

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

12 June 2023





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This report has been prepared by the Forward  
Planning Team of Kildare County Council.

## Report Date: 12 June 2023

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Appendix 1 – Submission from Office of the Planning Regulator

Appendix 2 – Summary of all Submissions Received

## **Glossary of Acronyms**

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
KTTS	Kildare Town Transport Strategy
NPF	National Planning Framework
NTA	National Transport Authority
OPR	Office of the Planning Regulator
OPW	Office of Public Works
PPN	Public Participation Network
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 Drainage Systems
TII	Transport Infrastructure Ireland
TRMP	Town Renewal Masterplan

## **1.0. Introduction**

This report relates to submissions and observations received from members of the public, prescribed bodies and key stakeholders following the publication of the Draft Kildare Town Local Area Plan 2023-2029 (the Draft Plan) under Section 20 of the Planning and Development Act 2000 (as amended).

### **1.1. Legislative Requirements**

In accordance with Section 20 (3)(c) of the Planning and Development Act 2000 (as amended), the Chief Executive is required to prepare a report on the submissions or observations received during the public consultation period in respect of the Draft Plan. This report should:

- List the persons who made submissions or observations,
- Summarise the recommendations, submissions and observations made by the Office of the Planning Regulator,
- Summarise the issues raised in all submissions or observations made by any other persons,
- Contain the opinion of the Chief Executive in relation to the issues raised and recommendations in relation to the proposed local area plan, taking account the proper planning and sustainable development of the area, the statutory obligations of the local authority and relevant policies or objectives of the Government or of any Minister of the Government.

### **1.2. Public Consultation**

The Draft Kildare Town Local Area Plan 2023-2029 was placed on public display from Tuesday, 21<sup>st</sup> March 2023 to Wednesday 3<sup>rd</sup> May 2023. The Draft Plan and accompanying documents were displayed at the offices of the Planning Department in Áras Chill Dara, in the Kildare Town Library and on the County Council's dedicated online public consultation portal at: <https://consult.kildarecoco.ie/en/browse>

The Draft Kildare Town Local Area Plan 2023-2029 comprises a written statement with maps and is accompanied by:

- An Environmental Report pursuant to the Planning and Development (Strategic Environmental Assessment [SEA] Regulations 2004-2011
- An Appropriate Assessment (AA) Screening Report - pursuant to the EU Habitats Directive (92/43/EEC).
- A Strategic Flood Risk Assessment (SFRA) Report pursuant to Section 28 of the Planning and Development Act 2000 (as amended), and an accompanying Surface Water Study.
- A Settlement Capacity Audit (SCA).
- A Social Infrastructure Audit (SIA).
- A Statement of Character (SoC) for the Kildare Town Architectural Conservation Area.

A public notice was published in the Kildare Nationalist on Tuesday 21<sup>st</sup> March 2023 notifying members of the public that a Draft Local Area Plan would be placed on public display from the 21<sup>st</sup> of March to 3<sup>rd</sup> of May 2023.

Submissions and Observations were invited during the public consultation period. Copies of the Draft Plan, associated documents and public notice were issued to the prescribed authorities and environmental authorities, including Government Departments and other agencies, as required by the Planning and Development Act 2000 (as amended). Groups registered with the Kildare Public Participation Network were also notified of the publication of the Draft Plan and the associated public consultation period.

Kildare County Council Social Media channels were used as mechanisms to promote awareness of the public consultation period for the Draft Plan.



### 1.2.1. Consultation 'Drop-in' Event



A public consultation event was hosted by the Planning Department Team at Áras Bhríde in Kildare Town on Wednesday 19<sup>th</sup> April from 4-8pm.

Approximately 100 people attended the event to inspect the Draft Plan and to discuss issues with members of the Planning Team.

All attendees were encouraged to make a submission to the Draft Plan.

In total 142 submissions or observations were received during the public consultation period, including 13 from public bodies.

The Members are advised that submissions are available for public viewing at: [Draft Kildare Town Local Area Plan 2023 - 2029 - Submissions | Kildare County Council \(kildarecoco.ie\)](https://consult.kildarecoco.ie/)

### **1.3. Contents of the Chief Executive's Report**

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

- Section 1:** Background to the Chief Executive Report.
- Section 2:** List of persons or bodies who made submissions or observations.
- Section 3:** Submission from the Office of the Planning Regulator (OPR).
- Section 4:** Submissions in respect of the Prescribed Authorities and public bodies.
- Section 5:** Issues raised by themes in submissions or observations from all other persons or bodies.
- Section 6:** Submissions relating to requests for the re-zoning of land and land use zoning objectives.
- Section 7:** Typographical errors in the Draft Plan.
- Section 8:** Chief Executive's Proposed Material Alterations.
- Section 9:** Composite list of the recommended Proposed Material Alterations to the Draft Kildare Town Local Area Plan 2023-2029.
- Appendix 1:** Submission from the Office of the Planning Regulator
- Appendix 2:** Detailed summary of submissions received (excluding those referred to under Section 3, 4 and 6).
- Note:** All sections of this report (including Appendices) should be read in their entirety in conjunction with the draft plan published on 21<sup>st</sup> March 2023



## 1.4. Next Steps

Within six weeks of receiving the Chief Executive's Report, the Elected Members of the Kildare-Newbridge Municipal District must consider the Draft Plan and the Chief Executive's Report. Following consideration of both, the Elected Members may, as they consider appropriate, by resolution, make, amend or revoke the draft local area plan.

If the Elected Members decide to materially alter the Draft Plan, a further period of public consultation will be necessary, and the Planning Authority must screen the Proposed Material Alterations to determine if a Strategic Environmental Assessment (SEA) or Appropriate Assessment (AA) or both are required for any of the Proposed Material Alterations. This screening, and if deemed necessary, the SEA or AA processes, must be carried out before proceeding to the public consultation period.

The public display period of any Proposed Material Alterations is a minimum of four weeks. Submissions or observations with respect to the Proposed Material Alterations will be taken into account, before the local area plan is made. The Elected Members must consider the Proposed Material Alterations to the local area plan, any environmental reports and the Chief Executive's Report on any observations or submissions received and decide whether to make the local area plan with or without the Material Alterations.

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

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

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

## 2.0. List of Persons/Bodies Who Made Submissions

### 2.1. Submissions or Observations Received

During the public consultation period a total of 142 submissions or observations were received. The list of persons, prescribed bodies, groups and stakeholders who made valid submissions are listed in Table 2-1. Kildare County Council would like to take the opportunity to thank those who made written submissions on the Draft Plan.

**Table 2-1 Persons/Organisations Who Made Submissions or Observations**

Ref. No <sup>1</sup> .	Name/Organisation	Ref. No.	Name/Organisation
1	Hugh McCarthy	72	Frank McMahon
2	Thomas Dunne <sup>2</sup>	73	Joan Conlan
3	Tony Bonnie	74	Anastassia Pinzariu
4	Silviu Munteanu	75	Tom Blennerhasset
5	Anil Vetsa	76	Barry Waters
6	Elaine Keating	77	Mark Murphy
7	Lalit Suryawanshi	78	Gayle Doyle
8	Zuhair Ahmed	79	Cunnaberry Hill, Oaktree Residents Association
9	Peter Daniel	80	Ailish Murphy
10	Aoife Hand	81	Marie Anne Ponsard
11	Tikkina Ananda Bai	82	Louise Rollo
12	John Nicol	83	Patrick Kearney
13	Rositsa Pavlova	84	Ricardo Olguin
14	Slavi Pavlov	85	Elaine McCormack
15	Olga Postolachi	86	Jiyoun Kim
16	Hazel Nolan	87	John Spencer

<sup>1</sup> Each reference number associated with a submission or observation starts with KCC-C127 and the unique reference is the last digits which are reflected in Table 2-1.

<sup>2</sup> See Section 2.2 of this Report.

<b>Ref. No<sup>1</sup>.</b>	<b>Name/Organisation</b>	<b>Ref. No.</b>	<b>Name/Organisation</b>
17	Environmental Protection Agency (EPA)	88	Drumcree Residents Association
18	Connell O'Donnell	89	Lynda & Shane Geraghty
19	Connell O'Donnell	90	Chris Geoghegan
20	Connell O'Donnell	91	Shane Byrne
21	Kaushal Adarsh	92	Janet Doyle
22	Nigel Curran	93	Kieran Conboy
23	Dublin Airport Authority (DAA)	94	Aoife Hegarty
24	Sean Donegan	95	Department of Housing, Local Government and Heritage
25	Caroline Christie	96	Round Towers GAA Club and Kildare Town AFC
26	Cathal Mahon	97	Meath County Council
27	Victoria Vaughan	98	Pousterle Limited
28	Mihaita Stoinoiu	99	Ronan Maher
29	Gaurav Verma	100	Michael Hegarty
30	Daniel Meaney	101	Shirley Flanagan
31	Keshmore Construction Ltd.	102	Kildare Sports Partnership
32	Adele Woods	103	Sean O'Fearghail
33	James Johnston	104	IHBA
34	Maurice and Karen Meaney	105	National Transport Authority (NTA)
35	Dylan Byrne	106	Department of the Environment, Climate and Communications
36	Simon Holohan	107	Cllr. Mark Stafford
37	Richard Bannister	108	Cristina Conchi
38	Select Vestry of St. Brigid's Cathedral	109	ESB
39	Rory de Bruir	110	Curragh Finn Residents Association

<b>Ref. No<sup>1</sup>.</b>	<b>Name/Organisation</b>	<b>Ref. No.</b>	<b>Name/Organisation</b>
40	Kildare Tourism Enterprise Centre Limited	111	Value Retail Dublin Ltd.
41	RSR Kildare (Ireland) Ltd.	112	Olive Watkins
42	Uisce Éireann (formerly Irish Water)	113	The Irish Province of Carmelites
43	Mairead Cooney	114	Jorge Rodrigues
44	Anna Hrdlickova	115	Teresa Harrington
45	Owen Kennedy	116	Annette Irwin
46	MRP Oakland Ltd.	117	Ciaran Brannock
47	Deborah Bonnie	118	Senator Mark Wall
48	Han Wang	119	Thomas Simpson
49	Eimear O'Brien	120	Darren Christie
50	Benson Ecology	121	Deborah Quigley Daly
51	Pamela Fletcher	122	Gillian Smyth
52	Livia Maria Bida	123	Office of the Planning Regulator (OPR)
53	Adam Doyle	124	Harry Seymour
54	Aoife O'Connor	125	Eoin Leavy
55	Frances Van Oirschot	126	Des Scahill
56	Edel McGovern	127	Kildare Green Party
57	Office of Public Works (OPW)	128	Glenveagh Homes Ltd.
58	Transport Infrastructure Irelands (TII)	129	Brian Murphy
59	Mary Munnelly	130	Garvan de Bruir
60	IOMST	131	Columbia Estates Management (IE) Limited
61	George Ryan	132	Maria Barry

Ref. No <sup>1</sup> .	Name/Organisation	Ref. No.	Name/Organisation
62	Department of Transport	133	Michael Lawlor on behalf of Curragh Finn Residents Association
63	Department of Education	134	Cill Dara le Gaeilge
64	Niamh Keogh	135	Kildare Town Chamber of Commerce
65	Malcolm Haig	136	4 <sup>th</sup> Kildare Town Scout Group
66	Rebecca Jones	137	Sinead Mahon
67	John Conway	138	BDP Assets Ltd.
68	Bill McDonald	139	Cllr. Suzanne Doyle
69	Lidon Ltd.	140	Catherine Gannon
70	Elstown Limited	141	Fine Gael Kildare Town Branch
71	Sara Byrne	142	David Hanley

## 2.2. Submission Not Considered

Submission No. 2 refers to the zoning of land in Castledermot. Land use zoning in the settlement of Castledermot is a matter for the County Development Plan process and is outside the remit of the Kildare Town Local Area Plan.

As this Chief Executive's Report and the draft Kildare Town Local Area Plan 2023-2029 relates to Kildare Town only, this particular submission is not considered in this report.

A summary of the submission is included in Appendix 2 for reference purposes only.

