendation Amend BI O23 and BI O25 as follows; BI O23 Consult with Inland Fisheries Ireland (IFI) and Waterways Ireland in relation to any development.... BI O25 Consult with Inland Fisheries Ireland (IFI) and Waterways Ireland in relation to any structures
446	David Knox	AHO40: IWAI Kildare continues to welcome the opportunity to work with KCC, Waterways Ireland and boat owners, to ensure any new crossings across the canals do not impede the passage of boats navigating the waterways.	Chief Executive's Response Agreed, See response to 445.
		It is noted that Naas Harbour is in the Naas Conservation area.	Chief Executive's Recommendation See recommendation to Submission No. 445.

445	IWAI Kildare	<p>The Councils' wish to regenerate old routes on water and land for recreation use is commended. It is encouraging that the Council recognises the opportunities presented by the ceasing of commercial activities and re-wetting of the bogs.</p> <p>There is an opportunity to introduce eco-friendly living on canals.</p>	<p>Chief Executive's Response The positive comments in relation to the above are noted and acknowledged. It is outside the scope of the Draft Plan to address living on canals.</p>
			<p>Chief Executive's Recommendation</p> <p>No change to the Draft Plan</p>
446	David Knox	<p>We commend Kildare County Council's wish to regenerate old routes on water and land for recreation use.</p> <p>It is encouraging that KCC recognises the opportunities presented by the ceasing of commercial activities and the rewetting of the bogs to reduce carbon emissions for not just the planet, but also for people.</p> <p>This is an opportunity to introduce eco-friendly living on canals.</p>	<p>Chief Executive's Response The positive comments in relation to the above are noted and acknowledged. It is outside the scope of the Draft Plan to address living on canals.</p>
			<p>Chief Executive's Recommendation</p> <p>No change to the Draft Plan</p>
503	Evelyn Cullen	<p>The submitter refers to a wetland situated on her land which was classified in the 2012-2014 Wetlands Survey as being of Local Conservation Value (moderate value) and assigned a rating of D.</p> <p>Welcomes Policy BI P8 (incorrectly referred to as BI P1 in the submission), which states that "It is the policy of the Council to ensure that Kildare's wetlands and watercourses are retained for their biodiversity and flood protection values and maintain good ecological status of wetlands and watercourses in support of the provisions of the</p>	<p>Chief Executive's Response Various policies and objectives contained in the Draft Plan provide protection to wetlands. It is considered that Policy BI P8 in Chapter 12 adequately addresses the submission with regards to the opportunities presented by the wetland resources, which seeks to maximise the biodiversity and flood protection values and the maintenance of good ecological status of wetlands. Also, it is a policy to 'Recognise the importance of Green Infrastructure in Kildare and protect this valued biological resource, the ecosystem services it provides and the contribution to climate resilience' (BI P12 refers). Furthermore, Objective BI 032 prevents the filling and drainage, where possible, of all of the wetlands identified as part of the County Kildare Wetland Survey 2012-2014 as identified in Table 12.6 of the Draft Plan. Objective BI O39 seeks to "Ensure</p>

		<p>Water Framework Directive and Ramsar Convention”.</p> <p>However, the submitter is disappointed that the Policy is qualified and restricted in Objective BI O31 which seeks to only protect wetlands that have been rated A, B, C+ and C and submits that the same protection should be afforded to wetlands rated D and E and thereby requests that the Council extend the protection to all of the 231 wetlands that were identified in the 2012-2014 Wetland Survey at a time of biodiversity crisis.</p> <p>Notes the value of the network of wetlands immediately south of the town of Naas, which provide flood protection and a host of other biodiversity benefits.</p> <p>The submission is accompanied by a Map of Irish Wetlands showing the location of various wetlands located south of Naas town.</p>	<p>the protection, enhancement and maintenance of Green Infrastructure in Kildare’.</p> <p>It is considered that the policies and objectives contained in the Draft Plan adequately protect wetlands in the county. However, it is recommended that an objective be added to review and update the Kildare Wetland Survey.</p> <p>NOTE: It is recommended that Objective BI 033 be amended due to grammatical errors.</p> <p>Chief Executive’s Recommendation</p> <p>Add an Objective in Section 12.11 to read as follows: Review and update the County Kildare Wetland Survey 2012-2014 during the life of this Plan.</p> <p>Amend Objective BI O33 as follows: Ensure that an ecological impact assessment is undertaken in conjunction with proposals involving the drainage or reclamation of wetland wetlands identified in Table 12.6. Ecological assessment of all developments on peatlands shall consider peatland stability, carbon emissions balance, Hydrology and Ecology.</p>
472	Keep Ireland Open	<p>The Submission recommends the inclusion of additional objectives:</p> <ul style="list-style-type: none"> • Protect and conserve wetlands from infilling, fragmentation, degradation and resist development that would destroy, fragment or degrade any wetland. • Resist development (including land reclamation) which would destroy, fragment or degrade wetlands, coastal wetlands, 	<p>Chief Executive’s Response</p> <p>Agreed, with amendments to BI O32</p> <p>Insert additional objective in section 13.4</p> <p>The importance of wetlands from an ecological and climate mitigation/adaptation perspective needs to be acknowledged.</p> <p>Objective BI O33 seeks an ecological assessment of projects involving drainage or reclamation of wetland.</p>

		<p>estuarine marshland by controlling adjacent development by the use of buffer zones.</p> <p>The submission recommends the inclusion of an additional objective to support the recreational amenity of wetlands.</p> <p>The Submission recommends the inclusion of an additional objective to ensure that development proposals or activities that may impact on sensitive water habitats, in particular wetlands, shall not be permitted without the introduction of mitigation measures agreed with the Council to eliminate negative environmental impacts.</p> <p>The submission recommends the inclusion of an additional objective to ensure that an appropriate level of ecological assessment is carried out for proposals involving drainage, infill or reclamation of wetland habitats.</p>	<p>Chief Executive’s Recommendation</p> <p>Amend Objective BI O32 as follows; Protect and conserve wetlands from Prevent infilling, and drainage, fragmentation, degradation and resist development that would destroy, fragment or degrade any wetland where possible, of wetlands identified as part of the County Kildare Wetland Survey 2012-2014, (See Table 12.6)</p> <p>To include an additional objective in section 13.4 Support the recreational amenity of wetlands.</p> <p>Include a new objective in Section 12.11 as follows; Ensure that development proposals or activities that may impact on sensitive water habitats, in particular wetlands (identified as part of the County Kildare Wetland Survey 2012-2014, (See Table 12.6), shall not be permitted without the introduction of mitigation measures agreed in writing with the Council to eliminate negative environmental impacts.</p>
470	IPCC	<p>The submission requested that the Council consider the protection of all wetlands identified within the Kildare Wetland Survey to be a priority. In particular boglands within the county have been reduced to just 12% of conservation worthy sites from the original extent of peatland and these should be a priority for protection and carbon storage.</p>	<p>Chief Executive’s Response</p> <p>Agreed. Chapter 12 contains policies and objectives that seek to protect Wetland sites identified in the County Wetland Survey BI O31 to BI 033. BI A7 and BI O14 seek to identify, map and protect locally important undesignated sites in the county.</p> <p>Chief Executive’s Recommendation</p> <p>No change to the draft Plan.</p>

MISCELLANEOUS			
364	Ursula King	KCC should actively engage with stakeholders to remove peat from the horticultural sector by creating incentives and collaborations into research for alternatives.	<p>Chief Executive's Response A Development Plan is primarily a land use plan and it is outside its scope to prohibit the removal of peat from the horticultural sector.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
472	Keep Ireland Open	<p>The submission recommends the inclusion of additional objectives:</p> <ul style="list-style-type: none"> • Implement the relevant parts of the Planning and Development (Amendment (No 2) Regulations 2011 and the European Communities (Amendment to Planning and Development Regulations 2011, which requires planning permission to be applied or where the area impacted by works relating to the drainage or reclamation of a wetland exceeds 0.1h or where such works have a significant effect on the environment. • Planning permission will be required where the area impacted by works relating to the drainage or reclamation of wetlands exceeds 0.1 ha or where such works may have a significant effect on the environment. 	<p>Chief Executive's Response The implementation of legislation and the circumstances in which planning permission is required are addressed outside of the CDP process.</p> <p>Chapter 12 and Chapter 13 contain policies and objectives which seek to identify, protect, preserve, manage, enhance and maintain aspects of natural heritage and its settings, visual and scenic amenities.</p> <p>This is a matter to be considered by the Eastern and Midlands Regional Authority in conjunction with Inland Fisheries Ireland and the Office of Public Works. County Kildare is part of the Eastern and Midlands Region with neighbouring counties of Wicklow, South Dublin, Meath, Offaly and Laois and is governed by a shared Regional Spatial and Economic Strategy (RSES). The Draft Plan aligns with the RSES. KCC has consulted with all neighbouring counties, including Carlow County Council which is within the Southern Region Assembly, in relation to this Draft County Plan. There are numerous policies and objectives within the plan that refer to cross-county initiatives and co-ordination (e.g. National Peatlands Park, Barrow Blueway, Joint Local Area Plans etc.).</p>

	<p>The submission supports the following policies, objectives and actions; Geology, Policy BI 037, All Objectives</p> <p>The submission recommends an additional objective to engage with stakeholders, including local communities and statutory authorities to identify, protect, preserve, manage, enhance, maintain, safeguard, facilitate and conserve all relevant aspects of natural heritage and its settings, visual and scenic amenities, the rich quality and character of the natural heritage features and the natural environment including rivers, streams, wetlands, woodlands, scenic areas and the general amenity of the countryside and in recognition of its importance as a non-renewable resource, from intrusive development that would detrimentally impact on it, while maximising the recreational amenity and quality of life by the provision of visual relief from the built environment. Avoid unnecessary harm and reduce its effect where it cannot be avoided by replacing like with like.</p> <p>The submission recommends an additional objective to adapt a regional approach to the protection, conservation and management of the environment by co-operating with adjoining councils to ensure that the natural environment is maintained so as to encourage a collaborative and consistent policy that could identify threats to the integrity of sites through a transboundary approach.</p>	<p>Chief Executive's Recommendation</p> <p>No change to the Draft Plan.</p>
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GEOLOGY																					
395	<p>Geological Survey of Ireland</p> <p>(to be read in conjunction with Dept. Environment, Climate & Communications submission, same number, submitted together)</p>	<p>Geoheritage GSI requests the inclusion of the Rathcore Spring CGS in Table 12.7 and the separation of the two Louisa Bridge Springs (Cold and Warm).</p> <p>In relation to BI A18 to publish the findings of the audit of Geological Heritage on completion, the submission notes that this was published in 2005.</p> <p>GSI requests the separation of the two Louisa Bridge Springs (Cold and Warm) in Table 5.4.1 and that the text under Section 5.4.1.2 refer to the 22 County Geological Sites.</p>	<p>Chief Executive’s Response The proposed changes in relation to the Geological Heritage Sites are accepted. In relation to BI A18, it is considered appropriate to delete this action.</p> <p>Chief Executive’s Recommendation Amend paragraph one of section 12.13 as follows: ...An audit of the Geological Heritage of County Kildare was carried out in 2005, which identified 202 geological sites of interest in the county...</p> <p>Amend Table 12.7 as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="color: #0070c0;">Site Name</th> <th style="color: #0070c0;">Geological Interest</th> <th style="color: #0070c0;">Location</th> </tr> </thead> <tbody> <tr> <td>Louisa Bridge Springs (Cold and Warm)</td> <td>Hydrogeology</td> <td>Leixlip</td> </tr> <tr> <td>Louisa Bridge Springs (Warm)</td> <td>Hydrogeology</td> <td>Leixlip</td> </tr> <tr> <td>Rathcore Spring</td> <td>Hydrogeology</td> <td>Herbertstown</td> </tr> </tbody> </table> <p>Delete action BI A18: Publish the findings of the audit of Geological Heritage of County Kildare on completion.</p> <p>Amend Table 5.4.1 in the SEA as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="color: #0070c0;">Site Name</th> <th style="color: #0070c0;">Geological Interest</th> <th style="color: #0070c0;">Location</th> </tr> </thead> <tbody> <tr> <td>Louisa Bridge Springs (Cold and Warm)</td> <td>Hydrogeology</td> <td>Leixlip</td> </tr> </tbody> </table>	Site Name	Geological Interest	Location	Louisa Bridge Springs (Cold and Warm)	Hydrogeology	Leixlip	Louisa Bridge Springs (Warm)	Hydrogeology	Leixlip	Rathcore Spring	Hydrogeology	Herbertstown	Site Name	Geological Interest	Location	Louisa Bridge Springs (Cold and Warm)	Hydrogeology	Leixlip
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Louisa Bridge Springs (Warm)	Hydrogeology	Leixlip							
Rathcore Springl	Hydrogeology	Herbertstown							
			<p>Amend paragraph one and two of section 5.4.1.2 of the SEA:</p> <p>... and identified the 202 of the most important sites which are worthy of protection as County Geological Sites...</p> <p>The locations of the 202 County Geological Heritage Sites within County Kildare are...</p>						

CHAPTER 13 – LANDSCAPE, RECREATION & AMENITY			
Sub No.	Name	Summary of Issues Raised	Chief Executive's Responses & Recommendations
LANDSCAPE			
552.	Department of Housing, Local Government and Heritage	The majority of the south-west of the county is designated as low landscape sensitivity. Kilberry Bog is located in the heart of this area. It is ideally suited to be managed for nature conservation. Derryvullagh Island (pNHA) is located at the centre of the bog. Kilberry Bog is noteworthy for hosting a sizable flock of overwintering whooper swans, an Annex I Birds Directive species as well as several bird of prey species. The Bog has been identified as a core area in Kildare's Green Infrastructure Strategy. Kilberry Bog should be designated class 3.	<p>Chief Executive's Response A Landscape Character Assessment (LCA) was undertaken in 2004 to inform the Kildare County Development Plan at that time. The LCA identified a range of landscape character areas and attributed a landscape sensitivity rating to each of these areas. The Draft Plan now includes Action LR A1 which, in summary, states that it shall be an action of the Council to review and update the County Landscape Character Assessment, within two years of the adoption of this Plan and furthermore that where material changes are identified, a statutory variation to the Plan may be required. It is not considered appropriate at this time to amend the Landscape Character Areas or Landscape Sensitivity Map until such time as a full, evidence based review of the LCA can be undertaken for the entire county rather than in a piecemeal fashion. The Council is committed to undertaking this action in the short term.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
421	Bord na Mona (BNM)	<u>Impact of Development on Landscape</u> Table 13.4 of the Plan refers to Likely Compatibility between a range of land-uses and proximity to Principal Landscape Sensitivity Factors. Peat bogs scored lowly across a range of sectors, which	<p>Chief Executive's Response For the purposes of Table 13.4, industrial projects shall be interpreted as constituting 'industrial buildings' and 'industrial process' as defined by Article 5 of the Planning and Development Regulations 2001 (as amended).</p>


		contrasts with other policies from Chapters 6 and 7. Clarification is sought regarding what constitutes 'industrial projects'. BNM bogs are of national significance with opportunities for socio economic uses across rural development and employment, renewable energy, industrial uses, recreation and tourism, and biodiversity.	Chief Executive's Recommendation No change to the Draft Plan.
515	Meath County Council	Notes that in Section 13.5 the draft Plan refers to the high-quality landscape, including those along the border with County Meath. Submission welcomes the measures which have been put in place to ensure the special protection of views and prospects and welcomes the inclusion of objectives LR O30 – LR O36.	Chief Executive's Response The comments of the submission relating to landscape are noted. Chief Executive's Recommendation No change to the Draft Plan.
555	Irish Solar Energy Association	Table 13.4 has not changed in relation to 'natural grasslands', 'agricultural land with natural vegetation', and 'peat bogs' between the 2017- 2023 and current draft development plans. The landscape stance on these three principal landscape sensitivity factors is at odds with the strong policy objectives EC 02 – EC 09 and Section 7.4 within draft Chapter 7. In relation to LR O13, the submission notes that the Council has acknowledged that cutaway bogs within this policy objective are a degraded landscape/brownfield site however this policy objective is at odds with Tables 13.2 and 13.4 and LR O1. Much of Kildares' bogs are cut-over boglands yet the landscape character area 'Western boglands' is 'class 3 high sensitivity'. Given the sensitivity of solar development within the landscape, a paragraph on the importance of	Chief Executive's Response It is an action of the Draft Plan to review and update the County Landscape Character Assessment (LCA) within two years of the adoption of the Plan (LR A1 refers) and a statutory variation will be undertaken on the Plan, if necessary, should material changes be identified. See response to Submission No. 555 in Chapter 7 [related to updated solar energy policy]. Chief Executive's Recommendation See recommendation to Submission No. 555 in Chapter 7 [related to updated solar energy policy].

		landscape assessment for solar development should be included within Chapter 13.	
598	Friends of Harristown Commons	The submission recommends amending objective LR O4: Ensure that local landscape features, including historic features and buildings, hedgerows, shelter belts and stone walls, are retained, protected and enhanced where appropriate, so as to preserve the local landscape and character of an area, whilst providing for future development.	Chief Executive's Response Agreed.
			Chief Executive's Recommendation Amend LR O4 as follows: Ensure that local landscape features, including historic features and buildings, hedgerows, shelter belts and stone walls, are retained, protected and enhanced where appropriate, so as to preserve the local landscape and character of an area, whilst providing for future development.
598	Friends of Harristown Commons	The submission welcomes LR 06 (related to a Landscape Conservation Area) particularly as it relates to Harristown Commons.	Chief Executive's Response Noted.
			Chief Executive's Recommendation No change to draft plan.
598	Friends of Harristown Commons	<p>The submission contends that the area within and around Harristown Commons is deserving of a Landscape Character designation.</p> <p>The submission queries the 'high compatibility' statement on Table 13.3 Eastern Transition -high compatibility with major powerlines and solar. with regard to the area around Harristown Commons.</p>	<p>Chief Executive's Response It is an action of the Draft Plan under LR A1 to review and update the County Landscape Character Assessment, within two years of the adoption of the Plan and a statutory variation will be undertaken on the Plan, if necessary, should material changes be identified.</p> <p>As part of the review of the LCA all related submissions received during either the pre-draft or draft stages of the CDP will be considered and the merits of including the various scenic routes, viewpoints and landscapes will be assessed, and incorporated into the LCA as appropriate.</p>


			<p>Chief Executive’s Recommendation No change to draft plan.</p>
21	Punchestown Area Community Group	<p><u>Importance of the landscape to Punchestown racecourse</u> The submission highlights action (LR A1) to prepare a Landscape Character Assessment within 2 years of the adoption of the Plan, which means that a period of more than 20 years will have elapsed (since it was initially published in 2004).</p> <p>It is submitted that KCC as part of their obligations under the Planning & Development Act 2000 needs to now provide protection to the landscape of Punchestown. The submission seeks the following wording to be included in Chapter 13: “Punchestown racecourse is a significant national and international amenity and is a high-quality landscape worthy of protection.” An image is provided of the landscape viewed from within the Punchestown racecourse.</p>	<p>Chief Executive’s Response The comments are noted.</p> <p>The designation of Punchestown racecourse as a Node/Stepping stone in the Green Infrastructure Strategy affords it a level of protection until such time as the Landscape Character Assessment is prepared. Stepping stones are defined in the Draft Plan as small geographical areas that are critically important because of their environmental quality, local amenity value or because of their scale as undeveloped areas.</p> <p>Various objectives contained in Chapter 13 (12.14.4) of the Plan provide protection to the Punchestown racecourse, including Policy BI P12 ‘Recognise the importance of Green Infrastructure in Kildare and protect this valued biological resource, the ecosystem services it provides and the contribution to climate resilience’ and objective BI O39 “Ensure the protection, enhancement and maintenance of Green Infrastructure in Kildare.”</p>
			<p>Chief Executive’s Recommendation Amend Map V1 12.3 to label the stepping stone identified on the map between ‘Naas Racecourse’ and ‘Harristown Common’ as ‘Punchestown Racecourse’.</p>
21	Punchestown Area Community Group	<p><u>Importance of the landscape to Punchestown racecourse</u> A map extract showing the local Sensitivity Factors which was appended to the Kildare CDP (2005) was included in the submission. It is highlighted that the</p>	<p>Chief Executive’s Response A Landscape Character Assessment (LCA) was undertaken in 2004 to inform the Kildare County Development Plan at that time. The LCA identified a range of landscape character areas and attributed a landscape sensitivity rating to each of these areas. The Draft Plan now includes Action LR A1 which, in summary, states that it shall be an action of the</p>

		<p>map includes and has a dot locating where Punchestown is.</p> <p>The Punchestown Area Community Group submits that the landscape architects that carried out the Landscape Character Assessment must have felt there was some significance attached to Punchestown. For this reason, it is inferred that there is a sensitivity around Punchestown.</p> <p>The submission highlights that the young population in the Kildare area grew by 70% in the last 20 years since the last Landscape Character Assessment was done, and that its now important to prioritise quality recreational space, such as the 500 acres available at Punchestown racecourse.</p> <p>The submission suggests showing the location of Punchestown as a sensitivity factor on the Landscape Sensitivity Areas map and including explanatory text in the Plan.</p>	<p>Council to review and update the County Landscape Character Assessment, within two years of the adoption of this Plan and furthermore that where material changes are identified, a statutory variation to the Plan may be required. It is not considered appropriate at this time to amend the Landscape Character Areas or Landscape Sensitivity Map until such time as a full, evidence-based review of the LCA can be undertaken for the entire county rather than in a piecemeal fashion. The Council is committed to undertaking this action in the short term.</p> <p>Chief Executive’s Recommendation No changes to the Draft Plan.</p>
21	Punchestown Area Community Group	<p><u>Landscape Sensitivity Classification</u> It is submitted that Punchestown should be assigned a more unique sensitivity, such as that enjoyed by the Curragh.</p> <p>The recognition of the important working landscape of the Eastern Transition Area is welcomed, it is however suggested that the following words be added to objective (LR010): “Such landscapes include the internationally recognised landscape of Punchestown and its environs”</p> <p>It is submitted that Punchestown racecourse satisfies the test for an area of “High Amenity” and should</p>	<p>Chief Executive’s Response The Curragh is classified as an area of Unique Sensitivity and is identified as an Area of High Amenity due to its unique sensitivity to the impact of development. The archaeological landscape of the Curragh contains almost 200 archaeological monuments and due to the management regime of the open grassland, nationally important populations of rare fungi are found which only occur in ancient grasslands.</p> <p>Objective LR O6 of the Plan is to investigate the feasibility of preparing a Landscape Conservation Area Assessment within the county to identify any area(s) or place(s) within the county as a Landscape Conservation Area while Action LR</p>

	<p>therefore be designate as such for the following reasons:</p> <ul style="list-style-type: none"> • Landscape - Punchestown racecourse is set within a natural amphitheatre with rolling hills of the eastern uplands in the near distance. Images from the main grandstand and grounds are provided in the submission. • Quality of landscape - High and in good condition. The acquisition of the nearby quarry by Punchestown was undertaken to continue to improve the quality of the landscape and improve the track. • Rarity of landscape - The natural amphitheatre of the racetrack is unique at a national and international level. • Biodiversity – High • Recreational - Important recreational amenity, hosting both race meets and being open as a local amenity. • Cultural - Widely regarded as Ireland’s premier racecourse. • Archaeological - Two significant henges/standing stones within metres of the racecourse. • Local Traditions - Associated with many local traditions, such as Walking Sunday (before the April race meet) and numerous other local events which take place annually. • Environmental - High as it provides a quiet tranquil environment and provides accessible relief from the nearby urban environments. 	<p>A1 of the plan commits to reviewing and updating the County Landscape Character Assessment within two years of the Plan. The status of Punchestown racecourse will be reassessed during the review and update of the County Landscape Character Assessment.</p> <p>The council acknowledges the significant working landscape of Punchestown racecourse and proposes amendments to objective (LR O10) to reflect the submission.</p> <p>Chief Executive’s Recommendation Amend LR O10 as follows: Recognise that the lowlands and the transitional area are made up of a variety of working landscapes, which are critical resources for sustaining the economic and social well-being of the county and include areas of significant landscape and ecological value, which are worthy of protection. Such landscapes include the internationally recognised landscape of Punchestown and its environs.</p>
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		<p>The submission welcomes the recognition of Punchestown racecourse as a Node/ Steppingstone in the Green Infrastructure Strategy and submits that it supports the argument that Punchestown and its environs deserve additional landscape protection.</p>	
<p>467</p>	<p>Harristown Coughlanstown Community Group</p>	<p>The submission seeks to outline the wealth of landscape built and cultural heritage in an area from Ballymore Eustace to the R412 / New Abbey, and north to Mullacash Hill to the R413 south of the River Liffey. The landscape centres on the local hill of Harristown which for millennia has enjoyed panoramic vistas across the local countryside to Wicklow in the east, Mullacash Hill in the north and south to the Liffey Valley. The submission includes an assessment of the local landscape character at Harristown, Coughlanstown West and Environs and makes strong suggestions as to why this area should be protected as outlined in the recommendations.</p>  <p>Recommendation:</p>	<p>Chief Executive's Response A Landscape Character Assessment (LCA) was undertaken in 2004 to inform the Kildare County Development Plan at that time. The LCA identified a range of landscape character areas and attributed a landscape sensitivity rating to each of these areas. The Draft Plan now includes Action LR A1 which, in summary, states that it shall be an action of the Council to review and update the County Landscape Character Assessment, within two years of the adoption of this Plan and furthermore that where material changes are identified, a statutory variation to the Plan may be required. It is not considered appropriate at this time to amend the Landscape Character Areas or Landscape Sensitivity Map until such time as a full, evidence based review of the LCA can be undertaken for the entire county rather than in a piecemeal fashion. The Council is committed to undertaking this action in the short term.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

		<p>A protected viewpoint is identified at Harristown and included in the List of Protected Viewpoints in the County Development Plan.</p> <p>The purpose of this protection would be to protect prospects east to the Eastern Uplands and Wicklow Mountains and the intervening landscape that provides the setting to the upland backdrop.</p> <p><u>Recommendation:</u> An expanded zone of increased sensitivity - Class 4 Special Sensitivity - north and south of the Liffey Valley, covering the study area should be acknowledged and included as a local variation to the sensitivity in the Eastern Transition Lands reflecting the interrelationship of the study area with both the Liffey Valley and Eastern Uplands. The purpose of this protection would be to protect the landscape character, as described above, from inappropriate developments and land use changes of significant scale that erode its rural qualities.</p>	
579	Residents of Boston Hill	<p><u>Chair of Kildare</u> The residents of Boston Hill and the surrounding area are seeking to confirm in writing as part of the new County Development Plan that the lands around Glenaree and Feighcullen are located within the Chair of Kildare and are duly designated as an area of high amenity. The subject area is outlined in red on the map below.</p> <p>PI ref No. 18/530 was dealt with by An Bord Pleanála and is highlighted in the submission.</p>	<p>Chief Executive's Response See response to Submission No. 467 above.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

			
507	Brian McArdle	<p>The submission asks if the Council has fully implemented the 2000 European Landscape Convention as ratified in 2008. States that, if not, this should be a priority so that residents can ensure their local areas are protected.</p>	<p>Chief Executive's Response</p> <p>It is noted that the Convention requires landscape to be integrated into planning policies and promotes interaction between local and central authorities, and trans-frontier co-operation to protect landscapes.</p> <p>It is further noted that the current Landscape Character Assessment dates from 2004. It is an action of the Plan to review the Landscape Character Assessment within two years of the adoption of the Plan. It is recommended that this Action (LR A1) be updated to include reference to the Green Infrastructure Strategy as being a key consideration in the review process.</p> <p>Chief Executive's Recommendation</p> <p>Amend LR A1 as follows:</p> <p>Review and update the County Landscape Character Assessment, within two years of the adoption of this Plan, having regard to the European Landscape Convention Florence 2000, in accordance with all relevant legislation and guidance documents and to ensure consistency with the forthcoming National and Regional Landscape Character Assessment. All landscape character designations will be</p>

			fully reviewed having regard to updated best practice guidance, LCAs of adjoining Local Authorities and other local relevant considerations, including clusters of biodiversity rich areas and the Council's Green Infrastructure Strategy.
507	Brian McArdle	The submission states that guidelines should be set for native pollinator-friendly species to be used in landscaping.	<p>Chief Executive's Response There are many policies, objectives and actions in the Plan in relation to conserving and promoting biodiversity (Section 13.6). They include Objective LR 062, which seeks to protect and enhance existing biodiversity rich areas within state and publicly owned land, peatlands, river, canal and railway corridors, grass verges along public roads and existing and future greenways, public parks and public open spaces in towns and villages. In Objective LR O64, the Council encourages the planting of pollinator friendly trees and plants, where appropriate.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
31	Michael Kinnane	<p>Punchestown Racecourse is a central part of the Kildare / Ireland racing community and also a significant resource for the whole community.</p> <p>Punchestown Racecourse should be designated as an Area of High Amenity to reflect its importance at a county and national level.</p>	<p>Chief Executive's Response Punchestown is located within the Eastern Transition Landscape Character Area, which has a Sensitivity Class 2 designation under Table 13.3 of the dCDP.</p> <p>It is an action of the Draft Plan under LR A1 to review and update the County Landscape Character Assessment, within two years of the adoption of the Plan and a statutory variation will be undertaken on the Plan, if necessary, should material changes be identified.</p> <p>The designation of Punchestown racecourse as a Node/Stepping stone in the Green Infrastructure Strategy affords it a level of protection until such time as the Landscape Character Assessment is prepared. Stepping</p>

			<p>stones are defined in the Draft Plan as small geographical areas that are critically important because of their environmental quality, local amenity value or because of their scale as undeveloped areas.</p> <p>Various objectives contained in Chapter 12 (12.14.4) of the Plan provide protection to the Punchestown racecourse, including Policy BI P12 ‘Recognise the importance of Green Infrastructure in Kildare and protect this valued biological resource, the ecosystem services it provides and the contribution to climate resilience’ and objective BI O39 “Ensure the protection, enhancement and maintenance of Green Infrastructure in Kildare.”</p> <p>The following areas have been classified as Areas of High Amenity under the dCDP; Dun Ailinne, The Curragh and Environs, Pollardstown Fen, The River Liffey and the River Barrow Valleys, Rye Water Valley at Carton SAC, The Grand and Royal Canal Corridors, Ballynafagh Lake SAC, Poulaphouca Reservoir SPA, Mouds Bog SAC, Ballynafagh Bog SAC, Red Bog SAC and East Kildare Uplands. Punchestown does not have an amenity value comparable to the aforementioned designated areas and therefore as such it is not considered appropriate to include Punchestown as part of the aforementioned.</p> <p>However, the Council acknowledges the significant working landscape of Punchestown racecourse and proposes amendments to objective (LR O10) to reflect the submission.</p> <p>Chief Executive’s Recommendation Regarding LR O10, see recommendation to Submission No. 21.</p>
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27	Cathy Meade	<p><u>Summary of Appendix</u> Punchestown should be designated in the plan as an area of high amenity both from a racing/event perspective and as a community recreational amenity.</p>	<p>Chief Executive's Response See response to Submission No. 31.</p>
			<p>Chief Executive's Recommendation See recommendation to Submission No. 21.</p>
244	Conor and Jane Horan	<p>The Liffey Valley should be protected by a 1KM buffer each side of the river corridor to ensure views and wildlife are protected from commercial development.</p>	<p>Chief Executive's Response Objective LR O22 in Chapter 13 'Landscape, Recreation and Amenity' supports a Special Amenity Area Order for the Liffey Valley which would further protect wildlife in this area. Action LR A1 commits to reviewing and updating the County Landscape Character Assessment within two years of the adoption of the County Development Plan. A statutory variation will be undertaken on the Plan, if necessary, should material changes be identified. This review should consider extending any Protected Views/ Sensitive Landscapes within the Liffey Valley.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
174	Mark Bruns	<p>The submission suggests that the Council should set a policy goal to acquire and reclaim unused land to reforest as Kildare has very few forests. There is an opportunity for Kildare to increase biodiversity habitat and carbon capture by reclaiming unused lands for reforesting.</p>	<p>Chief Executive's Response The Draft Plan includes many policies and objectives to help increase forest cover in the county including Policy RD P6 to increase forest cover in the county at appropriate locations while protecting sensitive landscapes, water bodies, special areas of conservation and amenity areas. Furthermore, Target LR T2 in section 13.3 aims to increase newly planted forests by 161 hectares per annum in line with the Governments Climate Action Plan.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>

113	Health Service Executive	<p>There are 5 recommendations in relation to green infrastructure, which include identifying green pockets in urban areas to protect them from development, protecting land left untouched for rewilding initiatives, using public engagement to increase environmental awareness in communities, developing urban greening plans, considering a diverse range of green spaces that are co-designed with communities, using green infrastructure as mitigation for noise and air pollution. It is also recommended to include an objective for council owned buildings to provide green spaces in car parks and on roof tops.</p>	<p>Chief Executive’s Response A variety of objectives are included in Chapter 13 which encourage and protect green infrastructure and nature-based recreation / amenities. These include LR O82 which aims to strengthen the overall Green Infrastructure network, LR O85 which is to ensure residual land in developments can be used for the provision of green infrastructure and LR O87 which is to minimise the impact of external lighting at sensitive locations within the Green Infrastructure network.</p> <p>In relation to identifying green pockets in urban areas to protect them from development, it is considered that this part of the submission would be more appropriately dealt with through the Local Area Plan (LAP) process for the 12 LAP towns throughout the county.</p> <p>While the Draft Plan cannot direct private owners in the management of their land with respect to rewilding, it does however manage development on public land and Chapter 12 includes policies and objectives which seek to identify and protect biodiversity of varying degrees of importance.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
164	Philip O’Reilly	<p>Requirement for a management plan for Tipperkevin, Ballymore Eustace. The protection and preservation of existing open and historical lands on the commons at Tipperkevin, Ballymore Eustace is deemed necessary.</p>	<p>Chief Executive’s Response Tipperkevin is located within the East Kildare Uplands, which is classified as an Area of High Amenity due to its outstanding natural beauty.</p> <p>Objectives LR O16 and LR O17 of the Draft Plan shall protect Areas of High Amenity like the East Kildare Uplands from inappropriate development that would adversely affect its visual integrity.</p>

			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
328	Teresa Bourke	<p>The submission relates to the sensitivity rating of the Coughlanstown and Harristown areas, the preservation of historic sites and the greenway which will cut through these lands.</p> <p>The submitter states that Coughlanstown and Harristown (townland maps included to illustrate areas) lie in Landscape Character Area 'Eastern Transition', which has a Class 2, medium sensitivity rating. In Table 13.3 the Eastern Transition area is denoted as being of high compatibility for solar energy and medium compatibility for wind energy. If this designation were to remain in place and development of this nature were to occur, not only would it ruin the area's present attraction for both locals and the wider Kildare population but also the possibility of the greenway being harnessed to its full capacity and would probably ruin any chance of it reaching realisation at all.</p> <p>States that the sensitivity of the above areas should be Class 4 Special Sensitivity to ensure that the area is protected from developments that would erode its present character, charm and scenic appeal for walkers and cyclists.</p>	<p>Chief Executive's Response The Draft Plan has an objective (LR O2) which requires all wind farm developments irrespective of location to submit a detailed landscape / visual impact assessment. There is also an objective (LR O14) to maintain the visual integrity of Eastern Transition Lands which have retained an upland character. Sensitivity classes for landscape character areas will be reviewed during the life of the plan. It is an action (LR A1) to review and update the County Landscape Character Assessment within two years of the adoption of this Plan. All landscape character designations will be fully reviewed having regard to updated best practice guidance, and regional LCA/ LCAs of adjoining Local Authorities, and other local relevant considerations, including clusters of biodiversity rich areas.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
256	Ballyshannon Action Group	<p><u>Heritage Sites</u> Much of the policy and objectives outlined in chapter 11 are welcomed. However, some Heritage sites such as the Hill of Allen and Dun Ailinne have been hugely impacted by quarrying. Clear policy needs to be</p>	<p>Chief Executive's Response Protections are afforded to heritage sites such as Dun Ailinne and the Hill of Allen in the Landscape Character Assessment contained in section 13.3 of the Draft Plan.</p>

		<p>created to ensure such sites cannot be circumvented by industry.</p> <p>There should be a strict requirement on quarrying activity to ensure it does not interfere with heritage sites. This should include a cap on quarry related HGV traffic in the vicinity of such sites. Impacts on views from and around the sites should also be considered for any new quarries or extensions to quarries. Specific requirements / conditions need to be placed on the extractive industry to protect the counties heritage sites from such development.</p>	<p>Dun Ailinne is classed as being uniquely sensitive with low capacity to accommodate uses without significant adverse effects on the appearance or character of the landscape. The area is identified as having a very low compatibility with extraction of materials such as sand, gravel, and rock. The Hill of Allen is in an area classed in a special landscape with low compatibility for extraction of minerals such as rock.</p> <p>In addition, Dun Ailinne is one of six locations known as Royal Sites which are being assessed for addition to the UNESCO World Heritage Sites Tentative List. There is an objective (LR O24) to work with relevant state bodies to support its designation as a UNESCO World Heritage Site.</p> <p>There is also an objective (LR O7) which restricts the quarrying of sensitive sites with the Landscape Character Areas in line with table 13.3 and 13.4, and to protect and conserve the ecological, archaeological, biodiversity and visual amenity of surrounding quarry sites.</p> <p>It should also be noted that there is an action (LR A1) in the Plan to review and update the County Landscape Character Assessment within two years of its adoption.</p>
			<p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
408	Creative Rathangan Meitheal (CRM)	Submits that the Kildare County Council Landscape Character Map (and its impact assessment criteria) be updated as a matter of urgency.	<p>Chief Executive’s Response Action LR A1 of the Plan commits to reviewing and updating the County Landscape Character Assessment, within two years of the adoption of the Plan, having regard to the European Landscape Convention Florence 2000, in accordance with all relevant legislation and guidance documents and to ensure consistency with the forthcoming National and Regional Landscape Character Assessment. In</p>