### 3.0. Submission from the Office of the Planning Regulator

This section of the Chief Executive's report outlines the evaluation and assessment by the OPR of the Kildare Town Local Area Plan 2023-2029 in accordance with Sections 31AO(1) and 31AO(2) of the Planning and Development Act 2000 (as amended). In accordance with Section 20(3)(c)(II)(B) of the Planning and Development Act 2000 (as amended) the recommendations, submissions and observations made by the Office of the Planning Regulator (OPR) are detailed in this section of the report. The Chief Executive's Response in relation to the issues raised by the OPR and recommendations in relation to the proposed Local Area Plan are also detailed in Table 3-1, below. A copy of the submission from the OPR is attached in Appendix 1 of this report.

The Chief Executive's recommended deletions to the Draft Plan are shown in ~~strikethrough blue~~ and recommended new text is shown in *italics red*.

**Table 3-1 Submission from the Office of the Planning Regulator**

Office of the Planning Regulator (OPR) (Ref. No. KCC-C127-123)
<p><b><u>Issues Raised</u></b></p> <p>The submission for the Office of the Planning Regulator includes one "Recommendation" in relation to the Strategic Flood Risk Assessment (SFRA) and one "Observation" in relation to sustainable transport measures.</p> <p>The OPR commends Kildare County Council for the robust evidence-based approach to the Draft Plan including the Kildare Town Transport Strategy, Settlement Capacity Audit and Social Infrastructure Audit. The OPR also welcomes the focus on town centre renewal and brownfield/infill development, in particular the infill and opportunity sites for the town centre and the identified public realm improvements from the Kildare Town Renewal Masterplan.</p> <p>The OPR considers that the Draft Plan is generally consistent with the RSES, in terms of compact growth, town centre renewal and local transport plans. The OPR does have concerns regarding the ability to service the more peripheral zoned lands adjoining the motorway interchange. The OPR is also concerned over an existing watercourse traversing the lands zoned for H: Industry and Warehousing and C: New Residential south of the motorway which may not have been adequately assessed as part of the SFRA.</p>

### **1. Consistency with the Regional, Spatial and Economic Strategy**

The OPR welcome the Vision contained in the Draft Plan and the specific measures to promote economic development to reach a job ratio target of 0.70. The Office references the sections of the Draft Plan that relate to the integration of lands use and transport as well as green infrastructure. They particularly commend the Council for including targets for modal shift and increases in tree canopy coverage.

### **2. Consistency with Development Plan and Core Strategy**

The OPR note the additional 12-month growth and housing allocation in respect of the plan timeframe and also the 25% additional provision included in the Draft Plan, which increases the unit allocation to 628 units. The submission also notes that the additional provision refers to an existing unmet social housing demand and will be provided for through the oversupply of units on sites with existing planning permissions.

The OPR note the total housing yield of 1,102 units as per Table 3-7 and notes the potential of Kildare Town exceeding its core strategy housing target due to historical legacy zonings and extant permissions for residential development. However, the OPR states that, on balance the Draft Plan includes a reasonable and pragmatic approach to address the surplus of residential zoned lands. The OPR welcomes the decisions to zone lands C: Phase 2 New Residential and SR: Strategic Reserve and the Objective CSO 1.10 to preserve these lands from inappropriate forms of development and to safeguard their strategic value. Similarly, Objective CSO 1.4 is welcomed which relates to monitoring constructed and permitted developments and applying appropriate development management standards to ensure compliance with the Core Strategy. The OPR note that this objective is critical to ensure that the growth is commensurate with Kildare Town's position in the county settlement hierarchy.

### **3. Compact Growth**

The submission notes that 65% of all new homes is within the CSO defined settlement boundary. However, it is noted that significant land for residential and employment development is outside the CSO settlement boundary adjoining Junction 13 of the M7 motorway. As these lands are removed from the train station, there is a greater likelihood that they will give rise to a car-based form of development.

### **4. Transport and Accessibility**

The OPR commend the Draft Plan on promoting sustainable travel and welcomes the range of measures set out in the maps and supported by objectives. However, they note the Draft Plan does not include public transport measures to support the future development of the Enterprise and Employments lands to the west of the KTOV and includes only a cycle track /lane as part of the Modus Link Road. The OPR also note that the land zoned for Industry and Warehousing and for New Residential south of the

motorway which does not include any permeability or cycling measures to serve this area and it is unclear if bus measure PT 4 is intended to serve these lands. The OPR consider that there is scope to integrate these lands into the overall proposed transport network to reduce reliance on private transport.

### **Observation 1 – Sustainable Transport Measures**

Having regard to:

- a) section 10 (2)(n) of the Planning and Development Act 2000, as amended.
- b) the vision and strategic principles of the Draft Plan including Creating Compact and Connected Communities, the measures and objectives promoting modal shift and more sustainable transport in Chapter 7; and
- c) the location of the Q: Enterprise and Employment zoned lands west of the Kildare Village Outlet Centre and the H: Industry and Warehousing and C: New Residential zoned lands south of the M7,

the Office advises the Planning Authority to investigate measures to promote use of public transport and active travel for the aforementioned undeveloped lands in consultation with the National Transport Authority and Transport Infrastructure Ireland.

### **5. Flood Risk Management**

The OPR welcome the preparation of the SFRA and the requirement for a site-specific flood risk assessment in areas at risk of pluvial flooding. The OPR note that the Surface Water Study indicates the location of the Armour Stream but states that no assessment has been included as to whether there is any flood risk associated with the watercourse. However, it is noted that the entire lands within the Draft Plan are located within Flood Zone C.

### **Recommendation 1 – Strategic Flood Risk Assessment – Armour Stream**

Having regard to:

- a) National Policy Objective 57 of the National Planning Framework Project Ireland 2040; and
- b) the Flood Risk Management Guidelines (2009), as revised, and Circular PL 2/2014 Flooding Guidelines,

the planning authority is required to review the Strategic Flood Risk Assessment for the Draft Plan to include a flood risk assessment of the Armour Stream, in particular having regard to adjoining vulnerable land uses, to ensure that any land use zonings, and flood risk associated with this watercourse, are assessed in accordance with the application of the sequential approach, and the Justification Test where appropriate, and having regard to potential climate change effects.

This review may entail the review of land use zonings where they fail to satisfy the plan-making Justification Test to ensure consistency with the guidelines. The OPR requires the planning authority to consult with the Office of Public Works regarding this Recommendation.



The OPR in their submission also state that the Draft Plan would benefit from referencing 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).

The OPR also notes that the SFRA appears to contain inconsistencies with respect to catchment sizes for CFRAM mapping and NIFM mapping in Sections 5.5.1 and 5.5.2. The planning authority is advised to consult with the Office of Public Works to clarify this matter.

### **6. Infrastructure Capacity**

The submission notes there is sufficient capacity within the wastewater treatment plant to cater for planned growth during the lifetime of the Plan. Similarly, they welcome the inclusion of objectives to incorporate nature-based solutions and SuDS into developments as well as objectives to keep areas designated as Nature-Based Management Areas free from development.

### **7. Economy and Employment**

The OPR note that the Draft Plan aims to protect existing employment in the town and to create new employment opportunities to ensure long-term and sustainable growth with the aim of increasing the town's job ratio to 0.70 and becoming more self-sustaining. The OPR also welcome the measure to connect the town centre to the Kildare Tourist Outlet Village.

### **Town Centre and Retailing**

The OPR welcome the comprehensive strategy to address current issues in the town centre and to protect its role while allowing a wider range of uses. The OPR also commend the focus on town renewal and the incorporation of projects from the Kildare Town Renewal Masterplan. In particular the OPR commend the overall clarity and direction provided for economic development and employment in the Draft Plan.

### **Summary**

The OPR requests that the Council addresses the one Recommendation and one Observation outlined in the submission.

### **Chief Executive's Response**

The comments set out in the submission from the Office of the Planning Regulator are noted, in particular the commendation regarding the robust evidence-based approach to the Draft Plan.

**Observation 1 – Sustainable Transport Measures**

The observation made in respect of the sustainable transport measures for the three specific areas within the Draft Plan are noted.

In respect of the Q: Enterprise and Employment zoned lands west of the Kildare Village Outlet Centre as noted there is an active travel proposal associated with the Modus Link Road. In order to further promote the use of sustainable travel within the overall site, it is recommended that Objective EDO 1.5 (Chapter 5, Economic Development) is amended to ensure a detail design statement providing for a clearly defined access arrangement and a sustainable transport network forms part of the development of the site.

In respect of the H: Industry and Warehousing and C: New Residential zoned lands south of the M7 it is proposed to include an additional permeability measure under Table 7-1 and Map 7.1 to provide for an active travel link from the roundabout at Grey Abbey Road linking the subject lands back to the town centre. Furthermore, an indicative location for a bus stop south of the motorway will be included on Map 7.3 Public Transport Measures.

**Recommendation 1 – Strategic Flood Risk Assessment – Armour Stream**

The Strategic Flood Risk Assessment was reviewed having regard to the specific comments raised by the OPR and the OPW and this clarified that the Armour Stream is no longer an active fluvial watercourse and currently functions as a local field drainage and stormwater drainage network conduit. A meeting was held between Kildare County Council and the OPW to discuss this matter. For clarity, it is proposed to update various sections of the SFRA to confirm this matter.

The comment in relation to referencing 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) in the Draft Plan is noted. However, Section 1.2. of the Draft Plan states that the policies and objectives included in the Plan do not replicate policies and objectives that are already addressed within the Kildare County Development Plan 2023-2029 as this is the higher-level planning policy document. Furthermore, Section 1.2. of the Draft Plan states that it is essential that both the CDP and the LAP are read in tandem. In this regard, Section 15.8 Surface Water of the CDP requests that planning applications shall include detailed proposals in compliance with the Nature-based Solutions Guidelines. For clarity, reference to these Guidelines will be included in the conclusion of the SFRA.

The comments in relation to the inconsistencies in the SFRA with respect to catchment sizes for CFRAM mapping and NIFM mapping are noted and accepted. The Office of Public Works (OPW) also raised these issues in their submission.

**Chief Executive's Recommendation**

**Proposed Material Alteration**

Chapter 5: Economic Development, amend Objective EDO 1.5 as follows:

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

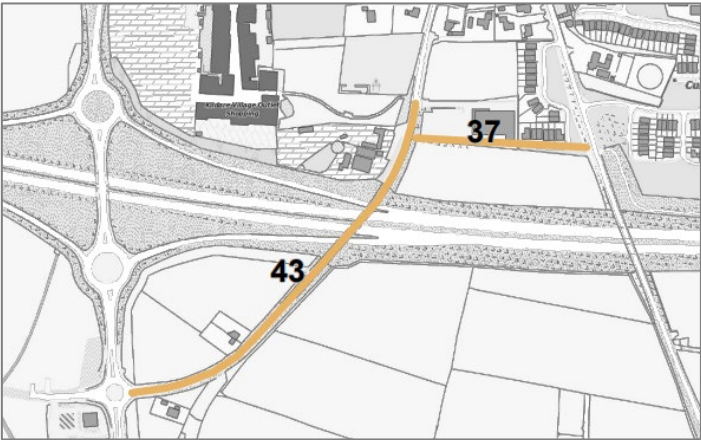
**Proposed Material Alteration**

Chapter 7: Movement and Transportation, insert new measure under Table 7-1 and on the corresponding Map 7.1, as follows:

Table 7-1 Permeability Measures

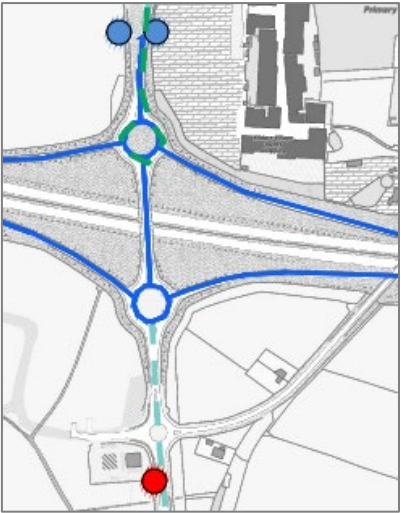
Ref. No.	Measure	Delivery Timeframe
<i>PERM 43</i>	<i>Create a new pedestrian / cyclist link along the Grey Abbey Road connecting from the R415.</i>	<i>Medium-term</i>

Map 7.1 Permeability Measures



**Proposed Material Alteration**

Chapter 7: Movement and Transportation, insert additional point on Map 7.3 in relation to Table 7-3 Public Transport Measures, PT 3 to improve quality and coverage of bus stops.