			<p>this regard RPO 7.27 of the Regional Economic and Spatial Strategy for the East and Midlands Region (including Kildare) is explicit and states that the Assembly will prepare a Regional Landscape Character Assessment following the adoption of a national landscape character assessment. All landscape character designations will be fully reviewed having regard to updated best practice guidance, LCAs of adjoining Local Authorities and other local relevant considerations, including clusters of biodiversity rich area.</p> <p>It is an action of the Draft Plan under LR A1 to review and update the County Landscape Character Assessment, within two years of the adoption of the Plan and a statutory variation will be undertaken on the Plan, if necessary, should material changes be identified.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
495	Suzanne Murphy	The quarrying of the Hill of Allen should be stopped immediately. More sustainable ways of supporting the housing and building industry must be found.	<p>Chief Executive's Response It is an objective within Chapter 13 to restrict the quarrying of sensitive sites within the Landscape Character Areas however the shutting down of the operation of a quarry on the Hill of Allen is something that is outside the remit of the Draft Plan.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
556	Mary Flaherty & Brian Giblin	The submission states that Chapter 13: Landscape Character Assessment defines Coughlanstown and Harristown areas in Eastern Transition, Class 2: Medium Sensitivity. Table 13.3 states the areas are	<p>Chief Executive's Response Objective LR O10 recognises that the lowlands and the transitional area are made up of a variety of working landscapes, which are critical resources for sustaining the economic and social well-being of the county and include</p>

		<p>highly compatible with Solar energy and medium compatibility with Wind energy development.</p> <p>The Development Plan should confirm its priority to preserve high quality agricultural land in this area, and clearly state how it will protect the contributions made by agricultural and food sectors to the local economy.</p> <p>The Development Plan should clearly state the development of Solar/ other Energy projects will not result in the loss of prime agricultural land.</p>	<p>areas of significant landscape and ecological value, which are worthy of protection.</p> <p>Notwithstanding the above, the Draft Plan must balance the needs of, inter alia, rural based industries including agriculture but also related to the bloodstock industry as well as housing and employment at appropriate locations, in accordance with the policies and objectives of the Draft Plan, while all the while being cognisant of the significant number of landscape designations at a local, national and international level.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
613	Philip O'Reilly	<p>The submission suggests the management of Tipperkevin Commons should be reviewed and managed as a natural and historical resource.</p>	<p>Chief Executive's Response While the management of commons is outside the scope of the Draft Plan, Action AH 7 does support the development of a database of features of historical interest (items not listed on the RMP or RPS). There may be an option to work with a local community group under the implementation of the County Kildare Heritage Plan to address the management of the commons.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
613	Philip O'Reilly	<p>The submission suggests the management of a grass triangle at the junction of the Tipperkevin Road and Ballymore/ Eadestown Road which is being damaged and inappropriately managed.</p>	<p>Chief Executive's Response The management of roadside verges is not a matter for the Draft Plan, which is mainly a land use plan.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

518	Strategic Power Projects Limited	<p>It is submitted that there is no change to Tables 13.1-13.4 in the Draft Plan which are the same as those in the existing CDP. These tables are not consistent with the policies and objectives in Chapter 7 – Energy and Communications. If the Council is serious about supporting renewable energy targets, landscape and solar policy objectives should be more compatible and not rule out solar completely based on landscape objectives.</p> <p>Reference is also made to Objective LR O13, which recognises that cutaway and cut-over bogs represent degraded landscapes and / or brownfield sites and are potentially fit to absorb a variety of development. It is contended this objective is at odd with Tables 13.2, 13.4, and LR O1.</p>	<p>Chief Executive’s Response It is an action of the Draft Plan under LR A1 to review and update the County Landscape Character Assessment, within two years of the adoption of the Plan and a statutory variation will be undertaken on the Plan, if necessary, should material changes be identified.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
395	<p>Geological Survey of Ireland</p> <p>(Read in conjunction with Dept. Environment , Climate & Communications submission)</p>	<p>The GSI states that the physiographic units map which are cartographic representations of the broad-scale physical landscape of a region may be useful for the Landscape Character Assessment referred to in Section 13.3.</p>	<p>Chief Executive’s Response Noted</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
PEATLANDS			
552.	Department of Housing, Local	Edit Objective LR O12	<p>Chief Executive’s Response While the process of developing a consist methodology for “carbon emissions balancing” is at an early stage it is</p>

<p>Government and Heritage</p>	<p>'greenhouse gas' should be used instead of 'methane' and the phrase 'strictly limited' should be changed to 'will not be considered'.</p> <p>Edit objective LR O13 Recognise that cutaway and cut-over boglands represent degraded landscapes and/or brownfield sites and thus are potentially fit to absorb a variety of development provided that the development proposal does not increase Green House Gas emissions', the Department recommends the removal of the term 'brownfield sites' as the majority of cutover bog in Kildare does not conform to this description.</p> <p>Amend Objective LR O12 to recognise the ecological importance of cutaway and cutover boglands.</p> <p>Add to Objective LR O13 Projects which result in increases in ammonia emissions to watercourses should also not be considered.</p> <p>The Department advises that assessment of development proposals on cutover and cutaway bogs should focus on the carbon balance resulting from rewetting and restoring bogs as an alternative land use scenario in deciding on whether to grant planning permission to developments which would preclude rewetting these sites.</p> <p>Carbon balance calculations should be based on the entire site in recognition that such sites will passively emit carbon into the future without restoration and should not be confined to areas where peat will be disturbed or redistributed due to the development.</p>	<p>considered reasonable to require proposals for development of peatlands to include a new objective requiring the preparation of carbon emissions balance assessments (among other assessments).</p> <p>It is not considered necessary to amend either Objectives LR O1 or LR O13 as suggested.</p> <p>In relation to the comments regarding 14% of the County being composed of bog, it is considered appropriate to amend Target LR T1 as set out below.</p> <p>Chief Executive's Recommendation Amend LR O12 as follows: Recognise that boglands, including cutaway and cut-over bogs, are critical natural resources for ecological and environmental reasons, particularly for climate mitigation and adaptation. Development proposals for boglands that reduce biodiversity and increase methane emissions greenhouse gas will be strictly limited will not be considered. Appropriate environmental assessment should be carried out for any development proposals which impact on boglands.</p> <p>Amend LR O13 as follows: Recognise that some cutaway and cut-over boglands may represent degraded landscapes and/or brownfield sites and thus are may potentially be fit to absorb a variety of development provided that the development proposal does not increase Green House Gas emissions or damage protected habitats or species. Projects which result in increases in ammonia emissions to watercourses will not be considered.</p> <p>Add new objective after LR O15 as follows:</p>
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		<p>The Department welcomes target LR T1. It should be noted that only 14% of the County is bog (Source: Chapter 9 9.8). As such other areas of bog, outside of the area proposed for the Peatlands National Park, would need to be designated to move some way towards the 27% target set here.</p>	<p>Require the undertaking of a peatland stability assessment, carbon emissions balance assessment and hydrological and ecological impact assessments, as appropriate, when developing project proposals for development on peatlands.</p> <p>Amend LR T1 as follows; ...This may be achieved, in part, by the development of the proposed Midlands Peatlands National Peatlands Park....</p>
421	Bord na Mona (BNM)	<p>Greenways, Blueways, Peatways and Trails BNM note objectives LR O39 and LR O40 and recognise the potential of cutaway peatlands for recreation and tourism uses (e.g. Lough Boora Discovery Park). BNM states that 'greenways' across BNM bogs can be co-located successfully along other commercial developments or biodiversity and nature conservation measures with minimal impacts. For example, Mount Lucas Wind Farm includes 84MW wind farm alongside rehabilitated cutaway and 10km of walking/running/cycling tracks. These comments refer to Chapters 7 and 12 also.</p>	<p>Chief Executive's Response It is acknowledged that BNM recognise the potential of cutaway peatlands for recreation and tourism and that such projects have been delivered in neighbouring counties.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
181	Lullymore Heritage & Discovery Park CLG	<p>Additional text suggested under LR O13 in recognition of the success in rehabilitation of many cutaways which are now areas of biodiversity and carbon stores: Recognise that some cutaway and cut-over boglands may represent degraded landscapes and/or brownfield sites and thus are may potentially be fit to absorb a variety of development provided that the development proposal does not increase Green House Gas emissions or damage protected habitats or species.</p> <p>Insert new action to implement LR O40:</p>	<p>Chief Executive's Response Agree, in part to amend LR O13 as suggested.</p> <p>It is agreed to amend objective LR O40 to support and facilitate the development of the National Peatlands Park. The suggested new action on foot of LR O40 is noted, however Objective RE O127 (Chapter 4) and EC A7 (Chapter 7) supports the proposal for the development of a National Peatland Park and includes reference to relevant stakeholders.</p> <p>Chief Executive's Recommendation Regarding LR O13, see recommendation to Submission No. 552.</p>

		<p>Engage with the Department of Housing, Local Government and Heritage and other County Councils and relevant stakeholders to advance the delivery of a new National Peatlands Park (see EC A7).</p>	<p>Amend LR O40 as follows: Support and facilitate investigate the feasibility of developing development of a Midlands Peatlands National Peatlands Park in consultation with Offaly and Laois County Councils, Bord na Móna, Coillte, NPWS, local landowners and all other relevant stakeholders to include areas of (inter alia) high nature value, amenity, education/science and eco-tourism potential.</p>
468	Ann Behan	<p>Acknowledgment and recognition of the positive contribution of Kildare’s natural assets in chapter 13 is welcomed. Reference is made again (chapter 12 also refers) for the need to employ ecological expertise in any nature-based solutions to reduce potential for any further biodiversity loss.</p> <p>Amend objective LR O40 to ensure consistency with RE O127. Objective should read as follows: Support and facilitate the development of a National Peatlands Park in consultation with Offaly and Laois County Councils, Bord na Móna, Coillte, NPWS, local landowners, and all other relevant stakeholders to include areas of (inter alia) high nature value, amenity, education/science, and eco-tourism potential.</p> <p>Amend objective LR O42. Insert the following text after the wording other relevant stakeholders: The creation of a successful community-led tourism destination supported by Kildare County Council, Failte Ireland and other stakeholders following the Blueway and encompassing peatland areas to the west as part of a National Peatlands Park has the potential to offer the visitor a unique experience to get “lost in wilderness” in a relaxed environment away</p>	<p>Chief Executive’s Response Agree to amend LR O40 as suggested.</p> <p>Regarding LR O42, the suggested additional text is noted. The Plan contains a number of policies, objectives and actions which support the development of a National Peatland park in the county (Chapter 13, objective LR O40, Chapter 4, objective RE O127 and Chapter 7, action EC A7). The reader is also advised to see response to submission from Fáilte Ireland in this regard (Submission 383, Chapter 4).</p> <p>For the purposes of writing clear, concise and implementable objectives, it is considered that the additional text would dilute objective LR O42. It is considered more appropriate to amend Section 9.8 of the Plan which refers to Bogs and Peatlands.</p> <p>Chief Executive’s Recommendation Regarding LR O40, see recommendation to Submission No. 181 above.</p> <p>Amend Section 9.8 as follows: The Council recognises the potential of industrial peatlands in relation to a variety of uses and functions including re-</p>


		<p>from urban life. The Council recognises that the development of a range of outdoor activities based around our natural amenities of bogs, canals, and rivers, and the discovery of the area's natural and built heritage would significantly support the future growth of tourism in Kildare and the midlands.</p>	<p>wetting, re-wilding, carbon sequestration, renewable energy, biodiversity, tourism, amenity, recreation and other appropriate after-uses with job opportunities.</p>
405	Kildare Climate Action Linkage Group	<p>Suggests amending objective LR O40 as follows: LR O40 - Investigate the feasibility of developing a Support and facilitate the development of a National Peatlands Park in consultation with Offaly and Laois County Councils, Bord na Móna, Coillte, NPWS, local landowners, and all other relevant stakeholders to include areas of (inter alia) high nature value, amenity, education/science, and eco-tourism potential.</p> <p>Suggests amending objective LR O42 as follows: LR O42 - Lead and support the extension and interconnection of Greenways, Blueways, Peatways and trails within and outside County Kildare in consultation with Coillte, Bord na Móna and all other relevant stakeholders. The creation of a successful community-led tourism destination supported by Kildare County Council, Failte Ireland and other stakeholders following the Blueway and encompassing peatland areas to the west as part of a National Peatlands Park has the potential to offer the visitor a unique experience to get "lost in wilderness" in a relaxed environment away from urban life. The Council recognises that the development of a range of outdoor activities based around our natural amenities of bogs, canals and rivers and the discovery of the area's natural and built heritage would significantly support the future growth of tourism in Kildare and the midlands.</p>	<p>Chief Executive's Response Agree to amend LR O40 as suggested.</p> <p>In relation to LR O42, see response to Submission No. 468 above.</p> <p>Chief Executive's Recommendation Regarding LR O40, see recommendation to Submission No. 181 above.</p> <p>See recommendation to Submission No. 468 in relation to LR O42.</p>

172.	Umerus Community Development Peatlands (UCDCLG)	<p>Regarding objective LR O42 supporting the development and extension of greenways, blueways and peatways, the submission refers to the following text below:</p> <p>'That the creation of a successful community-led tourism destination supported by Kildare County Council, Failte Ireland and other stakeholders following the Blueway and encompassing peatland areas to the west as part of a National Peatlands Park has the potential to offer the visitor a unique experience to get "lost in wilderness" in a relaxed environment away from urban life. The Council recognises that the development of a range of outdoor activities based around our natural amenities of bogs, canals and rivers and the discovery of the area's natural and built heritage would significantly support the future growth of tourism in Kildare and the midlands.'</p>	<p>Chief Executive's Response See response to Submission No. 468 above.</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 468 above.</p>
181	Lullymore Heritage & Discovery Park CLG	<p>Suggested additional text for LR O42:</p> <p>'Lead and support the extension and interconnection of Greenways, Blueways, Peatways and trails within and outside County Kildare in consultation with Coillte, Bord na Móna and all other relevant stakeholders. The creation of an eco-tourism destination supported by Kildare, Offaly and Laois County Councils, Fáilte Ireland and other stakeholders following the Blueway and encompassing peatland areas to the west as part of a National Peatlands Park has the potential to offer the visitor a unique experience to get "lost in wilderness" in a relaxed environment away from urban life. The Council recognises that the development of a range of outdoor activities based around our natural amenities of bogs, canals and rivers and the discovery of the area's natural and built heritage would</p>	<p>Chief Executive's Response See response to Submission No. 468 above.</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 468 above.</p>

		<p>significantly support the future growth of tourism in Kildare and the midlands.’</p>	
<p>147</p>	<p>National Peatlands Park Group</p>	<p>The existing Landscape Character Map was prepared in 2004 and fails to consider significant new developments in County Kildare. The submission references LR A1, LR A2 and LR A3 and suggests the following amendments:</p> <p>‘Reevaluate West Kildare Bogs to Class 5 and postpone decisions which would impact the landscape until an updated County Landscape Character assessment is completed. This would ensure the Bog of Allen’s potential for rewilding and tourism is not irreversibly damaged by any proposed developments in the intervening period.’</p> <p>‘Recognize the importance of the nationally-important greenways and blueways as presented in the Green Infrastructure Concept map and identify important clusters of core areas/nodes/stepping stones which can have strengthened landscape protections in recognition of their importance of peatlands nature/tourism hubs as identified in the Barrow Blueway Economic Plan, the West Kildare Just Transition Plan and the Kildare Tourism Strategy.’</p> <p>The current Matrix for the Impact of Development on Landscape is based on impacts in 2004 and is outdated and the landscape impacts on the core/nodes/corridors in the Kildare County Council’s Green Infrastructure Strategy need to be revised before the Wind Energy Strategy is adopted and impacts considered within 2000m of Landscape Sensitivity Areas. The current Matrix for Impact on</p>	<p>Chief Executive’s Response</p> <p>It is an action of the Draft Plan under LR A1 to review and update the County Landscape Character Assessment, within two years of the adoption of the Plan and a statutory variation will be undertaken on the Plan, if necessary, should material changes be identified.</p> <p>Any changes to landscape designations, to Table 13.3 (Likely compatibility between a range of land-uses and Principal Landscape Areas) and Table 13.4 (Likely compatibility between a range of land-uses and proximity to Principal Landscape Sensitivity Factors) are considered premature pending the review of the Landscape Character Assessment for County Kildare, at a County or at a Regional Level as provided for under Action LR A1. It is considered appropriate that the Green Infrastructure strategy should inform the LCA review and that LR A1 should be updated accordingly. The 300m reference in Section 13.3.2 is a proximity reference for a range of land uses, and not specific to wind turbines.</p> <p>It is considered that the amendment/addition of a singular scenic routes and/or protected views would represent an ad hoc approach in the absence of an updated county wide landscape character analysis review and would therefore be premature at this time. As part of the review of the LCA all related submissions received during either the pre-draft or draft stages of the CDP will be considered and the merits of including the various scenic routes, viewpoints and landscapes will be assessed, and incorporated into the LCA as appropriate.</p>

		<p>Development on Landscape is only based on a distance of 300m from significant Green infrastructure. This was based on a 2004 Landscape Character Assessment when wind turbines were only 50m in height.</p> <p>Amend Table 13.5 – Scenic Routes in County Kildare: No. 34 Views of the Bog of Allen (including the Allen-Lullymore Bog group) and the Hills of Allen, Grange and Dunmurry along the Allenwood middle, Allenwood south, Lullymore.</p> <p>Amend LR O42 to read as follows: Lead and support the extension and interconnection of Greenways, Blueways, Peatways and trails within and outside County Kildare in consultation with Coillte, Bord na Móna and all other relevant stakeholders. The creation of a successful community-led tourism destination supported by Kildare County Council, Fáilte Ireland and other stakeholders following the Blueway and encompassing peatland areas to the west as part of a National Peatlands Park has the potential to offer the visitor a unique experience to get “lost in wilderness” in a relaxed environment away from urban life. The Council recognises that the development of a range of outdoor activities based around our natural amenities of bogs, canals and rivers and the discovery of the area’s natural and built heritage would significantly support the future growth of tourism in Kildare and the midlands.</p>	<p>In relation to LR O42, see response to Submission No. 468 above.</p> <p>Chief Executive’s Recommendation Regarding LR A1, see recommendation to Submission No. 507.</p> <p>See recommendation to Submission No. 468 in relation to LR O42.</p>
181	Lullymore Heritage & Discovery Park CLG	<p>The submission references LR A1, LR A2 and LR A3 and suggest a change as follows: Reevaluate West Kildare Bogs to Class 5 and postpone developments which would impact the landscape until an updated County Landscape Character assessment</p>	<p>Chief Executive’s Response Any change to a landscape classification is considered premature pending the review of the Landscape Character Assessment for County Kildare. It is an action of the Draft Plan under LR A1 to review and update the County</p>

		<p>is completed. This would ensure the Bog of Allen’s potential for rewilding and tourism is not irreversibly damaged by any proposed developments in the intervening period.</p> <p>The LCA was undertaken in 2004 when industrial peat extraction was prevalent, and it undervalues the Bog of Allen’s historical, cultural, religious and environmental importance. It also fails to reflect the rehabilitation of peatlands over the past 18 years. It is not accepted that raised bogs have global significance and their protection and rehabilitation is the first line of defence in mitigating climate change and protecting biodiversity.</p>	<p>Landscape Character Assessment, within two years of the adoption of the Plan and a statutory variation will be undertaken on the Plan, if necessary, should material changes be identified.</p> <p>As part of the review of the LCA all related submissions received during either the pre-draft or draft stages of the CDP will be considered and the merits of including the various scenic routes, viewpoints and landscapes will be assessed, and incorporated into the LCA as appropriate.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
172.	Umerus Community Development Peatlands (UCDCLG)	<p>The submission welcomes KCC’s leadership and new vision contained in the Plan specifically around the Barrow Blueway, the Green Infrastructure Strategy and the holistic approach to planning in the county, to harness our natural assets for nature, the environment, the public good and the once in a lifetime opportunity to create new biodiversity areas from the Bord na Mona decommissioned peatlands.</p> <p>The submission includes a Concept Map of the proposed Peatlands National Park (see below) which will assist the Council in meeting its carbon and biodiversity targets, mindful that the EU Biodiversity Strategy 2030, EU Member States are required to designate 30% of their land and marine areas for conservation and biodiversity.</p>	<p>Chief Executive’s Response It is considered that the overarching guiding principles listed in Section 1.8.1 already include sufficient reference to the key sentiment of the suggested change, i.e. resilience to climate change, a low carbon future, sustainable development of communities, to promote employment opportunities, to recognise the role of the rural countryside in supporting the rural economy and its role as a key resource for <i>inter alia</i> tourism, recreation and rural based enterprises and to protect local assets by preserving the quality of the landscape, open space recreational resources, natural, architectural, archaeological and cultural heritage and the material assets of the county.</p> <p>While it is noted that Objective LR T1 refers to the 27% target of territory for nature in accordance with the EU Biodiversity Strategy 2030. However, it is acknowledged that this reference is misleading in its current form and was intended to read an increase of 27% to reach the</p>

		 <p>The objective of 50% of peatlands to be excluded from development does not make sense as there will be conflict between protecting areas (e.g. for birds) and facilitating wind turbines. There is a clear need for 100% of certain bogs to be protected areas for biodiversity separate from industrial development. The National Peatlands Park group has identified bogs in West Kildare which should receive full protection and this should be recognised in the new County Development Plan (no further details submitted in this regard).</p> <p>States that the Green Infrastructure strategy provides an opportunity to designate important biodiversity and nature tourism sites and routes that should be offered enhanced protection; with a vision extending to 2050. Nature-tourism has potential to regenerate economically depressed communities in West and South Kildare, which is already recognised in the Barrow Blueway Economic Plan, West, Kildare Just Transition Plan and Revised Kildare Tourism Strategy. Communities need to be at the centre of these initiatives.</p>	<p>Government’s target figure of 30%. An amendment is therefore proposed to address this anomaly.</p> <p>The request for a ‘Master Map’ is noted and this could be considered during the review of the Landscape Character Assessment (Action LR A1).</p> <p>Chief Executive’s Recommendation Amend LR T1 as follows: Endeavour to increase the territory of County Kildare designated to increase nature from 3% to by 27% from its current base of 3% by the end of this Plan period, in response to the Government’s commitment to designate 30% of the territory of Ireland for nature by 2030 and in accordance with the EU Biodiversity Strategy 2030. This may be achieved, in part, by the development of the proposed Midlands Peatlands National Peatlands Park (see objectives in Section 13.6). Such endeavours, such as the development of the National Peatlands Park, shall be subject to an AA Screening Report, and where applicable, Stage 2 AA. They shall have a regard for any hydrological connection shared with a European Site and their qualifying interest species. The project shall account for any potential likely significant effects and provide mitigation and monitoring where appropriate.</p>
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		<p>It is requested that a new Guiding Principle be added to Section 1.8.1: Develop the Green Infrastructure Strategy to protect and enhance the natural assets of the county to create a strong nature-tourism brand in the county using the backbone of our canals as corridors joining significant nature and tourism sites to regenerate economically-depressed areas close to the canals, forests and bogs of Kildare and achieve a target of 27% protected areas for biodiversity.</p> <p>A 'master map' would be useful to include Green Infrastructure, local and nationally important biodiversity areas, and key tourism to demonstrate which core areas, corridors and nodes require enhanced protection.</p>	
172.	Umerus Community Development Peatlands (UCDCLG)	<p>The Matrix for the Impact of Development on Landscape is outdated and the landscape impacts on the core/nodes/corridors in the Councils Green Infrastructure Strategy need to be revised before the Wind Energy Strategy is adopted and impacts considered within 2000m of landscape sensitivity areas. The current matrix is based on a distance of 300m from significant Green Infrastructure which is based on turbines being only 50m in height. Given that turbines are now 220m high, distances should be extended to 2000m.</p> <p>States that the existing Landscape Character Map was prepared in 2004 and fails to consider significant new developments in in the county. The position of the Council should be consistent with that outlined in the CAAS report commissioned by Kildare County Council in its submission on the Maighne Wind Farm.</p>	<p>Chief Executive's Response Any changes to Table 13.3 (Likely compatibility between a range of land-uses and Principal Landscape Areas) and Table 13.4 (Likely compatibility between a range of land-uses and proximity to Principal Landscape Sensitivity Factors) are considered premature pending the review of the Landscape Character Assessment for County Kildare or at a Regional Level as per LR A1. The 300m reference in Section 13.3.2 is a proximity reference for a range of land uses, and not specific to wind turbines.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

<p>147</p>	<p>National Peatlands Park Group</p>	<p>Amend LR O13 to read as follows: Recognise that some cutaway and cut-over boglands may represent degraded landscapes and/or brownfield sites and thus may potentially be fit to absorb a variety of development provided that the development proposal does not increase Green House Gas emissions or damage protected habitats or species.</p> <p>It is recommended that LR T1 be amended to increase the territory of County Kildare designated to nature from 3% to 27-30%.</p> <p>Amend LR O40 to read as follows: ‘Support and facilitate the development of / Work to develop a National Peatlands Park in consultation with Offaly and Laois County Councils, Bord na Móna, Coillte, NPWS, local landowners and all other relevant stakeholders to include areas of (inter alia) high nature value, amenity, education/science and eco-tourism potential.’</p> <p>In Section 13.4.4 (The River Liffey and the River Barrow Valleys), reference to the River Barrow forming part of an SAC should be added to this paragraph to ensure consistency with Sections 13.4.5 and 13.5.2.</p> <p>Insert new action to implement objective in LR040, as follows: LR A13 Engage with the Department of Housing, Local Government and Heritage and other County Councils and relevant stakeholders to advance the delivery of a new National Peatlands Park (see EC A7).</p>	<p>Chief Executive’s Response Agree, in part to amend LR O13, LR T1 and section 13.4.4 as suggested.</p> <p>It is agreed to amend objective LR O40 to support and facilitate the development of the National Peatlands Park. The suggested new action on foot of LR O40 is noted, however Objective RE O127 (Chapter 4) and EC A7 (Chapter 7) supports the proposal for the development of a National Peatland Park and includes reference to relevant stakeholders.</p> <p>Chief Executive’s Recommendation Regarding LR O13, see recommendation to Submission No. 552.</p> <p>Regarding LR T1, see recommendation to Submission No. 172.</p> <p>Regarding LR O40, see recommendation to Submission No. 181.</p> <p>Amend Section 13.4.4 as follows: The River Liffey and the River Barrow valleys are of significance in terms of landscape and amenity value and as such are sensitive to development. The River Barrow is a designated Special Areas of Conservation (SAC).</p>
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405	Kildare Climate Action Linkage Group	The submission requests that the River Barrow forming part of an SAC be referenced in Section 13.4.4.	Chief Executive's Response Agreed.
			Chief Executive's Recommendation Regarding the proposed amendment of section 13.4.4, see recommendation to Submission No. 147 above.
468	Ann Behan	Reference to the River Barrow forming part of an SAC should be added to section 13.4.4 for consistency.	Chief Executive's Response Agreed.
			Chief Executive's Recommendation Regarding the proposed amendment of section 13.4.4, see recommendation to Submission No. 147 above.
405	Kildare Climate Action Linkage Group	<p>Recommends amending objective LR O13 as follows: LR O13 - Recognise that some cutaway and cut-over boglands may have the characteristics of represent degraded landscapes and/or brownfield sites and thus may are potentially be fit to absorb a variety of development provided that the development proposal does not increase Green House Gas emissions or damage protected or high nature value habitats, or species.</p> <p>Suggests the amendment of target LR T1 as follows: LR T1 - Endeavour to increase the territory of County Kildare designated to nature from 3% to 27%–30% by the end of this Plan period, in response to the Government's commitment to designate 30% of the territory of Ireland for nature by 2030 and in accordance with the EU Biodiversity Strategy 2030. This may can be achieved by the development of the proposed Midlands Peatlands National Peatlands Park (see objectives in Section13.6).</p>	Chief Executive's Response Agree, in part to amend LR O13 and LR T1 as suggested.
			Chief Executive's Recommendation Regarding LR O13, see recommendation to Submission No. 552. Regarding LR T1, see recommendation to Submission No. 172.

<p>468</p>	<p>Ann Behan</p>	<p>Recommends amending objective LR O13 as follows: LR O13 - <i>Recognise that some cutaway and cut-over boglands may have the characteristics of degraded landscapes and/or brownfield sites and thus may potentially be fit to absorb a variety of development provided that the development proposal does not increase Green House Gas emissions or damage protected habitats or species.</i></p> <p>Amend the target LR T1 from 27% to 30%.</p> <p>Reference is made landscape sensitivity and the ratings in accompanying tables. Actions LR A1 to LR A3 are also noted. An amendment to action LR A3 is proposed to include the wording “<i>and the sensitivity of the surrounding landscape. This will be achieved under ecological guidance</i>” after the words traffic safety.</p> <p>It is also proposed to re-evaluate West Kildare Bogs to Class 5 and postpone decisions which would impact the landscape until an updated County Landscape Character assessment is completed. This would ensure the Bog of Allen’s potential for rewilding and tourism is not irreversibly damaged by any proposed developments in the intervening period. The current LCA is outdated and undervalues the Bog of Allen’s historical, cultural, religious, and environmental importance. Raised bogs have global significance as a carbon store and ecosystem treasures. Their protection and rehabilitation are the first line of defence in mitigating climate change and protecting biodiversity.</p>	<p>Chief Executive’s Response Agree, in part to amend LR O13 and LR T1 as suggested.</p> <p>The proposed amendment of action LR A3 is not accepted.</p> <p>Any change to a landscape classification is considered premature pending the review of the Landscape Character Assessment for County Kildare. It is an action of the Draft Plan under LR A1 to review and update the County Landscape Character Assessment, within two years of the adoption of the Plan and a statutory variation will be undertaken on the Plan, if necessary, should material changes be identified.</p> <p>As part of the review of the LCA all related submissions received during either the pre-draft or draft stages of the CDP will be considered and the merits of including the various scenic routes, viewpoints and landscapes will be assessed, and incorporated into the LCA as appropriate.</p> <p>Chief Executive’s Recommendation Regarding LR O13, see recommendation to Submission No. 552.</p> <p>Regarding LR T1, see recommendation to Submission No. 172.</p>
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405	Kildare Climate Action Linkage Group	<p>The submission references the first paragraph of section 13.3.1, LR A1, LR A2 and LR A3 and suggests the following amendments to this section: Reevaluate West Kildare Bogs to Class 5 and postpone developments which would impact the landscape until an updated County Landscape Character assessment is completed. This would ensure the Bog of Allen’s potential for rewilding and tourism is not irreversibly damaged by any proposed developments in the intervening period.</p> <p>Amendment of action LR A3 as follows: LR A3 - Plant gateway roundabouts within the county with innovative design themes, having regard to traffic safety, and the sensitivity of the surrounding landscape. This will be achieved under ecological guidance.</p>	<p>Chief Executive’s Response Regarding the landscape classification of West Kildare Bogs and the proposed amendment of LR A3, see response to Submission No. 468 above.</p> <p>Chief Executive’s Recommendation No changes to the Draft Plan.</p>
468	Ann Behan	<p>Include Ballydermot Bog Group in the location of reference number 34 within table 13.5. Its inclusion is important as it is the view looking westward from Lullymore, which is an established peatland tourism hub in West Kildare. The views across the Bog of Allen to the west are celebrated and promoted internationally by the IPCC and Lullymore Heritage & Discovery Park.</p>	<p>Chief Executive’s Response Regarding scenic route No. 34 in Table 13.5, see response to Submission No. 147 above.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
405	Kildare Climate Action Linkage Group	<p>The submission references view 34 of Table 13.5 - Scenic Routes in County Kildare and requests the insertion of the Ballydermot Bog Group in the ‘Location’ column.</p>	<p>Chief Executive’s Response Regarding scenic route No. 34 in Table 13.5, see response to Submission No. 147 above.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>

147	National Peatlands Park Group	Add the Local Just Transition Plan for West Kildare 2022 to the list of documents in the Appendix to the Plan.	<p>Chief Executive's Response The Local Just Transition Plan is an independent document and is not an Appendix to the County Development Plan.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
470	IPCC	<p>Amend Objective LR O13 as follows: Recognise that some cutaway and cut-over boglands represent degraded landscapes and/or brownfield sites that may have the potential to absorb a variety of development provided that the development proposal does not increase Green House Gas emissions or impact on biodiversity and conservation.</p> <p>Amend LR T1 as follows: Endeavour to increase the territory of County Kildare designated to nature from 3% to 27% 30% by the end of this Plan period, in response to the Government's commitment to designate 30% of the territory of Ireland for nature by 2030 and in accordance with the EU Biodiversity Strategy 2030. This may can be achieved by the development of the proposed National Midlands Peatlands Park.</p>	<p>Chief Executive's Response Agree, in part to amend LR O13 and LR T1 as suggested.</p> <p>Chief Executive's Recommendation Regarding LR O13, see recommendation to Submission No. 552. Regarding LR T1, see recommendation to Submission No. 172.</p>
472	Keep Ireland Open	The submission recommends an additional objective to promote and support the maintenance of increased access to state and semi-state lands such as National Parks, Bord na Mana Bogs, Coillte and other Forests Parks, Waterways and monuments for recreational purposes. Access should be planned and managed in a sustainable manner that protects environmental sensitivities, ecological corridors and the ability of local infrastructure to support increased tourism and will have to meet the requirements of the Habitats	<p>Chief Executive's Response Not agreed. Objectives LR O37, LR O39 promote and enhance public access for all to the upland areas, rivers, lakes and other natural amenities of the county and the provision of more recreational infrastructure in conjunction with the relevant landowners and agencies.</p> <p>Chief Executive's Recommendation No change to draft Plan.</p>

		Directive, National Monuments Act and other provisions and policies to protect and safeguard these resources.	
405	Kildare Climate Action Linkage Group	The submission references the second paragraph of section 13.6.2 and points out the need to employ ecological expertise in any nature-based solutions to reduce potential for any further biodiversity loss.	<p>Chief Executive's Response Any matter of funding and resourcing is outside of the scope of the Draft Plan, which is primarily a land use plan.</p> <p>Chief Executive's Recommendation No changes to the Draft Plan.</p>
RECREATION & AMENITIES			
221.	Office of Public Works (OPW) Heritage Services Unit	<p>Submission welcomes the inclusion LR O56 and requests that consideration be given to the following amendments to the objective; Investigate the feasibility of developing the Donaghcumper lands as an amenity for local people and of linking the lands with Castletown – in co-operation with the National Historic Properties unit of the OPW and other relevant stakeholders.</p> <ul style="list-style-type: none"> - The OPW notes the sensitivity of views from the Wonderful Barn to Castletown House. - The OPW welcomes the continued objective of a walkway in Donaghcumper and St. Wolstan's (Protected Area Castletown – Donaghcumper Map). <p>The submission welcomes the inclusion of the action LR A22.</p>	<p>Chief Executive's Response Noted and agreed in part.</p> <p>Chief Executive's Recommendation Amend the second bullet point of LR O56 as follows: The acquisition and development of the Donaghcumper land into a public park with the opportunity to create a linkage with Castletown estate in co-operation with the OPW and all other relevant stakeholders.</p>
552.	Department of Housing, Local	<p>Amend LR O38 as follows: Ensure the biodiversity value of all sites are considered and protected in the development of</p>	<p>Chief Executive's Response All recommendations agreed.</p>

	<p>Government and Heritage</p> <p>outdoor recreational facilities including greenways through the preparation of an Ecological Impact Assessment, which the impacts of recreational disturbance to ground-nesting birds, particularly within cutover and cutaway bogs. which shall guide the location and design of such facilities, the Department advises that Ecological Impact Assessment should assess the impacts of of recreational disturbance to ground-nesting birds, particularly within cutover and cutaway bogs.</p> <p>Include the following new action: The Council will develop Monitoring and Management Plans for Greenways, Blueways, Peatways and Trails, in their ownership, with the protection and enhancement of biodiversity at their core, to ensure the success of these routes and environmental sustainability.</p> <p>The submission believes Objective LR O64 could be harmful to biodiversity and lead to the loss of genetic diversity and recommends an alternative objective to reduce mowing.</p> <p>Tree growth should be encouraged through allowing natural regeneration of pockets of scrub. Scrub is the first stage of woodland development and is an important habitat in its own right. Tree planting within semi-natural areas should consist of native species of local provenance only.</p>	<p>Chief Executive's Recommendation</p> <p>Amend LR O38 as follows: Ensure the biodiversity value of all sites are considered and protected in the development of outdoor recreational facilities including greenways through the preparation of an Ecological Impact Assessment, which to include the impacts of recreational disturbance to ground-nesting birds, particularly within cutover and cutaway bogs which shall guide the location and design of such facilities.</p> <p>Include the following new action in Section 13.6: Develop Monitoring and Management Plans for Greenways, Blueways, Peatways and Trails, in their ownership, with the protection and enhancement of biodiversity at their core, to ensure the success of these routes and environmental sustainability.</p> <p>Amend LR O64 as follows: Encourage the planting of pollinator friendly trees and plants, where appropriate, to improve pollinator populations within state and publicly owned land, peatlands, river, canal and railway corridors, grass verges along public roads and existing and future greenways, public parks and public open spaces in towns and villages, including as part of mixed use and residential developments, in accordance with the All Ireland Pollinator Plan 2015-2020.</p> <p>Include the following new objective in Section 12.9: Natural regeneration of peatlands, river, canal and railway corridors, grass verges along public roads and existing and future greenways shall be encouraged and the use of "Wildflower mixes" shall not be permitted unless they can be certified as being native and of local provenance. Where tree planting occurs within semi-natural areas, native species of local provenance should ideally be used, however in the</p>
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			interests of species diversity, non-native species may also be considered. Reduced mowing of vegetation along peatlands, river, canal and railway corridors is encouraged.
364	Ursula King	<p>The council should not advocate wildflower mixtures in semi-natural areas or nature-based solutions which threaten our native species and habitats. Furthermore, any tree planting should be required to be native in origin and provenance.</p> <p>Submission also states KCC should actively support the Kildare Nursery Stock industry by encouraging and incentivising the local production of native tree stock for the current elevated planting requirements.</p>	<p>Chief Executive’s Response The Council does not advocate wildflower mixtures in semi-natural areas or nature-based solutions which threaten our native species and habitats. While there are many policies within the plan encouraging the planting of natives species it is not always appropriate to do so in all settings. Many non-native tree species can also have benefits for pollinators.</p> <p>While the incentivising of the local production of native tree stock is not a matter for the Draft Plan, the Council would support and facilitate the development of such a facility as a community enterprise.</p>
			<p>Chief Executive’s Recommendation Regarding native species, see recommendation to Submission No. 552 above.</p> <p>Add the following new objective to Section 13.7.2: Support and facilitate, the establishment of a community run nursery to grow native plants, at an appropriate location.</p>
26	Butterfly Conservation Ireland (BCI)	BCI recommends that the Council operates a nursery to grow native plants of local provenance to ensure the objective is achieved.	<p>Chief Executive’s Response Agree in part.</p>
			<p>Chief Executive’s Recommendation See recommendation to Submission No. 364 above.</p>
472	Keep Ireland Open	The submission recommends the inclusion of the following additional objectives in Section 13.4.12:	<p>Chief Executive’s Response Objective LR O23 supports the extension of the proposed Special Amenity Area Order in Kildare.</p>