### **Proposed Material Alteration**

Amend the Strategic Flood Risk Assessment (SFRA), Section 2.2 as follows:

*Within the Kildare Town LAP area, there are no watercourses identified within the EPA Flow Network dataset (<https://gis.epa/EPAMaps/>) within the Kildare Town LAP area, with. The closest identified watercourse to Kildare Town being the Tully Stream, which originates on the southern boundary of the LAP area and flows in a southerly direction away from Kildare Town. Other watercourses around Kildare Town include:*

- River Liffey 8.5km to the east, flowing northward;
- Cloncumber Stream 5km to the northeast, flowing northward;
- Slate River 11km to the north, flowing west; and,
- River Barrow 9.5km to the west, flowing south.

*A former tributary of the Tully Stream, commonly referred to as the Armour Stream previously drained a catchment area to the west of Kildare Town. Further information was drawn from the Hydrogeological Assessment of Saint Brigid's Well (Aqua Geoservices Ltd, 2021)<sup>3</sup>.*

*The assessment states that the Kildare Town By-Pass (M7 Motorway) altered the natural flow of a former Tully Stream tributary (Armour Stream), as the feeding springs/wells in its upper catchment area were located to the North of the motorway. Figure 3-1 shows an extract map from the report showing the assumed former catchment feeding the tributary. The map shows the M7 motorway has altered the Tully Stream catchment, with the upper portion of the catchment now diverted westward towards the River Barrow.*

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<sup>3</sup> Hydrogeological Assessment (Phase 1) At Saint Brigid's Well, Aqua Geoservices Ltd, 2021

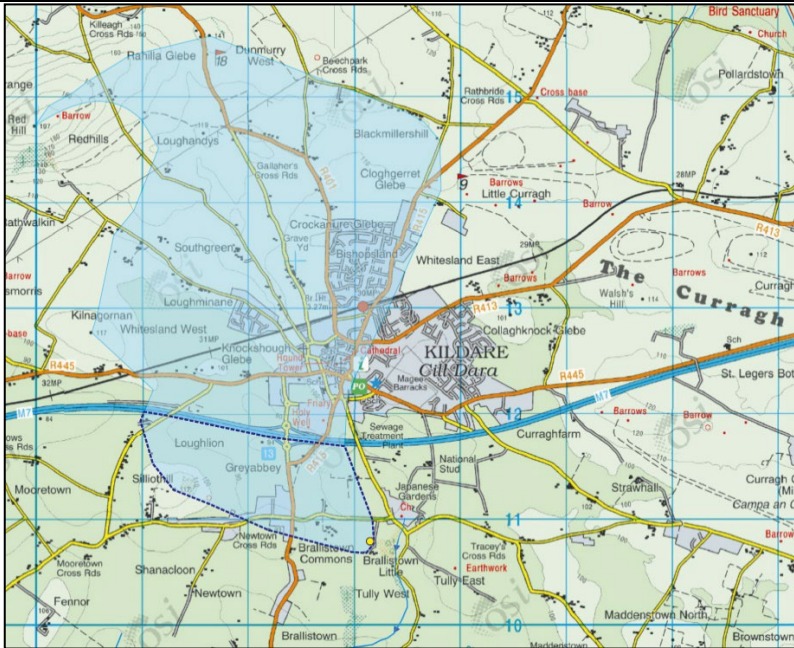


Figure 3-1 Extract from Hydrogeological Assessment of Saint Brigid's Well showing M7 motorway has altered the Tully Stream catchment.

*South of the M7, recent developments in the Greyabbey area have altered the nature and form of the watercourse channel through conversion into land drains overlain by infill or culverted to form part of the local stormwater drainage design. As such, it is understood that the former Armour Stream is no longer an active fluvial watercourse and currently functions as a local field drainage and stormwater drainage network conduit.*

*Approximately 800m of the former watercourse is culverted with a 450mm diameter concrete pipe downstream of Armour bridge through the Irish National Stud lands and outfalls to open channel adjacent to St. Brigid's Well.*

### Proposed Material Alteration

Amend Section 3.1 of SFRA as follows:

This section presents a brief summary of The Guidelines, for more detail refer to The Guidelines and the accompanying Technical Appendices at (<https://www.gov.ie/en/publication/7db50-the-planning-system-and-flood-risk-management-guidelines-for-planning-authorities-nov-09/>).

### Proposed Material Alteration

Amend Figure 3.1 of SFRA as follows:

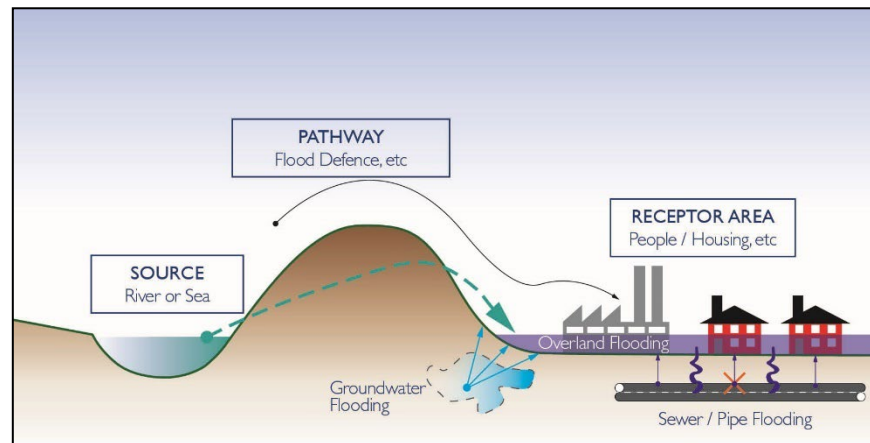


Figure 3-2 Flood Risk Assessment Source – Pathway – Receptor Model

### Proposed Material Alteration

Amend Section 3.7 of the SFRA, Table 3-4, Line 1 as follows:

The *urban settlement is targeted for growth as it is identified as a Self-Sustaining Growth Town in the Core Strategy of the Kildare County Development Plan 2023-2029, aligning with the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 (now superseded by the Regional Spatial Economic Strategy for the Eastern Midlands Region 2019- 2031 )-set out the planned direction for growth within the Greater Dublin Area up to 2022 (2031)* by giving regional effect to national planning policy under *the National Spatial Strategy (NSS) (now superseded by Project Ireland 2040; the National Planning Framework & its Implementation*

Roadmap) County Development Plan or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.

### **Proposed Material Alteration**

Amend Section 4.4.2, point vi, of SFRA as follows:

As well as reducing and treating runoff in accordance with GDSDS, NBS and NWRM also promote biodiversity and provide important amenity value to residents and visitors alike. Therefore, KCC require that SuDS features *may* ~~should~~ contribute towards a *maximum minimum* of ~~15~~-10% of the open space requirement *where it contributes in a significant and positive way to the design and quality of open space.*

### **Proposed Material Alteration**

Amend Section 5.5.1 of the SFRA as follows:

The CFRAM Studies have developed FRMPs to manage flood risk within the relevant catchment. Flood maps were one of the main outputs of the studies and indicate modelled flood extents for flood events of a range of annual exceedance probability (AEP) for catchments greater than ~~5~~-1 km<sup>2</sup>.

### **Proposed Material Alteration**

Amend Section 5.5.2 of the SFRA as follows:

Subsequent to the completion of CFRAM, the NIFM study was undertaken to assess fluvial flood risk for catchments greater than ~~4~~-5 km<sup>2</sup> not included within CFRAM studies.

### **Proposed Material Alteration**

Amend the SFRA, Section 6.6 with a new final paragraph as follows:

*All development proposals should incorporate surface water management in compliance with the Greater Dublin Drainage Strategy (GDSDS), in particular Volume 2 Chapter 6 Stormwater Drainage Design Criteria, and CIRIA SuDS Manual (C753) and with Nature-Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Best Practice Interim Guidance Document (2021, DHLGH).*



#### 4.0. Submissions from the Prescribed Authorities and Public Bodies

During the public consultation period 12 submissions were received from Prescribed Authorities and Public Bodies (in addition to the OPR) as follows:

- Sub 17 EPA
- Sub 23 DAA
- Sub 42 Uisce Eireann
- Sub 57 OPW
- Sub 58 TII
- Sub 62 Department of Transport
- Sub 63 Department of Education
- Sub 95 Department of Housing, Local Government and Heritage
- Sub 97 Meath County Council
- Sub 105 NTA
- Sub 106 Department of Environment, Climate and Communication
- Sub 109 ESB

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

The Chief Executive's recommended deletions to the Draft Plan are shown in ~~strikethrough blue~~ and recommended new text is shown in *italics red*.

**Table 4-1 Summary of Submissions from Prescribed Authorities and Public Bodies**

<b>Environmental Protection Agency (EPA) (Ref. No. KCC-C127-17)</b>
<p><b><u>Issues Raised</u></b></p> <p>The EPA submission outlines its role as one of the statutory environmental authorities under the SEA Regulations in which it focuses on the full integration of the findings of the Environmental Assessment into the Plan. The submission makes reference to the 'self-service approach' via the guidance document 'SEA of Local Authority Land Use Plans – EPA Recommendations and Resources'.</p> <p>The submission makes reference to the information to be contained in an Environmental Report such as an Assessment of Alternatives and their assessment against the 'Strategic Environmental Objectives', the Assessment of Environmental Effects including cumulative effects, Mitigation Measures including clear commitments to implement the measures and a flexible Monitoring programme. In respect of monitoring</p>

both positive and negative effects should be considered.

The EPA also refer to their 'State of the Environment Report' in which the key issues and challenges identified should be taken into account in preparing the Plan and the SEA.

The submission reminds the Council that any future amendments to the Plan should be screened for likely significant effects and that once the Plan is adopted an SEA Statement should be prepared and sent to the environmental authorities.

**Chief Executive's Response**

The items referred to in the EPA submission are noted and accepted.

**Chief Executive's Recommendation**

No change recommended.

**DAA (Ref. No. KCC-C127-23)**

**Issues Raised**

The Dublin Airport, DAA, Head Office have no comment to make in respect of the Draft Plan other than to recommend consultation with the IAA and the IAA-ANSP.

**Chief Executive's Response**

The comments in the submission from the DAA are noted. The Kildare County Development Plan 2023-2029, which is the overarching policy document for the County, includes appropriate policies and objectives pertaining to consultation with the IAA at project stage (e.g. TMN O138, 139 and 159 in Chapter 5).

**Chief Executive's Recommendation**

No change recommended.

## Uisce Éireann (Ref. No. KCC-C127-42)

### **Issues Raised**

Uisce Éireann (UÉ) welcome the objectives in Chapter 10 that support the work of UÉ. The submission provides the following high-level updates.

### **Water Supply and Wastewater Treatment**

There is currently sufficient headroom at the wastewater treatment plant and the water supply to cater for the town. Capacity registered are published annually and will give information over the lifetime of the Plan ([Capacity Registers](#) | [Connections](#) | [Uisce Éireann \(formerly Irish Water\)](#))

### **Zoning and Network Capacity**

UÉ refer to the feedback they provided in the preparation of the Draft Plan and note that network extensions may be required to service some sites. Depending on the extent of development realised, localised network upgrades may also be required, particularly in areas served by sewers with a diameter of 150mm or less, or watermains with a diameter of 80mm or less. The Submission also states that more significant network reinforcements are likely to be required to service the Strategic Residential Reserve Lands.

- The submission states that UÉ encourage phased sequential development in areas with existing water services infrastructure and spare capacity and that discharge of surface water to the combined sewers is not permitted.
- Upgrades and extensions should be developer driven, unless a committed UÉ project.
- New connections are assessed on a case-by-case basis through the New Connections process.
- Third-party agreement will be required where it is proposed to service a new development via private property or private water services infrastructure.
- In relation to UÉ assets on a development site they must be taken account of with the design layout. Information is available on the UÉ website in this regard. The submission notes that there are a number of proposed development sites within which there are important pipelines and other infrastructure e.g., at Magee Barracks (Magee Water Tower).