	<ul style="list-style-type: none"> • Improve the Liffey Valley SAAO and investigate the feasibility of extending it within two years of the adoption of/he Plan. • Re-establish the management committee for the Liffey Valley SAA with an annual programme of quarterly meetings in partnership with the South Dublin Council and develop a five year works programme within two years of the adoption of the Development Plan. • Protect and enhance the amenity of the Special Amenity Areas of the Liffey Valley in accordance with the Order and implement the Management Plan in consultation with all relevant stakeholders. <p>The submission recommends the inclusion of the following additional text:</p> <ul style="list-style-type: none"> • Supports initiatives for establishing new walking routes and enhanced accessibility. • Include a Table of Existing or potential riverside walks/cycle routes. <p>The submission recommends the inclusion of additional text to Include a Table of Cycle routes and produce cycle maps.</p> <p>The submission recommends the inclusion of the following additional objectives in Section 13.4.12:</p> <ul style="list-style-type: none"> • In partnership with the NPWS, WI, Councils, community groups, landowners and other relevant stakeholders, provide, protect, promote, encourage, develop, maintain, facilitate, manage, increase and improve access to inland waterways 	<p>Objective LR O55 supports the development of a Liffey Valley Linear Park in cooperation with adjoining councils, relevant government departments, existing landowners and other relevant stakeholders.</p> <p>Objective LR O56, LR O57 and LR O58 support the implementation of the recommendation of the report 'Towards a Liffey Valley Park Strategy' (2006).</p> <p>It is considered that the identification of walking routes will form part of the County Walking Strategy, as provided for in Action LR A9.</p> <p>Action TM A5 provides for the preparation of a walking and cycling strategy to identify riverside cycling routes.</p> <p>Chapter 13 Policy LR O39, LRO41 and LRO42 consider the development and promotion of blue ways. In particular objective LR O42 supports the extension and interconnection of Greenways, Blueways, Peatways and trails within and outside County Kildare in consultation with relevant stakeholders. County Kildare is part of the Eastern and Midlands Region with neighbouring counties of Wicklow, South Dublin, Meath, Offaly and Laois and is governed by a shared Regional Spatial and Economic Strategy (RSES). The Draft Plan aligns with the RSES. KCC has consulted with all neighbouring counties, including Carlow County Council which is within the Southern Regional Assembly, in relation to this Draft County Plan. There are numerous policies and objectives within the plan that refer to cross-county initiatives and co-ordination (e.g. National Peatlands Park, Barrow Blueway, Joint Local Area Plans etc.).</p>
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		<p>including rivers, lakes and riparian/waterway corridors.</p> <ul style="list-style-type: none"> • Support and facilitate the development of Greenways and Trails along (named) rivers. • Council will co-operate with other agencies in the development of Blueway's along existing watercourses as considered appropriate with existing greenways and blueway's. • Where a proposed development adjoining or adjacent to a river or canal bank or other watercourses reserve land to promote and facilitate the creation of waterside linear parks to link with existing parks and open spaces and to facilitate the provision of walking and cycling routes along canals and watercourses. • Ensure, where feasible, that canal towpaths are made available for the development of cycle and walking trails. • In order to build on their amenity potential, the Council will support the development and upgrading of Inland Waterways and their associated facilities in accordance with relevant management strategies, key stakeholders and other bodies including WI. • Strengthen the network of waterways at regional Level. • Promote the natural, historic and amenity value of watercourses to address the long term management and protection and strengthen regional links. • Promote the provision of access to lakes. • Maintain the amenity value of major lakes and their environs by restricting and regulating- 	<p>Objective BI O24 in Chapter 12 and Objectives LR O25, LR O27 in Chapter 13 seek to provide and protect riparian buffer zones from inappropriate development.</p> <p>Objective LR O61 seeks to identify, list and map public rights of way in County Kildare that give access to riverbanks, canal banks or other places of natural beauty or recreational value.</p> <p>Sustainable development of water-based sports is to be encouraged.</p> <p>Objectives TM O17, TM O 18, TM O24, TM O34 and Actions TM A11, TM A12 all address the issue of permeability and barriers to permeability.</p> <p>Objective LR O84 supports the retention of areas adjacent to waterways as a linear park, particularly where these link into the wider open space network.</p> <p>Objective LR O42 supports the interconnection of Greenways, Blueways, Peatways and trails within and outside the county.</p> <p>Objectives LR O23, LR O55, LR O56, LR O57, LR O58 all support the actions and recommendations in the report 'Towards a Liffey Valley Park Strategy'.</p> <p>Policy LR P2 and Objective LR O16 seek to manage development in Areas of High Amenity.</p> <p>There are no open upland areas Kildare therefore the proposed text would not be relevant to the plan.</p>
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		<p>development that would prejudice the use of these areas.</p> <p>The submission recommends the inclusion of the following additional objectives in Section 13.4.12:</p> <ul style="list-style-type: none"> • Reserve, preserve, protect and set aside, for public access, an undisturbed buffer zone between new development and river corridors, canal banks, lakeshores and other water bodies to promote and facilitate the creation of linear parks to link with existing routes and amenity spaces to accommodate/facilitate the provision of walking and cycling routes and to encourage increased recreational opportunities. • Recognising the importance of rivers, riparian corridors and buffer zones for their natural amenity and scenic values including rivers and canals in the facilitation and creation of linear parks, in co-operation with landowners, WI, the NPWS, Government Departments, community groups and other councils to develop their infrastructure, quality and amenity. • Improve aquatic riparian strips free from inappropriate development. Where necessary, restore the conservation value of waterways • Where possible, create and enhance riparian buffer zones. • Reserve land free from development to facilitate access • In areas adjacent to inland waterways, lakes, canals and rivers where planning permission is sought conditions may be attached requiring the retention or creation of public access to waterways 	<p>LR O39 addresses unenclosed land which is restricted from exemptions as per Planning and Development Regulations 2001, Art 9 (l)(a)(x).</p> <p>Walking and Cycling and access to the countryside is addressed under 13.6.1 Countryside Recreation and 13.6.5 Greenways, Blueways, Peatways and Trails and in Chapter 5 (Sustainable Transport & Mobility).</p> <p>Section 13.6.5 includes the following text: Existing public rights of way constitute an important amenity and the Council recognises the importance of maintaining established rights of way and supporting initiatives for establishing walking routes and general accessibility.</p> <p>Objective LT A8 proposes to Review all public rights of way, having regard to the Office of the Planning Regulators recent Case Study Paper titled “Public Rights of Way and the Local Authority Development Plan” June 2021 (Survey Report on the Operation of Section 10(2)(o) of the Planning Act), during the lifetime of this Plan.</p> <p>The matters that may be considered with respect to a Ministerial Direction are outside the scope of the Draft Plan.</p> <p>Objective LT A8 proposes to review all public rights of way, having regard to the Office of the Planning Regulators recent Case Study Paper titled “Public Rights of Way and the Local Authority Development Plan” June 2021 (Survey Report on the Operation of Section 10(2)(o) of the Planning Act), during the lifetime of this Plan.</p> <p>All objectives LR O37 to LRO65 relate to all themes under Recreation and Amenities.</p>
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		<p>in order to facilitate the creation or expansion of walking/cycle routes.</p> <ul style="list-style-type: none"> • Prohibit development along canal and riverbanks and other navigable and non-navigable waterways and preserve, conserve, enhance and protect these areas, their quality, natural heritage, landscape character and features at or close to them. • Maintain river and stream corridors and river valleys free from inappropriate. development that will adversely affect the visual integrity of distinctive linear sections of water corridors, river valleys by maintaining buffer zones where development should be avoided. • The line of development within river valleys shall be strictly controlled so as to maintain the integrity of the natural topography. The maintenance of natural riverbanks shall be required to be without physical or visual encroachment. • Ensure that any projects such as green ways are a suitable distance from ecological sensitivities such as riparian zones. <p>The submission recommends the inclusion of the following additional objective in Section 13.6.5: Potential applicants will ensure that full public access to lands along waterways which are in private ownership is maintained.</p> <p>The submission recommends the inclusion of the following additional objectives that relate to the management of watersports.</p>	<p>Action LR A8 seeks to review the process of listing of Rights of Ways having regard to the Office of the Planning Regulators recent Case Study Paper titled “Public Rights of Way and the Local Authority Development Plan” June 2021 (Survey Report on the Operation of Section 10(2)(o) of the Planning Act), during the lifetime of this Plan.</p> <p>Section 13.6 Recreation and Amenities considers all policies, objectives and actions concerned with Recreation and Amenities.</p> <p>Policy LR P4 seeks to protect and maintain the existing recreation infrastructure in County Kildare.</p> <p>Policy LR P4 seeks to protect and maintain the existing recreation infrastructure in County Kildare. Additional objectives have been recommended regarding protecting of existing walking routes in this report.</p> <p>Section considers the provision of recreation and amenity facilities in urban areas.</p> <p>Action LR A12 seeks to develop short walking routes such as looped walks, heritage/historic trails, famine trails, historical trails, and Slí Na Sláinte routes.</p> <p>Objectives LR O37 promote and enhance public access for all to the upland areas, rivers, lakes and other natural amenities of County Kildare, in conjunction with the relevant landowners and agencies.</p> <p>Established walking routes should be protected from future development.</p>
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	<ul style="list-style-type: none"> • As water sports cover a wide range of activities from tranquil uses such as sailing, canoeing, towing and sail boarding to powered activities such as water-skiing and powerboat uses, the Council may require management plans for particular areas to address the compatibility of such varying demands. • Adopt bye laws prohibiting or restricting jet-skiing, water skiing and any other noise generating activities within one year of the adoption of the Plan • Encourage proposals that promote sustainable development of water-based sports and recreation on river systems providing there is no cause of significant adverse impacts on the environment, visual amenity and heritage. • Work in partnership with relevant agencies, local voluntary groups and the public to protect the heritage of waterways. <p>The submission recommends the inclusion of an additional objective as follows; Any existing blockages to permeability such as redundant buildings should be resolved where possible.</p> <p>The submission recommends the inclusion of an additional objective to protect, enhance and improve existing public rights of way and where possible, provide additional access to inland waterways through agreement, permissive access and/or the acquisition of land for public rights of way and parking and lay-by facilities.</p> <p>The submission recommends the inclusion of the following additional objectives:</p>	<p>LR O47 facilitates the development of a walking trail from Ballymore Eustace.</p> <p>Objective LR O37 seeks to promote and enhance public access for all to the upland areas, rivers, lakes and other natural amenities of County Kildare.</p> <p>There are a number of policies in Section 13.6 Recreation and Amenities that consider potential projects that would be suitable for submission under the Outdoor Recreation Infrastructure Scheme and other funding schemes.</p> <p>The adoption of bye laws is not a matter for the plan.</p> <p>Policy LR P4 and Objectives LR O37 to LR O65 all seek to protect and maintain the existing recreation infrastructure in County Kildare and the development of the recreational potential of the countryside in accordance with the forthcoming National Outdoor Recreation Strategy.</p> <p>Chief Executive’s Recommendation Include the following new objectives in section 13.6: New objective: Normally only permit development proposals associated with water sports adjacent to waterways (including lakes) where the proposed facilities are compatible with the existing use of water including non-recreational uses, which will not result in damage to important features of archaeological heritage or Natura 2000 sites and where they can be satisfactorily integrated into the landscape so that they will not have an unacceptable impact on visual or environmental amenities especially in areas of high amenity or scenic importance.</p> <p>New objective: Protect, enhance and improve existing public rights of way and where possible, provide additional access</p>
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	<ul style="list-style-type: none"> • Ensure the conservation of canal corridors and require that developments abutting the canal relate to the context of the adjacent environment and contribute to its overall amenity. • Ensure that development along or adjacent to the Grand Canal contributes to the creation of an open and integrated network of walking and cycling routes that integrates into the Grand Canal Way Green Route and protects high value natural heritage. • Promote public use and facilitate and develop the towpath along the Royal Canal as a Greenway and a long distant walking route in order to expand recreation and ensure their integration with other strategic trails including those in adjoining counties in co-operation/consultation with WI, the NPWS, other relevant agencies and adjoining councils. <p>The submission recommends the inclusion of the following additional objectives:</p> <ul style="list-style-type: none"> • Support and facilitate the development of an integrated network of Greenways and Trails (including bluewater trails) and long distance walking routes along the Grand Canal for cycling, walking and nature study. • Increase pedestrian access and co-ordinate the continuing development of strategic walking routes/cycling trails and other countryside recreational opportunities. • Ensure the protection of and co-ordinate the continuation of strategic walking routes and trails. • Support community, authority or agency led projects that would deliver identified strategic cycling links. 	<p>to inland waterways through agreement, permissive access and/or the acquisition of land for public rights of way and parking and lay-by facilities</p> <p>New objective: Ensure any proposed walking or cycling route does not significantly impact the following:</p> <ul style="list-style-type: none"> - Special Areas of Conservation (SACs) - Special Protection Areas (SPAs) - Natural Heritage Areas (NHAs) - Other areas of importance for the conservation of flora and fauna. - Known sites of Flora Protection Order species - Zones of Archaeological Potential. - The vicinity of a recorded monument. - Sensitive landscape areas as identified in Chapter 13 of this Plan. - Scenic views and prospects. - Protected Structures. - Established rights of way and walking routes. <p>New objective: Established walking routes shall be identified prior to any new forestry planting, new infrastructural, energy/telecommunications or golf course developments.</p> <p>New objective: Take the potential impact of proposed development into account when considering/assessing applications for permission in the vicinity of established walking routes that might impinge on walking routes (including long distance or potential walking routes).</p>
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		<ul style="list-style-type: none"> • Support the progression of long distance linear green ways and further develop and improve cycleways, walking trails and paths and develop links with adjoining counties. <p>The submission recommends the inclusion of an additional objective as follows; Factors that will be taken into account when considering proposals including any landscape or archaeological designation for the area, any proposals to increase the extent of public access, the extent of any environmental improvements to the water environment and its surroundings, the nature of any recreation proposed and any conflict or compliance with proposals for walking and cycling routes.</p> <p>The submission recommends the inclusion of the following additional objectives:</p> <ul style="list-style-type: none"> • Promote, support and facilitate the development of the Liffey Valley Greenway and ensure its integration with other strategic trails including those in adjoining counties. • Support and facilitate the development of accessible links between the Liffey Valley and the Grand Canal. • Preserve the undeveloped sections of the Liffey Valley to develop paths and walkways, where appropriate. • Identify flagship projects for the River Liffey Valley from Ce/bridge to Ballymore Eustace as recommended in the report "Towards a Liffey Valley Strategy. • Explore the possibility of a Liffey Valley Walk to promote and support the development of new walking and cycling routes. 	
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		<p>The submission supports the following policies, objectives and actions; Wetlands and Ramsar Sites, Policy BI P8 and all Objectives</p> <p>The submission recommends the inclusion of the following additional objectives:</p> <ul style="list-style-type: none"> • Within high amenity areas, non-residential development will only be permitted where it relates to the area's amenity potential or its use for agriculture or recreational pursuits including recreational buildings, or if it comprises the re-development of or extensions to existing established area of commercial or civic activity and preserves its amenity value including landscape value, views or vistas. • Protect amenity areas from inappropriate development. • Improve the attractiveness and usability of the pedestrian environment in areas of high amenity. <p>Include an additional sub section: There has been a large increase in the amount of new fencing in upland areas. Barbed wire has been used in most of this new fencing, which, in the absence of stiles or gates, makes access for recreational users of our countryside almost impossible. Traditional hlll-sheep farming rarely required fencing, but since the introduction of AEOS, sheep-farmers must, in certain circumstances, stock-proof their land. The challenge is to ensure that such fencing will be done in a manner that will meet the requirements of AEOS without impinging on access for walkers and other recreational users.</p>	
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	<p>Include additional sub sections as follows;</p> <p>It is a requirement of the Planning Regulations 2001 Art 9(/)(a)(x) that the fencing or enclosure of land open to or used by the public during the ten years preceding such fencing or enclosure for recreational purposes or as a means of access to any seashore.</p> <p>Wire fencing constitutes visual pollution and destroys the "away from it all" feeling which makes upland areas such an attraction.</p> <p>The submission recommends an additional objective: As new fencing of land open to or used by the public during the ten years preceding is not exempt development in accordance with Art 9(/)(a)(x) of the Planning and Development Regulations the following criteria will be used when assessing planning applications for new fencing of hitherto open land: Fencing, particularly in upland, highly scenic or amenity areas, will not normally be permitted unless such fencing is essential to the viability of the farm. The nature of the material to be used, the height of the fence, and in the case of a wire fence the type of wire to be used will be taken into account. Stiles or gates at appropriate places will be required. Barbed-wire will not be used for the top line of wire.</p> <p>The submission recommends the inclusion of a new sub section entitled: <i>Walking, Cycling</i></p> <p>Include additional text: The listing and mapping of public rights of way will preserve Public Rights of Ways for recreational purposes.</p>	
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	<p>There are other pedestrian rights of way such as mass paths, which have existed for centuries but not all of which are readily identified</p> <p>The submission states that the listing of public rights of way is an urgent matter as the lack of certainty on access has not only affected the rights of local people but has been the major cause of the failure of walking tourism to reach its full potential in this country.</p> <p>The submission recommends the inclusion of a list of public rights of way in accordance with the 2010 Planning and Development (Amendment) Act Sec 7(b)(ii)(o), in the plan and recommends the list is drawn up in accordance with the wording in the Act and DoCELG circular to all councils of 25/10/12 (PL 09/12). The submission lists the counties that contain a list in their CDPs.</p> <p>The submission recommends that where a list of public rights of way is included in the Plan the following rider should be added: <i>The above list is not exhaustive. The omission of a right of way from this list shall not be taken as an indication that such a right of way is not a public right of way or has been extinguished. The public rights of ways mentioned in the Plan are based on evidence of their existence and validity.</i></p> <p>The submission recommends an approach to the listing of Rights of Ways:</p> <ul style="list-style-type: none"> - Identify the existing public rights of way which give access to seashores, mountains, lakeshores, riverbanks or other places of natural beauty or 	
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		<p>recreational activity using the following methodology:</p> <ul style="list-style-type: none"> – Place an advert in local papers seeking submissions from the public to identify public rights of way which give access to seashores, mountains, riverbanks or other places of natural beauty or recreational utility. – Identify existing rights of ways, paths and access points to seashores, mountains, lakeshores, riverbanks or other places of natural beauty or recreational activity. – Identify access points to seashores, mountains, riverbanks or other places of natural beauty or recreational activity which the Council have maintained or repaired with a view to identifying public rights of way. – Carry out a desktop analysis of public records, maps, aerial photographs and newspaper accounts to identify reputations of public rights of way. – Once the list is compiled, advertise and put it on display, the public will be invited to make submissions on the validity of the public rights of way. – Endeavor to verify and list the public rights of way and begin the formal process for designating rights of way under Section 14 of the Planning and Development Act 2000 (as amended). – Vary the Plan to include the list. <p>The submission queries if the recommendations relating to Public Rights of Way are not adopted would there be a possibility of the Plan being put on hold by a Ministerial Direction.</p>	
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	<p>The submission notes the commitment in the 2017 plan to identify and map public rights of ways, which to date has not been completed.</p> <p>The submission recommends the inclusion of the following additional objectives:</p> <ul style="list-style-type: none"> • When additional rights of way are identified they shall be incorporated into the Plan by way of a variation. • Examine the feasibility of identifying and mapping new Public Rights of Way in recreational and amenity areas in the context of emerging national guidance. • Identify links to established public rights of way with adjoining counties where appropriate. <p>The submission suggests that LR 59 to LR 61 only relate to Public Rights of Ways and that other objectives should be listed elsewhere in the plan.</p> <p>The submission recommends that LR A8 be deleted as there is currently no listing.</p> <p>The submission recommends the inclusion of an additional sub section <i>Walking, Cycling and Access to the Countryside</i>.</p> <p>Submission recommends the inclusion of an additional objective <i>to protect listed walks from development that creates or has the potential to create dis-amenities</i>.</p> <p>Submission recommends the inclusion of additional objectives: <i>Protect listed walks from development that creates or has the potential to create dis-amenities</i></p>	
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		<ul style="list-style-type: none"> • Prohibit development that might have a negative effect or impinge on public rights of way particularly those at scenic areas lakeshores, along inland waterways, riverbanks or other places of natural beauty or recreational activity. Enforce, by legal action if deemed necessary, any unauthorised at-tempt to inhibit access. • Look favourably on planning applications which include proposals to im-prove the condition and appearance of existing rights of way. • Development will not be permitted where a public right of way might be prejudiced, unless specific arrangements are made for suitable alternative linkages and that the developer can demonstrates that the level of amenity is maintained by: <ul style="list-style-type: none"> – the foot path/bridleway being diverted by the minimal practical distance and that the route continues to be segregated from vehicular traffic; – Appropriate legal procedures have been undertaken to extinguish the existing right of way and to establish the new right of way to replace it; – the diverted route is of at least equal character and convenience. • Where, in the interest of proper planning and development, the extinguishment of an existing right of way becomes expedient, the Council may require the provision of a suitable alternative. • The Council will utilise its relevant statutory powers to preserve, as practicable, the character of listed public rights of way for amenity purposes. • Council will use its powers under the Planning Acts to preserve, protect, maintain and enhance existing rights of way which give access to 	
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		<p>seashore, uplands, riverbank or other places of natural beauty or recreational use.</p> <ul style="list-style-type: none"> • Protect and promote Greenways and consider designating them as public rights of way. • Preserve and maintain existing public rights of way in order to link amenities. <p>The submission recommends that Urban should be deleted from the title to better reflect its contents.</p> <p>The submission recommends the inclusion of a Table with maps of Way-marked Ways including medium/long-long distance walking routes, Greenways, Sli na Slainte, heritage/historic walking trails, pilgrim paths, paths to mass rocks and holy wells, looped walks, hill walks, forest walks and other defined walking trails.</p> <p>The submission recommends a data base should be set-up and up-dated as new trails emerge and should be included on the KCC website.</p> <p>The submission recommends following the adoption of the Plan a temporary register of additional routes shall be maintained and should be included on the web site pending inclusion in the next Plan.</p> <p>The submission recommends the inclusion of the following new objectives:</p> <ul style="list-style-type: none"> • Support the provision of proposed long distance walking trails that provide access to scenic uplands, riverine and coastal features. • Protect access routes to upland walks and public rights of way. 	
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	<p>The submission recommends the inclusion of a new objective to facilitate the development of a walking trail between Ballymore Eustace, -Golden Falls, Russborough and Barretstown, in co-operation with land-owners and government agencies.</p> <p>The submission recommends the inclusion of new objectives to: Preserve, promote improve and extend recreational amenities and public access to lakes, riversides, uplands and other areas that have been traditionally used for outdoor recreation in co-operation with various stakeholders in promoting and developing recreational potential.</p> <p>Promote and encourage the recreational use of rivers and the development of blueways which provide opportunities for walkers, cyclists and canoers.</p> <p>The submission recommends the inclusion of a new objective to continue the development of projects for submission under the Outdoor Recreation Infrastructure Scheme and other funding schemes (e.g. LEADER Programme).</p> <p>The submission recommends the inclusion of a new objective to adopt bye-laws banning the use of motor bikes and quads (except for bo-na fide agricultural purposes) in privately owned areas of rough grazing (including commonage) and motorised para gliders.</p> <p>The submission recommends the inclusion of a new objective to support the protection, improvement and extension of recreational amenities and preserve their recreational attractions such as scenic beauty,</p>	
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		woodlands, waterways, coastal areas and beaches, natural heritage.	
432	West Kildare SMART Rural Alliance (SRA)	<p>The submission is supportive of TM O21 which includes the development of a walking route between Lullymore, Killinthomas Woods and Rathangan.</p> <p>It is stated that while the Barrow Blueway is the safest cycling and pedestrian route from Lowtown to Athy - a key challenge is how to draw people/tourists off the Blueways and into communities/attractions. The submission also states that the location of Killinthomas Woods beside the BnM works in Ballydermot has the potential to link many of the older BnM/ESB communities in Kildare to the Barrow, Grand and Royal Canal Blueways and on to communities in Laois and Offaly.</p> <p>It is requested that the Council considers providing a walking route to link the Royal Canal at Enfield with Kilshanroe and onto BnM lands at Timahoe North to complete the route across the county.</p> <p>The submission recommends the inclusion of new objectives:</p> <ul style="list-style-type: none"> • Established walking routes shall be identified prior to any new forestry planting, new infrastructural, energy/telecommunications or golf course developments. • Take the potential impact of proposed development into account when considering/assessing applications for permission in the vicinity of established walking routes that might impinge on walking routes(including long distance or potential walking routes). 	<p>Chief Executive’s Response It is considered that Objective LR O42 (as outlined below) adequately addresses the submission.</p> <p>LR O42 ‘Lead and support the extension and interconnection of Greenways, Blueways, Peatways and trails within and outside County Kildare in consultation with Coillte, Bord na Móna and all other relevant stakeholders.’</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>

		<ul style="list-style-type: none"> • Prohibit the intrusion of development along public walking routes, particularly those in scenic areas so that development doesn't impinge on or have negative impact on these routes particularly at lakeshores, river banks or other places of natural beauty or recreational activity and those in scenic and high amenity areas and along inland waterways. • Protect the integrity of public walking and potential routes (including long distance walking routes). 	
434.	Maynooth Community Council	<p>Notes that the grounds of St. Patrick's College and Carton House Hotel are in private ownership and there are in fact, no public parks of meaningful size in Maynooth. Submits that the Harbour Field, The Green and Carton Avenue are small green spaces and are earmarked for upgrade and further development. Supports the promised masterplan for the Carton Avenue area but contends that every idea for enhancement or improved maintenance gets referred to the non-existent masterplan, it's time for the masterplan to be presented. Support the idea to create a nature area connecting Carton Avenue to the walking and cycling infrastructure on the MERR and hence to the canal allowing a route connecting to the redeveloped Harbour field.</p> <p>Notes that the stretch of Royal Canal Greenway between the harbour and Leixlip has not yet been developed to greenway standard and it is understood that the project may be delayed another year. Submits that the development and advancement of these</p>	<p>Chief Executive's Response The issue of public open space provision within Maynooth, including the delivery of future parks and green linkages will be dealt with as part of a new local area plan for Maynooth, which forms part of the Council's work programme for 2022. Furthermore, the local area plan intends to include a specific section supported by objectives relating to the protection and future enhancement of Carton Avenue as a key public recreational amenity within the town.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

		projects should be given priority in the CDP and Maynooth LAP. Welcomes the provisions of LR O49.																																					
443	Clane Community Council	<p>Proposal: Add a listing of lands zoned F2 Strategic Open Space for the provision of local and regional parks. The listing may reflect and support zonings at LAP level.</p> <p>Example provided:</p> <table border="1"> <thead> <tr> <th>No</th> <th>Park Name</th> <th>Town</th> <th>Size</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>The People's Park</td> <td>Athy</td> <td>2ha / 5 acres</td> </tr> <tr> <td>2</td> <td>Woodstock Castle</td> <td>Athy</td> <td>11ha / 27 acres</td> </tr> <tr> <td>3</td> <td>The Fairgreen</td> <td>Castledermot</td> <td>1.5ha / 3.5 acres</td> </tr> <tr> <td>4</td> <td>Willowbrook Park</td> <td>Celbridge</td> <td>3.25ha / 8 acres</td> </tr> <tr> <td>4a</td> <td>Castletown, Donaghcumper, St Wolstans</td> <td>Celbridge</td> <td>?ha / ? acres</td> </tr> <tr> <td>5</td> <td>Abbeyland</td> <td>Clane</td> <td>6.4ha / 16 acres</td> </tr> <tr> <td>5a</td> <td>Capdoo</td> <td>Clane</td> <td>? ha / ? acres</td> </tr> <tr> <td>6</td> <td>Bawnogues</td> <td>Kilcock</td> <td>16ha / 40 acres</td> </tr> </tbody> </table> <p>In section 13.7 Urban Recreation and Amenity add new objective: Investigate the feasibility of developing an Urban Neighbourhood Park by integrating the existing local park at Abbeyland and undeveloped strategic open space as a River Liffey Park in Clane.</p> <p>Proposed new action - To prepare a detailed design for the River Liffey Park, Clane, an Urban Neighbourhood Park, by integrating the existing local park at Abbeyland and undeveloped strategic open space as a River Liffey Park in Clane.</p>	No	Park Name	Town	Size	1	The People's Park	Athy	2ha / 5 acres	2	Woodstock Castle	Athy	11ha / 27 acres	3	The Fairgreen	Castledermot	1.5ha / 3.5 acres	4	Willowbrook Park	Celbridge	3.25ha / 8 acres	4a	Castletown, Donaghcumper, St Wolstans	Celbridge	?ha / ? acres	5	Abbeyland	Clane	6.4ha / 16 acres	5a	Capdoo	Clane	? ha / ? acres	6	Bawnogues	Kilcock	16ha / 40 acres	<p>Chief Executive's Response It is not considered that a listing of lands zoned F2 Strategic Open Space for the provision of local and regional parks is necessary. Objectives LR O81 and LR O82 are clear in their support for the provision of a network of high quality, well connected and well located multifunctional public parks and spaces throughout the county. Also, a full list of KCC Parks and a hierarchy of Public Open Space is provided in sections 4.1 and 6.1 of Appendix 3 (Open Space and Outdoor Recreation Strategy).</p> <p>It is considered an objective which seeks to explore the feasibility of developing an Urban Neighbourhood Park by integrating the existing local park at Abbeyland and undeveloped strategic open space as a River Liffey Park in Clane is reasonable. However, the proposed Action is considered premature pending an outcome of the feasibility of the Urban Neighbourhood Park.</p> <p>Chief Executive's Recommendation Add the following new objective after LR O83: Explore the feasibility of developing an Urban Neighbourhood Park by integrating the existing local park at Abbeyland and undeveloped strategic open space as a River Liffey Park in Clane.</p>
No	Park Name	Town	Size																																				
1	The People's Park	Athy	2ha / 5 acres																																				
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445	IWAI Kildare	Section 13.6.1 in relation to countryside recreation is welcomed and supported.	<p>Chief Executive's Response The positive comments are noted and acknowledged.</p>																																				

		A range of objectives in chapter 13 are referred to which are welcomed and commended. These include LR O4, LR O39, LR O50, LR O51, and LR O52. The inclusion of LR A11 is also commended.	Chief Executive's Recommendation No change to the Draft Plan.
559	Newbridge Community Development	The submission urges Kildare County Council to include a specific objective towards the development of the proposed Linear Park in Newbridge from Tankardsgarden to Walshestown.	Chief Executive's Response Newbridge has its own statutory Local Area Plan and these matters can be considered as part of the review of the Newbridge Local Area Plan, preliminary work for which is already underway.
		The submission would also welcome enhanced cycling connectivity between Newbridge and Athgarvan and increased access to riverside amenity areas along this route.	Chief Executive's Recommendation No change to the Draft Plan.
410	Celbridge Community Council	<p><u>Recreation and Amenities</u> Submission welcomes objectives LR O55, LR O56 and LR O57. Submits Objective LR O57 should be expanded to state the nature of the recreational open space (e.g. create a riverside park with walking and cycling trails) and to list the locations along the River Liffey that might be considered for recreational open space. Submission identifies specific areas in Celbridge for inclusion.</p> <p><u>Urban Recreation and Amenity</u> Requests a new objective to progress opportunities to create circular/looped walks and enhanced access between the Royal and Grand Canals and the Liffey Valley in several locations to enhance access between the principal water corridors of the Dublin and Mid East Region [reference action 5.10 in Towards a Liffey Valley Park Strategy' (2006)].</p>	<p>Chief Executive's Response The request in relation to objective LR O57 is not accepted. The purpose of this objective is to provide a high level of overarching support for the development of a pedestrian link and expansion of recreational space along the River Liffey. The inclusion of site-specific provisions regarding such recreational space at a restricted number of areas in just one town is considered to be premature pending more detailed feasibility studies.</p> <p>The request regarding the development of circular/looped walks and connections between the Royal and Grand Canals and Liffey Valley and other waterways is noted. However, it is considered that objectives contained in section 13.6 (including objectives LR O42, LR 47, LR O56 and LR O57) contain a range of targeted provisions which seek to provide and connect green infrastructure routes and amenities along and between the principle water corridors in the county.</p>

		Notes that Action LR A18 in Chapter 13 is a duplicate of SC O13 in Chapter 10.	<p>The submission is correct in stating that both LR A18 and SC O13 reads the same except for the reference to objective in Chapter 10 and action in Chapter 13.</p> <p>Chief Executive's Recommendation Delete Action LR A18 (Chapter 13) and move Objective SC O13 (Chapter 10) to an action within the same section.</p>
446	David Knox	Kildare IWAI commends Kildare County Council's wish to regenerate old routes on water and land for recreation use.	<p>Chief Executive's Response Comments noted.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
446	David Knox	<p>13.6.1: This is a very positive initiative, which is welcomed and supported by Kildare IWAI.2.</p> <p>LRO39: IWAI Kildare welcomes the use of former commercial bogs as not just a way of lowering carbon emissions from this island, but also as a way to provide healthy recreation for our citizens.</p> <p>LRO4: This area is not directly in Kildare IWAI's typical 'territory'; however, as it is connected to the Barrow Line, we are keen to encourage this endeavour.</p> <p>LRO50: IWAI Kildare is pleased to see this statement.</p> <p>LRO51 (a) Naas to Corbally Harbours and (b) Corbally Harbour to Newbridge.</p> <p>IWAI Kildare welcomes the extension of the Grand Canal Greenway to Corbally Harbour and extending</p>	<p>Chief Executive's Response Comments noted.</p> <p>Chief Executive's Response No change to the Draft Plan.</p>

		<p>this recreational facility to the people of Newbridge, Kilcullen and Athgarvan.</p> <p>LRO52: The extension to Corbally Harbour with moorings, slipways, cafe and a service block, will create an ideal tourist destination for those navigating Kildare Canals.</p> <p>LRA11: Kildare County Council's wish to regenerate old routes on water and land for recreation use is commended.</p> <p>The extension of the Grand Canal Greenway to Corbally Harbour and also the extension of this recreational facility to the people of Newbridge, Kilcullen and Athgarvan is commended.</p>	
433	John Lawler	<p>The Victoria bridge area at Morrinstown Lattin should be regarded as an amenity zone.</p>	<p>Chief Executive's Response The proposal that the Victoria bridge area at Morrinstown Lattin should be regarded as an amenity zone is noted. The Victoria bridge area at Morrinstown Lattin is located along the River Liffey and objective LR O57 in Chapter 13 seeks to Investigate the feasibility of the 'possible expansion of recreational open space at other locations along the River Liffey, all subject to environmental considerations.' Also, action LR A1 commits to reviewing and updating the County Landscape Character Assessment within two years of the adoption of the County Development Plan. This review may consider extending any Protected Views/ Sensitive Landscapes within the Liffey Valley.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

322	Rathangan Tidy Towns	The concept of a National Peatlands Park in the Bog of Allen is supported. The submission is also supportive of peatway trails in Rathangan and Edenderry areas. These trails are very important for local tourism, community well-being and biodiversity.	<p>Chief Executive's Response The comments in support of the Bog of Allen to be considered as the location for a Peatlands National Park are noted. See response to submission 181 above.</p> <p>Chief Executive's Response See recommendation to submission 181 above.</p>
547	Siobhan Parker	<p>A leisure and pilgrim trail / blue way encompassing Old Connell, Great Connell Priory, The Curragh, Kildare Town with onward links to Wicklow / Glendalough.</p> <p>Reference is made to several historic figures and their connections to the area. It is submitted that a very ambitious vision would see Bord na Mona consider its tourism potential through the bog train rail network and link a cycle / walk route into a river route. The potential of Fionn and the Fianna, and their exploits on the Hill of Allen and the Curragh Plains is yet to be realised.</p>	<p>Chief Executive's Response Regarding the leisure / pilgrim trail route identified, it should be noted that there is a policy (RE P21) to work with the National Transport Authority, Kildare Fáilte, Fáilte Ireland, Waterways Ireland and all stakeholders to develop a co-ordinated approach to the selection, delivery, and servicing of future greenways, blueways, trails and routes throughout the county and region. There is also an objective (RE O146) to support and facilitate the integration of greenways and blueways with Heritage / Tourist Trails.</p> <p>In relation to the tourism potential of Bord na Mona, it should be noted there is an objective in the Draft Plan (RE O126) to facilitate the development of a tourism resource using cutaway peatlands in conjunction with Bord na Móna and Fáilte Ireland, subject to environmental considerations and nature designations, for example, recreational forestry, outdoor pursuits, peatways on the network of bogs and industrial railways and a designation of a National Peatlands Heritage Park.</p> <p>Chief Executive's Recommendation Amend the title of Section 13.6.4 as follows: 13.6.4 Greenways, Blueways, Peatways, and Trails and Peatland Railways</p> <p>Insert the following new paragraph:</p>

			<p>It is acknowledged that Kildare’s strong tradition associated with the peatlands has resulted in some attractive industrial rail lines which cross some of the county’s local roads and afford scenic qualities and remnants of our past. Some continue to be utilised by Bord na Móna. Consideration should be given to reserving the line of such railways / rights of way for possible future re-use. The national rail network which traverses the county also provides an opportunity for individuals to attain an overall perspective of the quality of the landscape of Kildare.</p> <p>Insert the following new objective after LR O65: Support the protection and retention of peatland railways lines where possible to support amenity use of the peatlands.</p>
538	Senator Mark Wall	<p>It is stated that the submitter supports:</p> <ul style="list-style-type: none"> • The submission of the Ballyshannon Action group; and • The submission to include an objective for the historic Barrow Drainage Scheme access routes and trail along the eastern bank of the river Barrow between Monasterevin and Athy to be re-opened, upgraded and re-developed to provide a Walking/Cycling/Canoeing route. 	<p>Chief Executive’s Response</p> <p>The reader is advised to review the Chief Executive’s response and recommendation with respect to the Ballyshannon Action Group submission (no. 256).</p> <p>The Draft Plan has an action in relation to the establishment of walking and cycling routes, including TM A5 which is to prepare a walking and cycling strategy to identify and invest in new routes. There is also an objective (LR O42) to lead and support the extension and interconnection of Greenways, Blueways, Peatways and trails within and outside the county while TM O21 will investigate the feasibility of further connections from existing and proposed greenways in the county. However, the benefits of the subject proposal are acknowledged, and it is proposed to amend the Draft Plan with respect to Objective TM O21 to specifically investigate the feasibility of providing the proposed route.</p>