### **Planned Roads and Public Realm Projects**

The submission highlights that public realm, active travel and road projects have the potential to impact UÉ assets and early engagement is required. Examples of initiatives which could impact assets are the Town Centre Regeneration and Local Transport Plans.

**Comments on Newly Zoned Residential Sites**

The following table was included within the submission:

<b>New Residential</b>	<b>Water Supply</b>	<b>Sewer Network</b>
<b>C1 Collaghknock</b>	There is a watermain immediately to the west of the site and in Melitta Rd to the north. Level of service. Improvements may be required	225 uPCV runs through the southwest of the site and Collaghknock Glebe WWPS is on the site. Wayleaves will need to be maintained over sewers.
<b>C2 Grey Abbey</b>	There is a 150mm DI Watermain (<20m) to east of site (R415). Dependent on the size of development, some level of service improvements may be needed.	The site gradient would have to be examined. Likely that the site would have to provide its own sewer and connect to Armour Bridge Pumping Station @100m. There is no Drainage Area Plan available for this area at present. The Pumping Station & downstream sewers will need to be assessed. An upgraded or new pumping station will most likely be required. However, a connection should be feasible.
<b>C3 Curragh Rd.</b>	There are watermains traversing the site to the north and also to the west and east of the site. Depending on size of development a connection should be feasible	There are a number of small sewers to the west and north of the site. Again, topography will dictate how sewage flows will be directed. A connection should be feasible.
<b>C4 Rathbride/Whitesland East</b>	A 100mm uPVC runs into the site at the northwest side and on the Rathbride Rd for 2 <sup>nd</sup> portion of the site. Level of Service improvements may be required, depending on size of development.	(1) Sewer in Dunmurray Drive (GIS missing information on pipe size, may need upgrading depending on number of units (2) 35m to 225uPVC to the northwest of the site on Rathbride Rd / Curragh Finn  Capacity of downstream sewers, pumping station & pumped main & railway crossing will need to be assessed.
<b>C5 Whitesland East</b>	Approximately 200m to the closest 100 mm uPVC in the Rathbride road through Site C4. Main may need upgrading depending on number of units	225m to the closest 225uPVC to the south of the site through Site C4. Connection dependent on number of units. Capacity of downstream sewers, pumping station & pumped main & railway crossing will need to be assessed.

### **Other Comments**

All references in the Draft Plan to Irish Water are updated to Uisce Éireann.

### **Strategic Reserve Lands**

Should full build out occur, a strategic watermain may be needed and the wastewater pumping station may be constrained which will need upgrading. Where the development of Strategic Reserve lands is being considered, this should be in line with principles of proper planning and sustainable development including sequential development, compact growth and developing in lands already/ easily serviced to optimise existing water services and minimise investment.

### **Masterplans for Regeneration and Opportunity Sites**

Earlier consultation with UÉ should take place. Consideration of how sites will be serviced and impacts on UÉ infrastructure and projects should be considered e.g. building over of assets, tree planting, synergies with planned UÉ projects, opportunities for surface water removal. A Pre-Connection Enquiry can be submitted to our Connections and Developer Services team to assist with this.

### **Section 9 and 10 Green Infrastructure and Nature Based Surface Water Management**

Reference could also be made to the following document: Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Best Practice Interim Guidance Document.

### **Chief Executive's Response**

The comments in the submission from Uisce Éireann are noted. The lands identified as Strategic Reserve are for the future expansion of the town beyond this plan period and are zoned to protect the integrity of the lands for the future and to avoid intervention which would hinder the future growth of the town at this location.

As stated under Table 11-4 the inclusion of these lands will not in any way infer a prior commitment regarding the nature of any future zoning and therefore, full build out of these lands do not form part of the development strategy of this Draft Plan. The comment that a strategic watermain and wastewater pumping station upgrade may be needed in this regard is noted.

The comments in relation to the existing infrastructure assets and the need to be considered in any design layout are noted and accepted. Section 33 of the Planning and Development Act 2000 (as amended) require planning authorities to notify and consult with prescribed bodies in relation to planning applications. Similarly, Article 22 (2A) of the Planning and Development Regulations 2001 (as amended) require applicants where it is proposed to connect the development to a public water or

wastewater network, or both, to submit evidence that Irish Water (now Uisce Éireann) has confirmed that it is feasible to provide the appropriate service or services and that the relevant water network or networks have the capacity to service the development.

The comment made that public realm, active travel and road projects have the potential to impact UÉ assets is noted and accepted, and early engagement is required. In this regard it is considered that an additional objective under Section 10 of the Draft Plan is appropriate.

The comments on the newly zoned residential lands are noted. It is considered in the interests of clarity that the information under Table 11-2 will be updated to reflect the narrative provided in the Uisce Éireann submission.

The comment that all references in the Draft Plan to Irish Water are updated to Uisce Éireann is noted. However, the Draft Plan makes no reference to Irish Water.

The comment in relation to referencing 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, in the Draft Plan is noted. However, Section 1.2. of the Draft Plan states that the policies and objectives included in the Plan are specific to the future development of the town of Kildare and the Draft Plan does not replicate policies and objectives that are already addressed within the Kildare County Development Plan 2023-2029 as this is the higher-level planning policy document to which this Draft Plan must align. Furthermore, Section 1.2. of the Draft Plan states that it is essential that both the CDP and the LAP are read in tandem. In this regard, Section 15.8 Surface Water of the CDP requests that planning applications shall include detailed proposals in compliance with the Nature-based Solutions Guidelines.

### **Chief Executive's Recommendation**

#### **Proposed Material Alterations**

Chapter 10 Infrastructure and Environment, insert new Objective IO 1.3 under Section 10.2 Water Supply and Wastewater as follows:

**IO 1.3** *Consult with Uisce Éireann prior to the implementation of any significant Public Realm Works or Transportation Measures contained in the Kildare Town Local Area Plan 2023-2029 to avoid and/or mitigate impacts on existing or planned water and wastewater infrastructure.*

### Proposed Material Alterations

Chapter 11 Implementation, under Section 11.2. Infrastructure Delivery Schedule insert additional text with respect to water and wastewater and the re-ordering /re-numbering of the listings under Table 11-2, as follows:

<b>Collaghknock – C (1)</b>		
<b>Infrastructure</b>	<b>Delivery Schedule</b>	<b>Funding Sources</b>
<b>Water and Wastewater</b>		
Water supply – <i>There is a watermain immediately to the west of the site and in Melitta Rd to the north.</i> Improvements may be required, modelling for suitability required.	In tandem with new development	PPP
Wastewater - <i>A 225 uPCV runs through the southwest of the site and Collaghknock Glebe WWPS is on the site.</i> Collaghknock Glebe Pumping Station will need to be assessed. <i>Wayleaves will need to be maintained over sewers.</i>	In tandem with new development	PPP

<b>Grey Abbey View – C (2)</b>		
<b>Infrastructure</b>	<b>Delivery Schedule</b>	<b>Funding Sources</b>
<b>Water and Wastewater</b>		
Water supply – <i>There is a 150mm DI Watermain (&lt;20m) to east of site (R415).</i> Improvements may be required, modelling for suitability required.	In tandem with new development	Developer
Wastewater – <i>There is no Drainage Area Plan available for this area at present. Likely the site</i>	In tandem with new	Developer

<p><i>would have to provide its own sewer and connect to Armour Bridge Pumping Station @100m.</i> The pumping station and downstream sewers will need to be assessed. An upgraded or new pumping station will most likely be required.</p>			development
<p><b>Rathbride Road – C (4) and C (5)</b></p>			
<p><b>Infrastructure</b></p>		<p><b>Delivery Schedule</b></p>	
<p><b>Funding Sources</b></p>			
<p><b>Water and Wastewater</b></p>			
<p>Water supply – C (4) A 100mm uPVC runs into the site at the northwest side and on the Rathbride Road for second portion of the site improvements may be required, modelling for suitability required.</p>		<p><i>In tandem with new development</i></p>	
<p>C (5) Approximately 200m to the closest 100 mm uPVC in the Rathbride Road through Site C (4). Water main may need upgrading.</p>			
<p>Wastewater – C (4) sewer in Dunmurray Drive may need upgrading, 35m to 225uPVC to the northwest of the site on Rathbride Rd / Curragh Finn. Capacity of downstream sewers, pumping station, pumped main and railway crossing will need to be assessed.</p>		<p><i>In tandem with new development</i></p>	
<p>C (5) is 225m to the closest 225uPVC to the south of the site through Site C (4). Capacity of downstream sewers, pumping station, pumped main and railway crossing will need to be assessed.</p>			



## Office of Public Works (OPW) (Ref. No. KCC-C127-57)

### Issues Raised

The OPW welcomes the inclusion of the SFRA and particularly the work carried out in the production of the Kildare Town Surface Water Study which informed and accompanied the Draft Plan. The submission highlights opportunities for improvements to the Draft Plan before it is finalised as detailed below.

### **Watercourses**

Section 2.2 of the SFRA states there are no watercourses except for the Tully Stream, however the Surface Water Study indicated the Armour Stream within the Plan area, and no commentary has been included.

### **Dataset Definitions**

The OPW highlighted that there was a “mix up” in the dataset definitions as follows:

Section 5.5.1 of the SFRA states that CFRAM maps “indicate modelled flood extents for flood events of a range of annual exceedance probability (AEP) for catchments greater than 5km<sup>2</sup>”. Similarly, Section 5.5.2 states that the NIFM study assesses “fluvial flood risk for catchments greater than 1km<sup>2</sup>”.

The OPW highlight in regard to the definitions that the; **CFRAM** mapping indicates modelled flood extents for catchments greater than **1km<sup>2</sup>**, while **NIFM** mapping is limited to catchments greater than **5km<sup>2</sup>**.

### **Errata**

Two errata have been referred to in the OPW submission which relate to the SFRA. Figure 3.1 of the SFRA, the definition in the image is obscured and should be amended. The other item is that Section 3.1 of the SFRA the full link relating to the Planning System and Flood Risk Management Guideline should be referred to instead of a link to the OPW site.

### **Justification Tests**

The submission states in reference to Section 3.7 of the SFRA that Box 4.1 has been updated in the Guidelines to reflect the changes at national and regional policy level. The OPW also highlight that Justification Tests are not required for the Draft Plan based on the assessment of risk in the SFRA. It is also highlighted for future reference, ‘the requirements for a settlement to be targeted for growth to pass Part 1 of the Justification Test’.

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

The OPW welcomes the discussion on SuDS in the Draft Plan in particular the various different SuDs techniques in the SFRA and the surface water management proposal outlined in the Surface Water Study. The submission suggest that 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)”.

The OPW highlight an inconsistency with two sections of the SFRA (Section 4.2.1 and 4.2.2) in relation to the minimum amount (10% or 15%) of open space provision which can be taken up by SuDs.

**Chief Executive's Response**

The comments in the submission from the OPW are noted.

The Strategic Flood Risk Assessment was reviewed having regard to the specific comments raised by the OPR and the OPW and this has clarified that the Armour Stream is no longer an active fluvial watercourse and currently functions as a local field drainage and stormwater drainage network conduit.

A meeting was held between Kildare County Council and the OPW to discuss this matter. For clarity, it is proposed to update various sections of the SFRA to confirm this matter.

The issues raised in relation to dataset definitions, Errata, Justification Tests and open space provision taken up by SuDS are noted and it is agreed that these typographical errors be rectified.

It is considered unnecessary to repeat the reference 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, as this is already referenced in the County Development Plan, which is the overarching policy document for Kildare. Section 1.2. of the Draft Plan states that the Plan must be read in tandem with the CDP and that the Draft Plan does not replicate policies and objectives that are already addressed within the CDP. Furthermore, Section 15.8 Surface Water of the CDP requests that planning applications shall include detailed proposals in compliance with the Nature-based Solutions Guidelines, which addresses Kildare Town. For clarity, reference to these Guidelines will be included in the conclusion of the SFRA.

**Chief Executive's Recommendation**

See detailed response to Recommendation No. 1 from the Office of the Planning Regulator.

## **Transport Infrastructure Ireland (TII) (Ref. No. KCC-C127-58)**

### **Issues Raised**

The TII states that there is a need to safeguard the national investment made in national roads. The submission states that the national network includes carriageways and associated services such as drainage that must be subject to coordination with and the prior approval of TII.

TII note that part of the Draft Plan includes a section of the M7 running west and east of Junction 13 with the R415. They state that this section of the M7, including Junction 13, is part of a Motorway Maintenance and Renewal Contract (MMaRC).

### **Cherryville: Transport Hub and Distribution Centre**

The TII highlight the future year capacity constraints that already arise at Junction 13 through Traffic and Transport Assessments for Greyabbey, south of Junction 13 and Kildare Tourist Outlet Village to its north that have included expansions e.g., for Phase 3 under Reg. Ref. 17/539 (appeal ref. ABP-300795). The TII state that these constraints already require careful event traffic management that includes measures such as the utilisation of traffic counting requirements and VMS services on part of the motorway at this location.

The submission refers to EDO 1.10 that relates to supporting the examination of the feasibility of development of Cherryville Junction. TII in their submission, are concerned with respect to the feasibility of Cherryville Junction and Kildare Town to become a “transport hub and distribution centre” in the absence of consultation with TII and without the evidence and design assumptions necessary to ensure no negative impact on the capacity and efficiency of the national road/associated junctions which could possibly lead to the premature and unacceptable reduction in the level of service available to road users. In this regard, the submission from the TII make the following recommendation:

### **Recommendation No. 1**

Having regard to the matters raised above and Appendix B of the Draft Plan, the evidence-based policy prescribed approach does not appear to be adhered to and TII consider same to be contrary to the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities, it is recommended that “Cherryville transport hub and distribution centre” is premature pending such required assessments and appropriate consultation with TII.

### **Movement and Transportation**

TII highlight the Movement and Transportation measures contained in the Draft Plan that interact with the M7 and advise that compliance with TII Publications (Standards) in accordance with relevant TII Publications (Technical) will be required for any work that may impact the national road pavement, structures and infrastructure including drainage. The submission also note that a design report will be required and access for the construction period will require prior consultation. The submission also highlights that separate structure approvals/permits, and other licences will be required in connection with the proposed works, including where temporary modification to the road network may be required.

## **Recommendation No. 2**

The requirement for consultation with TII as the national roads authority for the implementation of the above permeability walking and cycling measures is required to be recorded in the Plan for Measures no. 40, 55 and 56. It is a recommendation that such consultation should be included in the Walking and Cycling Objectives (MTOs) for the above measures.

### **Chief Executive's Response**

The contents of the submission from TII are noted.

In relation to Objective EDO 1.10 this relates to a higher-level plan objective, RE 044 of the Kildare County Development Plan 2023-2029 which states that it is an objective of the Council 'to review the possibility of an inland port at the strategic rail junction of Cork, Limerick and Waterford railway routes at Cherryville junction in Kildare Town'. It is important to note that development at Cherryville Junction does not form part of the development strategy for Kildare Town as it is located outside of the development boundary. However, given that Kildare Town is the closest urban settlement the Draft Plan supports the development subject to the feasibility of Cherryville Junction as a transport hub and distribution centre being examined across a wide range of evidence-based assessments, to ensure proper planning and sustainable development occurs. However, to alleviate concerns raised by the TII it is considered prudent to amend Objective EDO 1.10 to include reference to the protection of the carrying capacity of the national road network and associated junctions and that the feasibility assessment should be carried out in consultation with the TII.

The comments in relation to PERM 40 (new pedestrian / cycle bridge over the M7 to the INS<sup>4</sup>), Cycle 55 (M7 crossing from Cherry Avenue Park to the INS) and Cycle 56 (Tully Road M7 Crossing) are noted. Objective MTO 1.1 refers to implementation of the walking and cycling measures 'in conjunction with the National Transport Authority, other relevant statutory agencies and relevant stakeholders. In the interest of clarify reference will also be made to Transport Infrastructure Ireland.

### **Chief Executive's Recommendation**

#### **Proposed Material Alterations**

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

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

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<sup>4</sup> Irish National Stud (INS)

### **Proposed Material Alterations**

Chapter 7 Movement and Transportation, amend Objective MTO 1.1 as follows:

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

### **Department of Transport (Ref. No. KCC-C127-62)**

#### **Issues Raised**

This submission from the Department of Transport notes that since the previous plan was published there have been important policy developments which are relevant that should be referred to in the Draft Plan namely in the Section 6.5.1.4 'Open Space', Section 7.1.3 'Sustainable Movement and Accessibility', along with Section 7 'Public Transport'.

The submission notes the "whole of Government" National Disability Inclusion Strategy (NDIS) 2017-2022 includes specific actions assigned to local authorities such as action 108 relates to the 'dishing' of footpaths and action 109 relates to accessible infrastructure, including bus stops.

The submission references that work has commenced on the development of a United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) implementation strategy and notes Section 7.1.3 of the Draft Plan. The submission states that the UNCRPD puts obligations on State Parties to ensure access for persons with disabilities to the physical environment and transportation in both urban and rural areas.

The submission states that 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.

The submission states that making public transport fully accessible to people with disabilities requires a 'whole journey approach' from its starting point to destination. It is submitted that Local Authorities are a key stakeholder by ensuring a universal design approach to the built environment with attention needing to be paid to footpaths, tactile paving, cycle lanes, roads, pedestrian crossing points, town greenways

and bus stops/shelters.

Reference is also made to the Connecting Ireland Rural Mobility Plan (2022-2025), a major public transport initiative with the aim of increasing public transport connectivity, particularly for people living outside the major cities and towns. In which over 100 rural villages will benefit from frequent public transport service (at least three return trips daily) for the first time. The plan will also see a 25% overall increase in rural bus services, and over 60 new connections to regional cities from surrounding areas.

### **Chief Executive's Response**

The comments made in the submission from the Department of Transport are noted. In the context of the publication of new policy, it is important to note that Section 1.2. of the Draft Plan states that the policies and objectives included in the Plan are specific to the future development of the town of Kildare Town and the Draft Plan does not replicate policies and objectives that are already addressed within the Kildare County Development Plan 2023-2029 as this is the higher-level planning policy document. Furthermore, Section 1.2. of the Draft Plan states that it is essential that both the CDP and the LAP are read in tandem. In this regard Objective TM O3 of the CDP states that the application of universal design principles in all new transport infrastructure shall be in accordance with the National Disability Inclusion Strategy.

Furthermore, Objective TM O10, Objective TM O12 and Section 5.2.10 refers to facilitating the implementation of the NTA's 'Connecting Ireland - Rural Mobility Plan'.

Section 7.1.3 of the Draft Plan refers to universal accessibility for all members of community and therefore the local authority's obligation to ensure access for persons with disabilities to the physical environment and transportation is recognised, in accordance with the United Nations Convention on the Rights of Persons with Disabilities (UNCPRD). Similarly, the 'whole journey approach' is also acknowledged in this section of the Draft Plan.

The Department's comment in relation to the DMURS Interim Advice Note – Covid-19 Pandemic Response is noted. However, DMURS has a number of Advice Notes, one which has been updated in 2022. Therefore, it is not agreed that reference to DMURS should be replaced with references to the 2020 DMURS Interim Advice Note – Covid-19 Pandemic Response only.

### **Chief Executive's Recommendation**

No change recommended.

**Department of Education (Ref. No. KCC-C127-63)**

**Issues Raised**

The Department of Education note the population growth during the lifetime of the Plan and the estimated population growth arising from the estimated population methodology (Section 3.1.2. refers) and how it differs from what was included in CDP in terms of population growth. In this regard the Department notes that there are four schools within Kildare Town and its preference would be to expand these existing facilities (if possible) should there be a requirement for additional school places as a result of the planned population increases. In this regard the Department requests the Planning Authority to examine the potential of protecting a land buffer around each of the three primary schools (St. Brigid's, Gaelscoil Mhic Aodha, Educate Together) to enable them to expand further if required to meet the future population growth.

The Department notes that the SIA concludes that 11 additional classrooms are required over the Plan period, however even with the updated population provided in the Draft Plan the Department is still of the opinion that the additional requirement may be met by the expansion of existing facilities.

The Department notes the Draft Plan states that a significant proportion of residential units north of the rail line fall outside a 10-minute walking distance of existing primary schools and therefore the Draft Plan identifies an additional primary school off the Southgreen Road. In this regard, the submission states they are not opposed to this site identification, however, would like it noted that the requirement for use of this site may possibly arise beyond the lifetime of this plan (6 years).

The submission from the Department of Education notes and supports reference to the new post-primary school which will replace and expand the Curragh Post-Primary school within the Former Magee Barracks site. The Department also notes and supports objectives in the Draft Plan such as HCO 3.1, HCO 3.4, HCO 3.5, MTO 1.1, MTO 1.10, and MTO 4.6. They also note the contents of the Social Infrastructure Audit.

The Department of Education highlight in the context of assessing current and future capacity, that they are mindful of potential unforeseen circumstances such as the Ukrainian crisis, which have the ability to put unforeseen pressure on school place provision in particular areas which could necessitate reassessments of school place provision from time to time. The Department outlines that they will engage with the Council where the findings of an assessment require a review of existing or future school site provision within a specific location. Similarly, the Department will consult with the Council if and when additional Special Education Needs accommodation is required within specific locations.

**Chief Executive's Response**

The comments and details set out in the submission from the Department of Education are noted. The Council accept that the site identified off the Southgreen Road for potential future primary school may be a requirement beyond the lifetime of the Draft Plan, however, in preparing the Draft Plan for Kildare Town it was considered prudent, in the interests of proper planning and sustainable development, to plan for and

safeguard the future education needs of the town beyond the lifetime of the plan.

With regards to the Department's request to examine the potential of protecting a land buffer around each of the three primary schools this was considered during the preparation of the Draft Plan. St Brigid's Primary School is currently divided across three sites and the land use zoning reflects the education land use across the three sites. Given the town centre location of the school sites no additional land was available for future expansion and therefore reconfiguration of the existing sites is deemed most appropriate for future expansion. With respect to the two primary schools on the Former Magee Barracks site the undeveloped land adjoining the school is zoned T: Mixed Use where a school is 'Permitted in Principle'. This will allow for greater flexibility in the provision of educational land uses within an overall mixed-use development. Furthermore, the Former Magee Barracks Design Framework (Figure 11-2, refers) indicated the location of the post-primary school lands adjacent to the Educate Together Primary School and Gaelscoil Mhic Aodha.

**Chief Executive's Recommendation**

No change recommended.

**Department of Housing, Local Government and Heritage Ref. No. KCC-C127-95)**

**Issues Raised**

The Department broadly concurs with the objectives BHO 4.1 to BHO 4.5 for the protection of the archaeological heritage resource. The Department notes the definition of archaeological heritage in section 8.5 and states that the following part is not clear: '*...and are located to the south of the motorway within the Plan boundary.*' References to the 'Department of Culture, Heritage and the Gaeltacht' should be amended to 'Department of Housing, Local Government and Heritage'.

The submission strongly recommends that the LAP cross-reference the Kildare County Development Plan 2023 – 2029 which includes detail on current national policy for the protection of archaeological heritage. Recommends that an explanatory statement be included in the opening section on archaeological heritage (an explanatory statement to assist is included).

The submission includes a suite of suggested policies and objectives that could be included in the Plan in relation to protecting archaeological heritage, to ensuring provision is made in the planning process to ensure preservation (and possible presentation) in-situ, preservation of above-ground urban medieval and early modern structures, historic graveyards, incorporation of monuments into designated open/public amenity spaces, development control objectives (including for the Former Magee Barracks), conditions of planning permission and climate change. An objective is recommended in relation to the incorporation of monuments into designated open spaces and public amenity spaces provided this is done in a manner compatible with the protection and proper management and conservation of the monument in question.