			<p>Chief Executive's Recommendation Amend TM O21, add wording / bullet point at the end as follows: Investigate the feasibility of re-opening / upgrading and re-developing the historic Barrow Drainage Scheme access routes and trail along the eastern bank of the river Barrow between Monasterevin and Athy.</p>
538	Senator Mark Wall	The submission requests that the Curragh plains be designated as a national park and be brought under the direct control of the OPW.	<p>Chief Executive's Response The Curragh Plains is owned by the Minister of Defence and the Plan includes Action AH A4 and Objectives LR O19 & RE O106 in support of the implementation of the Curragh Conservation, Management and Interpretation Plan, when prepared. It is considered that the aforementioned objectives and action adequately address the issue of the protection and conservation of the Curragh Plains.</p> <p>A Curragh Plains Draft Conservation Management Plan is also being prepared with a second phase of public consultation due to take place as soon as the Draft Plan has been prepared. The focus of the second consultation will be on wayfinding and branding.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
308	Irene O'Neill	The submission commends the Council on its wish to re-generate old routes on water and land for recreation use; this being another way to encourage locals and visitors biking, boating and walking to explore the Kildare countryside and its attractions.	<p>Chief Executive's Response The comments are noted.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

<p>507</p>	<p>Brian McArdle</p>	<p>The submission refers to the lack of parks in many of Kildare's towns. States that Celbridge has no park apart from Castletown House, which has no playground or open areas for ball games. Suggests that the Council creates more parks.</p>	<p>Chief Executive's Response</p> <p>The Kildare Open Space Strategy (2021), identified a hierarchy of open space within the county, including three categories of open space types, which will influence future open space provision in County Kildare (Appendix 3 refers).</p> <p>It is an objective of the Council to provide or facilitate the development of suitable sites of appropriate scale for recreational and amenity use, through this Plan and the Development Management process in accordance with the forthcoming National Outdoor Recreation Strategy, the Ready, Steady, Play! A National Play Policy (2004) and the TeenSpace: National Recreation Policy for Young People (2007). Such land shall be easily accessible to the public and located in or adjacent to areas of existing or proposed residential use, or close to centres of rural communities (LR O66).</p> <p>Of relevance to the submission is Objective LR O80, which aims to identify potential sites for regional type parks in the Naas-Newbridge-Allenwood, Celbridge-Maynooth-Leixlip and Athy areas, and to commence the process of delivery of same, as outlined in the Council's Kildare Open Space Strategy, 2021 and Objective LR O81, which seeks to implement the recommendations of the Kildare Open Space Strategy 2021 and make provision for a hierarchy of public parks, open spaces and outdoor recreation areas within towns and villages.</p> <p>In addition, it is noted that a Celbridge Town Renewal Master Plan is currently being progressed by the Strategic Projects and Public Realm Team. A draft masterplan and a Priority Project Report has been circulated to Members of Celbridge Leixlip Municipal District. It is anticipated that the Masterplan will be finalised by the end of 2022. As part of</p>
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			<p>the draft masterplan, an extensive public consultation was carried out. As a result, a number of Priority Projects have been identified including the need for more open and public spaces. The Celbridge Local Area Plan aims to support the provision of a hierarchy of high quality multi-functional public open spaces within Celbridge, and to preserve and protect such spaces through the appropriate zoning of lands.</p> <p>In addition, it shall be an action of the Council to develop an outdoor teen facility in Celbridge as a pilot scheme to inform the development of other play facilities in County Kildare (LR A16).</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
308	Irene O'Neill	The submission makes reference to AH O40 and would like the opportunity to work with KCC, Waterways Ireland and boat owners in this regard.	<p>Chief Executive's Response In relation to the objective to co-operate with Waterways Ireland in the management, maintenance and enhancement of the Royal Canal and Grand Canal and associated structures/features (AH O40, refers) as per the Implementation and Monitoring Framework (Appendix 12) this will be implemented through the development management process and Waterways Ireland. Therefore, it will be subject to public consultation through a planning application under the Planning and Development Act 2000 (as amended).</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
308	Irene O'Neill	The submission welcomes the initiative under Section 13.6.1.	<p>Chief Executive's Response The contents of the submission are noted.</p>

		<p>The submission supports LR O39, LR O4, LR O50, LR O51, LR O52, and LR A11.</p>	<p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
<p>276.</p>	<p>County Kildare Access Network</p>	<p>Submission requests the following additional text to objective LR O67: <i>(iv) inclusion of Disabled Parking Bays</i> <i>(v) accessible play recreational facilities/equipment.</i></p> <p>Requests the inclusion of the word “<i>accessible</i>” in action LR A18, as follows: <i>Progress plans for the provision of an accessible swimming pool in North Kildare in conjunction with other relevant bodies.</i></p>	<p>Chief Executive’s Response It is agreed to amend objective LR O67 to include the proposed additional text.</p> <p>Both Action LR A18 (Chapter 13) and Objective SC O13 (Chapter 10) reads the same except for the reference to objective in Chapter 10 and action in Chapter 13.</p> <p>Chief Executive’s Recommendation Amend LR O67 as follows: <i>Ensure that new developments are compatible with the availability and size of passive and active open space and recreational facilities,</i> <i>i) within 10 minutes’ walk from people’s homes;</i> <i>ii) accessible to all, regardless of age, physical mobility, disability or social disadvantage, and</i> <i>iii) are in line with the Settlement Strategy and the ‘Sustainable Development in Urban Areas: Guidelines for Planning Authorities,’ (DEHLG, 2009),</i> <i>iv) includes disabled parking bays, and</i> <i>v) includes accessible play recreational facilities/equipment.</i></p> <p>Delete Action LR A18 (Chapter 13) and move Objective SC O13 (Chapter 10) to an action within the same section.</p> <p>Amend SC O13 as follows: <i>Progress plans for the provision of a fully accessible regional swimming pool in North Kildare in conjunction with other relevant bodies.</i></p>


222	David Wright	<p><u>Improving walking routes</u> There should be a pedestrian connection between Blackwood Feeder and Ballynafagh Lake and the mainline of the Grand Canal.</p>	<p>Chief Executive's Response Ballynafagh Lake is a Special Area of Conservation, a Natura 2000 site in accordance with the European Habitats Directive. There are known sources of vertigo around the Blackwood Feeder and the installation of a pedestrian connection may have the potential for significant negative impacts on the presence of Annex species and habitats. Whilst it is not considered appropriate to include an objective to deliver a pedestrian link between the Blackwood Feeder and Ballynafagh Lake, should any potential project emerge it would have to undergo rigorous appropriate assessment to ensure no negative impact on the qualifying interests of the Natura 2000 site.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
222	David Wright	<p><u>Improving walking routes</u> There is no specific mention of long walking routes from Monasterevin to Portarlinton, although there are ambitious plans for old railway routes.</p>	<p>Chief Executive's Response Objective LR O43 of the Plan is 'to investigate the feasibility of connecting the Barrow Blueway with Portarlinton, Co. Laois and along the Mountmellick Grand Canal and Peatways in consultation with Laois County Council and Waterways Ireland.' This has the potential to link Monasterevin to Portarlinton.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
222	David Wright	<p><u>Improving walking routes</u> Protection of 'Rights of Way' should be a priority.</p>	<p>Chief Executive's Response Objective LR O59 in Chapter 13 'Landscape Recreation and Amenity' ensures Public Rights of Way are preserved, protected, promoted, and improved for the common good, while Objective LR O61 in the same chapter seeks to identify, list and map all existing rights of way and walking routes over the lifetime of this plan.</p>

			Chief Executive's Recommendation No change to the Draft Plan.
222	David Wright	Strong mention is given to the greenways and blueways, which should equally be given to grand and royal canals and their feeder/branches. Both banks of all canals need to be protected which will prove challenging if not a policy item.	Chief Executive's Response Section 13.4.6 of the Plan refers to the Grand and Royal Canal corridors. It is acknowledged in the Plan that canal corridors are potentially vulnerable linear landscape features, as they are often highly distinctive in the context of the general landscape and in some cases landscape sensitivities may be localised or site-specific. The canals are identified as areas of High Amenity and objective LR P2 is to protect High Amenity areas from inappropriate development and reinforce their character, distinctiveness and sense of place.
			Chief Executive's Recommendation No change to the Draft Plan.
222	David Wright	<u>Improving walking routes</u> Attention should be given to Naas Harbour area, in particular the lands on the 'west' bank accessed by Abbey Bridge. During Covid the Naas Branch proved to be very popular. However, the mixture of traffic and pedestrians was problematic. The long term use of this recreational area from Lock 1 to Jigginstown should be looked at.	Chief Executive's Response In December 2021, the Naas Local Area Plan 2021-2027 was adopted by Kildare County Council, in which the Canal Quarter is designated as a Core Regeneration Area. It is envisaged that the area has the potential to become a tourism and family recreation hub for the greenway and a creative district for Naas, where sustainable mobility and enhancement of the built heritage are key factors in future development. Policy CQ1 of the LAP is to protect and enhance the amenity of the lands located within the Canal Quarter through sensitive interventions to improve the existing amenity and to encourage and promote appropriate development and regeneration of this area in a sustainable manner.

			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
413.	Kildare Public Participation Network	<p>Proposes the following additional action: New action - Collaborate with Waterways Ireland and other relevant stakeholders to ensure recreation, amenity and heritage sites in Kildare are accessible to all e.g. the removal of Kissing Gates along the canals as these are in-accessible for wheelchair users.</p>	<p>Chief Executive's Response Request accepted, in part.</p> <p>Chief Executive's Recommendation Insert the following new action after TM A17: Collaborate with Waterways Ireland and other relevant stakeholders to ensure that recreation, amenity and heritage sites in County Kildare are accessible to all, and that design solutions retain existing man-made, local features of interest such as 'kissing gates.'</p>
VIEWS & PROSPECTS			
21	Punchestown Area Community Group	<p><u>Scenic routes and Protected Views</u> It is submitted that there is a clear omission in the Plan with regards to not including protected views of Punchestown racecourse or the area around Punchestown racecourse, for these two reasons:</p> <p>Horseracing in an outdoor landscape, offering animated and beautiful scenes set within an attractive landscape and people use the recreational amenity of Punchestown because of its beautiful setting and scenic views.</p> <p>The submission identifies the following scenic routes and views to be considered for inclusion in the Plan: (a) The scenic route from Ballymore Eustace Road (before Watch House Cross) heading on the R411</p>	<p>Chief Executive's Response It is considered that the addition of a singular scenic routes and/or protected view would represent an ad hoc approach in the absence of an updated county wide landscape character analysis review and would therefore be premature at this time.</p> <p>It is an action of the Draft Plan under LR A1 to review and update the County Landscape Character Assessment, within two years of the adoption of the Plan and a statutory variation will be undertaken on the Plan, if necessary, should material changes be identified.</p> <p>As part of the review of the LCA all related submissions received during either the pre-draft or draft stages of the CDP will be considered and the merits of including the</p>

		<p>until it enters the village of Ballymore Eustace. An image of the starting point and a map of the proposed route are provided.</p> <p>(b) The view from Watch House Cross junction looking towards Punchestown racecourse. An image of the view is provided.</p> <p>(c) The view from the Woolpack Road looking upwards towards Colliers Hill (Woolpack Road immediately alongside Gowran Grange lodge is known locally as Colliers Hill). An image of the view is provided.</p>	<p>various scenic routes, viewpoints and landscapes will be assessed, and incorporated into the LCA as appropriate.</p> <p>Chief Executive's Recommendation No changes to the Draft Plan.</p>
598	Friends of Harristown Commons	<p>The submission welcomes the aim of Chapter 13. The submission contends that the area around Harristown Common is unique in terms of landscape character.</p> <p>The views across the 182 acres of common are rare and should be protected. The views of Lugnaquilla, the Liffey Valley and the Wicklow mountains from Mullacash Hill should be protected.</p>	<p>Chief Executive's Response See response to Submission No. 21 above.</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 21 above.</p>
181	Lullymore Heritage & Discovery Park CLG	<p>The submission suggests that when referencing the Views of the Bog of Allen that the following text should be included: 'including the Lullymore / Allen Bog group'.</p>	<p>Chief Executive's Response See response to Submission No. 21 above.</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 21 above.</p>
450	Eric Galbraith	<p>Request to identify additional scenic routes along L6044, L6045, L6046 and L6048 between Ballymore Eustace, Mullacash and Carnalway. Request to identify additional Protected Views as follows: The view from point W91 E2N5 over Harristown, Mullaboy and Coughlinstown townlands includes historic points like Harristown (Portlester castle) remains, Harristown</p>	<p>Chief Executive's Response See response to Submission No. 21 above.</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 21 above.</p>

		station on the old Sallins to Tullow railway line. This view also includes a full span of the north side of the Wicklow Mountains showing Kippure, Church mountain and Lugnaquilla. It also includes the River Liffey valley.	
42	E O'Loughlin	<p>Scenic Routes KCC is thanked for ensuring Wind Farms do not impinge on the waterways in Kildare and that they take into consideration views across the River Barrow, Grand Canal, and Royal Canal in Kildare.</p>	<p>Chief Executive's Response Noted.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
196	Noel Coyle	<p>The submission recommends that Mullacash Hill should be a protected view.</p> <p>The view from Mullacash Hill is enjoyed by many people who cycle, run, walk and drive this route. It is a segment on Strava. Currently the view from the road on Mullacash Hill is totally unspoiled. There is no development on it and this is pretty unusual.</p> <p>The Landscape Character Analysis that was carried out in 2003 (appended to the 2005 CDP) makes specific reference to Mullacash Hill at 18.5.1. It lists Mullacash Hill as being one of the main hilltops in the area at 171 O.D. It specifically mentions that the "elevated vantage points along the long roads provide long-distance views of the Kildare lowlands". It also states the area is generally perceived as being important and special in landscape terms.</p> <p>Taylor's map of 1783 also clearly shows Mullacash Hill as a prominent land feature.</p>	<p>Chief Executive's Response See response to Submission No. 21.</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 21.</p>

<p>192</p>	<p>Deirdrett Brett</p>	<p>The submission recommends Mullacash Hill as a new protected view.</p>  <p>The view from Mullacash Hill is enjoyed by many people who cycle, run, walk and drive this route. It is a segment on Strava. Currently the view from the road on Mullacash Hill is totally unspoiled. There is no development on it and this is pretty unique in itself.</p> <p>The Landscape Character Analysis that was carried out in 2003 (appended to the 2005 CDP) makes specific reference to Mullacash Hill at 18.5.1. It lists Mullacash Hill as being one of the main hilltops in the area at 171 O.D. It specifically mentions that the “elevated vantage points along the long roads provide long-distance views of the</p>	<p>Chief Executive’s Response See response to Submission No. 21.</p> <p>Chief Executive’s Recommendation See recommendation to Submission No. 21.</p>
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		<p>Kildare lowlands". It also states the area is generally perceived as being important and special in landscape terms.</p> <p>Taylor's map of 1783 also clearly shows Mullacash Hill as a prominent land feature.</p>	
478	Siobhan Taffee and Stephen Bourke	<p><u>Additional Scenic routes</u> Classify the route from Harristown Estate, through Dunnstown towards the Harristown Commons (L6044) as a scenic route.</p> <p>The road, as it approaches Harristown Estate rises to give a clear, unobstructed view towards Ballymore Eustace, Hollywood village and the rising of the Wicklow Mountains National Park towards the Wicklow Gap. The mountains are clearly visible and include Church Mountain, Sorrel Hill, Mullaghcleevaun and Turlough Hill. The rise on the road mentioned above also means that the L6044 has a view along the walls of Harristown Estate and into the River Liffey Valley.</p>	<p>Chief Executive's Response See response to Submission No. 21.</p> <p>Chief Executive's Recommendation See recommendation to Submission No. 21.</p>
ALLOTMENTS & COMMUNITY GARDENS			
501	Fiona O'Loughlin	The submission states that community gardens and allotments should be considered where possible.	<p>Chief Executive's Response Section 13.7.2 in Chapter 13 'Landscape, Recreation and Amenity' recognises the importance of allotments, community gardens and farms in an urban context, while Objective LR O85 in the same chapter ensures that residual land in developments can be used for the provision of green infrastructure including for community food programmes/allotments and pollination.</p>

			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
434.	Maynooth Community Council	States that in line with LR O86 allotments should be provided in Maynooth as travelling to existing allotments in Celbridge or Leixlip does not make sense. Submits that there is space available in the set-back areas along the M4 and close to residential areas. In addition, the set-back area around Carton Avenue would have sufficient space for some allotments or a community garden.	<p>Chief Executive's Response The provision of allotments and community gardens will also be addressed as part of the new local area plan for Maynooth and it should be noted that there are a number of supporting objectives in the Draft Plan to support the creation of allotments and community gardens throughout the county.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
364	Ursula King	KCC should support community gardens/allotments in urban areas.	<p>Chief Executive's Response Section 13.7.2 in Chapter 13 'Landscape, Recreation and Amenity' recognises the importance of allotments, community gardens and farms in an urban context, while Objective LR O85 in the same chapter ensures that residual land in developments can be used for the provision of green infrastructure including for community food programmes/allotments and pollination.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
72	Community Gardens Ireland	The number of community gardens and allotments is low in Ireland compared to other European countries. Community gardens and allotments can contribute towards many of the UNs Sustainable Development Goals. Kildare County Council should open up a waiting list for community growing spaces to better	<p>Chief Executive's Response The submission proposes to amend LR O86 of the Draft Plan as set out above. Allotments/community gardens may be considered on the roofs of buildings where they do not pose a safety risk to the users of such spaces. It is considered appropriate to support</p>

	<p>plan for demand in this area. The waiting list is closed for Wonderful Barn allotments in Leixlip, which is the only community gardens provided by Kildare County Council. It is requested to strengthen the objective in relation to the criteria for allotments/community gardens by adding the following as the first bullet point within Objective LR O86:</p> <p>(i) On the roofs of buildings, as temporary uses on vacant, under-utilised or derelict sites in the county and in peripheral urban areas, and in residential developments.</p> <p>(ii) preserve existing opportunities for Kildare residents to engage in food production through allotments, community gardens and the provision of food foraging areas.</p> <p>(iii) to seek to provide an adequate number of community growing spaces to meet community demand in all municipal districts.</p> <p>(iv) to carry out a survey of underutilised open spaces for community gardens with a view to identifying areas in the county appropriate and suitable for community gardens.</p> <p>Summary of Appendix from Community Gardens Ireland:</p> <p>Community Gardens Ireland believe there is currently record demand for communities to grow their own produce.</p> <p>It is believed that there should be oversight from a third party, above local authority level, which would</p>	<p>allotments/ community gardens on vacant, under utilised or derelict sites throughout the county in order to facilitate more sustainable, local means of food production.</p> <p>In relation to community growing spaces in all municipal districts, it is considered that this is adequately addressed by Action LR A23 which reads as follows: Investigate the feasibility of an Allotment Pilot Programme to consider matters relating to site identification, administration, leases/rental and resources required to deliver an allotment in each Municipal District in association with District Engineers and the Parks Department.</p> <p>Chief Executive’s Recommendation Add the following new objectives after LR O85: New objective: Support and facilitate allotments/ community gardens on roofs of buildings where they do not pose a safety risk to the users of such spaces. Each proposal shall be assessed on its own merits.</p> <p>New objective: Support and facilitate allotments/ community gardens on vacant, underutilised and derelict sites throughout the county.</p>
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		formally approve the removal of existing allotments or community gardens from public land. Also, the establishment of a 'community land trust' that would encourage communities to purchase and set up community owned resources would be beneficial. There is substantial evidence that there are significant mental health benefits associated with allotments and community gardens.	
195	Elizabeth Cullen	It is proposed that allotments be made available to residents in all new housing schemes, to allow people grow their own food. This will also increase community spirit and promote a sense of wellbeing.	<p>Chief Executive's Response The Draft Plan encourages allotments through the stated objectives within Chapter 13, such as Objective LR O85 which is to ensure residual land in developments can be used for the provision of green infrastructure including for community food programmes / allotments and pollination. In addition, Objective LR O86 supports and facilitates the development of allotments/community gardens that are accessible to all, subject to meeting criteria such as proximity to public transport, walking / cycling infrastructure, adequate water supply and parking facilities.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
207	Deirdre Lane	Submission supports an increase in allotments, especially affordable ones to those of low means or income, for every town and village.	<p>Chief Executive's Response Regarding an increase in allotments, especially affordable ones to those of low means or income, for every town and village, it is considered that this is adequately addressed by Action LR A23 which reads as follows: Investigate the feasibility of an Allotment Pilot Programme to consider matters relating to site identification, administration, leases/rental and resources required to deliver an allotment in each Municipal District in association with District Engineers and the Parks Department.</p>

			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
331	Fionnuala Corcoran	<p>The submission would like the Draft Plan to support small family farms, measures to reduce intensification and consolidation of farms, measures to promote a fair income for farmers, promotion of local food growing, food education, and an acknowledgement of the food insecurity situation in Ireland. Ireland currently imports 75% of its food.</p> <p>The submission outlines the impact of the Common Agricultural Policy (CAP) has had on the environment and agriculture.</p> <p>The submission suggests amending RD O12 as follows: Encourage farmers markets and local food Hubs for the sale of locally produced goods at appropriate locations in the towns and villages across the county.</p> <p>The submission also suggests the inclusion of an objective to promote community supported agriculture across the county and also to organise access to allotments in every town in the county.</p>	<p>Chief Executive's Response It is outside the remit of a land use plan to dictate to farmers how to operate their business or to be involved in issues relating to farmer's incomes. The Draft Plan supports the agricultural industry across many of the plans policies and objectives.</p> <p>The introduction of local food hubs is considered acceptable in the context of RD O12 as they are considered a beneficial way of connecting farmers with customers and distributors thereby strengthening local economics and giving people access to local food.</p> <p>Section 13.7.2 refers to Allotments and Community Supported Agriculture, which is supported by objective LR O86.</p> <p>Chief Executive's Recommendation Amend RD O12 as follows: Encourage farmers markets and local food Hubs for the sale of locally produced goods at appropriate locations in the towns and villages across the county.</p>
413.	Kildare Public Participation Network	<p><u>Allotments, Community Gardens and Farms</u> Proposes the following additional objective: New objective - Increase the amount of Kildare County Council community gardens/allotments by 40% throughout the duration of the Plan.</p> <p>Proposes the following additional action:</p>	<p>Chief Executive's Response The request to increase the amount of community gardens/allotments by 40% is not accepted as it is considered that any targeted increase should be evidence-based in nature and not the subject of any arbitrary set predetermined increase.</p> <p>It is considered that the request to support and facilitate the development of allotments and community gardens is</p>

		<p>New action - Support and facilitate the development of allotments and community gardens, by actively identifying suitable sites throughout Kildare.</p>	<p>already sufficiently provided for under objective LR O86. It is also noted that action LR A23 provides for the investigation of an Allotment Pilot Programme to deliver an allotment in each municipal district of the county.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
INLAND WATERWAYS & CANALS			
472	Keep Ireland Open	<p>The Submission recommends the inclusion of additional objectives:</p> <ul style="list-style-type: none"> Promote and develop the towpaths along the Grand Canal and the Barrow and Corbally Lines to expand recreation and continue to work closely with in co-operation with WI, the NPWS and adjoining councils. Support the development of the Grand Canal for amenities//recreation including the Naas to Sallins and Naas to Corbally Harbour Greenways and linking them to the Grand Canal Greenway. Support the delivery of the Barrow Greenway and Blueway projects that promotes walking and cycling in conjunction with relevant organisations including WI to enhance the amenity use of river and canal areas. Investigate the possibility of developing long distance walking routes, within the lifetime of the Plan, along disused canals (Corbally Line and Blackwood Feeder. <p>The submission recommends the inclusion of an additional objective:</p>	<p>Chief Executive's Response Not agreed. Objectives LR O42, LR O46, LR O50. LR O51, LR O52 all support the development of walking routes along Corbally canal, the Blueway and other Blueways in the county. Objective LR O52 considers the opening of the canal between Naas and Corbally Harbour. The Blackwood feeder is an SAC with known habitat for vertigo snail populations and so it will not be feasible to consider reopening this canal as it will conflict with the EU Habitats Directive.</p> <p>Chief Executive's Recommendation Add the following new objective to Section 13.6: <i>All developments that would be visible from the canal network shall be required to submit a visual assessment of the proposal relative to the canal in order to determine any negative impacts on the visual amenity and environmental quality of the canal.</i></p>

		<p>Protect, enhance and preserve the natural heritage of the Royal Canal including the maintenance of a broad zone protection area of 100m either side of the canal. This shall include a visual assessment zone of 500m from each bank in which development proposals are assessed for their impact on the natural setting of the canal and its views and prospects. If a proposed development is deemed to have a detrimental negative impact on its integrity, then it shall not be permitted.</p>	
42	E O'Loughlin	<p>The submission highlighted several objectives and outlined its support for same for example: Objectives RE O95, RE O137 and RE O155 in Chapter 4; Action RD A1 in Chapter 9, Objective AH O40 in Chapter 11, various objectives relating to boglands in Chapter 12., Objectives LR O39 and LR O52 as well as Action LR A11 in Chapter 13.</p> <p>3 no. proposals are made in relation to bogs at Lullymore/Lodge, Ummeras, and Ticknevin.</p> <ol style="list-style-type: none"> 1) Lullymore / Lodge Bog: Install mooring posts for boats along the canal and create safe new walking and cycling connections from the canal to the attractions offered within the neighbouring bogs including signage noting the nearby tourist attractions. A list of the attractions is noted along with the potential benefits of providing such infrastructure. 2) Umeras Bog: Create a marina for residential and touring barges adjacent to the Grand Canal. This would provide a destination for tourists, aligning the natural heritage of the canal with Umeras Peatlands Park. It is also recommended to create 	<p>Chief Executive's Response The positive comments in relation to the objectives outlined above in the Draft Plan are noted. Regarding the proposals for marinas, canal and other infrastructure at Lullymore / Lodge, Ummeras, and Ticknevin Bogs it should be noted the council is not the responsible authority for providing such infrastructure and the Draft Kildare County Development Plan is not the instrument through which to provide the level of design detail suggested in the submission. However, LR O39 in Chapter 13 supports Waterways Ireland and other state agencies to explore the provision of more recreational infrastructure at appropriate locations to include access ways and nature trails with a view to opening up state lands for recreational use.</p> <p>Chief Executive's Recommendation Add the following new action to Section 13.6: Liaise with Waterways Ireland and other agencies to investigate the feasibility of creating inland Marinas / mooring facilities on canals at Lullymore / Lodge, Ummeras, and Ticknevin Bogs.</p>

		<p>new mooring posts on the canal, along with a jetty, and a service block for all visitors. The proposal can provide further housing options, be positive for climate change, while attracting tourists and growing the local economy. A list of potential benefits and customers are included with the proposal while an example of a rural Marina along a canal in Wales is also provided to support the proposal.</p> <p>3) Ticknevin Bog: Create a Recreation Hub that consists of a Marina for barges, facilities for walkers and cyclists, a stopping point for recreational vehicles, overnight glamping pods, all within a green environment showcasing local flora and fauna. A list of potential benefits and customers are included with the proposal while an example of a Marina in Wiltshire is also provided to support the proposal.</p>	
222	David Wright	The specific mention of Corbally, including the harbour and extension of walking routes to Newbridge, is welcomed, however a long-term aim could be included to restore the navigation of the canal to Corbally.	<p>Chief Executive's Response Objective LR O52 (chapter 13) commits to exploring the feasibility of reopening the canal between Naas and Corbally Harbour for navigation, mooring and launching vessels, to encourage its use for recreational water sports in conjunction with Waterways Ireland. However, it should be noted that Waterways Ireland are the competent authority responsible for the management of canals and the navigability of canal waters.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
615	Niall O'Dowda	The submission highlights the opportunities presented by the canals as historic, cultural and leisure resources. The maintenance of the canals to ensure that they are navigable all year round is requested.	<p>Chief Executive's Response It is considered that policy RE P27 adequately addresses the submission with regards to the opportunities presented by the canal resources which seeks to maximise opportunities</p>

		Furthermore, the re-opening of The Corbally Branch for navigation and the development of Corbally Harbour are also requested.	<p>for the use of canals and waterways as tourism and recreational amenities.</p> <p>While it is not a function of the Council to maintain canals, it is an objective of the Council to co-operate with Waterways Ireland in the management and maintenance of same (Objective AH O40 refers).</p> <p>The re-opening of The Corbally Branch for navigation and the development of Corbally Harbour are addressed in Objectives LR O52 and RE O137</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
GENERAL			
358	Deirdre Lane	<p><u>Environmental Training</u> Each party should undertake training to promote protection of landscapes and permaculture while mapping school and university course shortfalls. KCC should also implement a programme that investigates the life cycle of green infrastructure. Parties should also identify their own territory, its character, any pressures, how it is transformed and how it is valued. These identification and assessment procedures shall be guided by the exchanges of experience and methodology, organised between the Parties at European level pursuant to Article 8.</p>	<p>Chief Executive's Response It is unclear what is meant by 'party' in the context of this submission. Notwithstanding same however, the provision of training programmes is not a matter for the Draft Plan, it being primarily a land use plan. Neither has the Council any role to play in the educational syllabuses associated with the various educational facilities across the county. All educational matters are under the remit of the Department of Education and Skills.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
472	Keep Ireland Open	The submission recommends the inclusion of additional text to implement the provisions of the Planning & Development Act 2009 (as amended) which offers protection for natural heritage.	<p>Chief Executive's Response The Plan was prepared in accordance with the Planning and Development Act 2000, as amended which requires local authorities to include mandatory objectives for, inter alia, the following;</p> <ul style="list-style-type: none"> • Conservation and protection of the environment.

	<p>The submission recommends an additional objective to carry out an audit of natural heritage sites in the ownership of the Council and develop conservation/management strategies for them.</p> <p>The submission supports the following policies, objectives, and actions; Landscape Character Assessment, all policies and objectives; Impact of Development on Landscape, Policy LRP1, Objectives LR 01, LR O16 to LR O18, LR O22 to LR O25, LR O27 to LR O29; Scenic Routes and Protected Views, all policies and objectives</p> <p>The submission supports the following policies, objectives, and actions; Recreation and Amenities, Policy LR P4, Objectives LR O37 to LR O52, LRO54 to LR O58, LR O59, LR O60, LR O65 and Action LR A8; Urban Recreation and Amenity, Objectives LR O66, LR O80, LR O83, LR O 84 and Action LR A13, LR A14</p> <p>The submission recommends the inclusion of new objectives:</p> <ul style="list-style-type: none"> • Engage in the Compulsory Purchase Order process, when required, to facilitate the timely delivery of Greenway and Cycleway Projects. • Lobby the appropriate Government Department to agree and implement a scheme to indemnify private landowners with regard to recreational users of their land. • Seek to negotiate access to lands for amenity purposes using access agreements, where appropriate and feasible. 	<ul style="list-style-type: none"> • Management of features of the landscape, such as traditional field boundaries. • Promotion of compliance with environmental standards and objectives established for bodies of surface waters and groundwater. <p>Audits of natural heritage sites are not matters for the county development plan but will be addressed in the County Kildare Heritage Plan 2019-2025</p> <p>The Development Plan Guidelines for Planning Authorities – S. 28 Ministerial Guidelines states ‘The statutory elements and remit of the development plan are set out clearly in the Planning & Development Act. In preparing the development plan, planning authorities must exercise caution not to inappropriately stray into the operation of other statutory codes and regulatory regimes that relate to the development sector but are outside the remit of a county or city development plan. This is applicable to policies or objectives for non-planning functions governed by other legislation and regulations’. It is considered that these recommended objectives are outside of the scope of the plan.</p> <p>Chief Executive’s Recommendation No change to draft Plan.</p>
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CHAPTER 14 – URBAN DESIGN, PLACEMAKING & REGENERATION			
Sub No.	Name	Summary of Issues Raised	Chief Executive's Response & Recommendations
PLACEMAKING			
276.	County Kildare Access Network	With regard the policy UD P1, the submission requests that the wording be amended to include persons with disability, as follows (amended text in purple): Apply the principles of people-centred urban design and healthy and adapted to meet the changing needs of growing populations including aging and disabled persons.	<p>Chief Executive's Response Noted and agreed</p> <p>Chief Executive's Recommendation Amend policy UD P1, as follows: to meet the changing needs of growing and aging populations including aging and disabled persons.</p>
287	Arts Council	The Arts Council would recommend that specific reference is made to the provision of public spaces for the use of formal and informal public engagement, interaction and/or the provision of arts/cultural activities/events under each type as set out in Table 14.1 in Chapter 14 'Urban Design, Placemaking and Regeneration' of the Draft Development Plan.	<p>Chief Executive's Response This Table outlines the purpose and level of detail of Kildare County Council's Placemaking Strategies. It is considered the use of open space for the provision of arts/cultural activities/events should instead be referenced in paragraph 14.5.4 'Transforming the Public Realm'</p> <p>Chief Executive's Recommendation Reword Section 14.5.4 to state the following:a well-designed town square or waterside space has the potential to become a key social/recreational/cultural event space, enticing people to linger and patronise the businesses of an area.</p>
287	Arts Council	The Arts Council would welcome the inclusion of a policy/objective in the Development Plan to promote high-quality architecture that is built to last, designed for climate resilience and sustainability and that public spaces are of	<p>Chief Executive's Response It is considered that policy UD P1 in Chapter 14 'Urban Design and Regeneration' of the Draft Development Plan satisfactorily addresses the issues raised and, for ease of reference, reads as follows;</p>

		sufficient quality, responsive to their locational characteristics, and designed for public benefit, use and functionality.	<p>It is the policy of the Council to apply the principles of people-centred urban design and healthy placemaking as an effective growth management tool to ensure the realisation of more sustainable, inclusive, and well-designed settlements resilient to the effects of climate change and adapted to meet the changing needs of growing and aging populations.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
TOWN CENTRES			
207	Deirdre Lane	That the CDP build 10-minute town plans to reduce car use and the creation of fossil fuels	<p>Chief Executive's Response The Draft Plan addresses the 10-minute Town Concept in Chapter 14. The 10-minute settlement concept is a key aim of the Draft Plan and a number of provisions are integrated throughout various chapters to ensure its practical implementation in towns and villages of all scales across the county.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
287	Arts Council	The Arts Council would support the inclusion of a policy/objective in the Development Plan that supports the temporary use of vacant commercial / retail premises in town centres for the promotion of arts and culture.	<p>Chief Executive's Response It is considered policy UD O10 in Chapter 14 'Urban Design and Regeneration' of the Draft Development Plan satisfactorily addresses the issues raised and, for ease of reference, reads as follows; It is an objective of the Council to support the establishment of alternative uses and functions for buildings within town centres and facilitate the implementation of the 'meanwhile use' concept to allow for temporary uses to be established in vacant units, subject to the appropriate planning and environmental considerations.</p>

			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
495	Suzanne Murphy	The submission states that the council should target Sundays as a car-free day in town centres during the summer months and generally prioritise pedestrian and cyclist access over car access. Derelict properties in towns and villages should not be allowed to sit vacant and living above shops/restaurants in towns needs to be supported. Install water dispensers in all Kildare towns	<p>Chief Executive's Response It is not within the remit of the CDP to target Sundays as a car-free day in town centres during the summer months or to install water dispensers in towns.</p> <p>The aim of Chapter 14 (Urban Design, Placemaking & Regeneration) is to continue to pursue a Town Centre first approach to planning, renewing, and developing the historic cores of County Kildare's towns and villages. Section 14.5.7 of the Draft Plan is also clear in its commitment to tackling town centre vacancies throughout the county.</p> <p>Chapter 5 (Sustainability Mobility & Transport) and 14 include many objectives which seek to support and facilitate a reduction in traffic congestion in town centres and to promote pedestrian and cycle access over car access.</p> <p>Section 14.5.4 contains Public Realm Strategies (as outlined in Table 14.1), which are a critical tool for setting out a long-term vision for the design and management of a town's key network of public spaces.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
432	West Kildare SMART Rural Alliance (SRA)	The submission highlights the ongoing death of village/town centres as businesses closed and shops were left vacant - leading over time to dereliction. It is submitted that the SRA would welcome an integrated approach to this problem via Town and Village Renewal Schemes but point to the need to provide age friendly	<p>Chief Executive's Response The Council has commenced the preparation of Town Renewal Masterplans for settlements of all sizes across the county. Town Renewal Masterplans (as outlined in Table 14.1 of the Plan) will focus on maximising the potential of towns and villages' built and natural heritage by using these existing assets to enhance their role as visitor destinations, helping to create new local</p>

		<p>accommodation for older citizens which enables them to continue living in their community and to access services. It is also submitted that Town and Village Renewal Schemes should include a broadband strategy to ensure that redevelopment facilitates and encourages remote working.</p>	<p>employment opportunities. It is also an Action (UD A3) of the Plan to prepare and implement on a phased basis Town Renewal Masterplans for various settlements.</p> <p>In relation to the provision of age friendly accommodation, Section 3.11.1 of the Plan provides a range of objectives (HO O21, HO O22, HO O23, HO O25) in support of multigenerational housing and includes the following statement: ‘Older people require housing that is appropriate and responsive to more complex needs, enabling them to enjoy more active, healthy and socially connected lives and to age healthily and safely within their community.’</p> <p>In relation to broadband, the Plan includes Policy EC P22 and Objectives EC O89, EC O90 and EC O92 in support of the roll out of broadband. EC O89 specifically states that it is an objective of the Council to: ‘Support and facilitate the delivery of the National Broadband Plan as a means of developing further opportunities for enterprise, employment, education, innovation, and skills development for those who live and work in rural areas.’</p> <p>Having regard to the above it is considered that the submission is already addressed in the Draft Plan.</p>
<p>Chief Executive’s Recommendation No changes to the Draft Plan.</p>			
<p>410</p>	<p>Celbridge Community Council</p>	<p><u>Urban Design, Placemaking and Regeneration</u> Submission refers to the text in section 14.4.3 and states it should not be assumed that online shopping will continue to rise or even remain at pandemic levels. Submits that the concept of sustainability and 10-minute towns is to enable citizens to meet their needs locally. States that an analysis of what people travel out of town for is</p>	<p>Chief Executive’s Response The comments in relation to section 14.4.3 are noted. It is considered that the rise of online retail activities is a permanent trend that has repercussions for the long-term viability of our town centres. As is noted in section 14.4.3 of the draft Plan, studies undertaken by the Council in various settlements show that the elevated rates of vacancy in town centres, in many instances ‘are long term in nature, indicating that previous uses may never</p>

	<p>needed and initiatives should be taken based on any identified gaps to promote provision of these goods and services.</p> <p>Requests that objective UD O3 be amended as follows (additional text in purple, deleted text crossed out):</p> <p>UD O3: Support and promote the '10-minute settlement' concept across all towns and villages in the county through implementation of the specific actions for local authorities outlined in the Town Centre First Policy and through requiring and require that all Local Area Plans incorporate policies and objectives that will assist in its implementation"</p> <p>Submits that the draft Plan lacks explicit actions that address how the Planning Authority will support the rollout and implementation of Town Centre First Policy to establish Town Teams for each town. States that the Development Plan must include actions that address:</p> <ul style="list-style-type: none"> ○ the appointment of Town Regeneration Officers and the establishment of Town Teams for towns including Celbridge. ○ Liaising with the National Town Centre First Office. ○ Sequencing for the preparation of Town Centre Health Checks, Town Renewal Plans, Masterplans / Urban Design Frameworks and Local Area Plans. <p>Submits that as Town Centre First Plans are non-statutory and expected to be produced by local Town Teams, there is a risk that they will not happen in a timely manner and accordingly, the</p>	<p>return'. Such a situation is confirmed in the Government's Town Centre First Policy which seeks to redress this issue by increasing the focus on the 'retail-led experience' which includes a blend of retail services (including food and drink), leisure, entertainment, and cultural uses. It is considered that the development of new and alternative uses and functions for town centres that maximise new recreational, tourist, cultural, employment and residential opportunities will help to secure the long-term viability of the existing retail offer in the county's town centres.</p> <p>It should be noted that the 10-minute principle does not mean that all services including convenience and comparison retail services would be located within a 10-minute walk/cycle for all residents in settlements. It is considered that such an aspiration would neither be viable nor implementable. As is noted in section 14.3.3 of the draft Plan, the concept seeks to ensure that community services and facilities are accessible to residents, thereby encouraging active travel (walking/cycling). Such services and facilities within towns would typically and ideally include a local park/amenity area, neighbourhood centre (for immediate retail needs), a creche, primary school and public transport access (i.e. bus stop or train station).</p> <p>The requests that objective UD O3 includes specific reference to Town Centre First Plans is not accepted. This objective is specially tailored to provide targeted support to the 10-minute concept, which it is noted fully aligns with town centre first principles. It is considered that the Town Centre First policy is sufficiently supported by objective UD O6 (v) and action UD A5.</p> <p>The comments and requests with regard to the Town Centre First provisions of the draft Plan are not accepted. It is considered that section 14.5.6, objective UD O6 (v) and action UD A5 provide sufficient support for the comprehensive implementation of the</p>
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		<p>draft Plan must include objectives to ensure that a Town Centre First Plan is prepared as a matter of urgency.</p> <p>States that the Masterplan / Urban Design Framework for the lands at St. Raphael's / Oakley Park, Celbridge mentioned in Action UD A2 should also include The Mill and surrounding area, as proposed in the outcomes from the recent Celbridge Town Renewal Plan public consultation.</p>	<p>Town Centre First policy in the county. It should be noted that the actions requested to implement the Town Centre First policy are premature and are considered to stray into operational matters of Council. It should be noted that the National Town Centre First Office will be established in August 2022 and a Town Regeneration Officer for Kildare will be appointed thereafter. It is intended that the day-to-day work of the Town Regeneration Officer, as per the Town Centre First policy documentation, be centrally involved in undertaking the tasks which have been outlined in the request.</p> <p>The request to include the 'Mill and surrounding area' as part of a Masterplan for Oakley Park is not accepted. All the masterplans / urban design frameworks proposed to be carried-out under action UD A2 are either located on zoned lands identified as requiring masterplans/frameworks within adopted local area plans or designated as strategic residential/employment locations in the RSES.</p>
			<p>Chief Executive's Recommendation No changes to the Draft Plan.</p>
410	Celbridge Community Council	<p><u>Building Heights</u> States that Table 14.4 suggests that building heights of 6+ storeys may be appropriate in Celbridge Town Centre. Submission notes the provisions of section 14.8.3 relating to the integration of Taller Buildings into the Urban Environment. States that it is hard to imagine how even a 4-6 storey building would not have undue impact on Celbridge Town Centre.</p> <p>The phrase "subject to the avoidance of undue impacts on the existing residential or visual amenities" in Objective UD O12 should be further</p>	<p>Chief Executive's Response The request is not accepted. It must be noted that the Development Plan is required to adhere to the Guidelines for Planning Authorities on Urban Development and Building Heights (2018) including the Specific Planning Policy Requirements (SPPRs) contained therein. It is considered that in taking 'a contextual approach to building heights', as outlined in sections 14.8.2 and 14.8.3, along with objective UD O12, the draft Plan provides for sufficient safeguards to prevent tall buildings from being inappropriately developed in sensitive areas such as historic town centres.</p>
			<p>Chief Executive's Recommendation No changes to the Draft Plan.</p>

		qualified to reflect the above acknowledgement that tall buildings would not generally be appropriate given the existing streetscape.	
405	Kildare Climate Action Linkage Group	<p>Objective UD O11 and sections 14.5 and 14.5.7 of the Plan are referenced. The submission questions the necessity to “investigate a feasibility” of another pilot scheme if the scheme in Athy yielded positive results. It is suggested to revise objective UD O11 as follows:</p> <p>Review the Athy pilot scheme and implement same or amended scheme in all towns across the county aiming to complete 3 towns each year in order to reduce vacancy levels in conjunction with all relevant stakeholders.</p> <p>Suggests amending action UD A1 as follows:</p> <p>Continue to seek funding from relevant agencies and Government sources including the Rural and Urban Regeneration and Development Funds (RRDF/URDF) to secure financial support for all town and village renewal projects in the county and to explore possibilities for community-led and social financing opportunities.</p> <p>The submission highlights the importance of recognising and supporting community-led and social financing opportunities and provides examples.</p>	<p>Chief Executive’s Response The request to revise Objective UD O11 is accepted.</p> <p>The proposed amendments to Action UD A1 are accepted. It is considered appropriate to explore all opportunities for financing town and village renewal projects.</p> <p>Chief Executive’s Recommendation Amend UD O11 as follows: Investigate the feasibility of a pilot scheme for a Kildare town to reduce vacancy levels, in conjunction with all relevant stakeholders. Review the Athy pilot scheme and implement similar town and village renewal schemes on a phased basis for the settlements of County Kildare in order to reduce vacancy levels in conjunction with all relevant stakeholders.</p> <p>Amend action UD A1 as follows: Continue to seek funding from relevant agencies and Government sources including the Rural and Urban Regeneration and Development Funds (RRDF/URDF) to secure financial support for all town and village renewal projects in the county and to explore possibilities for community-led and social financing opportunities.</p>
CELBRIDGE			
428	Beans Land	Refers to the Celbridge Local Area Plan and states that it is essential to continue the	<p>Chief Executive’s Response The request to include the Crodaun area in Action UD A2 on the list of lands for which the Council seeks to prepare a series of</p>

		<p>consolidation of the growth to date within the Celbridge area.</p> <p>Notes that all the KDA lands have now been granted permission and new lands are required to accommodate the further growth of Celbridge in this area. Submits that it is important to continue the consolidation and infill growth in the town, particularly around Key Development Areas with extant permission and that this could be achieved through the continuation of Crodaun on the subject site, which is immediately adjacent to the permitted development in this area. Submits that this would continue the provision of the Maynooth Road Gateway confirming it as a key driver for development to the north. Contends that the continued growth of this area should be encouraged and enabled to ensure that the existing and proposed facilities, including access to employment in the existing Business Park and that schools and retail would have the population to support their future use. Submits that this strategy (as set out in section 12.2.4 of the Local Area Plan) has been successful to date and this success should be built upon. States that the vision for the lands in the LAP should be completed including new road, streets and residential development all of which provide connection to the Beans lands.</p> <p>Requests that Action under UD A2, as part of policy UD P2, includes an action for the Council to prepare a Masterplan / Urban Design Framework for the Crodaun area in conjunction with the LAP for Celbridge, to enable the delivery</p>	<p>Masterplans / Urban Design Frameworks over the lifetime of the Plan is not accepted. It should be noted that all lands on the list comprise of either existing zoned lands (Residential / Town Centre / Enterprise and Employment) which have been identified in Local Area Plans or have been designated for strategic development purposes in the Regional Economic and Spatial Strategy. It is further noted that Action UD A2 provides that masterplans and frameworks should include, but not be limited to the areas identified in the draft Plan. However, it is considered that any further areas which may be considered for masterplans should be identified through a specific land use zoning designation, as part of a robust evidence-led local area plan-making process.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
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		of this land. Submission outlines the 'ideal location' of the lands to deliver housing and employment, due to their proximity to Celbridge Town Centre and existing residential areas.	
431.	O'Flynn Group	Submission states that to allow for the proper development of the land around Hazelhatch Train Station and the new Link Road Scheme it is essential that there is a masterplan / urban design framework plan developed for the area the subject of this submission. States that this should be included in the Development Plan in the same way that lands at St Raphael's/ Oakley Park, Celbridge and Lands at Simmonstown Celbridge are identified and also these lands should be identified in the Development Plan as zoned for housing. Further states that the suitability of this land is reinforced by the enclosed letter from the Department of Environment, Community and Local Government, which encourages development to the south of Celbridge to enable a more sustainable pattern of urban development proximate to high quality public transport. Accordingly, the submission requests that Action UD A2 is updated to include 'Lands at Hazelhatch, Celbridge'.	<p>Chief Executive's Response The request to include lands at Hazelhatch in Action UD A2 on the list of lands for which the Council seeks to prepare over a series of Masterplans / Urban Design Frameworks over the lifetime of the Plan is not accepted. It should be noted that all lands on the list comprise of either existing zoned lands (Residential / Town Centre / Enterprise and Employment) which have been identified in Local Area Plans or have been designated for strategic development purposes in the Regional Economic and Spatial Strategy. It is further noted that Action UD A2 provides that masterplans and frameworks should include, but not be limited to the areas identified in the draft Plan. However, it is considered that any further areas which may be considered for masterplans should only be identified through a specific land use zoning designation, as part of a robust evidence-led local area plan-making process.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
MAYNOOTH			
434.	Maynooth Community Council	Welcomes the development of a masterplan for the public realm in the town centre of Maynooth as this is very popular with the community. States that as part of the new masterplan, they would	<p>Chief Executive's Response The Council recognises the importance of the public realm in creating attractive and liveable settlements. The Council is progressing the Maynooth Town Renewal Masterplan (TRMP) and it is envisaged that the preparation of the Maynooth TRMP</p>

		<p>like to see a reduction in car parking spaces around Main Street and provision instead in the back lands close to the centre. States their support for policy TM P10.</p> <p>Submits that Maynooth is a very beautiful historic town, and the protected structures are much beloved of the population. In this regard the submission refers to Chapter 2 which mentions possible residential development in St Patrick’s College. States that this would need to be very carefully done.</p>	<p>document, stakeholder engagement and public consultation will commence in Q4 of 2022, with an overall timeline of approximately 9 months. The masterplan will provide for specific public realm improvement projects in Maynooth and will be supported by specific objectives of the new local area plan for Maynooth.</p> <p>With regard to car parking, it is noted that any reduction in spaces should be considered on a case-by-case basis having regard to the individual circumstances of the town, be based on an evidence-led assessment and informed by the requisite public consultation. Notwithstanding same Section 15.7.8 of the Draft Plan states that ‘lower rates of parking and car-free developments should be considered in the first instance, particularly where such developments are close to and can avail of public transport’.</p> <p>It is noted that St. Patrick’s College is home to a number of protected structures and is partially covered by a designated Architectural Conservation Area. Accordingly, any proposals for residential development would be required to be advanced in a highly sensitive manner. Any such consideration for development will be considered as part of the local area plan-making process.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
515	Meath County Council	<p><u>Masterplans</u> Submission notes the provisions in the draft Plan regarding the preparation of a Town Renewal Masterplan and a masterplan for the College lands. States that Meath County Council would welcome the opportunity to input into the preparation of these masterplans. States that</p>	<p>Chief Executive’s Response The contents of the submission relating to the proposed Town Renewal Masterplan and a masterplan for the College lands in Maynooth is noted.</p> <p>The Council’s Strategic Projects and Public Realm Team is progressing the Maynooth Town Renewal Masterplan. It is</p>

		<p>they have identified two masterplans as part of the settlement strategy for Maynooth as outlined in Volume 2 of the Meath County Development Plan 2021-2027. Meath County Council would welcome engagement from Kildare County Council in relation to both masterplans.</p>	<p>envisaged that the preparation of the Maynooth TRMP, will commence in Q4 of 2022, with an overall timeline of approximately nine months. This project will be subject to its own separate public consultation process.</p> <p>It is intended that further details regarding the masterplan for the College lands will be outlined in the Maynooth and Environs Joint Local Area Plan. Kildare County Council looks forward to engaging with Meath County Council on this as part of the overall preparation and delivery of the Joint Local Area Plan for Maynooth and Environs.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
NEWBRIDGE			
559	Newbridge Community Development	<p>Newbridge requires the creation of a resourced Town Centre Manager and better resourcing of business and community groups or Town Teams.</p> <p>More nuance should be introduced into Objective RET O82 to allow for 'meanwhile uses' for vacant uses to be temporary utilised for showcase initiatives of community groups, artists or social enterprises.</p> <p>There should be a programme of entertainment and other attractions, art displays and cultural elements which would further enhance the visitor experience and offer a broader scope to attract footfall to the Main Street of Newbridge, especially the Northern end.</p>	<p>Chief Executive's Response Town Centre Managers and Town Teams are operational matters which are outside the scope of a County Development Plan, which is primarily a land use plan. However, there is currently a District Manager who oversees Newbridge. Furthermore, Town Centre First Teams are supported by Objective UD O6 point (v) in Chapter 14 'Urban Design, Placemaking and Regeneration'.</p> <p>'Meanwhile Uses' are supported by UD O10 also in Chapter 14 'Urban Design, Placemaking and Regeneration'.</p> <p>The Draft Kildare County Development Plan does not include any specific entertainment programmes for Newbridge as Newbridge has its own statutory Local Area Plan. The matter of attractions can be considered as part of the review of the Newbridge Local Area Plan, preliminary work for which is already underway.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

CHAPTER 15 – DEVELOPMENT MANAGEMENT STANDARDS			
Sub No.	Name	Summary of Issues Raised	Chief Executive’s Responses & Recommendations
BIODIVERSITY			
552.	Department of Housing, Local Government and Heritage	<p><u>Bats</u> Oftentimes, bats will roost in basements or attics of old buildings and could potentially be disturbed during works to protected structures. The Department recommends that a section is included which outlines the strict protection afforded to all bat species which are listed on Annex IV of the EU Habitats Directive as well as bat survey and licencing requirements</p>	<p>Chief Executive’s Response The potential for Bat Roosts should be considered in any interventions to protected structures.</p> <p>Chief Executive’s Recommendation Addition to Section 15.16.1. Bats will often roost in basements or attics of old buildings and could potentially be disturbed during works to protected structures. Bats are protected under the Wildlife Acts 1976 to 2012. It is an offence to intentionally disturb, injure or kill a bat or disturb its resting place and any work on a roost must be carried out with the advice of the National Parks and Wildlife Service. Bats are also protected under the EU Habitats Directive (92/43/EEC), Annex IV. It is important that expert advice is sought in determining the presence of bat species in older buildings to address the requirement of derogation licence that will be required if bats are found to be present.</p>
405	Kildare Climate Action Linkage Group	<p><u>Soft Landscaping</u> The submission notes and welcomes the following sentiment and suggests the following amendments: Planting and landscaping should be used to incorporate new buildings into their surroundings and provide privacy between dwellings. New planting should consist of local native plant types with consideration given to providence and origin of plants indigenous to the area and be incorporated into the site to enhance overall appearance and conserve biodiversity (Refer to Table 15.2) and contribute to the green infrastructure of the area.</p> <p>It is stated that there is no table in Chapter 15 labelled 15.2.</p>	<p>Chief Executive’s Response A Glossary of Terms will be included in the adopted County Development Plan.</p> <p>In relation to the recommendation for KCC to develop a nursery to grow native plants of local provenance, the Council unfortunately does not have the resources to commit to undertaking such a project but would support and facilitate the development of such a facility as a community enterprise.</p> <p>While there are many policies within the Plan encouraging the planting of native species it is not always appropriate to do so in all settings. Many non-native tree species can also have benefits for pollinators.</p>

	<p>It is recommended to include a glossary of technical terms in the Plan as suggested by the Draft Development Plans Guidelines for Planning Authorities 2021. The submission references publications which include the definitions of provenance and origin.</p> <p>The lack of native tree stock nationally is highlighted, and it stated that we need to be aware of the significant threat currently posed to our native biodiversity from the importation of maladapted genotypes and the recognised risk of importing pests and diseases (particularly microorganisms) on imported stock. Publications are references to support the statement.</p> <p>The submission references the first bullet point of section 15.2.5 and submits that it is unlikely that developers will be able to obtain semi-mature trees of local provenance and origin unless we develop and support an indigenous Nursery Stock sector in Kildare.</p> <p>3rd bullet point - The following amendments is proposed: This proposal should provide for the replacement of, at minimum, an equal amount of similar indigenous hedgerows species, of native provenance and origin and the planting of a minimum of five mature / established trees per tree felled.</p> <p>5th bullet point - The following amendments is proposed: Landscaping works should incorporate sustainable urban drainage systems such as biodiversity areas or established native vegetation or wetlands, which can reduce surface water run-off. Green roofs, walls, and permeable surfaces will be encouraged. The Council commits to ensuring that the construction of SuDs or other nature-based solutions will not contribute to further native biodiversity loss, by requiring that plans submitted at design stage are under the direction of a suitably experienced botanist/ecologist. Additionally, the preferred option in employing these techniques is to allow natural recolonization, or at the very</p>	<p>In relation to SUDS it should be noted that amendments to sections throughout the Draft Plan are proposed which will now include references to nature based solutions (see response to Observation No. 4 of OPR submission, no. 550).</p> <p>Chief Executive's Recommendation Amend the numbering of all the tables in Chapter 15 and the reference to 'Table 7-2' in the Key directly underneath Table 0.2.</p> <p>Amend the first paragraph of section 15.2.5 as follows: Planting and landscaping should be used to incorporate new buildings into their surroundings and provide privacy between dwellings. New planting should consist of local native plant types with consideration given to provenance and origin of plants indigenous to the area. and The planting should be incorporated into the site to enhance overall appearance, and to conserve biodiversity (Refer to Table 15.2) and to contribute to the green infrastructure of the area.</p> <p>To include an additional objective in Section 13.7.2 as follows: Support and facilitate, the establishment of a community run nursery to grow native plants, at an appropriate location.</p> <p>In relation to SUDS it should be noted that amendments to sections throughout the Draft Plan are proposed which will now include references to nature based solutions (see recommendation to Observation No. 4 of OPR submission, no. 550).</p> <p>Amend Section 15.6.4 as follows: Natural / Semi-Natural Green Space (e.g., undeveloped, or previously developed land with habitats such as woodland or wetland areas) and Green Corridors (linear green spaces such as canal and river corridors) also provide valuable open space enhancing conserving biodiversity, and enhancing natural drainage, and carbon storage.</p>
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		<p>minimum, that any plantings arise from locally sourced native material of native provenance and origin.</p> <p>Suggest the following amendment of bullet point number 4 of Section 15.7.6:</p> <ul style="list-style-type: none"> • Where the removal of hedgerow is required in order to achieve sight lines, the minimum amount of hedgerow shall be removed (see 15.2.5 above). Any new boundary should be planted with suitable indigenous species of local provenance and origin as outlined in section 15.2.5. <p>The submission references the recommendations in relation to hedgerows in the SEA Environmental Report for the Kildare County Development Plan 2017-2023 and provides a link to 'Go Native, Planting for biodiversity, Guidelines for planting projects in the countryside.'</p> <p>Suggest the following amendment of Section 15.6.4: Natural / Semi-Natural Green Space (e.g., undeveloped, or previously developed land with habitats such as woodland or wetland areas) and Green Corridors (linear green spaces such as canal and river corridors) also provide valuable open space enhancing conserving biodiversity, and enhancing natural drainage, and carbon storage.</p> <p>It is submitted that there are very few intact natural habitats left in Ireland and that semi-natural habitats are rapidly disappearing. Furthermore, the submission includes figures from 'The Status of EU Protected Habitats and Species in Ireland 2019' report that shows the overall status of habitats and the pressures and threats recorded in habitats.</p>	
EMPLOYMENT			
113		<u>Cycle Parking</u>	Chief Executive's Response

	Health Service Executive	<p>There are 3 recommendations in relation to employment which include connecting large-scale employment sites to town centres and parks / recreational facilities through pedestrian and cycle links, requiring employers to provide bike parking, bike repair and shower facilities and providing access to nature.</p>	<p>The Draft Plan includes requirements around bicycle parking and shower facilities in section 15.7.2 of Chapter 15. It should be further noted under section 15.9.3, Business and Technology Parks, that proposals shall include a green infrastructure plan, create new green infrastructure assets such as public open spaces and improve / increase linkages and connectivity with existing green infrastructure assets in the area.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
518	Strategic Power Projects Limited	<p><u>Solar Energy and Industrial Warehousing & Commercial Operations</u> Reference is made to section 15.9.2 and while the encouragement and support of solar and wind energy as part of industry and warehouse schemes is positive, it is stated that it doesn't go far enough. Reference is made to a press release from the European Commission on May 18th, 2022, where it was noted a framework under the fit for 55 package will include a dedicated EU Solar Strategy to double solar PV capacity by 2025 and install 600GW by 2030, a solar rooftop initiative with a phased-in legal obligation to install solar panels on new public and commercial buildings and new residential buildings.</p> <p>Council policies regarding the provision of solar in industrial buildings should be revised taking this into consideration. It should be recognised that many industrial warehousing and commercial operations have high energy demands that may not be entirely serviceable by solar within the confines of their respective curtilage or buildings. Therefore, policy should promote ground mounted solar in locations remote from high energy users, but which can be connected to them by means of private lines.</p>	<p>Chief Executive's Response It is considered that the objectives outlined in section 7.6 provide sufficient support for solar technologies to service industrial warehousing and commercial operations. Large proposals to serve high energy users can be considered and they are supported under objective EC O21.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
555	Irish Solar Energy Association	<p><u>Solar Energy</u> Council policies regarding the provision of solar energy in industrial buildings should factor in new guidance by the EU regarding solar energy.</p>	<p>Chief Executive's Response In accordance with the Draft Development Guidelines (2021), when preparing development plans, planning authorities must exercise caution not to inappropriately stray into the operation of other statutory codes and regulatory regimes that relate to the</p>

		<p>The submission also encourages the Council to consider the role of private wire renewables in decarbonising Kildare's electricity supply and update the Draft Development Plan accordingly. It is expected that regulations related to same will be soon published.</p>	<p>development sector, but are outside the remit of a county or city development plan. While Section 7.6 sets out the Council's policy and objectives with respect to solar energy, to require the installation of solar panels in any instance is a matter that is outside the remit of the Draft Development Plan, which is primarily a land use plan.</p> <p>In relation to the comments raised with respect to 'private wire' solar farms, see response to submission no. 555 where changes are proposed to Section 7.6 (Solar Energy).</p>
			<p>Chief Executive's Recommendation See recommendation to submission no. 555 where changes are proposed to Section 7.6 (Solar Energy).</p>
HOUSING			
533	Cill Dara Le Gaeilge	<p><i>Forbairtí Nua a Ainmniú</i> <i>Cinntigh go n-ainmneofar agus go léirítear gach forbairt nua i nGaeilge amháin, chun gannionadaíocht stairiúil ar ainmneacha Gaeilge sa chontae a chúiteamh. Léireoidh seo freisin éagsúlacht mór staire agus bunús ainmneacha áiteanna / bailte fearainn.</i></p> <p><i>Caithfear ainmneacha áite do sráideanna nua nó sráideanna / bóithre oifigiúla in eastáit nua bheith dá-theangach.</i></p> <p><u>Naming of new developments</u> All new developments should be named and displayed in the Irish language only, to redress the historic under-representation of Irish language names in the county, and to reflect the rich diversity of history / social history and origin of place names in Kildare.</p> <p>Place names for new streets or official streets / roads in new estates must be bi-lingual.</p>	<p>Freagairt an Phríomhfheidhmeannaigh <i>Forbairtí Nua a Ainmniú</i> Léirítear in Alt 15.4.15 den Dréacht-Phlean tabhacht na Gaeilge in ainmniú forbairtí cónaithe nua. Tugann an Comhairle cur chun cinn agus spreagadh d'úsáid na Gaeilge d' ainmniú forbairtí cónaithe nua sa Chontae. Beidh úsáid na Gaeilge san áireamh in ainmneacha forbairtí.</p> <p>Chief Executive's Response <u>Naming of new developments</u> The importance of the Irish language in the naming of new residential developments is referenced in Section 15.4.15 of the Draft Plan. The Council promotes and encourages the use of Irish Language for the naming of new residential developments in the County. Names of developments shall include the use of the Irish language.</p> <p>Moladh an Phríomhfheidhmeannaigh: Gan athrú a dhéanamh ar an Dréacht-Phlean.</p> <p>Chief Executive's Recommendation</p>

			No change to the Draft Plan.
526	Conradh na Gaeilge	<p><u>Forbairtí Nua a Ainmniú</u> <i>De réir An Bord Pleanála níl bac ann ainm eastáit tithíochta a bheith i nGaeilge amháin. Mar sin, moltar go gcuirtear polasaí i bhfeidhm chun cinntiú go mbeidh ainmneacha eastáit nua i nGaeilge amháin</i></p> <p><u>Naming of New Developments</u> According to An Bord Pleanála there is no impediment to the name of a housing estate being in Irish only. In the circumstances it is recommended a policy be implemented to ensure that the naming of new estates is in Irish only.</p>	<p>Freagairt an Phríomhfheidhmeannaigh: <u>Forbairtí Nua a Ainmniú</u> Déantar tagairt in Alt 15.4.15 den Dréacht-Phlean do thabhairt na Gaeilge in ainmniú forbairtí cónaithe nua. Tugann an Comhairle cur chun cinn agus spreagadh d'úsáid na Gaeilge d'ainmniú forbairtí cónaithe nua sa Chontae. Beidh úsáid na Gaeilge san áireamh in ainmneacha forbairtí.</p> <p>Chief Executive's Response <u>Naming of New Developments</u> The importance of the Irish language in the naming of new residential developments is referenced in Section 15.4.15 of the Draft Plan. The council promotes and encourages the use of Irish Language for the naming of new residential developments in the County. Names of developments shall include the use of the Irish language.</p>
			<p>Moladh an Phríomhfheidhmeannaigh Gan athrú a dhéanamh ar an Dréacht-Phlean</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
526	Conradh na Gaeilge	<p><u>Eastáit Tithíochta trí Ghaeilge</u> <i>Tá an Ghaeilge á imeallú agus is é bealach is éifeachtaí chun an teanga a normalú ná pobal a chruthú. Is féidir é seo a dhéanamh trí eastáit tithíochta nua a bhunú do chainteoirí Gaeilge amháin. Ba cheart cúpla teach a chur ar fáil ar dtús. Níl i mbaile amháin sráid, céide, corrán, ascaill ná scéim tithíochta a labhrann Gaeilge. . Teastaíonn baile mór ó lucht labhartha na Gaeilge. Tá samplaí i mBéal Feirste, Corcaigh agus An Dún.</i></p> <p><u>Irish Language Housing Estates</u> Irish is being marginalised and the most effective way to normalise the language is to create a community. This can be done by establishing housing estates for Irish speakers only. Initially a couple of houses should be provided. There is not a street, a drive, a Crescent, an Avenue, or a housing</p>	<p>Freagairt an Phríomhfheidhmeannaigh: <u>Eastáit Tithíochta trí Ghaeilge</u> Baineann an Dréacht-Phlean le h-úsáid talún, agus ní ionstraim é chun plé nó ordú le leithdháileadh tithíochta do chainteoirí Gaeilge.</p> <p>Chief Executive's Response <u>Irish Language Housing Estates</u> The Draft Plan is a land use plan and is not the instrument to address or prescribe housing allocations to Irish speakers.</p>
			<p>Moladh an Phríomhfheidhmeannaigh Gan athrú a dhéanamh ar an Dréacht-Phlean</p> <p>Chief Executive's Recommendation No change to the Draft Plan</p>

		scheme in any town that speaks the Irish language. The Irish speaking community wants a town. There are examples in Belfast, Cork and Down.	
195	Elizabeth Cullen	<p><u>Co-Housing and Recycling Facilities</u> Provision of refundable centres for hard plastic at recycling centres in housing developments, develop pedestrian and open spaces in the centre of housing developments, explore the concept of co-housing, use dementia friendly signage in housing developments, and explore the use of grey water in flushing toilets or composting toilets in all new housing developments.</p>	<p>Chief Executive's Response In accordance with SPPR 9, there is a presumption against granting permission for co-living developments unless a need is identified in the HNDA. It should be noted the HNDA prepared for Kildare did not identify a need for this type of development.</p> <p>Matters such as pedestrian walkways and open spaces are addressed as part of all housing developments as both, among numerous other factors, are an integral part of the layout of all residential schemes.</p> <p>Section 15.10.3 notes that recycling facilities are appropriate at new commercial / retail developments and in large scale residential and mixed-use developments. Refundable centres are more sustainable close to other services rather than in housing developments.</p> <p>The use of grey water and composting toilets are both outside of the scope of the Draft Plan which is a land use plan.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
207	Deirdre Lane	<p><u>Fauna Gateways and Green Roofs</u> Fauna gateways should be provided within housing developments as a means of addressing loss of green corridors.</p> <p>Every new and older building should be given funding to incorporate green roofs, where a certain percentage of the roof areas are dedicated as a 'Green Roof'. The adoption of bio-solar roofing (a combination of photovoltaic panels with vegetated roofs and potential for bird habitats), should also be encouraged.</p>	<p>Chief Executive's Response Section 15.16.4 of Chapter 15 of the Draft Plan states that in order to ensure that areas of biodiversity value are adequately protected, an Ecological Impact Assessment will be required, as well as the provision of mitigation measures to address proposals that have the potential to impact on environmentally sensitive sites.</p> <p>The proposal that every new and older building should be given funding to incorporate green roofs, where a certain percentage of the roof areas are dedicated as a 'Green Roof' is not considered feasible, however section 15.9.3 of the Draft Plan requires that in Business and Technology Parks.</p> <p>'Green Roofs covering a minimum of 60% of the roof shall be provided for roof areas greater than 300 m² unless a suite of</p>

			<p>complementary or alternative ‘soft SuDS measures as detailed above are proposed. A proposal that relies solely on attenuation storage systems and/ or permeable paving as an alternative to the provision of a Green Roof will not be acceptable.’</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
256	Ballyshannon Action Group	<p><u>Extractive Industry and residential amenity</u> It is proposed to amend RD O32 to include the residential amenity of local residents, road safety of local residents, and impact on existing dwellings (i.e. 300m minimum setback distance from dwellings). It is also suggested to add a policy “to regulate the extractive industry in the interests of public safety, public amenity, and sustainable development.”</p> <p>The impact of quarrying on the amenity of residential neighbours is not acknowledged in the Plan. Residents that live close to quarries suffer due to increased HGV activity on the road network, noise / dust and air pollution among other things. In recognition of these negative impacts, it is requested that minimum set back distances are identified to ensure dwellings are protected from any new quarry or extension to an existing quarry.</p> <p>A range of measures are suggested to be included as objectives such as setback distances, maximum depths from the water table, permitted noise / dust / vibration levels, and monitoring / logging of truck movements.</p> <p>It is considered that objective RD O36 cannot be enforced unless all vehicles using a quarry site have telematics tracking installed, and all vehicles entering and exiting these sites are logged. This objective should be amended to include the wording “residents whose property values are negatively impacted by new quarries must be recompensed by the operator”.</p>	<p>Chief Executive’s Response Section 15.9.6 of the plan requires details of all dwellings or other developments within 1km of the subject site to be identified on maps submitted with planning applications. Furthermore, details of the likely impact of extraction on sensitive local receptors such as residences, the local transportation network, along with details of noise, vibration, and dust emissions must be submitted with proposed quarry development applications. Appropriate mitigation measures must be provided, where impacts are identified. Details of depths of extraction are also required.</p> <p>In relation to truck / HGV movements, details of haul routes, trip movements and articulated lorry weights are required with applications. Conditions attached to the permission will address this. Alleged breaches of conditions notified to the planning authority will be investigated by enforcement staff. The Draft Plan ensures that planning applications for extractive industries shall include a description of cumulative impact when taken together with other quarries in the vicinity.</p> <p>It should be noted that the Draft Plan is not the instrument to address property values or compensation measures for loss of value.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>

		A further range of measures are proposed in relation to limiting quarrying activity such as avoiding oversaturation of quarrying and quarry related activity in one area (within 20km of the subject site), limiting the amount of quarrying that occurs in the county and keeping a record of unauthorised activities associated with quarry applicants to monitor their behaviour.	
351	Eco Advocacy	<p><u>Build-to-rent housing developments</u> The submission states that to support the common good, it should be the policy of the County Council to promote the private buy-to-rent sector in preference to investment funds.</p>	<p>Chief Executive’s Response A Local Authority cannot constrain housing provision in the manner suggested. This conflicts with policies relating to compact growth, density, building heights, mix of dwelling types and tenure.</p> <p>Build-to-rent (BTR) housing developments are purpose-built development for long-term rental, are managed by an individual entity and provide dedicated amenities and facilities for residents. They have a role to play in providing choice and flexibility to people where homeownership may not be a priority or where transient people move between countries for employment.</p> <p>All proposed BTR housing developments must comply with SPPR 7 and SPPR 8 as set out in the Sustainable Urban Housing: Design Standards for New Apartments (2020) or any subsequent guidelines.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
351	Eco Advocacy	<p><u>Shared Accommodation/Co-living residential development</u> The submission states that ‘shared accommodation’ or ‘co-living’ is an unacceptable form of accommodation and should not be permitted under any circumstances. The submitter recommends the insertion of a specific policy in the Draft Plan as follows: “To ensure that living standards are upheld in the county it shall be the policy of the County Council to prohibit the development of co-living accommodation.”.</p>	<p>Chief Executive’s Response Shared accommodation/co-living developments are professionally managed rental accommodation, where individual rooms are rented within a commercial development that includes access to shared or communal facilities and amenities. In accordance with SPPR9 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) there shall be a presumption against granting planning permission unless a need is identified to meet a specific demand identified in the Housing Need Demand Assessment (HNDA). The HNDA prepared as part of the Plan review did not identify a specific need for this type of residential development in Kildare.</p>

			<p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
583	Ballymore Group	<p><u>Overshadowing</u> Section 15.4.6 in Chapter 15 ‘Development Management Standards’ is too onerous and should be reworded to ‘the Planning Authority may require a Daylight and Sunlight Analysis to be carried out to demonstrate an appropriate level of daylight and sunlight is being achieved.’</p>	<p>Chief Executive’s Response It is considered the wording of Section 15.4.6 ‘Development Management Standards’ is unambiguous and best practice, giving both the public and applicants certainty when going through the planning process. Removing the requirement for a daylight and sunlight analysis having regard to Planning For Daylight and Sunlight: A Guide to Good Practice (B.R. 209, 2011) and British Standard (B.S.) 8206 Lighting of Buildings, part 2, 2008: Code of Practice for Day Lighting or other updated relevant documents is therefore not considered appropriate.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
375	Land Development Agency	<p><u>Site Layout Planning for Sunlight & Daylight</u> The LDA recommend the following change to Section 15.2.4: “All new developments are required to comply with have regard to the recommendations of Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (B.R.209, 2011) and British Standard (B.S.) 8206 Lighting for Buildings, Part 2, 2008: Code of Practice for Day Lighting or other updated relevant documents”.</p> <p>The LDA cite the need for this change given that the Apartment Guidelines state that authorities should have regard to same. Similarly, the Guidelines state “where an applicant cannot fully meet all of the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out”. Therefore, it is clear that National Guidance does not require ‘compliance’ with the provision of the BRE Guide.</p>	<p>Chief Executive’s Response The comments in relation to overshadowing are noted and accepted.</p> <p>Chief Executive’s Recommendation Amend the second paragraph of Section 15.2.4: All new developments are required to comply with have regard to the recommendations of Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (B.R.209, 2011) and British Standard (B.S.) 8206 Lighting for Buildings, Part 2, 2008: Code of Practice for Day Lighting or other updated relevant documents. Where an applicant cannot fully meet all of the requirements of the daylight provisions, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, which will be considered by the planning authority on a case by case basis.</p>