The Department recommends that the titles provided on Maps 8.1 and 8.2 be amended to reference 'Archaeological & Built Heritage'.



Welcomes where possible in future development plans the insertion of the policies and objectives of Heritage Ireland 2030, the Climate Change Sectoral Adaptation Plan for the Built and Archaeological Heritage (published in 2019), the Built Vernacular Strategy (published in 2021) and the National Policy on Architecture (2022).

Notes the research into the symbiotic relationship between cultural heritage and the biodiversity provides opportunities to build capacity as per the National Biodiversity plan 2017–2021 actions and to focus not just on protection but also on the conservation/restoration of diminishing or under threat cultural assets i.e. the archaeological and built heritage of the county. The Department welcomes the opportunity for making cultural heritage more accessible and better integrated with wider tourism and recreational opportunities of the county.

### **Chief Executive's Response**

The typographical error in Section 8.5 is acknowledged and it is agreed that this be omitted. All references to the Department in Section 8 of the Draft Plan will be updated to correctly refer to the Department of Housing, Local Government and Heritage, noting that Departmental changes occur frequently during the lifetime of a CDP/LAP.

Section 1.2 of the Draft Plan states that it is essential that both the County Development Plan (CDP) and the Local Area Plan (the Plan) are read in tandem. The Draft Plan includes policies and objectives that are specific to Kildare Town and does not replicate the overarching policies and objectives that are already addressed within the CDP to avoid excessive duplication of policy.

Section 11.1 and 11.2 of the CDP includes explanatory statements of archaeological heritage, and therefore it is not considered necessary to replicate similar statements in the Draft Plan. In relation to the extensive list of suggested objectives regarding archaeology, it is considered that these are adequately addressed by the CDP, as the overarching policy document, by the following policies, objectives and action: AH P2, AH A2, AH A3, AH A4, AH A6, AH, AH O2-21 inclusive, LR O4, LR O69, LR A2, SC 98 and AS C24.

In relation to the Former Magee Barracks site, it is noted that this area is not located within the Zone of Archaeological Potential as replicated in Map 8.1 of the Draft Plan. It is stated in Section 11.6 of the CDP that any proposed development (due to its location, size or nature) with the potential to affect the archaeological heritage resource will be subject to an Archaeological Impact Assessment, which includes proposals close to archaeological monuments, proposals extensive in area (half a hectare or more) or length (1 km or more). Furthermore, Condition No. 15 of the Strategic Housing Development planning permission granted by An Bord Pleanála on the Former Magee Barracks site requires archaeological monitoring and preservation of archaeological material within the site.

In relation to the appropriate incorporation of monuments into public parks, it is agreed that a new objective should be included in this regard, for example to facilitate any proposals which may be forthcoming to develop parks around the Grey or Black Abbey Friary ruins, St. Brigid's Cathedral and Round Tower for example.

In relation to the references to Map 8.1 and Map 8.2 provided in Section 8.5.1 of the written statement, the titles of the maps match the chapter titles throughout the Draft Plan. However, in the interests of clarity it is considered appropriate to reference the chapter and associated maps as 'Built Heritage and Archaeology'. In relation to the list of policy documents, it not considered appropriate to duplicate references that are already made in the CDP.

Conservation Plans have been prepared for the Curragh and for the Kildare Town Walls. Section 11.9 of the Kildare County Development Plan 2023-2029 states that in considering development proposals, the Council will have regard to any existing and forthcoming conservation plans prepared as part of the County Kildare Heritage Plan 2019-2025. The Draft Plan also includes objectives BHO 1.1 to BHO 1.4 which addresses the conservation and restoration of protected structures and structures of historic significance, (or parts of structures) including the curtilage and attendant grounds of structures or any additional structure placed on the Record of Protected Structures.

### **Chief Executive's Recommendation**

#### **Proposed Material Alteration**

Chapter 8 Built Heritage, amend the second sentence of Section 8.5., as follows:

Archaeological heritage consists of such material remains (whether in the form of sites and monuments or artefacts in the sense of moveable objects) and environmental evidence ~~and are located to the south of the motorway within the Plan boundary.~~

#### **Proposed Material Alteration**

Chapter 8 Built Heritage, Section 8.5.2. Zone of Archaeological Potential, amend the citations of the Department of Housing, Local Government and Heritage, as follows:

~~Department of Culture, Heritage and the Gaeltacht~~ *Department of Housing, Local Government and Heritage.*

#### **Proposed Material Alteration**

Chapter 8 Built Heritage, Section 8.2. insert new objective after BHO 1.4:

*Support the sensitive incorporation of public amenity and open spaces around monuments, in a manner compatible with the protection and proper management and conservation of the monument, subject to an appropriate management and conservation plan to be prepared by the relevant landowner or stakeholder.*

**Proposed Material Alteration**

Chapter 8 Built Heritage, amend chapter title to, Built Heritage and Archaeology and all consequential amendments throughout the Draft Plan, including titles of Map 8.1 and Map 8.2 as follows:

8. Built Heritage *and Archaeology*  
Built Heritage *and Archaeology*

**Proposed Material Alteration**

Chapter 8 Built Heritage, amend Objective BHO 4.2 of the Archaeological Heritage Objectives as follows:

**BHO 4.2** Prioritise the protection/preservation in situ (or upon agreement preservation by record) of items of archaeological interest as listed in Table 8-5 and shown on Map 8.1 and Map 8.2 Built Heritage *and Archaeology* from inappropriate development that would adversely affect and/or detract from the interpretation and setting of these sites.

**Meath County Council (Ref. No. KCC-C127-97)**

**Issues Raised**

Meath County Council in their submission would like to commend the approach taken in formulating the Draft Plan. In particular the comprehensive suite of data-based documents which have informed the overall vision. Meath County Council have no further comments at this stage of the process.

**Chief Executive's Response**

The contents of the submission are noted.

**Chief Executive's Recommendation**

No change recommended.

**National Transport Authority (NTA) (Ref. No. KCC-C127-105)**

**Issues Raised**

**1. Land Use Zones – Residential Development**

The submission references residential zoned land at Grey Abbey to the south of the M7 and notes the Settlement Capacity Audit referred to the site as 'No Development', which are sites which didn't pass a pre-determined threshold demonstrating a poor level of serviceability and couldn't be classified as Tier or Tier 2 lands. Reference is also made to the NPF where sites which are not Tiered should not be zoned. The NTA states that clarity should be provided, however they do note there is an existing planning permission at this location.

The NTA from a transport perspective relating to the Greyabbey site, state the Draft Plan offers no committed measures that would ensure that the site could be served by sustainable transport and how connectivity to other key destinations in the town by such modes will be ensured.

In relation to the Greyabbey Site the NTA make the following two recommendations:

- In the interests of clarity, an explanation should be provided in the Plan as to why these lands are zoned and yet also identified as within the 'No Development' category in the Settlement Capacity Audit.
- The plan should clearly set out the proposed transport networks and access arrangements to serve the Grey Abbey residential area, with an emphasis on sustainable modes.

## **2. Economic Development**

### **Objective EDO 1.5**

The NTA note the area of land zoned 'Employment and Enterprise' to the north of the M7 and west of the Kildare Village Outlet and Objective EDO 1.5 which support the development of the lands. The NTA state that while they do not object in principle to the zoning, they note by virtue of its scale, location and the potential nature of development it appears that the development of these lands could lead to a significant amount of car-based commuting, if not properly planned for in tandem with supporting sustainable transport networks.

They also state the Draft Plan does not specifically address this future development area in terms of clearly defining access arrangements and networks that would facilitate the demand generated by development in a sustainable manner. It is stated that the permeability measures, cycle measures and public transport measures that are mapped in the Draft Plan offer no or little detail to how these areas will be serviced. Furthermore, the submission states that Map 7.4 'Roads' includes for a 'Modus Link Road' to serve these lands however this has not been included as a pedestrian and cycling link. The NTA note that Development, in terms of layout, scale and density, in this area should be contingent on the provision of sustainable transport networks and should be designed to ensure accessibility and permeability by walking, cycling and public transport.

### **Objective EDO 1.6**

In relation to the Industrial and Warehousing zoning to the south of the motorway at Greyabbey the NTA is concerned given the proximity to the M7 and removed from the town centre that the Draft Plan does not specifically consider the potential impact on the national road network, access arrangements or the future transport networks that would facilitate the serving of demand generated by development at this location in a sustainable manner. The NTA state that access to the lands concerned should be developed in accordance with the principles included in Section 2.5 of the DoECLG Spatial Planning and National Roads Guidelines.

### **Objective EDO 1.10**

The NTA note the objective which relates to examining the feasibility of Cherryville Junction. The NTA reference Section 15.4 'Planning Policy and the Location and Management of Freight Intensive Development' of the Transport Strategy which states that 'the potential for the use of rail and associated inter modality with road-based freight movement will be examined as part of the Transport Strategy's implementation'. The NTA take the view that the development of a transport hub and distribution centre or 'inland port' are strategic in nature and should be taken in the context of the wider transport networks. The submission states that the NTA recommends that any such feasibility study should be carried out in collaboration with key relevant stakeholders including the NTA, TII and Irish Rail. In this regard they recommend this is reflected in EDO 1.10.

In relation to Economic Development the NTA make the following recommendations:

- Clearly set out the proposed transport networks and access arrangements to serve the Employment and Enterprise zoned lands to the west of the Kildare Village with an emphasis on sustainable modes and avoiding car dependency. The area should be contingent on the provision of sustainable transport networks and should be designed to ensure accessibility and permeability by walking and cycling.
- The Industry and Warehousing lands and Employment and Enterprise zoned lands should be developed in accordance with the principles included in Section 2.5 of the National Roads Guidelines, and the Plan should clearly set out the proposed transport networks to serve this area.
- Amend Objective EDO 1.10 as follows: 'Support the examination of the feasibility of Cherryville Junction and Kildare Town to become a transport hub and distribution centre, by maximising its strategic location at the intersection of key national roads and rail networks, in collaboration with key relevant stakeholders including the NTA, TII and Irish Rail.'

### **3. Movement and Transportation**

The NTA notes the policy context has changed since the Kildare Town Transport Strategy was prepared, particularly, the 2016-2035 Transport Strategy has since been superseded by the Greater Dublin Area Transport Strategy 2022-2042 on 23rd January 2023, which includes an updated GDA Cycle Network Plan. The other policy changes referred to are the National Investment Framework for Transport in Ireland (NIFTI) and the National Sustainable Mobility Policy.

In relation to the new Policy Context the NTA make the following three recommendations:

- The National Investment Framework for Transport in Ireland (NIFTI) and the National Sustainable Mobility Policy should be referenced in the Draft Plan.
- An overarching Objective should be included in the Movement and Transportation Chapter to prioritise walking, cycling and public transport associated with the town by applying the modal and intervention hierarchies set out in NIFTI.
- The Movement and Transportation section of the Draft LAP should make specific reference to the current Transport Strategy and GDA Cycle Network Plan and demonstrate that regard to these has been taken.

#### **4. Achieving a Modal Shift**

The submission notes that the Draft Plan references the modal shift targets in the CDP. However, the NTA consider that the Plan should include sustainable transport indicators, including mode share, for the purpose of monitoring the effectiveness of policies and development objectives and to demonstrate how Kildare Town can contribute towards the county wide targets in the CDP.

In relation to Achieving a Modal Shift the NTA make the following recommendation:

- Consideration should be given at the LAP level for the inclusion of sustainable transport indicators, including mode share, for the purpose of monitoring the effectiveness of policies and development objectives.

#### **5. Walking and Cycling**

The NTA note that a Cycle Network Map has not been published as part of the Draft LAP and the NTA is of the view that, the formal inclusion of a Cycle Network Map, by virtue of its statutory nature, would be a of great benefit to future investments in this mode and illustrate how the proposed measures contribute towards the provision of a coherent network.

In relation to walking and Cycling the NTA make the following recommendation:

- Include a comprehensive Cycle Network Map setting out the primary, secondary and greenway network along with the key infrastructural interventions required.