583	Ballymore Group	<p><u>Design of Houses</u> Section 15.4.6 in Chapter 15 'Development Management Standards is ambiguous as the word dwelling can refer to a house or apartment. It should instead be titled house design. Table 15.3 should also relate to houses.</p>	<p>Chief Executive's Response Noted and agreed.</p> <p>Chief Executive's Recommendation Amend the title of Section 15.4.6 as follows: 15.4.6 Dwelling House Design</p> <p>Amend the sentence before Table 0.3 as follows: Dwelling-House design open space provision shall have regard to the following requirements:</p>
HEDGEROWS & INVASIVE SPECIES			
358	Deirdre Lane	<p><u>Hedgerows</u> The submission states all existing hedgerows in Kildare need to be mapped, monitored and protected under the Landscape Convention 2000, and the recommendations of the Kildare Hedgerow survey (2006). Hedge conservation should be encouraged and rewarded instead in line with best practice by Hedge Laying Association of Ireland.</p> <p>Existing hedgerows need to be included in any development site as part of planning applications – if for any reason the existing hedgerow or parts of it, need to be removed, another new hedgerow equivalent in size to the one taken out, should be planted within the development site.</p> <p>Any new hedgerow being planted should include a rich mix of hawthorn and where possible include native trees, some, if feasible, of edible varieties, such as apples, cherries, and should not be of monoculture, such as lengthy stretches of beech being of poor biodiversity source. Any non-native bush/shrub or hedge plant, such as laurels and laurel species, e.g., the Red Robin, should be prohibited in any public spaces, and the ones already in existence be removed. Laurels are non-native, very invasive and toxic.</p>	<p>Chief Executive's Response Objective HO O51 in Chapter 3 'Housing' seeks to retain, sensitively manage and protect features that contribute to local culture heritage and distinctiveness including hedgerows.</p> <p>Objective HO P27 requires that proposals retain and maintain existing hedgerows in all instances, with the exception only of the section required to be removed to provide visibility at the proposed site entrance. In such cases, proposals for replacement hedgerows, including details of composition and planting must be submitted with any application which requires such removal.</p> <p>Objective B1 O15 in Chapter 15 'Biodiversity and Green Infrastructure' outlines that hedgerow, in the first instance, cannot be removed. If removed they must be replaced with an equivalent number, species, variety, provenance and size as was in situ. Existing vegetative or 'stepping-stone' linkages are to be maintained and improved upon to increase wildlife corridors.</p> <p>Objective BI O16 promotes the integration of boundary hedges within and along development sites into development design in order to avoid "trapped hedges" located along the boundary of houses within the development layout and to encourage the planting of woodlands, trees and hedgerows as part of new developments and as part of the</p>

Chapter 15 - Development Management Standards

		No hedge trimming or removal should be carried out by private people, contractors or KCC staff during the breeding season as stipulated in legislation.	<p>Council’s own landscaping works using native plants of local provenance.</p> <p>Section 15.2.5 in Chapter 15 ‘Development Management Standards’ outlines in great detail how local authorities will control the removal of any hedging and any potential replacement with a list of appropriate native species.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
26	Butterfly Conservation Ireland (BCI)	<p><u>Hedgerows</u></p> <p>The last sentence in Section 12.9.1 should read: The species are listed in Chapter 15, Development Management Standards.</p>	<p>Chief Executive’s Response Noted and agreed. Proposed change to Chapter 15 is also considered appropriate as set out below.</p> <p>Chief Executive’s Recommendation Add a new sentence to bullet point number 4 in section 15.9.8:</p> <ul style="list-style-type: none"> The removal of hedges to accommodate agricultural developments shall only be permitted with the written agreement of the Planning Authority and shall only be considered as a last resort. It is important that hedgerows are retained in order to maintain and enhance existing green infrastructure networks in the interests of biodiversity. When retaining boundary hedgerows, the council requires infill planting where possible. A landscaping plan is required as part of an application for agricultural development and should include screening and shelterbelt planting, composed principally of native species;
495	Suzanne Murphy	<p><u>Biodiversity, solar panels and landscape management practices</u></p> <p>Do not allow any trees or hedgerows to be cut down in the county unless there is a critical reason for it. Plant trees in wet areas or areas that are prone to flooding. Stipulate that green roofs or solar roofs are a requirement for all new buildings in the county. Any fencing or walls should also be designed to permit wildlife such as hedgehogs to freely pass through.</p>	<p>Chief Executive’s Response Section 15.16.4 of Chapter 15 of the Draft Plan states that in order to ensure that areas of biodiversity value are adequately protected, an Ecological Impact Assessment will be required, as well as the provision of mitigation measures to address proposals that have the potential to impact on environmentally sensitive sites.</p> <p>The proposal that every new building should have a green roof or solar roof, is not considered feasible, however section 15.9.3 of the Draft Plan requires that within Business and Technology Parks green</p>

			<p>roofs covering a minimum of 60% of the roof shall be provided for roof areas greater than 300 m² unless a suite of complementary or alternative 'soft SuDS measures as detailed within section 15.9.3 are proposed. A proposal that relies solely on attenuation storage systems and/ or permeable paving as an alternative to the provision of a Green Roof will not be acceptable.' Objectives are also contained within Chapter 7 (Energy & Communications), which support the installation of solar panels on residential roof spaces.</p> <p>Also, Kildare County Council currently encourages less intensive landscape management practices. KCC Parks department is committed to managing public open spaces in a more sustainable manner. This includes reduced mowing of public open spaces and residential areas under the care of KCC. Within the KCC Climate Adaptation Plan there is a commitment to extend the areas where reduced mowing is practiced. The Parks Department of KCC also has an ongoing county-wide planting programme in place, which includes the planting of trees in wet areas or areas that are prone to flooding.</p>
418.	Kildare Tidy Towns	<p><u>Invasive Species</u> Submission recommends that the planting of certain species be banned from all proposed new development, i.e. all species listed as of concern by invasive species Ireland, including species such as cherry laurel Prunus laurocerasus and also species of a potential invasive nature as outlined by invasive species Ireland such as Cornus sericea L.</p>	<p>Chief Executive's Recommendation No change to Draft Plan.</p> <p>Chief Executive's Response The avoidance of the planting of invasive species is a priority for the Council.</p> <p>Chief Executive's Recommendation Addition to Development Management Standards 15.2.5 Soft landscaping The planting of species listed as of concern by invasive species Ireland, including species such as Cherry Laurel Prunus Laurocerasus and also species of a potential invasive nature as outlined by invasive species Ireland such as Cornus sericea L. shall not be permitted in rural areas and shall only be permitted in urban areas as part of development schemes that are not close to native hedgerows or woods.</p>
STANDARDS			

529	Consortium of housebuilders	<p><u>Review of Development Management Standards</u> The submission assesses the proposed DMS within the Draft Plan, to determine the degree of variance from requirements in the guidelines published under Section 28 and to consider if the proposed standards could be construed as onerous and act as an impediment to delivering viable housing projects.</p> <p>The submission considers that a mathematical rather than placemaking led approach is promoted in the DMS. There are examples with other plans (e.g., Fingal Development Plan) of how a 'design-led approach' can be adopted.</p> <p><u>Dual Aspect</u> It is generally accepted that a proportion of flats or apartments in a development can be single aspect. The Section 28 Guidelines entitled 'Sustainable Urban Housing: Design Standards for New Apartments' specifically accepts that up to 33% or 50% (depending on circumstances) of apartments can be single aspect, which is contrary to the DMS standards of the Draft Plan, which stipulates that dual aspect is achieved with all dwelling units.</p>	<p>Chief Executive's Response <u>Development Management Standards</u> The methodology used in the DMS shall ensure that new development takes place in an orderly and efficient manner. The specific control measures shall ensure that new development is of high quality and relates to the character, scale, layout, and form of the area in question.</p> <p><u>Dual Aspects</u> It is accepted that the requirement in the Draft Plan that dual aspect shall be incorporated into all dwelling units is overly onerous. The Draft Plan should be amended to correlate with the 'Sustainable Urban Housing: Design Standards for New Apartments', where it is a policy requirement that apartment schemes deliver 33% or 50% (depending on circumstances) as dual aspect.</p> <p>Chief Executive's Recommendation Amend the text below Table 15.3 to read as follows: Dual aspect shall be incorporated into all dwelling units. Apartment schemes shall deliver a minimum of 33% or 50% of units (depending on circumstances) as dual aspect, in accordance with the criteria as set out in 'Sustainable Urban Housing; Design Standards for New Apartments'</p>
511	Land & Utility Compensation Consultants Limited	<p><u>Clearance distances in respect of overhead lines</u> This submission relates to removing Section 15.11.2 from the Draft Plan which relates to applications proximate to overhead lines.</p> <p>The submission states that Section 15.11.2 of the plan which refers to clearance distance from 110kv and 220kv powerline is non-statutory and is inappropriate and Ultra Vires.</p> <p>The submission is accompanied by five separate appendices.</p>	<p>Chief Executive's Response The comments made are noted and accepted, and it is agreed that ESB will issue the clearance distances that comply with the relevant rules and legislation under the Electricity Acts.</p> <p>It is considered appropriate to remove the current text from Section 15.11.2 'Application Proximate to Overhead Lines' from the Draft Plan and replace it with an advisory note to liaise with the ESB at the earliest opportunity in the interests of clarity.</p> <p>Chief Executive's Recommendation Amend Section 15.11.2 as follows:</p>

	<p>The submission states the following reasons necessitate the removal of the Section in the Draft Plan:</p> <p><u>Electricity (Supply) (Amendment) (No. 2) Act, 1934</u> Sections 19 and 20 of the Electricity (Supply) (Amendment) (No. 2) Act, 1934 (“the 1934 Act”) provide that the decision on the restriction or prohibition on the erection of buildings or structures proposed in proximity to electricity lines is a Ministerial function and not a function of the ESB. Section 20 of the 1934 Act requires that a person who intends to build within a particular distance of an electricity line notifies the ESB (or Eirgrid in the case of transmission lines) at least two months prior to erecting the proposed building or structure. Section 19 of the 1934 Act provides that where the proposed building or structure involves a risk to the build or structure or to the public and where the ESB decides not to move the electricity line to another site, the ESB may apply to the Minister for a Building Prohibition Order. This Section also contains provision for a landowner to object to a BPO or for the minister to hold a public inquiry.</p> <p>Section 15.11.2 seeks to usurp the powers of the Minister and also is an interference by the Council with constitutionally protected property rights which could leave the Council open to claims for compensation.</p> <p><u>No statutory restriction on development in proximity to overhead lines</u> The issue of development in proximity to electricity lines was considered by An Bord Pleanála in the application for the 400kV North South Interconnector made by Eirgrid. The submission states the Inspector’s Report states that EirGrid argued at the oral hearing that there is no statutory restriction in relation to development in proximity to overhead lines and that the ESB/IFA Code of Practice makes provision for the alteration of the overhead line or compensation if the line interferes with any future viable development of land.</p>	<p>In determining applications proximate to overhead power lines the planning authority will have regard to the clearance distances as recommended by the Electricity Supply Board (ESB):</p> <ul style="list-style-type: none"> • For development in proximity to a 10kv or a 38kv overhead line, no specific clearance is required by the ESB. • For development in proximity to a 110kv overhead line, a clearance distance of 20 metres either side of the centre line or 23 metres around a pylon is recommended. <p>For development in proximity to a 220kv overhead line, a clearance distance of 30 metres either side of the centre line or around a pylon is required.</p> <p>In relation to development proposals proximate (within 23 metres) to overhead electrical infrastructure, developers / applicants should contact ESB in advance of completing or finalising designs etc. (i.e. prior to pre-planning stage), so as to ensure that the relevant clearances are maintained from any overhead electricity infrastructure. The Council will have regard to those clearances.</p>
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	<p>The submission states that both An Bord Pleanála and Eirgrid accept that there are no statutory restrictions on development in proximity to overhead electricity line infrastructure and that the provisions of the ESB/IFA Code of Practice allow for the alteration of an overhead line (or compensation) if the line interferes with the development of lands.</p> <p><u>ESB Policy Towards Landowners for Overhead Lines</u> Does not specify any restriction on development of land arising from electricity lines but rather sets out at clause 7 that:</p> <p>7. (i) If in the future the line interferes with any viable development of land other than cultivation of the soil and the Board is so satisfied, the Board shall either:</p> <ul style="list-style-type: none"> - raise or otherwise alter the line to permit the development in full, or - pay for the loss caused by interference of the line with the development, - raise or otherwise alter the line to permit partial development and for the loss caused by interference of the altered line with the development. <p>The submission also refers to clause 8 of the ESB Policy Towards Landowners which includes that:</p> <p style="padding-left: 40px;">Anyone who intends to erect a building or structure within 25 yards on either side of any transmission wire is statutorily bound under penalty to give at least two months' notice in writing to the Board and to state all relevant particulars of such building/structure.</p> <p>In this context the submission states that the recommendation or requirement for mandatory restriction on development as set out in section 15.11.2 of the draft Plan cannot be reconciled with ESB policy.</p>	
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		<p>Appendices:</p> <ul style="list-style-type: none"> - Inspector's Report regarding VA0017. This is the report referred to in the submission. - Excerpt from the Electricity (Supply) (Amendment) (No. 2) Act, 1934 – Public Inquiries. - Excerpt from the Electricity (Supply) (Amendment) (No. 2) Act, 1934 S. 19 Prohibition of building under transmission lines. - Excerpt from the Electricity (Supply) (Amendment) (No. 2) Act, 1934 – notice of intention to erect building. - ESB Policy Towards Landowners 	
452	Harmony Solar Ireland Limited	<p><u>Clearance distances in respect of overhead lines</u></p> <p>Reference is made to the clearance distances outlined in section 15.11.2, Applications Proximate to Overhead lines.</p> <p>It is requested that the Council expand section 15.11.2 to reference setback distances required from Solar PV panels to overhead lines, as advised by both ESB Networks and Eirgrid. In this regard two documents are cited '<i>Interim Standard Guideline Clearances for Solar Farm to DSO overhead network</i>' prepared by the ESB and '<i>Transmission Line and Solar Farm Guideline Clearances</i>'</p> <p>Therefore, it is proposed to amend section 15.11.2 as follows</p> <p>"In determining applications proximate to overhead power lines, the planning authority will have regard to the clearance distances as recommended by ESB Networks for 10kV, 20kV and 38kV overhead lines, and by EirGrid for overhead lines of 110kV and greater.</p> <p>Solar projects should take note of the most recent specific advice issued by ESB Networks and Eirgrid, which is currently:</p>	<p>Chief Executive's Response See response to Submission No. 511 in Chapter 15.</p> <hr/> <p>Chief Executive's Recommendation See recommendation to Submission No. 511 in Chapter 15.</p>

		<ul style="list-style-type: none"> • From ESB Networks: 'Interim Standard Guideline Clearances for Solar Farm to DSO Overhead Network' • From EirGrid 'Transmission Line and Solar Farm Guideline Clearances' <p>For other non-solar developments:</p> <ul style="list-style-type: none"> • in proximity to a 10kv or a 38kv overhead line, no specific clearance is required by the ESB. • in proximity to a 110kv overhead line, a clearance distance of 20 metres either side of the centre line or 23 metres around a pylon is recommended. • in proximity to a 220kv overhead line, a clearance distance of 30 metres either side of the centre line or around a pylon is required. 	
452	Harmony Solar Ireland Limited	<p><u>Solar PV developments</u> The number of permitted solar PV developments in Kildare are referred to, and this includes a list of all relevant applications with a note of the application duration and the operational periods. It is submitted that the duration of permission should be for a period of 10 years given the procedural requirement for grid connections etc. The timeframe for receiving a grid offer is unknown. Solar PV developments can therefore take over 5 years to reach construction phase. Reference is made to departmental guidelines on Wind Farm Developments which states planning authorities may grant permission for a duration of longer than 5 years if appropriate to ensure permission does not expire before a grid connection is granted. However, it is noted that the responsibility to request longer durations falls with the applicant.</p> <p>It is submitted that permissions for 10-year periods are appropriate and cannot be thought of as premature given the above-mentioned factors. It is further contended that an operational period of 40 years should be granted, as the lifespan of technology provided for manufacturers is at least 30 years. The council is implored to apply a 10-year</p>	<p>Chief Executive's Response Duration of permissions and operational periods are more appropriately dealt with on a case-by-case basis. Such timeframes will be determined during the development consent process and conditioned as part of any successful application. See response to submission no. 550 (Chapter 7).</p> <p>Chief Executive's Recommendation See response to submission no. 550 (Chapter 7).</p>

		duration of permission to future solar development with an operation period of 40 years.	
266	Irish Farmers Association	<p><u>Setback distances and National Roads</u> A setback distance of 91 metres is given to national roads and motorways in Chapter 15. In some cases, this means a farmer could have a motorway go through their land and when they want to add additional buildings a significant portion of their land is effectively frozen. This was not catered for in their compensation.</p>	<p>Chief Executive’s Response The setback distances outlined in table 15.8 are specified by the National Roads / Transport Authority and are minimum requirements for road safety purposes. It is not proposed to reduce these minimum requirements.</p> <p>Chief Executive’s Recommendation No change to Draft Plan.</p>
365	An Post	<p><u>An Post service provider and zoning matrices</u> It is requested that Kildare County Council provide flexibility under their land use zonings and objectives in relation to An Post’s facilities and operational requirements. It is important that appropriate zoning objectives are included as part of the County Development Plan, and any Local Area Plan, to allow for the enhancement of existing facilities and the development of new postal infrastructure.</p> <p>Both An Post Customer (Retail) and An Post e-Commerce (Mails & Parcels distribution/logistics) operations are a necessity in urban locations in order to effectively provide an essential public service, and it is submitted that these uses can, and do, work within tight urban constraints and amongst a variety of other land uses including in Town Centres. In this regard, in the interests of compact urban growth, sustainable travel and employment, it is considered that the co-locating of different commercial activities in proximity to other urban uses can be achieved.</p> <p>It is therefore requested that Kildare County Council include provisions for An Post postal facilities as ‘Permissible in Principle’ or ‘Open for Consideration’ land uses across all zoning objectives in the Kildare County Development Plan 2023-2029 and the associated Local Area Plans for County Settlements.</p>	<p>Chief Executive’s Response It is not considered appropriate to identify An Post facilities as either ‘Permissible in Principle’ or ‘Open for Consideration’ across all zoning matrices in either the Draft County Development Plan or the various Local Area Plans. An Post is one of a number of service providers, each with their own individual requirements and it is neither feasible nor practical to list all such service providers in the Plan. It is however considered more appropriate to assess the individual requirements of all service providers, including An Post, on a case by case basis, having regard to the ever changing environment within which all service providers work and subject to all normal planning and environmental considerations.</p> <p>Chief Executive’s Recommendation No Change to the Draft Plan.</p>
365	An Post	<u>An Post and land use classification</u>	Chief Executive’s Response

		<p>A specific land use classification for postal facilities to be added to the Development Plan as follows;</p> <p>Postal Facilities: A building which facilitates mail services that can include the processing, sortation and distribution of mail.*</p> <p>*Note: This use can be assessed on a case-by-case basis appropriate to site context and all other relevant policies, objectives and standards set out in this Plan.</p>	<p>It is not considered appropriate to identify An Post as a specific service provider in the Draft Plan as An Post is one of a number of service providers operating in the county and it would neither be feasible or practical to list all such service providers in the Plan. Any application for An Post facilities will be assessed on its merits having regard to the individual requirements of the facility, subject to all normal planning and environmental considerations.</p> <p>Chief Executive's Recommendation No Change to the Draft Plan.</p>
583	Ballymore Group	<p><u>Public Open Space Standards</u> The submission believes 20% of zoned lands being dedicated to public open space is excessive, a potential burden to purchasers and a source of anti-social behaviour. In the Greater Dublin Area only 10% is required. Quality should be more important than quantity and a box ticking exercise.</p>	<p>Chief Executive's Response The submission relating to the minimum public open space requirements within new residential developments is noted. It is considered that this is a typographical error in the plan and it is noted that it is not consistent with the 15% figure outlined in the Open Space Strategy (Appendix 3 of the draft Plan). Similarly a requirement for 25% public open space to be located within institutional sites is also considered to be a typographical error and should read 20%, as per the Open Space Strategy.</p> <p>Chief Executive's Recommendation Amend Section 15.6.6 as follows: Open space shall be provided within the development site as follows:</p> <ul style="list-style-type: none"> On greenfield sites, the minimum area of open space that is acceptable within the site is 20% 15% of the total site area. This may include Natural / Semi-Natural Green Spaces incorporating the planting of native species and pollinator friendly areas which enhance biodiversity up to a maximum of 8%. On institutional sites a minimum requirement of 25% 20% of the site area may be required. This may include Natural / Semi-Natural Green Spaces incorporating the planting of native species and pollinator friendly areas which enhance biodiversity up to a maximum of 10%.
405	Kildare Climate Action Linkage Group	<p><u>Public Open Space for Residential Development</u> Requests the amendment of the first three bullet points of Section 15.6.6:</p>	<p>Chief Executive's Response It is not considered necessary to amend the text as proposed. See response to submission no. 583 above.</p>

		<ul style="list-style-type: none"> On greenfield sites, the minimum area of open space that is acceptable within the site is 20% of the total site area. This may include Natural / Semi-Natural Green Spaces incorporating the planting of native species of native provenance and origin and pollinator friendly areas (which refer to recommendations from the most recent version of the All-Ireland Pollinator Plan) and enhance help to conserve biodiversity up to a maximum of 8%. On institutional sites a minimum requirement of 25% of the site area may be required. This may include Natural / Semi-Natural Green Spaces incorporating the planting of native species of native provenance and origin and pollinator friendly areas (which refer to recommendations from the most recent version of the All-Ireland Pollinator Plan) which enhance help to conserve biodiversity up to a maximum of 10%. In all other cases, public open space should be provided at the rate of 15% of the total site area (at a minimum). This may include Natural / Semi-Natural Green Spaces incorporating the planting of native species of native provenance and origin and pollinator friendly areas which enhance biodiversity up to a maximum of 6%. <p>It is submitted that you can “enhance” green infrastructure, but that we must seek to conserve and protect our native biodiversity. Furthermore, specifications often include the distribution of commercial ‘wildflower’ mixes. These plant mixtures bear little or no resemblance to the flora of the surrounding area and have the potential to impact on our native biodiversity.</p>	<p>Chief Executive’s Recommendation See recommendation to submission no. 583 above.</p>
529	Consortium of housebuilders	<p>Open Space DMS prescribes the quantum of open space to be provided for residential development on greenfield sites to be 20% of the total site area. The requirement rises to 25% on institutional lands and elsewhere requires 15% (i.e.</p>	<p>Chief Executive’s Response <u>Open Space:</u> The minimum public open space requirements within new residential developments contains a typographic error in the Draft Plan, which is inconsistent with the 15% figure outlined in the Open Space Strategy</p>

		<p>brownfield/infill). Sustainable Residential Developments in Urban Areas, Guidelines for Planning Authorities (2009) recommends 2.5 hectares per 1,000 of population, with new residential development on greenfield sites providing minimum open space of 15% of the site and 10% of the site area with new residential development on infill or brownfield sites.</p> <p>There is an overarching requirement for minimum densities of 35/ha to be achieved on zoned land, rising to 50+/ha on lands well served by public transport. Increasing the requirement of public open space to 20%, while still achieving the minimum 35/ha density, will significantly increase the proportion of duplexes and apartments.</p>	<p>(Appendix 3 of the draft Plan). Similarly, a requirement for 25% public open space to be located within institutional sites is also a typographical error and should be reduced to 20%, to align with the Open Space Strategy.</p> <p>Chief Executive's Recommendation See recommendation to submission no. 583 above.</p>
437.	Receiver for Maplewood Developments & Barina Construction Ltd	<p>Public Open Space Submission notes that for residential developments, section 15.6.6 of the draft Plan requires 20% of the total site area to be provided as public open space on greenfield sites, representing a 5% increase from the current Development Plan. Submits that this is considered onerous and does not align with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009). Further submits that such a requirement has the potential to significantly compromise the design and layout of residential proposals as well as the ability to optimise and ensure the efficient use of land to deliver housing.</p> <p>Requested that Section 15.6.6 should be amended (additional text in purple and deleted text to be crossed out), as follows: 'On greenfield sites, the minimum area of open space that is acceptable within the site is 20% 15% of the total site area. This may include Natural / Semi-Natural Green Spaces incorporating the planting of native species and pollinator friendly areas which enhance biodiversity up to a maximum of 8%.'</p>	<p>Chief Executive's Response The submission relating to the minimum public open space requirements within new residential developments is noted. It is considered that this is a typographical error in the plan and it is noted that it is not consistent with the 15% figure outlined in the Open Space Strategy (Appendix 3 of the draft Plan). Similarly a requirement for 25% public open space to be located within institutional sites is also considered to be a typographical error and should read 20%, as per the Open Space Strategy.</p> <p>Chief Executive's Recommendation See recommendation to submission no. 583 above.</p>
403	Cairn PLC	Public Open Space	Chief Executive's Response

	<p>Regarding public open space provision retention is sought of the existing minimum 15% provision of open space for greenfield sites to be reserved for use as public open and / or communal space. The proposed increase by 5% to 20% is not considered necessary and is inconsistent with National Planning Policy (Residential Density Guidelines 2009).</p> <p>The inclusion of 20% would restrict the ability of mixed typology schemes to provide an appropriate urban form and compact growth.</p> <p>Development sites contribute well in excess of 15% open space when informal spaces (which have an amenity benefit) are included in the calculation. An increase to 20% would place additional strain on the county's ability to deliver sustainable developments with appropriate densities.</p> <p>An illustration of the 20% requirement is used on a permitted scheme in Naas, which demonstrates that if 20% was used for open space it would result in a reduction in the number of housing units from 314 (density of 36/ha) to 282 (density of 32/ha). The increase has a disproportionate impact on the layout of the development, for a marginal benefit.</p> <p>In addition, the 20% requirement would reduce the developable areas of sites which could lead to an unintended consequence of a mix of typologies which would not be in keeping with the wider objectives of the Plan. Another consequence would be a reduction in passive surveillance and overlooking of open space areas as they become disconnected from the dwellings within a scheme.</p> <p>Amend section 15.6.6 "On greenfield sites, the minimum area of open space that is acceptable within the site is 20% 15% of the total site area. This may include Natural / Semi-Natural Green Spaces incorporating the planting of native</p>	<p>Regarding the minimum public open space requirements within new residential developments it is considered that this is a typographical error in the Plan. This was not consistent with the 15% figure outlined in the Open Space Strategy (Appendix 3 of the draft Plan). Similarly a requirement for 25% public open space to be located within institutional sites is also considered to be a typographical error and should read 20%, as per the Open Space Strategy.</p> <p>It is not considered appropriate to include unsuitable areas in the open space provision to include areas of high gradients, or narrow tracts of land. It is important to provide usable open spaces for communities.</p> <p>In addition, while provision of "off road" green infrastructure links between housing areas and schools would be welcome it is not considered appropriate to include this as part of the public open space provision. It should be noted there is an action (TM A21) in Section 5.11 to require all multi-unit developments and schools to submit mobility management plans and travel plans, including an assessment of the public transport capacity in a manner consistent with existing NTA guidance and to implement mobility management initiatives to minimise the impact of new developments on the road and street network of the County.</p> <p>Chief Executive's Recommendation See recommendation to submission no. 583 above.</p>
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		<p>species and pollinator friendly areas which enhance biodiversity up to a maximum of 8%.”</p> <p>Also amend the following in section 15.6.6: Areas of public open space should be generally flat. While some undulation may be incorporated as a design feature, areas with high gradients, containing swales or attenuation ponds, or otherwise impractical to function effectively as amenity / play areas, will not be acceptable as open space, unless the design is of high quality.</p> <p>Narrow tracts of land (less than 10m) or pieces of land ‘left over after planning’ are not acceptable unless they incorporate the planting of native species and pollinator friendly areas. Natural features, e.g., trees, hedgerows, and wetland sites, should be retained, protected, and incorporated into public open space areas, where possible, subject to an Arboricultural Assessment.</p> <p>In recognising that open space is to serve all ages, that where there is an integrated high quality design green routes can form part of the open space calculations as they can provide significant health benefits, passive recreation and improve permeability in towns.</p> <p>The submission is also supportive of initiatives that will deliver safe “off road” green infrastructure links between housing areas within towns and schools / education campuses. It is recommended that an objective is included to deliver “off road” improved green infrastructure linkages to schools and education campuses in the county with active residential frontages (for passive surveillance). Cairn landbanks in Maynooth are well placed to provide such connections.</p>	
457	Glenveagh Properties Limited	<p><u>Open Space</u> The submission states that a comprehensive approach to development management standards which adheres to</p>	<p>Chief Executive’s Response The submission relating to the minimum public open space requirements within new residential developments is noted. It is</p>

	<p>national guidelines be reflected in the new Development Plan to ensure that sustainable development which delivers the growth envisioned in the Core Strategy is achievable.</p> <p>Submits that the standards in relation to open space provision have taken a quantitative rather than a qualitative approach to the provision of open space.</p> <p>Refers to the provisions of Section 15.6 of the Draft Plan and states that these provisions are overly onerous and will end up being detrimental for proposed residential development brought forward in the future. Of particular concern is the minimum requirement of 20% of lands to be dedicated to open space on greenfield sites.</p> <p>States that this open space requirement is completely at odds with National Guidelines, notably, the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009 which states that “In greenfield sites or those sites for which a local area plan is appropriate, public open space should be provided at a minimum rate of 15% of the total site area. This allocation should be in the form of useful open spaces within residential developments and, where appropriate, larger neighbourhood parks to serve the wider community.”</p> <p>The submission states that it is not considered appropriate to apply a standard which is not supported by National Guidelines to residential developments on greenfield sites. States that these overly restrictive measures are not supported by the standards set out in the Guidelines and will lead to an unsustainable approach to development making residential development unviable in these areas. The submission includes a table setting out the national standards versus the Kildare Draft Plan standards (Table 1 refers).</p> <p>Proposes that the forthcoming Development Plan introduces policies in relation to the provision of Open</p>	<p>considered that this is a typographic error in the draft Plan and it is noted that it is not consistent with the 15% figure outlined in the Open Space Strategy (Appendix 3 of the draft Plan). Similarly, a requirement for 25% public open space to be located within institutional sites is also considered to be a typographical error and should be reduced to 20%, as per the Open Space Strategy.</p> <p>There shall be no change to the requirements in respect of pollinator friendly areas as set out in Section 15.6 and the reference that areas of open space less than 500 square metres will not be taken in charge by the Council for maintenance purposes shall remain in Section 15.6.</p> <p>Chief Executive’s Recommendation See recommendation to submission no. 583 above.</p>
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		<p>Space and amenity in new residential development which is aligned with the National Guidelines. States that quality public open spaces will greatly improve residential areas throughout County Kildare and consideration should be given by the Local Authority to providing a greater degree of flexibility in the approach taken to public open space development standards which move towards a qualitative method in the forthcoming Development Plan.</p> <p>The submission proposes amendments to the Draft Plan on Open Space to be consistent with National Guidelines (additional text in purple and deleted text to be crossed out) as follows:</p> <ul style="list-style-type: none"> • On greenfield sites, the minimum area of open space that is acceptable within the site is 20% 15% of the total site area. This may include Natural/Semi-Natural Green Spaces incorporating the planting of native species and pollinator friendly areas which enhance biodiversity up to a maximum of 8% 6%. • On institutional sites a minimum requirement of 25% 20% of the site area may be required. This may include Natural/Semi-Natural Green Spaces incorporating the planting of native species and pollinator friendly areas which enhance biodiversity up to a maximum of 40% 8%. • In all other cases, public open space should be provided at the rate of 10% of the total site area (at a minimum). This may include Natural/Semi-Natural Green Spaces incorporating the planting of native species and pollinator friendly areas which enhance biodiversity up to a maximum of 6% 4%. • A relaxation of these standards may be considered in smaller developments (less than 8 units) for which a minimum of 10% would be required which includes 4% for biodiversity. • A relaxation of these standards may also be considered on brownfield and/or regeneration sites where higher residential densities are required. On such sites a 	
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		<p>minimum of 10% would be required which includes 4% for biodiversity.</p> <ul style="list-style-type: none"> • Areas of open space less than 500 square metres will not be taken in charge by the council for maintenance purposes. 	
457	Glenveagh Properties Limited	<p><u>Private Open Space</u> The submission states that the standards for storage and floor areas for dwellings with four or more units that is set out in Table 0.3 of Chapter 15 is considered excessive in relation to the requirements set out by the guidance in the Quality Housing for Sustainable Communities.</p> <p>The submission states that the maximum storage required for a dwelling house in the Quality Housing for Sustainable Communities is 6sqm. However, Kildare County Council requires 9sqm for a 3-bedroom dwelling and 10sqm for a 4-bed unit. Similarly, the floor areas have up to 17sqm of a difference between floor areas for 3-bed units as demonstrated in Figure 6 of the submission.</p> <p>States that in line with the Quality Housing for Sustainable Communities, a more flexible merit-based approach to minimum floor areas and storage requirements should be adopted by the Local Authority in line with National guidance. Submits that the removal of onerous requirements on floor and storage areas would enable the wider strategic aims of the Kildare County Development Plan and NPF to be achieved and ensure delivery of a greater number of quality affordable homes with sufficient floor areas and suitable storage facilities, in line with greater housing output targets.</p> <p>The submission proposes amendments to Table 0.3 of the Draft Plan on Dwelling Design (additional text in purple and deleted text to be crossed out) as follows:</p>	<p>Chief Executive’s Response The provisions of Section 5 of Dwelling Design contained in the document ‘Quality Housing for Sustainable Communities’ are noted. However, the document does not constitute statutory ministerial guidelines under Section 28 of the Planning and Development Act 2000 (as amended).</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>

Unit Type (House)	Floor Area	Storage Area	Minimum Private Open Space
One bedroom	55 sqm 45sqm	3 sqm	48 sqm
Two bedroom	85 sqm 70sqm	6sqm 4sqm	55 sqm
Three bedroom	100 sqm 75 sqm	9sqm 6sqm	60 sqm
Four bedroom	110sqm 105 sqm	10sqm 6sqm	60 sqm

PARKING			
542	David Mulcahy Planning Consultant	<p><u>Car Parking Standard</u></p> <p>It is noted that carparking provision should be as per other County Development Plans with a scaled or graded reduction in car parking requirement based on proximity to urban centres and high-quality public transport.</p>	<p>Chief Executive’s Response</p> <p>It should be noted, that within the car parking standards section it is stated that the Council reserves the right to alter requirements having regard to the circumstances of each development, on a case-by-case basis. Lower rates of parking and car-free developments should be considered in the first instance, where developments are close to and can avail of public transport. The Council will also have regard to the sites’ proximity to the town centre, services, and public car-parking areas.</p> <p>In addition, it is noted that parking standards are maximum standards and should not be viewed as a target. However, additional text will be included for further emphasis.</p> <p>Chief Executive’s Recommendation</p> <p>Insert additional text under section 15.7.8 as follows: Car parking standards are set out in Table 15.9 below to guide proposed development. Other than ‘Residential’ parking standards are maximum standards. Residential development in areas within walking distances of town centres (800 metres i.e. a 10-minute walk) and high-capacity public transport services (Dart+ services, Bus Connects routes and any designated bus only or bus priority route) should be designed to provide for fewer parking</p>

			spaces, having regard to the need to balance demand for parking against the need to promote more sustainable forms of transport, to limit traffic congestion and to protect the quality of the public realm from the physical impact of parking.
385	County Kildare Chamber	<p><u>Electric Vehicles and Car Parking</u> With regard to Electric Vehicles, County Kildare Chamber believes any new planning permission for residential development should have provision for at least one charging point. The Chamber also believes in developments where car spaces are reduced or removed, in line with climate action and planning policy, provision should be made for initiatives such as GoCar.</p>	<p>Chief Executive’s Response <u>Electric Vehicles and Car Parking</u> Section 5.12 (Car Parking) sets out clear objectives regarding electric vehicle charging infrastructure requirements. Also section 7.12.5 (Electric Vehicles) sets out clear policies and objectives which promote the necessary infrastructure to support the continued roll out of electric vehicles.</p> <p>Car parking standards are set out in Table 15.9 of the Draft Plan. Parking standards are now maximum standards, having regard to the need to balance demand for parking against the need to promote more sustainable forms of transport.</p> <p>Chief Executive’s Recommendation See recommendation to submission no. 542 above.</p>
437.	Receiver for Maplewood Developments & Barina Construction Ltd	<p><u>Car Parking Standards</u> Notes that Section 15.7.8 of the Draft Plan sets out car parking standards, with Table 15.9 requiring 1.5 spaces per unit and 1 visitor space per every four apartments and the supporting text states that “other than ‘residential’, parking standards are maximum standards. Notes that the supporting text outlines where lower rates of parking should be considered, but states it is not specific in stating this is in relation to residential developments.</p> <p>Considers the supporting text and Table 15.9 should recognise that the quantum of car parking for apartment developments will vary, having regard to the location in accordance with paragraphs 4.18 to 4.27 of the Apartment Guidelines 2020.</p> <p>It is requested that additional text (in purple) should be included in section 15.7.8, as follows:</p>	<p>Chief Executive’s Response The request regarding the additional text to be inserted in the plan to have regard to the Section 28 Guidelines on Apartment Developments (2020) is accepted.</p> <p>Chief Executive’s Recommendation Amend Section 15.7.8 of the draft Plan, as follows:</p> <ul style="list-style-type: none"> • New residential development should take account of the different criteria regarding car parking including: <ul style="list-style-type: none"> ○ A reduction of car parking standards will be considered on a case-by-case basis, having regard to ‘Sustainable Urban Housing: Design Standards for New Apartments (2020)’ where applicable.

		<ul style="list-style-type: none"> • New residential development should take account of the different criteria regarding car parking including: <ul style="list-style-type: none"> ○ A reduction of car parking standards will be considered on a case by case basis, having regard to the Apartment Guidelines 2020 including the type of location and based on proximity and accessibility criteria. 	
583	Ballymore Group	<p><u>Car Parking Standards</u> In the absence of a radical improvement in public transport, restricting car parking spaces to a max of one per unit will not lead to the reduction in car ownership but instead chaotic ad-hoc arrangements. The submission recommends a max of 2 car spaces should be recommended for a 3 and 4 bed property. Furthermore, this submission considered that 2 staff members per parking space at creches is excessive. Creches have a large staff and large mainly unused carparks in residential schemes are unsightly.</p>	<p>Chief Executive’s Response It should be noted that parking standards are maximum standards, having regard to the need to balance demand for parking against the need to promote more sustainable forms of transport, to limit traffic congestion and to protect the quality of the public realm from the physical impact of parking. Therefore, the number of spaces provided should not exceed the maximum provision set out below’. These are maximum standards and flexibility will be shown when assessing developments in central / accessible urban locations close to, inter alia, public transport, public car parks, as appropriate. It is noted however that there is an anomaly in Section 15.7.8 where the text currently reads that maximum parking standards apply to all developments except residential developments. This is proposed to be changed to omit the words ‘other than residential’ as parking standards will be maximum for all types of development.</p> <p>Chief Executive’s Recommendation See recommendation to submission no. 542 above.</p>
403	Cairn PLC	<p><u>Car Parking Standards</u> Table 15.9 is referred to, in particular parking requirements for Houses, Apartments and Creches. It is recommended that Section 28, Apartment Guidelines 2020 are used in determining the parking standards.</p> <p>Regarding creche provision, it is acknowledged that the rates are a maximum, it is submitted there is no requirement for the additional 1 per 4 children as the creche is not a generator of car parking in its own right, particularly</p>	<p>Chief Executive’s Response The submission in relation to the minimum car parking standards is noted. It is considered reasonable to amend Table 15.9. See recommendation below. It should also be noted that Section 15.7.8 provides that the Council reserves the right to alter the requirements, having regard to the circumstances of each development, on a case-by-case basis.</p> <p>It is accepted that a creche is not a generator of car parking generally, and Table 15.9 has been amended to reflect this also.</p>

		<p>as the staff member already has an allocation in the parking standards table.</p>	<p>The number of spaces are maximum standards and flexibility will be shown when assessing developments in central / accessible urban locations close to, inter alia, public transport, public car parks, as appropriate.</p> <p>Chief Executive's Recommendation Amend Table 15.9 to read as follows: HOUSE: 1 space each for units up to and including 3 bed units and 1 space + 0.5 visitor spaces for units of 4 units bedrooms or greater CRECHE: 0.5 per staff member plus 1 per 4 children</p>
529	Consortium of housebuilders	<p><u>Parking Standards</u> The submission notes that within the DMS Parking Requirements of the Draft Plan there appears to be a typo and it is assumed that 1 space plus 0.5 visitor spaces per each 4-bedroom unit is what the Draft Plan intended to state.</p> <p>It is considered that the parking standards, as maximum standards, are inadequate and have the potential to create significant parking issues, such as uncontrolled parking in new housing schemes.</p> <p>The parking strategy and application of parking standards should be informed by a wider strategy to improve the overall public transport provision in Kildare.</p> <p>A requirement for 1 parking space for every 4 children attending a creche is unrealistic</p>	<p>Chief Executive's Response <u>Parking Standards</u> The submission is correct in its assertion that Table 15.9 (Maximum Car Parking Standards) contains a 'typo' and it should read 1 space plus 0.5 visitor spaces per each 4-bedroom unit.</p> <p>It is agreed that a requirement for 1 parking space for every 4 children attending a creche is unrealistic and this standard will be proposed to be omitted from the Draft Plan.</p> <p>It is considered the maximum standards outlined in Table 15.9 provide an appropriate guide for car-parking in Kildare, which balances demand for parking against the need to promote more sustainable forms of transport, to limit traffic congestion and to protect the quality of the public realm from the physical impact of parking. These are maximum standards and flexibility will be shown when assessing developments in central / accessible urban locations close to public transport. It is noted however that there is an anomaly in Section 15.7.8 where the text currently reads that maximum parking standards apply to all developments except residential developments.</p> <p>Chief Executive's Recommendation See recommendation to submission nos. 403 & 542 above.</p>

Chapter 15 - Development Management Standards

365	An Post	<p><u>Car Parking Standards for postal facilities</u> An Post requires use of c.3,000 vehicles on a daily basis to transport mail within and between settlements throughout the Country. Due to the increasing number of larger parcels being processed, it is considered likely that this requirement will increase over time. Charging facilities are also required for EVs in the fleet. It is requested therefore that Kildare County Council provide flexibility with car parking standards for postal facilities which require sufficient car parking spaces to operate in an efficient manner.</p>	<p>Chief Executive's Response While post offices/depots are not listed in Table 15.9 in Chapter 15 'Development Standards, Section 15.7.8 states that; for any use not specified, the default parking rate will be calculated based on those of a comparable use and / or as part of a Transport and Traffic Assessment.</p> <p>This is considered adequate for the assessment of any future postal developments.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
560	Cllr. Suzanne Doyle	<p><u>Car Parking for tourism</u> The submission recommends that the Draft Plan be amended to provide for adequate and appropriately located car parking facilities to support tourism visitors to Kildare Town.</p>	<p>Chief Executive's Response Any proposals to amend the Draft Plan to provide for car parking facilities in Kildare Town falls outside the scope of this draft Plan and therefore cannot be taken into consideration at this stage. It should be noted that the preparation of a local area plan for Kildare Town forms part of Kildare County Council's work programme for 2022. Furthermore, it is noted that the Council's programme for local area plans is based on the preparation of a series of evidence-based assessments including an Infrastructural Assessment (Settlement Capacity Audit), a Social Infrastructure Audit, and an Area Based Transport Assessment (ABTA) to determine the suitability and capacity of specific sites to accommodate particular land use zoning objectives. The adequacy and location of car parking facilities to support tourism and other uses will be considered during the preparation of the Local Area Plan for Kildare Town.</p> <p>Chief Executive's Recommendation No change to Draft Plan.</p>
457	Glenveagh Properties Limited	<p><u>Car Parking Standards</u> The car parking standards proposed in Chapter 15 of the Draft Plan reflect a significant change to standards outlined in the current 2017 Kildare County Development Plan.</p>	<p>Chief Executive's Response The submission in relation to the minimum car parking standards is noted. It is also noted that there is a typographic error in Table 15.9. It is considered that Table 15.9 be amended to remove the error as follows:</p>

		<p>States that the National Transport Authorities Draft Transport Strategy for the Greater Dublin Area, which is the framework for investment in transport infrastructure and services over the next two decades, extends to 2042 and as such prolongs beyond the 2029 timeframe for this Development Plan.</p> <p>The submission states that as part of the Development Plan process, it is important that the Local Authorities implements a “step down” approach to the “norm” of 2 no. parking spaces per dwelling until such time that suitable alternative modes of transport are in place within the towns of Kildare County.</p> <p>Proposes that transitional arrangements could be implemented as part of the new Development Plan which would provide flexibility and support for new residential development in line with a comprehensive Mobility Management Plan that provides for innovative solutions to address this transitional period.</p> <p>The proposed car parking standards will result in the maximum car parking spaces achievable on residential sites for dwelling houses, representing a nearly fifty percent decrease in the current standard set out for residential dwellings. States that while Glenveagh Properties Limited are supportive of the planned improvements in the public transport network for County Kildare, the proposed reduction in car parking standards is being implemented well in advance of these improvements. This level of change will be unsustainable to support growth to achieve targets set out in the Core Strategy and will prevent the development of strategic sites.</p> <p>The submission proposes amendments to Table 15.9 (Maximum Car Parking Standards) of the Draft Plan as follows:</p> <table border="1" data-bbox="504 1337 1218 1396"> <tr> <td data-bbox="504 1337 862 1396">Residential</td> <td data-bbox="862 1337 1218 1396">Proposed Amendment to Draft Plan</td> </tr> </table>	Residential	Proposed Amendment to Draft Plan	<p>HOUSE: 1 space each for units up to and including 3 bed units and 1 space + 0.5 visitor spaces for units of 4 units bedrooms or greater</p> <p>It is noted that Section 15.7.8 provides that the Council reserves the right to alter the requirements outlined above, having regard to the circumstances of each particular development, on a case-by-case basis.</p> <p>Chief Executive’s Recommendation See recommendation to 403 above.</p>
Residential	Proposed Amendment to Draft Plan				

		House	1 space each for units up to and including 3 bed units and 1 space + 0.5 visitor spaces for units of 4 units or greater 2 spaces per unit.	
330	Maynooth Cycling Campaign	<p><u>Cycling parking standards</u> Cycling parking standards are inadequate for 2029 targets and woefully inadequate for 2050. At a minimum new schools should have twice the level.</p>		<p>Chief Executive's Response Noted and agreed.</p> <p>Chief Executive's Recommendation Amend the fourth bullet point under Section 15.7.2 as follows;</p> <ul style="list-style-type: none"> The cycle parking standards set out in Table 15.5 shall apply and cycle parking provision shall be in accordance with Section 5.4.1 of this Plan. The cycle parking standards set out in Table 15.5 shall be taken as minimum standards. <p>Amend the numbering of Table titled 'Cycle Parking Standards' as '15.5' and to renumber all other tables in Chapter 15 accordingly.</p>
410	Celbridge Community Council	<p><u>Cycle and Car Parking</u> Notes that the Cycle Parking Standards in Table 0.5* should be noted as a minimum requirement to ensure the appropriate provision of cycle parking for new developments. Should include provision of resident and visitor cycle parking for houses (and not just for apartments) to promote cycling to new residential developments.</p> <p>*Notes that the Cycle Parking Standards Table has been mislabelled and should be relabelled as 15.5. This applies to other tables in Chapter 15.</p> <p><u>Car Parking</u> States that Car Parking Standards for residential developments should also be a maximum standard to promote more sustainable forms of transport. Notes that this would be in line with other development plans throughout Ireland and in accordance with the Design Standards for New Apartments document.</p>		<p>Chief Executive's Response The request that table 0.5 should have a reference to minimum requirements with respect to cycle parking is accepted.</p> <p>The issue relating to the incorrect numbering of the tables in Chapter 15 is acknowledged. This is a formatting error.</p> <p>It is noted that Table 0.9 already refers to 'maximum' car parking standards.</p> <p>Chief Executive's Recommendation Amend table 0.5, as follows: Table 015.5 - Minimum Cycle Parking Standards</p> <p>Correct order and formatting of the numbering of all Tables in Chapter 15.</p>

CHILDCARE			
437.	Receiver for Maplewood Developments & Barina Construction Ltd	<p><u>Childcare Facilities</u> Notes that Section 15.5.2 of the Draft Plan refers to the 'Childcare Facilities Guidelines for Planning Authorities' (2001) and states that they "require" 20 childcare spaces for every 75 dwellings. Submits that the 20 childcare spaces for every 75 dwellings is not a "requirement", but rather a guideline standard and will depend on the circumstances of each individual site as reflected in Appendix 2 of the Guidelines.</p> <p>Notes that the 2001 Guidelines further state that the threshold for such provision should be established having regard to the existing geographical distribution of childcare facilities and the emerging demographic profile of areas, in consultation with city / county childcare committees. The location of childcare facilities should be easily accessible by parents, and the facility may be combined with other appropriate uses, such as places of employment. Refers to the 'Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020)' that state in relation to childcare facilities that '<i>one-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms</i>'.</p> <p>Submits that 15.5.2 of the draft Plan also includes over prescriptive requirements for the assessment of childcare facilities as part of the undertaking of a Social Infrastructure Audit. Submitted that the information identified in points (ii) and (iii) of Section 15.5.2 is not readily available to</p>	<p>Chief Executive's Response In order to respond to the issues raised, phone calls were made by the Planning Authority to a sample of childcare facilities, who confirmed that the information proposed for deletion is readily available and can be provided at the request of anyone, including developers.</p> <p>Chief Executive's Recommendation Amend SC O76 as follows: Have regard to the criteria specified in the Childcare Facilities for Planning Authorities, DEHLG (2001), Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020) and any updated policy guidance, regarding the provision of childcare and early years education facilities.</p>

		<p>applicants and it is recommended that they are omitted. States that their experience, from preparing such audits, is that such information is commercially sensitive and mostly not forthcoming from existing childcare operators. States if it is to be verified by the Council’s Childcare Committee, this information will be more readily available to the Council than to a private developer, with the former being the more appropriate repository of such sensitive data.</p> <p>The submission also requests that Section 15.5.2 of the draft Plan, should be omitted (text crossed-out), as follows: (ii) the total number of childcare spaces on offer at the subject childcare facility with a clear breakdown of the various types of childcare that are available in each identified facility and (iii) details of any remaining capacity in each facility. This information must be supported, in writing, by each of the childcare facilities identified in (i) above and must be confirmed by the Kildare County Childcare Committee.</p>	
403	Cairn PLC	<p><u>Childcare Facilities</u> Reference is made to 15.5.2 and it is submitted that the 20 childcare spaces for every 75 dwellings is not a requirement but rather a recommendation which is to be based on, inter alia, emerging demographic profiles of an area and will depend on the circumstances of each site.</p> <p>In addition, reference is made to Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020), which state in relation to childcare facilities that <i>“one-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms.”</i></p> <p>It is requested that items (ii) and (iii) are omitted from the second paragraph under Section 15.5.2 as this information</p>	<p>Chief Executive’s Response To respond to the issues raised, phone calls were made by the Planning Authority to a sample of childcare facilities, who confirmed that the information proposed for deletion is readily available and can be provided at the request of anyone, including developers.</p> <p>Agreed to amend SC O76 as proposed. See below recommendation.</p> <p>Regarding the reference to a standalone property, it is considered that such facilities are most suitable for childcare facilities; however, this doesn’t exclude other types note the wording “should” in the text, which allows some degree of flexibility. It is acknowledged that dual usage may not be possible in some circumstances, however, where possible, it is encouraged. This is also the case for other community infrastructure / facilities which may prove beneficial for childcare providers.</p> <p>Chief Executive’s Recommendation See response to submission no. 437 above.</p>

	<p>is not available to applicants as it is commercially sensitive and mostly not forthcoming from childcare operators.</p> <p>Circular PL 3/16 is referred to and it is submitted that Section 15.5.2, takes into account its contents in relation to childcare facility standards and remove commentary in relation to internal layouts etc. The circular states “In light of the foregoing, planning authorities are requested to exclude matters relating to childcare facility standards outlined in Appendix 1 of the Childcare Facilities Planning Guidelines 2001 – including the minimum floor area requirements per child - from their consideration of planning applications relating to childcare facilities and to solely focus on planning related considerations that fall within the remit of the Planning and Development Act 2000, as amended, in the determination of such planning application.”</p> <p>In this regard it is proposed to amend SC O76 in Chapter 10, to include additional text referring to Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020), & Circular PL 3/16.</p> <p>The third last paragraph of Section 15.5.2 should be amended as is it overly prescriptive and the reference to standalone property with capacity for dual usage e.g., “night-time community uses” should be removed as creches can be provided at ground floor apartment/commercial developments. Remove dual usage for night-time community uses as it is unfeasible for private operators to include such floorspace. It is difficult to manage and may act as a deterrent to new operators entering childcare provision.</p>	
<p>FAMILY FLATS</p>		

<p>444.</p>	<p>James McInerney</p>	<p>Family Flat Requests to have text deleted from Chapter 17 Section 17.4.9 Family Flat, Draft Kildare County Development Plan 2023-2029, as follows: Accommodation must be subsidiary to the main dwelling in scale and only in exceptional cases will more than one bedroom be permitted where a need has been demonstrated. And replace with (new text in purple): Accommodation shall be subsidiary to the main dwelling in scale and its floor area shall not exceed 70sq metres. The maximum site coverage shall not exceed 50% and due regard shall be given to the Plot Ratio Standards set out in Table 01- Plot Ratio Standards.</p> <p><u>Note:</u> The above request for the deletion/addition of text relates to the Kildare County Development Plan 2017-2023 and not the draft Plan which is the subject of this Chief Executive's Report.</p> <p>The submission illustrates that the text requested to be deleted has been carried over to the draft Plan. States that the use of the words 'in <i>exceptional circumstance</i>' can be applied differently, by different Planners which can lead to a lack of a uniform approach within the planning authority.</p> <p>Contends that the profile and make-up of families today differs greatly from the past. States that it is impossible for applicants and planners to decide what social need is less or greater than another under the heading 'exceptional circumstances'. Submits that it is overly restrictive without proper definition and should be deleted with the key considerations to instead reflect those set out below:</p> <ul style="list-style-type: none"> • Subsidiary to the main dwelling and reflect its design, character, and finishes. • Site coverage and plot ratio • Protection of existing residential amenities and character of the area. 	<p>Chief Executive's Response The request to omit the requirement for an exceptional case to be demonstrated when considering an application for a family flat is not accepted. While the Council recognises that family circumstances have evolved over the past number of years, it is considered that the removal of this provision to demonstrate 'genuine need' would have the effect of completely undermining the overall concept around the need for a family flat. Not requiring an applicant to demonstrate 'genuine need' could lead to a range of unintended circumstances whereby people may seek to construct 'family flats' for other purposes than for which they are intended.</p> <p>The suggested provision relating to site coverage and plot ratio limitations is also not accepted as such provisions are already utilised as part of the normal planning and design considerations for all applications for residential development. Furthermore, it is a key intention of the stated policy that any such family flat remains 'subsidiary' to the main building, with the design and scale of proposals being assessed on a case-by-case basis. A generous limitation of 70 sq metres could in some instances undermine this provision and also inhibit the Planning Authority from taking varying site-specific circumstances into consideration.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
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274.	DC Architects and Engineers	<p><u>Family Flat Introductory Overview to Submission</u> Submission suggests that Kildare Co. Council might broaden the scope of its definition of a Family Flat and also consider the introduction of a separate category to deal with the sub-division of dwellings.</p> <p><u>Attached Submission Document</u> Submission refers to the provisions for Family Flats under section 15.4.14 of the draft Plan. States that the term 'Granny-Flat' or Family Flat traditionally referred to a situation where a member of an older generation is accommodated in the home of a member of a younger generation to whom they are related. Notes that it was also associated with an element of care being provided to the member of the older generation and that the Planning Authority has sought the requirement to demonstrate genuine need, usually provided by evidence of medical illness. Submits that the rationale for family flats has changed and that it appears now that much of the current demand for family flats stems from a younger generation seeking to be accommodated by an older generation. States that this would appear to stem from Ireland's housing crisis and the associated shortage of accommodation which will not change substantially during the lifetime of the Plan. Contends that a more open</p>	<p>Chief Executive's Response The details of the submission are noted. However, a family flat provides the opportunity to provide additional semi-independent accommodation for family members within the existing or extended dwelling unit and the policy is not to provide for a separate unit. The council recognise the social changes that have resulted in younger family members availing of these units and Section 15.4.14 does not preclude those family members from using this form of accommodation when a genuine need can be established.</p> <p>It is noted that the submission highlights financing the units as a difficulty as the ownership of properties is not clear. It is important to clarify that in the event that fully self-contained units are required then planning permission should be sought for same and assessed on its merits. A family flat is merely a solution for family members to live a somewhat independent life from that of the occupants of the main dwelling as a temporary solution. It is considered that the development management standards contained in the Draft Plan provide sufficient guidance on the criteria for assessment of a planning application.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

		<p>approach to the provision of such family flats could help to address the shortage of affordable accommodation in the county.</p> <p>Notes that the difficulties in realising such family flats can be the problem of accessing finance where the ownership of properties is not clear. States that this problem could be addressed by a less restrictive approach to the sub-division of dwellings. Submits that other Local Authorities are taking a more open approach to Family Flats and the Sub-Division of Dwellings in their Development Plans e.g., Kilkenny Co. Council and Dublin City Council.</p> <p>Requests that the draft Plan be edited so that the wording of Section 15.4.14. reads as follows:</p> <p>15.4.14 Family Flat</p> <p>A 'family' flat refers to a sub-division or extension of a single dwelling unit to accommodate a member of the immediate family and is generally acceptable, provided it is not a separate detached unit and that it is possible to provide direct access to the remainder of the house if required in the future. There shall be no permanent subdivision of the garden. The 'family' flat shall not be let or sold, other than as part of the overall property and shall revert to being part of the original house when no longer occupied by a family member. The design should ensure that the flat forms an integral part of the main dwelling unit capable of reintegration for single family use.</p> <ul style="list-style-type: none"> • A valid case is made, including details of the relationship between the occupant(s) of the main dwelling house and the proposed occupant(s) of the ancillary family flat. • The principal requirement for any proposed family flat extension is that the family flat shall generally be less than 50% of the floor area of the main dwelling. 	
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		<ul style="list-style-type: none"> • In the case of a two-storey family flat, there should be provision for an internal connecting door at both levels to facilitate any future reintegration for single family use. • External doors will normally only be permitted to the side and rear of the house, with the presumption against an independent front door. Access shall be either from an internal door or by side door well screened from the front elevation. • The design should have regard to the need for light and privacy of adjoining properties. • The form and design of the existing building should be followed, and the extension should integrate fully with the existing building by using similar detailing and window proportions, materials, and finishes. 	
274.	DC Architects and Engineers	<p>The submission also suggests a new section is introduced into the Plan which deals with the Sub-division of Dwellings, as follows:</p> <p>Sub-division of Dwellings A large amount of residential development in Co. Kildare has retained a pattern of use as single family dwelling units. The sub-division of large dwelling houses may be permitted in highly accessible areas to provide for the demographic changes in the county, subject to the residential amenity standards, including minimum floor space, etc. This may involve the sub-division of such dwellings into individual distinct units on each floor.</p> <p>Where sub-division is being considered, factors such as the extent of open space within the site boundaries, landscaping schemes including the retention and planting of trees, the provision of on-site parking, the retention of existing railings and gates, and screened refuse storage areas will be evaluated as part of the assessment.</p> <p>When sub-divisions are allowed, they should be compatible with the architectural character of the building. An appropriate mix of accommodation in particular areas will</p>	<p>Chief Executive’s Response The comments in relation to policy for a subdivision of a unit is noted. The Planning and Development Act 2000 (as amended) defines a house as a ‘building or part of a building which is being or has been occupied as a dwelling or was provided for use as a dwelling but has not been occupied, and where appropriate, includes a building which was designed for use as 2 or more dwellings or a flat, an apartment or other dwelling within such a building’. The permanent subdivision of a property into two residential units or multiple residential units will be assessed on its merits against both Section 28 Guidelines (Sustainable Urban Development, Apartment Guidelines, Quality Housing for Sustainable Communities) and the various policies, objectives, and development management standards of residential development in the Plan.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>

		<p>be determined by Kildare Co. Council, taking account of the mix of residential accommodation in an area.</p> <p>Applications for permission to subdivide or change the use of existing residential will be considered on their merits. The design of developments shall be such that it complements the existing layout or streetscape and shall not interfere with the residential and other amenities of the area and shall provide a suitable quality of residential amenity for all the proposed units.</p>	
SIGNAGE			
533	Cill Dara Le Gaeilge	<p><u>Aghaidheanna Siopaí</u> <i>Tacaidh le Gaeilge a úsáid ar aghaidheanna siopaí. Ba cheart gnólachtaí a spreagadh agus a dhreasú chun Gaeilge a úsáid ar aghaidheanna siopaí, agus ar chomharthaíocht ginearálta.</i></p> <p><u>Shopfronts</u> Support the use of the Irish language on shopfronts. Businesses should be encouraged and incentivised to use the Irish language on shopfronts and on general signage.</p>	<p>Freagairt an Phríomhfheidhmeannaigh: <u>Aghaidheanna Siopaí</u> <i>Cuireann Aidhm GS A37 in Alt 4.7 úsáid na Gaeilge ar chomharthaíocht sa chontae chun cinn tríd an Scéim Deontais Aghaidheanna Siopaí agus Rochtana.</i></p> <p><i>Deirtear freisin in Alt 15.14 go dtugann an Comhairle cur chun cinn agus spreagadh d'úsáid na Gaeilge ar chomharthaíocht sa chontae, agus í seo ar aghaidheanna siopaí san áireamh.</i></p> <p>Chief Executive's Response <u>Shopfronts</u> Objective RE O37 in Section 4.7 promotes the use of Irish Language signage in the County through the Shop Front & Accessibility Grant Scheme. It is further stated in Section 15.14 that the Council promotes and encourages the use of Irish language signage in the County, including on shop fronts.</p>
			<p>Moladh an Phríomhfheidhmeannaigh: <i>Gan athrú a dhéanamh ar an Dréacht-Phlean.</i></p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

526	Conradh na Gaeilge	<p><u>Comharthaíocht agus an Geilleagar Gaeilge</u> <i>Ba cheart don Chomhairle cinntiú go mbeidh gach comhartha ar fáil go dátheangach nó i nGaeilge amháin. Ba cheart iniúchadh a dhéanamh ar na comharthaí atá ann faoi láthair, chun cinntiú go bhfuil an litriú, gramadach agus aistriúchán i gceart. Ba cheart cinntiú go gcloíann aon comharthaí nua le dea-chleachtas dá-theangach. Tugtar nasc a bhaineann le comharthaí bóthair, agus moltar go mbaineann na prionsabail céanna le h-aon comharthaíocht dá-theangach.</i></p> <p><i>Ba cheart gnóthaí a spreagadh chun Gaeilge a úsáid. Ba chóir iarraidh orthu ainmneacha Gaeilge dá siopaí a úsáid agus iad ag cur iarratas pleanála isteach. Ba cheart deontais a chur ar fáil do ghnóthais a chuireann fógraí i nGaeilge</i></p> <p><u>Signage and Irish Language Economy</u> The council should ensure that all signs are available bilingually or in Irish only. Existing signs should be surveyed to ensure that spelling, grammar, and translation are correct. Ensure new signs comply with best bilingual practice. A link is provided relating to road signs, and it is submitted the same principles apply to any bilingual signage.</p>	<p><u>Freagairt an Phríomhfheidhmeannaigh:</u> <u>Comharthaíocht agus an Geilleagar Gaeilge</u> <i>Cuireann Aidhm GS A37 in Alt 4.7 úsáid na Gaeilge ar chomharthaíocht sa chontae chun cinn tríd an Scéim Deontais Aghaidheanna Siopaí agus Rochtana. Deirtear freisin in Alt 15.14 go dtugann an Comhairle cur chun cinn agus spreagadh d’úsáid na Gaeilge ar chomharthaíocht sa chontae, agus í seo ar aghaidheanna siopaí san áireamh.</i></p> <p>Chief Executive’s Response <u>Signage and Irish Language Economy</u> Objective RE O37 in Section 4.7 promotes the use of Irish Language signage in the County through the Shop Front & Accessibility Grant Scheme. It is further stated in Section 15.14 that the Council promotes and encourages the use of Irish language signage in the County, including on shop fronts.</p> <p>Moladh an Phríomhfheidhmeannaigh Gan athrú a dhéanamh ar an Dréacht-Phlean.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan</p>
281	Donal Knight	<p><u>Shopfronts</u> New development of roads and housing or industrial estates should be encouraged where possible to continue the use of long-established place names whether in English or Irish but preferably both.</p>	<p>Chief Executive’s Response Section 15.4.15 in chapter 15 ‘Development Plan Standards’ acknowledges that placenames are an important part of our cultural heritage and placemaking and that the naming of residential and other developments shall reflect local heritage by incorporating local placenames or names of geographical, historical or cultural significance to the site location. Furthermore, the same section of the Draft Plan emphasises the Council promotion and encouragement of the use of the Irish Language for the naming of new residential developments in the County.</p> <p>In this regard any placenames for new development shall have regard to the Council’s document titled ‘Naming of New Residential</p>

Chapter 15 - Development Management Standards

			Developments (2018)'. It should also be noted that the Council intends reviewing this guidance document within two years of the adoption of this Plan.
			Chief Executive's Recommendation No change to the Draft Plan.
520	Newbridge Community Development	<u>Advertisements</u> There is uncontrolled advertising of additive substances in town centres. This should be curtailed.	Chief Executive's Response Section 15.15 of Chapter 15 'Development Management Standards' sets out in detail how the Draft Development Plan will control the design and scale of advertisements in line with Section 254 of the Planning and Development Act 2000 (as amended). It is not within the remit of a Development Plan to control the content of advertising.
			Chief Executive's Recommendation No change to the Draft Plan.
521	South Western Regional Drug and Alcohol Task Force	There is an uncontrolled advertising of alcoholic substances in towns, villages and at events across County Kildare. The clause within the Public Health Act should be noted which curtails advertising of alcohol products and licenced premises outside schools where are not being monitored.	Chief Executive's Response Section 15.15 of Chapter 15 'Development Management Standards' sets out in detail how the Draft Development Plan will control the design and scale of advertisements in line with Section 254 of the Planning and Development Act 2000 (as amended). It is not within the remit of a Development Plan to control the content of advertising.
			Chief Executive's Recommendation No change to the Draft Plan.
544	Sult na Sollan	<u>Aghaidheanna Siopaí</u> <i>Tacaidh le Gaeilge a úsáid ar aghaidheanna siopaí. Ba cheart gnólachtaí a spreagadh agus a dhreasú chun Gaeilge a úsáid ar aghaidheanna siopaí, agus ar chomharthaíocht ginearálta.</i> <u>Shopfronts</u>	Freagairt an Phríomhfheidhmeannaigh: <i>Cuireann Aidhm GS A37 in Alt 4.7 úsáid na Gaeilge ar chomharthaíocht sa chontae chun cinn tríd an Scéim Deontais Aghaidheanna Siopaí agus Rochtana. Deirtear freisin in Alt 15.14 go dtugann an Comhairle cur chun cinn agus spreagadh d'úsáid na Gaeilge ar chomharthaíocht sa chontae, agus í seo ar aghaidheanna siopaí san áireamh.</i> Chief Executive's Response

		Support the use of the Irish language on shopfronts. Businesses should be encouraged and incentivised to use the Irish language on shopfronts and on general signage.	Objective RE O37 in Section 4.7 promotes the use of Irish Language signage in the County through the Shop Front & Accessibility Grant Scheme. It is further stated in Section 15.14 that the Council promotes and encourages the use of Irish language signage in the County, including on shop fronts
			<p>Moladh an Phríomhfheidhmeannaigh <i>Gan athrú a dhéanamh ar an Dréacht-Phlean.</i></p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
544	Sult na Sollan	<p><u>Forbairtí Nua a Ainmniú</u> <i>Cinntigh go n-ainmneofar agus go léirítear gach forbairt nua i nGaeilge amháin, chun gannionadaíocht stairiúil ar ainmneacha Gaeilge sa chontae a chúiteamh. Léireoidh seo freisin éagsúlacht mór staire agus bunús ainmneacha áiteanna / bailte fearainn.</i></p> <p><i>Gan forbairtí nua san áireamh, caithfear gach ainm áite a suiteáil do sráideanna nua nó sráideanna / bóithre oifigiúla in eastáit nua bheith dá-theangach.</i></p> <p><u>Naming of New Developments</u> Ensure all new developments are named and displayed in the Irish language only, to redress historic under-representation of Irish language names in the county. This will also reflect the rich diversity of history and origins of place / townland names. Excluding new developments, all place names installed for new streets or official streets / roads in new estates must be bi-lingual.</p>	<p>Freagairt an Phríomhfheidhmeannaigh: <i>Léirítear in Alt 15.4.15 den Dréacht-Phlean tabhacht na Gaeilge in ainmniú forbairtí cónaithe nua. Tugann an Comhairle cur chun cinn agus spreagadh d'úsáid na Gaeilge d' ainmniú forbairtí cónaithe nua sa Chontae. Beidh Gaeilge san áireamh in ainmneacha forbairtí.</i></p> <p>Chief Executive's Response The importance of the Irish language in the naming of new residential developments is referenced in Section 15.4.15 of the Draft Plan. The council promotes and encourages the use of Irish Language for the naming of new residential developments in the County. Names of developments shall include the use of the Irish language.</p> <p>Moladh an Phríomhfheidhmeannaigh: <i>Gan athrú a dhéanamh ar an Dréacht-Phlean.</i></p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
LEVIES			
53	Gerard Delaney	<u>Levies</u>	Chief Executive's Response The Draft Plan is a land use plan. There are other mechanisms whereby the merits of a special development levy can be considered.

		<p>The implementation of a special development levy, which is ring fenced for the fast tracking of social and physical infrastructure within Newbridge should be considered.</p>	<p>Supplementary development contribution schemes are legislated for under Section 49 of the Planning and Development Act 2000 (as amended).</p> <p>It should also be noted that there will be a review of the Development Contribution Scheme later this year and the proposal for a special development levy, which is ring fenced for the fast tracking of social and physical infrastructure within Newbridge may be considered as part of that process.</p>
			<p>Chief Executive's Recommendation No change to Draft Plan.</p>
559	Newbridge Community Development	<p>Would welcome an approach where more Development Levies were ring-fenced to deliver specific essential infrastructure and community facilities in the area where they are collected. Special Development Contributions should be collected where appropriate. Community gain proportionate to the size of the development in question needs to be a standard expectation for local communities. Would especially like to see green space amenity areas delivered to compensate that lost to development.</p> <p>Newbridge in particular badly needs lands centrally located to be allocated to the development of public leisure facilities. There must be a policy of appropriately zoning lands and also bringing them into public ownership. Zoning alone is not sufficient to protect the integrity of the land use for community facilities.</p>	<p>Chief Executive's Response Development Levies are not reviewed by the County Development Plan process. The current Development Contribution Scheme 2015 – 2022 is currently under review. Furthermore, a review of the Kildare Local Economic and Community Plan (LECP) 2016-2021 is also currently underway. The LECP sets out the objectives and actions needed to promote and support the economic development and the local and community development of County Kildare.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
538	Senator Mark Wall	<p>The submission requests Kildare County Council to consider a special development contribution rate for towns and villages including already zoned land for any location within 10km of a bordering county where there is a negative differential on such a rate. This rate should be set to</p>	<p>Chief Executive's Response The Draft Plan is a land use plan. There are other mechanisms whereby the merits of a special development contribution can be considered.</p>

		encourage commercial development in these border areas.	<p>Supplementary development contribution schemes are legislated for under Section 49 of the Planning and Development Act 2000 (as amended).</p> <p>There will be a review of the Development Contribution Scheme later this year during which proposals for special development contributions for towns and village will be considered.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
CONDITIONS & ENFORCEMENT			
419	Ardclough Community Council	Three acres of community dividend which was conditioned as part of the William's Grove Development has yet to be delivered. This is a need to enhance recreational and sporting facilities in the area.	<p>Chief Executive's Response The Draft Plan is not the instrument to address compliance / non-compliance with planning conditions. As building works progress on this development, the Council's building control unit will continue to monitor compliance with conditions and where it is found that conditions are not being complied with the planning enforcement team can then investigate and address such matters.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
501	Fiona O'Loughlin	The submission states that there should be a clear statement in the CDP as to how unauthorised developments will be dealt with, both in terms of residential, waste facilities and operation of quarries.	<p>Chief Executive's Response Section 15.1.1 of the Draft Plan is very clear that the Council will take enforcement action in cases of unauthorised development, where it is appropriate to do so, as resources allow, consistent with the provisions of Part VIII of the Planning and Development Act 2000 (as amended).</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>

210	Naas Action Group	<p>The submission is concerned that homeowners are choosing to replace real grass with artificial fake grass. Artificial grass blocks access to the soil beneath for burrowing insects, and the ground above for soil dwellers. This is a particular concern in view of the dramatic global decline in insect species. Fake grass has no climate benefits and in fact, producing it emits carbon and uses fossil fuels.</p> <p>The submission suggests that KCC should attach a planning condition restricting and prohibiting plastic/artificial grass.</p> <p>The following is the recommended policy: It is the Policy of the Council to restrict and prohibit the use of artificial grass in all new developments in order to halt biodiversity loss in the County.</p>	<p>Chief Executive's Response Agreed, in part.</p> <p>Chief Executive's Recommendation Insert the following new standard in Section 15.2.6: The use of artificial grass in all new residential developments shall not be permitted.</p>
TAKING IN CHARGE			
386	Jennifer Whitty	<p>There is too much ambiguity around the Council's taking in charge policy and the Council's policy needs to be much stronger.</p> <p>The TIC Policy (2008) states that the 'taking in charge process is integrated into every aspect of the planning process, from the formulation of the County Development plan right through the development control and construction phases of a residential development'.</p> <p>The Policy states that TIC should be taken into account at the earliest point in the development process, that the CDP, LAP and AAPs should all include statements setting out the Council's policy and should indicate the limited development types where management companies are acceptable.</p>	<p>Chief Executive's Response The comments in the submission are noted. Taking in Charge is an operational matter for the Council that is governed by separate policy to the County Development Plan. However, the Taking in Charge Policy (2008) is currently under review with an expected completion date of Q4 2022. The updated Policy will provide information on taking in charge in developments which comprise a mix of elements some which will relate to taking in charge and others which will be governed by a management company and therefore outside the remit of the Taking in Charge Policy. In this context it is considered that reference should be made to the updated policy document under Section 15.4.16 of the Draft Plan.</p> <p>Chief Executive's Recommendation Amend the second paragraph under Section 15.4.16: The Council's policy on the taking in charge of residential developments is set out in the Taking in Charge Policy Statement</p>

	<p>The Draft Plan makes reference to TOC and Owner management companies but does not adequately call out policy as intended in the TIC policy document.</p> <p>The Draft Plan does not address issues arising around the taking in charge of multi-unit estates with both houses and apartments present and leaves house owners in limbo between both sections.</p> <p>The submission requests that the Draft Plan has stronger and lengthier policy wording, clearer policy for taking in charge of mixed-use developments, clear policies around what is considered an appropriate management company and policies regarding transferring ownership of common areas from the OMC to the Council.</p> <p>It is also suggested that the Council should undertake to review the taking in charge policy and undertake a public consultation within 1 year of the publication of the CDP.</p> <p>Suggested policies that could be included in conjunction with the full review are as follows: It is the policy of Kildare County Council to take the conventional housing element of residential developments in charge once they have been completed to the satisfaction of the planning authority.</p> <p>In mixed developments that consist of 'conventional houses', apartments and commercial/retail developments, the public infrastructures should be laid out and constructed in such a manner so that there is a clear distinction between the areas and infrastructure that are to be taken in charge and those that will be managed and maintained by a management company.</p> <p>Where management companies have been formed for conventional housing estates or for the conventional housing element of mixed-use estates, the County Council will take these estates in charge when they have been</p>	<p>(June 2008) which is currently under review and should be considered from the outset (either in its current form or as subsequently amended), from the initial pre-application stage through to the post construction phase of a development.</p>
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		<p>completed to the satisfaction of the County Council on condition that the management company is wound up when the estate has been taken in charge.</p>	
434.	Maynooth Community Council	<p>Submits that the draft Plan should provide clearer reference on the Council's Taking in Charge policy (TIC) and in particular the policy of TIC of conventional areas of multi-unit developments. Notes that the Council's own TIC policy (2008) states, in the introduction, that the aim of the policy is to ensure that the taking in charge process is integrated into every aspect of the planning process. Also notes that the TIC policy states that the County Development Plan should include statements setting out the Council's policy on taking in charge of private residential developments and the limited development types where the council considers it acceptable to use management companies and that it should also provide guidance for the type of management companies that the council considers to be appropriate.</p> <p>States that Sections 15.4.10 and 15.4.16 of the draft Plan make some reference to owner management companies and TIC but do not adequately call out policy as intended in the TIC policy document. Notes that these sections also do not address issues arising around the taking in charge of multi-unit estates with both houses and apartments present. Submits that the draft Plan should be revised to:</p> <ul style="list-style-type: none"> ● Have much stronger and lengthier policy wording on the council's policy of the taking in charge of estates. ● Have a much clearer and strongly worded policy for the taking in charge of mixed-use developments. ● Have clear policies around what is considered an appropriate management company. ● Have clear policies about how the council will engage with the owner management company and its members in terms of the process of transferring ownership of common areas from the OMC to the Council. 	<p>Chief Executive's Response As per response to sub no. 386 above.</p> <hr/> <p>Chief Executive's Recommendation As per response to sub no. 386 above.</p>