#### **6. Public Transport**

##### **Provision of Public Transport Services in Rural Areas**

The submission states the NTA provides rural transport services through the Local Link Rural Transport Programme, currently with services linking Kildare Town with Rathangan, Newbridge, Naas and Athy. The NTA intend to develop and expand this service to seek further integration with other public transport such as HSE and school transport, ensure fully accessible vehicles operate, enhance customer experience, increase patronage among children and young people and encourage innovation in the service.

In relation to rural transport the NTA make the following recommendation:

- The Draft Plan should acknowledge the role rural transport services can perform in providing for social and economic connectivity between small villages/rural areas and larger towns and that an objective is included in the plan to support the role of rural transport services within the town in particular through the provision of bus stops.

#### **7. Facilitating Bus Services**

The NTA note the Draft Plan includes the extension of bus services. In this regard the NTA state that alterations to bus services or the provision of new services is outside of the control of Kildare County Council and is within the remit of the NTA through either the procurement or the licensing processes. It is recommended that proposals for the extension of services are removed from the Draft Plan and that the measures and objectives are reworded to focus on the provision of bus infrastructure, which would facilitate and support the extension and

increase of service provision.

In relation to facilitating bus services the NTA make the following two recommendations:

- Recommend that proposals for the extension of services (PT1, PT2, PT4, MTO 2.1) are removed and that the measures and objectives are reworded to focus on the provision of bus infrastructure, and which would facilitate and support the extension and increase of service provision.
- The NTA recommend the inclusion of an objective as follows: 'Work with the owners of Kildare Tourist Outlet Village, the NTA and bus operators to improve bus services provision associated with the Village and to upgrade and provide the necessary bus infrastructure (i.e. bus stops, layover, turning areas) to support this.'

### **8. Roads and Streets Measures**

The NTA makes one recommendation in respect of the Roads and Street Section of the Draft Plan as follows:

- Include an overarching Objective in relation to the provision of roads that reflects the Objectives of the Kildare Town Transport Strategy and the principles of the Transport Strategy for example 'Roads measures should focus on reducing unnecessary vehicular trips through the town centre, to facilitate infrastructure improvements for active modes and safety.'

### **9. Parking**

The NTA note the Draft Plan states that 'good parking management can help free up valuable public space, make towns more attractive, support the local economy, reduce traffic congestion, and improve road safety and air pollution', and is supportive of this rationale particularly in the town centre. However, the NTA state the measures in the Draft Plan do not address this potential. Contrary measures PK2, PK3, PK4 and Objectives MTO 4.5 and MTO 4.5 relate to the re-location of car parking and/or the creation of new or upgraded car parking. The NTA consider that the need to 'relocate' car parking from Main Street (Measure PK2) should be reviewed and consideration should be given to 'removal' rather than 're-location'.

The NTA also recommend the development of a Parking Management Strategy, that would give further consideration to the quantum and cost of parking within the town in the longer term, is included as a measure within the Draft Plan.

The NTA make two recommendations in respect of Parking, as follows:

- Consideration should be given to the 'removal' rather than the 'relocation' of car parking on Main Street (Measure PK 2).
- Objective 4.4 should be amended to state the following: 'Review the car parking measures as identified in the Kildare Town Transport Strategy and prepare a Parking Management Strategy for Kildare Town that considers the quantum, location and cost of car parking (on and off street).'

## **Chief Executive's Response**

### **1. Land Use Zones – Residential Development**

The contents of the submission from NTA are noted.

Having regard to the lands zoned at Grey Abbey for New Residential development, the Draft Plan has been prepared in the context of a land use zoning surplus, which presented a unique challenge in the preparation of the Draft Plan (Section 1.5., refers). The OPR in their submission (Section 3.0, refers) also recognises the impact the historical legacy zonings and extant permissions for residential development had on the preparation of the Draft Plan. While, the Grey Abbey lands did not perform favourably in the Settlement Capacity Audit, the subject lands have planning permission for 207 units and construction has commenced on site. Therefore, the units will contribute to the housing unit allocation for the town throughout the lifetime of the plan and therefore, must be considered and included in the overall development strategy for Kildare Town. However, in the interests of clarity additional text is considered necessary under Section 3.5.1. A Tiered Approach to Land Zoning.

As regards the provision of a transport network and access arrangements to serve the Grey Abbey residential area it is proposed to include an additional permeability measure under Table 7-1 and Map 7.1 to provide for an active travel link from the roundabout at Grey Abbey Road linking the subject lands back to the town centre. Furthermore, an indicative location for a bus stop south of the motorway will be included on Map 7.3 Public Transport Measures. This point was also raised as an Observation in the submission received from the OPR (Section 3.0, refers) and the proposed changes have been detailed under the Chief Executive's Recommendation in response to the OPR.

### **2. Economic Development**

#### **Objective EDO 1.5**

The NTA comments in relation to the lands to the south of the M7 and West of the KTOV zoned for Employment and Enterprise are noted. In respect of the point regarding there being no pedestrian and cycling infrastructure relating to the 'Modus Link Road', Map 7.1 and Table 7-1 includes PERM 35 which provides for a road scheme (Modus Link Road) with footpaths. Similarly, Map 7.2 and Table 7-2 includes Cycle Measure 31 which includes a cycle track/cycle lane as part of a road scheme. Indeed, Objective EDO 1.5 references the development of the subject lands would be supported by the connectivity links detailed on these maps. However, to ensure orderly development of the site additional text will be added to Objective EDO 1.5 to ensure that sustainable transport is considered as part of a detailed design brief for the site.

#### **Objective EDO 1.6**

In relation to the Industry and Warehousing zoning south of the motorway and the concerns raised in relation to the development of these lands, the proposed active travel measures and the additional bus stop as detailed in response to the residential zoning at this location will facilitate improved integration of transportation and land use south of the motorway. The Draft Plan under, Objective MTO 3.1 specifically refers to safeguarding the carrying capacity in accordance with the Spatial Planning and National Road Guidelines. Furthermore, the CDP under Objective TM 062 states the Council will protect the strategic function of national roads in line with the Spatial Planning and National Road Guidelines (2012). Section 1.2. of the Draft Plan states the plan includes policies and objectives that are specific to the future



development of the town of Kildare and does not replicate policies and objectives that are already addressed within the Kildare County Development Plan 2023-2029 as this is the higher-level planning policy document.

### **Objective EDO 1.10**

In relation to Objective EDO 1.10 this relates to a higher-level plan objective of the Kildare County Development Plan 2023-2029 (RE 044, refers) which states that it is an objective of the Council 'to review the possibility of an inland port at the strategic rail junction of Cork, Limerick and Waterford railway routes at Cherryville junction in Kildare Town'. It is important to note that development at Cherryville Junction does not form part of the development strategy for Kildare Town as it is located outside of the development boundary. However, given that Kildare Town is the closest urban settlement the Draft Plan supports the development subject to the feasibility of Cherryville Junction as a transport hub and distribution centre being examined across a wide range of evidence-based assessments, to ensure proper planning and sustainable development occurs. However, to alleviate concerns raised by the NTA it is considered prudent to amend Objective EDO 1.10 to include reference that the feasibility study should be carried out in collaboration with key relevant stakeholders including the NTA, TII and Irish Rail and that the carrying capacity of the national road network and associated junctions should be protected.

### **3. Movement and Transportation**

The comments in relation to the national policy context are noted. It is important to note that Section 1.2. of the Draft Plan states that the Draft Plan includes policies and objectives that are specific to the future development of the town of Kildare and does not replicate policies and objectives that are already addressed within the Kildare County Development Plan 2023-2029 as this is the higher-level planning policy document. Furthermore, Section 1.2, states that it is essential that both the CDP and the LAP are read in tandem. In this regard, Section 5.2.5 of the CDP refers to the National Sustainable Mobility Policy (2022) and Section 5.2.8 to the Draft Transport Strategy for the Greater Dublin Area, 2022-2042. Given the national high-level strategic context of the National Investment Framework for Transport in Ireland (NIFTI) reference at local level is not considered warranted, the CDP is aligned with the National Planning Framework (NPF) and supports the delivery of the ten National Strategic Outcomes (NSOs).

### **4. Achieving a Modal Shift**

The comments in relation to the inclusion of sustainable transport indicators are noted. As part of the Implementation and Monitoring Framework included in the CDP car-based trips to work and education will be monitored (TM T1, refers). This is an on-going monitoring measure across the county and its settlements, across the 5-year interval with the Census. Both the Census and POWSCAR data will provide accurate information on progress to achieving modal shift at county and settlement level. The CDP did not set specific targets at settlement level and at such it is not considered warranted at local area plan level. However, the Kildare Town Transport Strategy did note (Section 14.3, refers) in light of the current levels of car dependency in Kildare Town and the level of intervention proposed, it would be appropriate to set challenging modal split targets of a -10% reduction in private motor vehicle use for work trips and a -5% reduction in private motor vehicle use for education trips by Census 2036. Additional text shall be added to Section 7.1.2 in this regard.

### **5. Walking and Cycling**

The request to include the comprehensive Cycle Network Map is noted. The Greater Dublin Area Cycle Network Plan formed part of the regional policy context of the Kildare Town Transport Strategy and was reproduced under Figure 2.1 of the Strategy. Furthermore, one of the strategic objectives in relation to cycling for the town was to provide for an integrated cycle network in accordance with the Cycle Network Plan and the Strategy. The cycling measures were developed having regard to inter alia, the Cycle Network Plan. Therefore, the Map has already been considered in the preparation of the Draft Plan.

### **6. Provision of Public Transport Services in Rural Areas**

The comments in relation to the provision of public transport services in rural areas are noted. The CDP focuses on supporting improvements to intra-county public transport services (Section 5.4.2., refers). In particular, Objective TM O43 of the CDP supports the implementation of the Local Link Rural Transport Programme Strategic Plan (2018-2022). Therefore, the role of the rural transport network has been acknowledged at this higher-level plan. In respect of including an objective in the Draft Plan to support the role of rural transport services within the town in particular the provision of bus stops, this is noted and accepted.

### **7. Facilitating Bus Services**

The comments in relation to the removal of references to the extension of bus services is noted. The Council will work with the NTA in the progression of public transport measures in Kildare Town.

The inclusion of an objective to work with the owners of the Kildare Tourist Outlet Village is noted and accepted.

### **8. Roads and Streets Measures**

The comments in relation to an objective relating to roads measures focusing on reducing unnecessary trips is noted. However, Section 7.5. of the Draft Plan states that 'one of the principle aims of the Kildare Transport Strategy is to reduce car dependency through improvements to public transport services and walking/cycling facilities. The measures included in the Draft Plan under Table 7-1, Table 7-2, and Table 7-3 aim to make improvements in active travel and public transport across the plan area in order to reduce vehicular trips where possible.

### **9. Parking**

The comments in relation to parking measures are noted. The Parking Strategy as provided in the Draft Plan was devised from the Kildare Town Transport Strategy which underwent extensive consultation with members of the public and key stakeholders. In the context of Kildare Town, the measures proposed are considered those most suitable.

### **Chief Executive's Recommendation**

#### **Proposed Material Alteration**

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

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

**EDO 1.6** Facilitate the development of Industry and Warehousing on the lands south of the motorway at Grey Abbey Road for manufacturing, warehousing, distribution, logistics and other uses associated with the transport industry. *Any development proposal shall have regard to the Spatial Planning and National Road Guidelines (or any subsequent Guidelines) and also be subject to a Traffic and Transport Assessment to ensure there are no negative impact on the local and national road network.*  
~~subject to the protection of the carrying capacity of the national road network and a Traffic and Transport Assessment.~~

#### **Proposed Material Alteration**

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

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

#### **Proposed Material Alteration**

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

The measures proposed in this Plan (as detailed in the following Sections) in respect of improving infrastructure for active travel and public transport will endeavour to move towards achieving the targets set out in the County Plan to reduce car journey and increase trips by walking,

cycling, bus and train. *It is considered that a -10% reduction in private motor vehicle use for work trips and a -5% reduction in private motor vehicle use for education trips by Census 2036<sup>5</sup>, would be challenging modal shift targets for Kildare Town. If these modal split targets are achieved, then car dependency for work trips would reduce to 64.1% and education trips car dependency would fall to less than half of trips at 49.4%.*

#### **Proposed Material Alteration**

Chapter 7 Movement and Transportation, insert new objective MTO 2.2 (re-number subsequent objectives), as follows:

**MTO 2.2** *Liaise with the National Transport Authority (NTA), the owners of Kildare Tourist Outlet Village and bus operators to support and facilitate the improvement of bus services provision including the upgrading of existing infrastructure and the provision of the necessary supporting bus infrastructure (bus stops, lay over, turning areas) within the Kildare Tourist Outlet Village.*

#### **Proposed Material Alteration**

Chapter 7 Movement and Transportation, amend Objective MTO 2.4, (and subsequent re-numbering) as follows:

**MTO 2.4** Work with the **National Transport Authority (NTA)** to *support and* pursue the delivery of the following:

- a) Improvements to the quality and coverage of the bus stops and achieve more frequent bus services in Kildare Town.
- b) *Rural Transport Services and associated bus stops within the town.*
- c) Achieve Leap Card integration at Kildare Train Station.
- d) Extension of the Phoenix Park tunnels rail services to Kildare Town.