		<ul style="list-style-type: none"> • Include the policies listed in the TIC policy. • Undertake to review the taking in charge policy and a public consultation within 1 year of the publication of the CDP in light of issues arising from ambiguity in the current TIC policy. <p>Further states that a full review of the TIC policy is needed and an undertaking to review the TIC policy should be included in the draft Plan having regard to issues arising in mixed use developments.</p>	
ENERGY EFFICIENCY			
443	Clane Community Council	<p>The development of infrastructure for carbon fuels and their advertisement should be permitted in very limited circumstances and should not be linked to building transport dependency on fossil fuels.</p> <p>The submission refers to MRA's RSES and states: The overall growth in transport emissions projections is largely underpinned by growth in diesel fuel consumption which is expected to decline post 2025 with the acceleration of the deployment of electric vehicles during this period. Policies are therefore needed to facilitate and encourage use of electric vehicles and to increase the potential for trips to be taken by sustainable modes of transport</p> <p>The submission refers to Objective RPO 7.30 and RPO 7.31 of the RSES.</p> <p>Submission recommends: 15.13.6 Motor Service Areas / Petrol Filling Stations" could be changed to: "15.13.6 Motor Service Areas"</p>	<p>Chief Executive's Response Agreed, in part. These edits will reflect the changing patterns in motor fuel supplies.</p> <p>Chief Executive's Recommendation Amend Section 15.13.6 as follows: 15.13.6 Motor Service Areas / Petrol Filling Stations</p> <p>(ii) Petrol Filling Stations Motor Fuel Stations Petrol filling Motor fuel stations must be located on the outskirts of the town or village but inside the 50km or 60km speed limits. The preferred location is on the near side of the roadway on the way out of town.</p> <p>The essential purpose of petrol motor fuel stations is to provide facilities for the sale of fuels for vehicles. The Council however recognises the more diverse role of petrol motor fuel stations in recent times, and the expansion from merely fuel depots to the provision of a wide range of convenience and other goods and services, including functioning as rest areas.</p> <ul style="list-style-type: none"> • A high standard of overall design, architectural layout, and material content to ensure an attractive development that

	<p>“(ii) Petrol Filling Stations” could be changed to: “Motor Fuel Stations”</p> <p>Petrol filling Motor fuel stations must be located on the outskirts of the town or village but inside the 50km or 60km speed limits. The preferred location is on the near side of the roadway on the way out of town.</p> <p>The essential purpose of petrol motor fuel stations is to provide facilities for the sale of fuels for vehicles. The Council however recognises the more diverse role of petrol motor fuel stations in recent times, and the expansion from merely fuel depots to the provision of a wide range of convenience and other goods and services, including functioning as rest areas.</p> <p>A high standard of overall design, architectural layout, and material content to ensure an attractive development that integrates with and complements or enhances its surroundings. Where proposals include a The forecourt canopy, it should be justified given the strategies to reducing carbon fuel sales and integrated into the overall design and sited so that it does not dominate the surrounding buildings.</p> <p>Insert After (viii) insert Priority for the safe movement of walkers and cyclists shall be prioritised over vehicle movements with a layout of segregated routes to protect vulnerable road users at points of entry/egress and within the site.</p> <p>A footpath of 2 m wide with 0.5 m high wall along the front boundary</p> <p>Amend Section 15.15.2 Totem Signage</p>	<p>integrates with and complements or enhances its surroundings. The forecourt canopy, it should be justified given the strategies to reducing carbon fuel sales and integrated into the overall design and sited so that it does not dominate the surrounding buildings.</p> <p>Add the following bullet point to Section 15.13.6 as the last bullet point of the section:</p> <ul style="list-style-type: none"> • The safe movement of walkers and cyclists shall be prioritised over vehicle movements with a layout of segregated routes to protect vulnerable road users at points of entry/egress and within the site. <p>Amend the third bullet point of Section 15.15.2 as follows:</p> <ul style="list-style-type: none"> • Where the requirement for a totem sign can be justified, their height and width shall not be excessive and they should be sympathetic to the surroundings, in particular in the public realm of town and village centres, within or near Architectural Conservation Areas, close to sites of heritage interest and where they adjoin residential areas.
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		<p>Where the requirement for a totem sign can be justified, their height and width shall not be excessive and they should be sympathetic to the surroundings, in particular in the public realm of town and village centres, within or near Architectural Conservation Areas, close to sites of heritage interest and where they adjoin residential areas.</p> <p>It is outside the remit of a Development Plan to regulate price advertisements for hydrocarbons.</p>	
SEVESO			
15	Health and Safety Authority (HSA)	<p><u>Major accident hazard sites</u> The submission states that the Health and Safety Authority expects the planning guidelines to contain:</p> <ol style="list-style-type: none"> 1. An indication of planning policy in relation to major accident hazard sites notified under the regulations, which reflects the intentions of Article 13 of Directive 2012/18/EU. 2. The Consultation distances and generic advice, where applicable, supplied by the Authority to Kildare County Council in relation to such sites. These distances to be indicated on the various maps included in the plan, as well as any more specific distances and advice supplied by the Authority. 3. A policy on the siting of major hazard establishments, taking account of Article 13 and the published policy of the Authority in relation to new developments, including developments in the vicinity of such developments. 	<p>Chief Executive's Response It is considered that Section 15.12 of the Plan adequately addresses points 1 & 3 of this submission.</p> <p>In relation to point no. 2 of the submission, it is not considered appropriate to amend both Section 4.14 and 15.12 to include the consultation distances as any increases to Seveso site boundaries, which could intensify the use of the overall site would result in a need to amend the HAS consultation boundary. Having regard to same therefore it is considered more appropriate not to identify the HSA boundary on a map but instead to refer all relevant planning applications to the HSA for comment on a case-by-case basis.</p> <p>Furthermore it is noted that the 'Guide to the COMAH Regulations 2015 (S.I. No. 209 of 2015)' states that the CCA will periodically review and update the consultation distance as necessary which would also necessitate the need for updates to the Development Plan maps.</p> <p>Chief Executive's Recommendation Amend the last paragraph of Section 15.12 as follows:</p>

			Developers of Seveso sites and any sites within the consultation distances of these industries (See Section 4.14) adjacent to Seveso sites are encouraged to consult with the HSA at the pre-planning stage to assess the impacts of their proposals.
GENERAL			
472	Keep Ireland Open	<p>The submission supports the following text of the Development Management Standards (Chapter 15).</p> <p>15.9.6 Extractive Industry 15.11 Energy and Communications 15.11.1 Wind Energy Proposals 15.11.3 Telecommunications and Supporting Infrastructure 15.16.4 Natural Heritage, Green Infrastructure and Biodiversity 15.16.4.1 Riparian Corridors</p>	<p>Chief Executive's Response Noted and welcomed.</p> <p>Chief Executive's Recommendation No change to draft Plan.</p>
403	Cairn PLC	<p>The Strategic Vision of the plan which places an emphasis on promoting a climate resilient environment is welcomed. Reference is made to the company's commitment to reducing carbon emissions, and to enhancing biodiversity which is a key component of recent developments. However, caution is urged against any overly prescriptive development standards linked to climate action. Consideration should be given to facilitating the use of new technologies, construction methods, and materials as they become available / viable for use. It is further noted that Draft Development Plan Guidelines state that Development Plans should prescribe matters dealt with by other guidance (e.g., Building Regulations) and standards relating to construction.</p>	<p>Chief Executive's Response Development management standards can facilitate the use of new technologies, construction methods and materials. It is not considered that the Plan is overly prescriptive in relation to the use of construction materials; however, the use of more sustainable building materials / products is encouraged throughout the Plan. It should be noted that reference is made to Building Regulations in sections 15.1, 15.2, and 15.9. The Regulations are also referenced in Chapter 3 (HO A3) and Chapter 7 (EC O23 and EC O44).</p> <p>Chief Executive's Recommendation No change to Draft Plan.</p>

CHAPTER 16 – MONITORING & IMPLEMENTATION			
Sub No.	Name	Summary of Issues Raised	Chief Executive's Response & Recommendations
STRATEGIC ENVIRONMENTAL ASSESSMENT			
552.	Department of Housing, Local Government and Heritage	<p>Recommendations in Section 8.4 of the SEA should be implemented.</p> <p>Article 10 of the SEA Directive requires that monitoring should be carried out in order to identify at an early stage any unforeseen adverse impacts associated with the implementation of the plan or programme.</p> <p>Section 9.2 of the Environmental Report outlined proposed monitoring measures. While the Implementation and Monitoring Framework outlined in Section 16.2.3 of the plan will incorporate a level of monitoring of environment related objectives, the full and comprehensive monitoring and evaluation assessment, required to be undertaken under Article 10 of the SEA Directive, will be undertaken as part of a separate SEA monitoring process, which is outlined in the Environmental Report.</p> <p>The Department would welcome a clear and specific monitoring programme to be included with the Environmental Report, outlining how it is proposed to record the impacts of plan implementation on biodiversity, both in terms of biodiversity loss and biodiversity enhancement during the lifetime of the plan.</p>	<p>Chief Executive's Response</p> <p>Due to the timings involved in relation to the necessary dates for publication of the Draft Plan and the receipt of the Environmental Reports it was not possible to include all recommendations within the Draft Plan. However, all recommendations have now been incorporated into the Chief Executive's Report (this Report) and identified as Chief Executive's Proposed Amendments. If approved by the elected members, all such recommendations will be incorporated into the adopted Development Plan.</p> <p>The Draft Plan has undergone a SEA as is required. All plans and programmes must also undertake SEA in accordance with the provisions of the SEA Directive. It is not considered necessary to include a narrative around same in the Draft Plan.</p> <p>Chief Executive's Recommendation</p> <p>Add the following two new objectives in Section 16.3.4:</p> <p>New objective: Implement the mitigation measures as set out in the SEA Environmental Report.</p> <p>New objective: Implement the monitoring programme as set out in the SEA Environmental Report. This will include the preparation of standalone SEA Monitoring Reports to accompany:</p> <p>a) The report required of the Chief Executive under section 15(2) of the Act, including information in relation to progress on, and the results of, monitoring the significant</p>

		<p>The Department would also encourage making these reports publicly available.</p> <p>Consideration should also be given to monitoring of indirect development impacts on biodiversity such as nitrogen deposition related to bioenergy and agricultural developments, disturbance/visitor pressure, impacts of recreation, amenity and tourism development and impacts on water quality.</p> <p>The Department recommends including a commitment in the CDP to undertake screening for SEA and if required, SEA, in relation to all downstream plans (which can be variously termed 'strategies', 'concept studies' 'programmes' and 'masterplans') as defined by Article 2(A) of the Strategic Environmental Assessment (SEA) Directive (Directive 2001/42/EC). Furthermore, the Department recommends that the Council ensures that all plans, defined by Article 2(A) of the SEA Directive (Directive 2001/42/EC), which are supported in whole or in part through policy objectives or otherwise have undergone screening for SEA and if required, SEA.</p>	<p>environmental effects of implementation of the development plan.</p> <p>b) In advance of the beginning of the review of the next County Development Plan, on the significant environmental effects of implementing this Plan.</p>
483.	Environmental Protection Agency (EPA)	<p>Submission notes the notice of the Council in relation to the Draft Kildare County Development Plan 2023-2029 (the 'Plan') and SEA Environmental Report. Notes the statutory role of the EPA is one as an SEA environmental authority. Function is also to promote the full and transparent integration of the findings of the Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the Plan.</p>	<p>Chief Executive's Response</p> <p>The EPA's submission has been reviewed and its contents have been noted.</p> <p>A number of mitigation measures have been set out in the SEA Environmental Report however it is acknowledged that the Draft Plan could be improved by including additional objectives to implement such measures as set out in the Report for clarity.</p>

	<p>States that the Agency focuses its efforts on reviewing and commenting on key sector plans. Notes that for land use plans at county/local level, it provides a 'self-service approach' via the attached guidance document 'SEA of Local Authority Land Use Plans – EPA Recommendations and Resources' which is updated regularly. Further states that the Council should also ensure that the Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the NPF and RSES.</p> <p><u>Content of the Environmental Report</u></p> <p><u>Mitigation Measures</u></p> <p>Submits that the Council has identified the potential for likely significant effects, it should provide appropriate mitigation measures to avoid or minimise these. States that the Council must ensure that the Plan includes clear commitments to implement the mitigation measures.</p> <p><u>Monitoring</u></p> <p>Submits that the Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise and should consider and deal with the possibility of cumulative effects. States that monitoring of both positive and negative effects should be considered and that the programme should set out the various data sources, monitoring frequencies and responsibilities. Submits that if the monitoring identifies adverse impacts during the</p>	<p>On the issue of monitoring, it is considered that the provisions outlined in Chapter 16 'Monitoring and Implementation' along with the Implementation and Monitoring Framework (Appendix 12) will provide for a robust approach to ensuring the key provisions of the Plan (including environment related aspects) are monitored appropriately and continuously during the life of the Plan and beyond. However, the Council recognises that while the Monitoring and Implementation Framework provided will incorporate a level of monitoring of environment related objectives, the full and comprehensive monitoring and evaluation assessment, required to be undertaken under Article 10 of the SEA Directive, will be undertaken as part of a separate SEA monitoring process, which is outlined in the Environmental Report that accompanies the draft Plan.</p> <p>It should also be noted, that as part of the preparation of the Strategic Environmental Report, baseline information was collected from available sources, including the 2020 EPA State of the Environment report. Any subsequent updates to the emerging County Development Plan will also fully consider the contents of this report as they apply to SEA preparation.</p> <p>The preparation of the emerging Plan and the SEA are iterative processes, with one continually being informed/aligning with the other. In this regard, any future amendments to the Plan will be screened for likely significant effect.</p> <p>The Planning Authority notes the points raised in relation to procedures with respect to the SEA Statement upon the adoption of the Plan and the commentary regarding who the copy of the SEA Statement should be forwarded to. The</p>
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	<p>implementation of the Plan, the Council should ensure that suitable and effective remedial action is taken. Notes that guidance on SEA-related monitoring is available on the EPA website at: https://www.epa.ie/publications/research/environmental-technologies/research-306-guidance.php</p> <p><u>State of the Environment Report – Ireland’s Environment 2020</u> States that in finalising the Plan and integrating the findings of the SEA into the Plan, the recommendations, key issues and challenges described in our ‘State of the Environment Report Ireland’s Environment – An Integrated Assessment 2020 (EPA, 2020)’ should be considered, as relevant and appropriate. States that this should also be taken into account, in preparing the Plan and SEA.</p> <p><u>Future Amendments to the Plan</u> Requests that any future amendments to the Plan should be screened for likely significant effects, using the same method of assessment applied in the “environmental assessment” of the Plan.</p> <p><u>SEA Statement – “Information on the Decision”</u> Submits that once the Plan is adopted, the Council should prepare an SEA Statement that summarises:</p> <ul style="list-style-type: none"> • How environmental considerations have been integrated into the Plan; • How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan; 	<p>Planning Authority acknowledges same and will follow due process in this regard.</p> <p>Chief Executive’s Recommendation See response to Submission No. 552 above.</p>
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		<ul style="list-style-type: none"> • The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and, • The measures decided upon to monitor the significant environmental effects of implementation of the Plan. <p>Submission states that a copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process. Notes that guidance on preparing SEA Statements is available on the EPA website at the following link: https://www.epa.ie/publications/research/environmental-technologies/research-306-guidance.php</p> <p><u>Environmental Authorities</u> Submission notes that the following environmental authorities are required to be consulted with under the SEA Regulations:</p> <ul style="list-style-type: none"> • EPA • Minister for Housing, Local Government and Heritage; • Minister for Environment, Climate and Communications; • Minister for Agriculture, Food and the Marine. • any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation, or local area plan. 	
23	E.P.A. (SEA Section)	<p><u>Mitigation Measures</u> Provide appropriate mitigation measures where the potential for likely significant effects is identified and</p>	<p>Chief Executive’s Response Section 9.1 of the SEA Environmental Report provides mitigation measures designed to prevent, reduce and as fully as possible offset any significant adverse impacts on</p>

		<p>ensure that the Plan includes clear commitments to implement the mitigation measures.</p> <p><u>Monitoring</u> The submission provides guidance in relation to the SEA monitoring programme and provides a link to the 'Guidance on Strategic Environmental Assessment Statements and Monitoring' document.</p>	<p>the environment that could be realised with the implementation of the CDP.</p> <p>Section 9.2 of the SEA Environmental Report provides the monitoring programme. During the development of the programme the guidance on SEA-related monitoring on the EPA website was consulted.</p> <p>It is proposed to add two new objectives in Section 16.3.4 of the Plan to ensure the implementation of the mitigation measures and the implementation of the monitoring programme set out in Section 9 of the SEA Environmental Report.</p> <p>Chief Executive's Recommendation See response to Submission No. 552 above.</p>
23	E.P.A. (SEA Section)	<p><u>Future Amendments to the Plan</u> Future amendments to the Plan should be screened for likely significant effects, using the same method of assessment as applied in the "environmental assessment" of the Plan.</p>	<p>Chief Executive's Response It should be noted that amendments made following the draft can be screened for SEA/AA.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
MONITORING & IMPLEMENTING THE DEVELOPMENT PLAN			
318	Orla O'Neill	<p>The submission requests that the Council build on the excellent Draft Plan consultation process by having an equally innovative approach to the process of monitoring and implementation of the CDP. Submits that a robust approach to implementation, having timelines and specific indicators to measure progress and naming the department / authority with the main responsibility</p>	<p>Chief Executive's Response It should be noted that the overall approach to the implementation of the adopted plan is subject to the provisions of the Section 28 Development Plans, Guidelines for Planning Authorities (August 2021) (June 2022). These ministerial guidelines outline specific measures which the Council is required to undertake with regards to the implementation and monitoring of the provisions of the</p>

		<p>for implementing the various aspects of the CDP would be particularly helpful. Submits that participatory approaches to the process should be used to deepen and widen democracy and to build community engagement on these very important issues.</p>	<p>Development Plan and have been fully integrated into Chapter 16 of the draft Plan. With regard to implementation of the Plan Chapter 16 notes that ‘upon the adoption of the Plan, the Development Plan Team will be recalibrated to ensure the Plan’s implementation, through facilitation and pro-active engagement with project partners (i.e., state and semi-state bodies), active land management, plan monitoring and reporting.’ The Council acknowledges that the Plan requires not only an ‘all of council’ approach in its implementation but also necessitates significant and sustained collaboration with all key stakeholders including members of the public, sectoral interests, developers, statutory bodies and adjoining local authorities. In this regard, Appendix 12 of the Draft Plan should be noted wherein all the proposed objectives, actions and targets of the Draft Plan have been listed. The relevant stakeholder(s) for each listing and an associated timeline for the realisation of same (short/medium/long term or ongoing) has been clearly set out. The Council commits to seeking a meaningful partnership with all interested parties in order to achieve the effective implementation of all policies and objectives contained in the Plan.</p> <p>Chief Executive’s Recommendation No change to the Draft Plan.</p>
553	Rosemary Flanagan	<p>The Biodiversity crisis needs to be acknowledged and addressed in the Plan. Meaningful Biodiversity actions need to be informed and implemented across relevant areas in all chapters.</p>	<p>Chief Executive’s Response Biodiversity is considered across all chapters of the plan. All the objectives, actions and targets are listed in the Draft Plan in Appendix 12. A stakeholder(s) is/are identified against each one with responsibility for realising the various objectives, actions and targets either in the short term (1-2 years), medium term (3 -6 years), long term (6 years +) and ongoing (as appropriate).</p>

			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
413.	Kildare Public Participation Network	<p><u>16.2.1 Provisions of the County Development Plan</u> Submits that a significant number of actions in the draft Plan are not assigned specific measurable targets or timelines and proposes that key timelines are attributed to each of the actions contained in the plan, or at the very least assign a timeframe for each action as Short, Medium or Long and include a key outlining the approximate duration corresponding to short, medium or long timeframes.</p> <p><u>16.2.2 Monitoring and Reporting on the Development Plan</u> Proposes that a yearly progress report on the County Development Plan is compiled and published on the Kildare County Council website. While noting the extensive resources required it submits that such a report is necessary to keep members of the public in Kildare fully informed on the development of their county.</p> <p>The submission also requests that the Sustainable Development Goals are integrated within the actions of the plan when monitoring and reporting on the progress of the Plan.</p>	<p>Chief Executive's Response It should be noted that Appendix 12 of the draft Plan outlines the Council's Implementation and Monitoring Framework for the Plan which comprises a range of both quantitative and qualitative based key performance indicators to provide an overall level of focus to the monitoring of the Plan. For the purpose of streamlining the monitoring process, the Overarching Guiding Principles of the Plan are grouped together and presented under five main themes which relate to each of the objectives, actions and targets. The framework assigns specific responsibility to named stakeholders and identifies whether the various objectives/actions/targets will be undertaken in the short, medium and long term (or ongoing as appropriate).</p> <p>With regard to the request to publish yearly reports, it is noted that the monitoring and implementation of the Plan is set out in legislation and further detail in the Development Plans Ministerial Guidelines (June 2022), which prescribe a comprehensive framework to govern the implementation and monitoring of the plan, including the requirement to prepare an Annual Development Plan Monitoring Report (see Section 16.2.2 of the draft Plan).</p> <p>It is considered that all the stated policies, objectives and actions contained in the draft Plan already comply with all relevant Sustainable Development Goals.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
330	Maynooth Cycling Campaign	Radically overhaul this section, starting with items to be reported annually, through to items which have to be reported after 5 years.	<p>Chief Executive's Response The comments are noted. Under the planning legislation, the Council is legally obliged to prepare a 2-year progress report</p>

		<p>It fails to measure the key metrics and fails to inform the general public of what the Council is trying to achieve and why, in a way the general public can read and understand.</p> <p>To measure the performance of the modal shift targets it is necessary to measure on an annual basis.</p> <p>KCC will need to estimate the impact of emission reduction of active travel schemes and the impact of emission increase of non-active travel transport projects at the design and post-construction stage.</p>	<p>on the Plans' objectives, actions and targets. The Monitoring and Implementation Framework that accompanies the Plan (see Chapter 16 and Appendix 12) is designed to provide the public with an overview of all objectives, actions and targets in the Draft Plan and includes details of the relevant stakeholder(s) with responsibility for realising the various objectives, actions and targets over a clearly defined timeframe (short term (1-2 years), medium term (3-6 years), longer term (beyond the life of the Plan) and ongoing). Unfortunately, the Council will not have the data available on an annual basis to examine the trends in modal shift and hence this is not an objective of the Draft Plan but rather a separate target. The data is available through the CSO's Place of Work, School of College – Census of Anonymised Records (POWSCAR).</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
410	Celbridge Community Council	<p><u>Monitoring and Reporting on the Development Plan</u> Questions if this 'live' Geographical Information System (GIS) and database on development information can be accessible to the public as Open Data for transparency and to assist the public with submissions and independent monitoring of the Plan</p> <p><u>Plan Implementation</u> Refers to the following text which states 'many areas of the county have witnessed rapid and prolonged periods of growth without the delivery of adequate, supporting social and community infrastructure. The Regional Spatial and Economic Strategy 2019- 2031 (RSES) recognises this issue and states that measures should be taken to ensure 'catch-up' investment...' Submission asks how is the word</p>	<p>Chief Executive's Response The meaning of the phrase 'adequate, supporting social and community infrastructure' within settlements relates to findings of the Social Infrastructure Audits (SIAs) which will be carried out for all settlements subject to a statutory local area plan. In this regard, the SIA will assess the levels of specific social infrastructure in a town against benchmark standards which denote best practice provision to determine if a settlement is adequately served by such a facility. For example, a SIA would assess playground provision within a town using the Fields in Trust (FIT) standard which states that there should be 0.25 ha of local play areas for very young children per 1,000 people and they should be located within 400 metres of all dwellings. This will indicate if the town is adequately served given its existing population. It can also be used to determine future playground needs,</p>

	<p>'adequate' defined? Asks how will the Council measure the delivery of adequate infrastructure? Questions what measures does Kildare County Council propose to take to ensure 'catch-up' investment as stated in the RSES?</p> <p><u>Implementing the Hierarchy of Plans</u> Questions the evidence-based methodology for preparing Local Area Plans and asks will it be shared with the public?</p> <p>States that Area Based Transport Assessment (ABTA) for a wider area (that includes neighbouring towns, especially when clustered closely together) will be as important as a LTP which will be focused on the town for which the LAP is being prepared. States that no town can be looked at in isolation when movement happens between towns.</p> <p><u>Securing Funding</u> Refers to the following text in the chapter which states 'Where a key objective of the County Development Plan (or Local Area Plan) is not identified on the three-year capital programme, then the presumption will be that the project will be delayed and/or could be advanced as a 'developer-led' investment'. States that there should not be any "presumption" or objectives are likely to fall through the cracks. Submits that instead, each objective should be listed with a status update provided (and made public) on a quarterly basis.</p>	<p>including the location of new playgrounds, in a town over the life of the LAP, taking into consideration any projected increase in population.</p> <p>The specifics of 'catch-up' investment can relate to various types of infrastructure including social infrastructure and servicing infrastructure (roads/water/wastewater). The need for such investment will be identified in the various assessments carried out in the preparation of the plan including the Area Based Transport Assessment (ABTA), the Social Infrastructure Audit (SIA) and the Settlement Capacity Audit (SCA).</p> <p>Necessary social/servicing infrastructure and catch-up investment will be identified and incorporated as a priority of each respective local area plan. For example, a new local area plan for Celbridge will integrate the key recommendations of the ABTA/Transport Strategy regarding the provision of transport infrastructure and provide safeguards (through a clearly defined infrastructure phasing and delivery schedule) which will ensure that development can only proceed in tandem with the delivery of identified transport infrastructure requirements.</p> <p>The evidence-based methodology for preparing local area plans has formed the basis of the Council's suite of local area plans since 2020. The methodology is clearly stated in all local area plans published and adopted since that time. An example of this is contained in section 1.8 Approach Taken in Formulating this Plan of the Athy Local Area Plan 2021-2027.</p> <p>It should be noted that a Local Transport Plan (LPT) can take the form of an Area Based Transport Assessment (ABTA) or Transport Strategy depending on the</p>
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			<p>circumstances of the settlement in question. The ABTA/Transport Strategy can examine the wider environs of a settlement and not just the immediate built-up area. For example, a Naas/Sallins Transport Strategy was undertaken to inform the Naas Local Area Plan 2021-2027 due to the close relationship and interaction between Naas and Sallins.</p> <p>The request that there should be no presumption that a project could be advanced as a 'developer-led' investment' is not accepted. Local Authorities operate within finite budgets and limited resources. This provision allows for the delivery of necessary servicing infrastructure by the private sector in instances where for example, lands may be identified as being appropriate for new housing (i.e. zoned as New Residential) but the local authority or other service providers such as Irish Water lack the necessary funding to unlock these sites for the development of much needed housing. With regard to the request that objectives should be reviewed quarterly, it should be noted that the monitoring and implementation of the Plan is set out in legislation and further detailed in the Development Plans ministerial guidelines (June 2022), which includes the requirement to prepare an Annual Development Plan Monitoring Report (see Section 16.2.2 of the draft Plan).</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
364	Ursula King	KCC should use GIS technology to inform staff and the general public of those habitats worth conserving, restoring and protecting. Additional resources must be committed here to do this.	<p>Chief Executive's Response Kildare County Council has an up-to-date GIS portal that is available to the public and includes a number of environmental layers. See http://webgeo.kildarecoco.ie/planningenquiry - Furthermore, it is an action in Chapter 16 'Monitoring & Implementation' to Establish a 'live' GIS system and</p>

			supported database to include information relating to planning and development.
			Chief Executive's Recommendation No change to the Draft Plan.
405	Kildare Climate Action Linkage Group	<p>The submission notes the statutory obligation under section 15(1) of the Planning and Development Act 2000 to take all steps within its powers to secure the objectives of the Development Plan and notes the following: <i>The Council's key priorities over the life of the Development Plan will be to secure the full quantum of new housing provision for the county as set out in the Core Strategy, accompanied by the timely delivery of servicing and community infrastructure, along with transitioning the county to a model of low carbon society.</i></p> <p>The submission questions why tackling Biodiversity loss is not a key priority for the Council, given the Biodiversity Crisis that was declared by Dáil Éireann and Kildare County Council in 2019.</p> <p>The submission references paragraph 1 and 2 of Section 16.2.3 and the Strategic Vision of the plan. It is submitted that Dáil Éireann and Kildare Co. Co. declared a Biodiversity crisis in 2019 and that both of these crises should be acknowledged in the strategic vision of this Development Plan with an explicit statement of intent to conserve and protect our native biodiversity.</p>	<p>Chief Executive's Response The submission is noted, and it is considered appropriate to add the loss of biodiversity to the paragraph which outlines the Council's key priorities.</p> <p>Given the declared Biodiversity crisis, it is considered reasonable and appropriate to strengthen the Strategic Vision of the Plan and to amend the description of 'Resilience' in the table under section 16.2.3.</p> <p>Chief Executive's Recommendation Amend paragraph 3 of Section 16.1: <i>...along with transitioning the county to a model of low carbon society and tackling the loss of biodiversity.</i></p> <p>See recommendation to submission 413 in Chapter 1 with regard to proposed amendments to the Strategic Vision.</p> <p>Amend the description of 'Resilience' in the table under section 16.2.3: <i>The Covid-19 Pandemic has most recently shown the importance of resilience and adaptability. Resilience is a principle that also underpins the Plan and is described as 'the ability of a system, community or society exposed to hazards to resist, absorb, accommodate and recover from the effects of a hazard in a timely and efficient manner, including through the preservation and restoration of its essential basic structures and functions'. (United Nations Office for Disaster Risk Reduction (UNISDR), 2009).</i></p>

		<p>Additionally, the submission states that protecting existing biodiversity is well recognised as key to resilience under future climate change scenarios.</p>	<p>Protecting biodiversity can help us adapt to the hazard of climate change. Healthy ecosystems will be more resilient to climate change and more able to maintain the supply of ecosystem services on which our prosperity and wellbeing depend. Resilience is therefore built into the strategic policies and recommendations of each of the cross-cutting themes: quality of life, sustainability, climate action, and inclusivity.</p>
405	Kildare Climate Action Linkage Group	<p>The submission references paragraph 2 of Section 16.2.1. The submission challenges the claim that the objectives of the plan have SMART goals or targets.</p> <p>It is submitted that Appendix 12 fails to measure the key metrics and fails to inform the general public of what the Council is trying to achieve. Appendix 12 should be reordered to start with items to be reported on annually, through to items which must be reported on after 6 years i.e., at the end of the Plan's life.</p> <p>A few examples are provided in the submission to demonstrate the issues outlined above.</p>	<p>Chief Executive's Response It is not accepted that Appendix 12 fails to measure the key metrics and fails to inform the general public of what the Council is trying to achieve. Appendix 12 gives a very brief overview of each of the objectives, actions and targets of the Draft Plan. Each of the references for the various objectives, actions and targets are however provided so that it is possible for the reader to refer to those of particular interest within the main body of the Draft Plan itself and to then review the full wording against the relevant objective/ action/ target. The purpose of Appendix 12 is to provide sufficient information to identify the relevant objective, action and target against the identified stakeholder(s) who will have responsibility for the delivery of same over the short term (1-2 years), medium term (3-6 years), longer term (beyond 6 years) and to identify those that are, by their nature ongoing. Appendix 12 has been laid out chapter by chapter so that it can be clearly read in conjunction with the Plan itself. It is not considered appropriate to report on the progress of Appendix 12 annually as this would be extremely resource intensive. Instead, the focus, upon the adoption of the Development Plan, will be to ensure the delivery of the various identified objectives, actions and targets in accordance with the timelines as referenced above.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>

405	Kildare Climate Action Linkage Group	<p>The submission expressed disappointment to learn of the ongoing low level of resources in place in KCC and the fact that there is no ecologist employed by KCC.</p> <p>It is submitted that ongoing resource and retention issues should be explicitly identified in the plan, highlighting related risks in the ability to deliver quantified targets and objectives.</p>	<p>Chief Executive's Response Matters in relation to resourcing and retention issues are outside the scope of a Development Plan, which is primarily a land use plan.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
405	Kildare Climate Action Linkage Group	<p>While acknowledging the forthcoming Kildare Climate Action Plan, the CDP should clearly acknowledge targets related to emissions reduction for each of Scope 1, 2 and 3 emissions.</p> <p>The CDP should clearly outline where KCC influences Scope 3 emissions and should not limit its responsibility to Scope 1 and 2 emissions. Progress, both positive and negative, should be shared publicly each year against the original baseline and on an absolute basis, not on a relative basis to growth.</p> <p>The climate impact of KCC functions, such as procurement and working practices, should be included in all climate targets, as well as targets to assess and reduce the climate impact of any investments and pensions KCC is involved in.</p>	<p>Chief Executive's Response It is considered that the matters raised would be more appropriately addressed as part of the preparation of the Sustainable Energy Climate Action Plan that is currently being prepared for County Kildare and that is separate to the Development Plan process.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>
405	Kildare Climate Action Linkage Group	<p><u>Transportation</u> The submission states that there are two key performance indicators relating to transportation:</p> <ul style="list-style-type: none"> • Travel modal split by kilometres travelled, and • Reduction in carbon emissions 	<p>Chief Executive's Response To measure the performance indicators as raised in this submission is outside the scope of a Development Plan, which is primarily a land use plan.</p>
			<p>Chief Executive's Recommendation No change to the Draft Plan.</p>

	<p>It is submitted that if these performance indicators are achieved, much of the transport objectives and actions will be successfully implemented. If they fail to be implemented, then management must redouble efforts to achieve their implementation.</p> <p>To measure these performances, the submission suggest that it is necessary to</p> <ol style="list-style-type: none"> 1. Measure travel mode split on an annual basis, and 2. Estimate the impact of emission reduction of active travel schemes and the impact of emission increase of non-active travel transport projects at the design and post-construction stage. <p>Furthermore, the submission states that performance indicators which are measured annually, will of course also be reviewed after two years in accordance with the statutory requirements, but statutory requirements do not preclude them from being measured more often if they are critical.</p>	
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CHAPTER 17 – INFRASTRUCTURAL ASSESSMENT			
Sub No.	Name	Summary of Issues Raised	Chief Executive's Response & Recommendations
501	Fiona O'Loughlin	The submission states that given current housing stock levels are inadequate, it is crucial that the level of housing supply target is met through appropriate tiered zonings as well as appropriate rural housing.	<p>Chief Executive's Response Under Chapter 17 (Infrastructural Assessment) of the Draft Plan a high-level Infrastructural Assessment has been carried out in accordance with Appendix 3 of the NPF. The suitability of lands was considered on the basis of compact growth, sequential development, connectivity to village/settlement centres, availability (inc. capacity) and access to physical and social infrastructure and environmental considerations such as flood risk, proximity to SACs etc. An infrastructural assessment is presented for each of the Towns (which are not LAPs), Villages and Rural Settlements.</p> <p>The Draft Plan does not rule out building houses in the countryside. However, there are qualifying criteria that must be met by prospective applicants to demonstrate their ability to comply with the local need criteria which are set out in Table 3.4 of Chapter 3 of the Draft Plan. For those who meet the qualifying criteria there are other considerations such as siting, design, environmental considerations and rural density that may result in qualifying applicants being unsuccessful. Furthermore, the Draft Plan has also proposed a number of locations for 'serviced sites' throughout Kildare.</p> <p>Chief Executive's Recommendation No change to the Draft Plan.</p>
405	Kildare Climate Action Linkage Group	In the interest of clarity and accessibility of information to the general public, please qualify abbreviations at first usage in chapters, as is the accepted convention.	<p>Chief Executive's Response Accepted.</p> <p>Chief Executive's Recommendation Amend paragraph one under the Policy Context heading in Chapter 17:</p>

		<p>The submission suggests amending the first paragraph under the Policy Context heading as follows:</p> <p>A key consideration is identifying locations for sustainable population growth and new development is the availability and capacity of existing or planned services. The NPF National Planning Framework – Project Ireland 2040 (NPF) (in Appendix 3 [NPF]) sets out a tiered approach for zoning lands (TAZ), as follows:</p>	<p>A key consideration is identifying locations for sustainable population growth and new development is the availability and capacity of existing or planned services. The National Planning Framework – Project Ireland 2040 (NPF) (in Appendix 3 [NPF]) sets out a tiered approach for zoning lands (TAZ), as follows:</p>
405	Kildare Climate Action Linkage Group	<p><u>Rural Settlements</u></p> <p>The submission suggests the following amendments to allow easier interpretation of the maps in Volume 2:</p> <p>These areas are shown as Settlement Expansion (SE) areas and Serviced Sites (SS) areas and may infill in-between areas shown as Existing Settlement or be located on the periphery of the established centre.</p> <p>Additionally, the submission suggests that the map legends in Volume 2 should have the abbreviations appended and standardised, along the lines of the following:</p> <ul style="list-style-type: none"> • Settlement Expansion (SE) • Serviced Sites (SS) • Record of Protected Structures (RPS) 	<p>Chief Executive’s Response</p> <p>The suggested abbreviations to be added to Chapter 17 – Rural Settlements is noted and accepted.</p> <p>In relation to the request to add abbreviations to the map legends in Volume 2, it should be noted that the land use zoning abbreviations are provided in the legends of the Land Use Zoning Maps of the Small Towns, Environs, Villages and Rural Settlements.</p>
			<p>Chief Executive’s Recommendation</p> <p>Amend paragraph two under the Rural Settlements heading in Chapter 17:</p> <p>These areas are shown as Settlement Expansion (SE) areas and Serviced Sites (SS) areas and may infill in-between areas shown as Existing Settlement or be located on the periphery of the established centre.</p>