Note: See Recommendations in response to the OPR submission also.

### **Department of the Environment, Climate and Communications (Ref. No. KCC-C127-106)**

#### **Issues Raised**

The Department state that they will drive the climate agenda by engaging with local authorities to build resilience in citizens, communities, and business to overcome climate adaptation challenges, maximising climate mitigation and adaptation opportunities and facilitating the transition to a truly Circular Economy. In this regard they ask the Council to take the following into regard when drafting the final Plan.

#### **Climate Action**

The Department welcomes the acknowledgement that the Draft Plan presents an opportunity to initiate the necessary transition to a low

<sup>5</sup> If the strategy is implemented as planned, most measures will be in place by Census 2036.

carbon and sustainable model of development (Section 3.8 Future Development Priorities). It is submitted that reference to the Climate Action Plan 2021 in Section 2.1.1 should be amended to reference CAP 2023. CAP 2023 commits the Government to reducing transport emissions by 50% from 2018 emissions rates. The Department note and support the promotion of active travel and the provision of public transport in the Draft Plan and consider that Climate Action has been given a priority in the Draft Plan.

### **District Heating**

The Department notes and supports the objective to facilitate compact growth in the Draft Plan which provides an opportunity to develop and roll-out district heating networks in an efficient and planned manner. Reference is made in the submission to Objective IO 4.4 which promote the use of renewable energy technologies, however it is submitted that an opportunity exists to more explicitly support the roll-out of district heating in individual areas or developments. In this regard the Department highlight policy objectives in the NPF, the RSES and the CDP which support heat mapping and district heating. In this regard the Department encourages KCC to examine the potential of district heating including district heating derived from waste heat, where available, technically feasible and cost effective, and commit to carrying out a feasibility exercise and the use of heat mapping in support of same in the draft policies. As such, more explicit policies in support of same are encouraged in the final Plan for Kildare Town.

### **Built Environment and Heating**

The Department note Objective EC O39 in the CDP. However, it requests the Council to consider the development of the electrification of heating and the Department encourages further consideration with regard to the energy efficiency of existing residential buildings, having regard to the CAP 2023 and Kildare County Development Plan 2023-2029. As such, explicit policies in support of same are encouraged.

### **Renewable Energy**

The submission noted the inclusion of Objective IO 4.4 which promotes and encourages renewable energy technologies particularly micro generation. The Department also notes Policy EC P10 in the CDP. However, they suggest that the Draft Plan further elaborate on the role of domestic scale renewables within the Kildare Town, in particular, the role of self-consumers and appropriately scaled renewable developments/projects, in line with the CAP 2023 and the CDP policy. The Department also encourage the Council to consider how renewables can be integrated with other land uses within the urban area (such as solar and car parking areas) and promote same.

### **Waste**

The Department note that the Council should consult with the Regional Waste Management Planning Office regarding development of the final plan. They also state that the CAP 2023 actions relating to waste include the implementation of the Waste Action Plan for a Circular Economy (WAP). They note an objective in the CDP to encourage a just transition from a waste economy to a green circular economy in accordance with the WAP (IN O39) and encourage references to the principles of the circular economy throughout the Draft Plan.

The Department also bring to the Council's attention the guidance titled, "Best practice guidelines for the preparation of resource and waste management plans for construction and demolition projects' and suggest the Council consider how such guidance could be incorporated into

the policies of the Draft Plan to give effect to them through the planning system.

### **Geological Survey Ireland**

The submission from the Department of Environment, Climate and Communications also includes a letter from Geological Survey Ireland (GSI). The submission recommends that the data sets available on their website should be used for EIAR, SEA, planning and scoping process and should be attributed correctly to GSI.

They state they are pleased to see use of their Bedrock, Geological Heritage Sites, Groundwater Vulnerability, Groundwater Source Protection Areas, Groundwater Wells and Springs and Groundwater Flooding maps and datasets within the draft SEA Report and the Strategic Flood Risk Assessment Report.

### **Chief Executive's Response**

The comments in the submission are noted. It is considered that Section 2.1.1 of the Draft Plan should be updated to reflect the Climate Action Plan 2023.

One of the key principles of the draft Plan is achieving a high-quality low carbon environment, and this permeates the objectives of the plan which aim to achieve compact growth and prevent urban sprawl.

It is important to note that the Development Plan Guidelines (2022) provide guidance on drafting objectives for land use plans and state that objectives should not address matters that are the subject of other legislative provisions. Furthermore, Section 1.2. of the Draft Plan states that policies and objectives in the Draft Plan are specific to the future development of the town of Kildare and will not replicate policies and objectives that are already addressed within the Kildare County Development Plan 2023-2029 as this is the higher-level planning policy document providing for overarching policies and objectives that are applicable county-wide. Section 1.2. also states that it is essential that both the CDP and the Kildare Town Plan are read in tandem. Therefore, it is considered that there are sufficient objectives in the CDP in respect of district heating, the electrification of heating, renewables, the circular economy and waste management that are applicable across all settlements in the county, including Kildare Town.

### **Chief Executive's Recommendation**

#### **Proposed Material Alteration**

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

The Climate Action Plan [2024-2023 \(CAP 2023\)](#) *is the first to be prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021 and sets out how Ireland can accelerate the actions that are required to respond to the climate crisis. The sectoral emissions ceilings (SECs) agreed in July 2022 put in place targets for each sector to achieve, as part of the CAP 2023 progress reports will*

*be published each quarter. The six high impact sectors are powering renewable, building better, transforming how we travel, making family farms more sustainable, greening business and enterprise and changing our land use.* ~~which followed on from the 2021 Act sets a roadmap for sectoral actions for decarbonisation. These actions and policy frameworks set out how Ireland will achieve its international and European commitments relating to reductions in greenhouse gas emissions. Every sector must adapt rapidly, and some sectors will be more impacted than others.~~

#### **Electricity Supply Board (ESB) (Ref. No. KCC-C127-109)**

##### **Issues Raised**

The ESB note Section 10.5 of the Draft Plan and wish to highlight that ESB would welcome opportunities to future proof delivery of electricity infrastructure through greater collaboration between ESB and Local Authorities. The submission states that early engagement at design stage of key public infrastructure projects, such as the Public Realm renewal plans, offer opportunities to provide ducting/underground cabling in the most economically efficient way and limit disruption to local services.

ESB is implementing energy strategies that support the transition of Ireland to a low-carbon and ultimately post-carbon economy to become a competitive, resilient, and sustainable region. In this regard, the ESB state they support the ambition of the Draft Plan to deliver an overarching land use strategy for the proper planning and sustainable development of Kildare Town.

##### **Chief Executive's Response**

The comments from the ESB in relation to early engagement in respect of public realm projects is noted and accepted. It is considered that an objective under Section 10.5 of the Draft Plan to support consultation with the ESB in relation to public infrastructure projects should be inserted into the Draft Plan.

##### **Chief Executive's Recommendation**

###### **Proposed Material Alteration**

Chapter 10 Infrastructure and Environment, insert new objective under Section 10.5 Energy Supply and Communications as follows:

**IO 4.6**      *Consult with the Electricity Supply Board prior to any significant Public Realm Works to ensure opportunities to provide ducting/underground cabling in the most economically efficient way and limit disruption to local services.*

## 5.0. Issues raised by themes in submissions or observations from all other persons or bodies.

### Chapter 1 Introduction and Context

No submissions received.

### Chapter 2 Spatial Planning Context and Vision for Kildare Town

#### Vision for Kildare Town and Strategic Development Principles

Submission	Summary of Issue Raised
099 Ronan Maher	Supports the Vision for Kildare Town specifically the following: <ul style="list-style-type: none"> <li>• The creation of compact and connected communities and the implementation of 10-minute settlement principals.</li> <li>• The delivery of catch-up infrastructure.</li> <li>• The use of the former Magee Barracks as a settlement consolidation site.</li> </ul>
107 Mark Stafford	Outlines the purpose of a Vision and how it should describe what or where the town needs to be and that it should connect with the aspirations of all stakeholders. Notes the designation of the town as a ' <i>Self-Sustaining Growth Town</i> ' and submits that a more ambitious Vision be prescribed in the Draft Plan which is encapsulated in the strategic development principles at Figure 2.2. States that aside from Magee Barracks there are no substantial brownfield sites or backland areas within the Town Centre to be developed. The acknowledgment of the requirement to deliver key infrastructure is welcomed. Requests the Vision include the provision of new tourist offerings as well as the enhancement of the existing heritage and cultural features mentioned. Submits that the strategic goal of ensuring a vibrant town centre should include a specific emphasis on the regeneration of Fairgreen/Shraud Street.
127 Kildare Greens	The submission outlines support for the ambitions for Kildare Town including support for the creation of compact and connected communities, the implementation of the 10-minute settlement, along with the delivery of catch-up infrastructure. States that for the town to thrive residents must have the infrastructure to support themselves. Agrees with the challenges for the town outlined in Section 1.5, including its car-orientated urban form, the lack of social infrastructure along with poor public and active transport infrastructure. Also agrees with the objective to create a people-centred, walkable and cycle friendly town. However, the submission states that it is not convinced that the Plan as drafted addresses the very significant identified challenges.
134 Cill Dara le	In 2019 Minister Seán Kyne launched the Kildare Language Plan



Submission	Summary of Issue Raised
Gaeilge	<p>- the first ever language plan for any county (<a href="https://cilldaralegaeilge.ie/pleanail-teanga/">https://cilldaralegaeilge.ie/pleanail-teanga/</a>).</p> <p>Irish should be given proper recognition and appropriate status in the LAP and it should be clear in the document that the council not only understands its duties in terms of language under the Official Languages (Amendment) Act 2021 but that the status and use of Irish is important to it. States that it must be recognised that the Irish-speaking community is growing in the county and notes the number of pupils attending all-Irish schools in Kildare Town and in Naas.</p> <p>States that making the Irish language more accessible to the community should be centric to the Vision ensuring, for example, that Irish is visible on public signage and afforded equal status to English, as well as developing more Irish language opportunities in areas such as learning, economy or culture.</p>
139 Cllr. Suzanne Doyle	<p>Submits that the overarching statement should include addressing deprivation factors within town.</p> <p>Suggests replacing '<i>Creating Compact Connected Communities</i>' with '<i>Creating Healthy integrated Communities</i>', in Figure 2-2.</p> <p>States that the strategic development principle '<i>Enhancing Kildare Town as a Tourist Destination</i>' needs to support the provision of tourism bed night spaces through supporting town centre redevelopment opportunities.</p> <p>Requests that reference is made to supporting development of quality over-the-shop residential opportunities and redevelopment of brownfield sites within town centre in the strategic development principle Ensuring a Vibrant Town Centre.</p> <p>Requests that the Plan include a further Strategic Development Principle as follows: '<i>Enhancing the living and working ratio Kildare Town</i>' to support quality employment opportunities and reservation of sufficient lands, including close to the train station and the Cherryville Rail Junction in order to attract key employers.</p>

### Chief Executive's Response

Support for the various elements of the Vision including the implementation of the 10-minute settlement principles and the delivery of catch-up social infrastructure within the town are acknowledged. It is considered that the Vision statement sets out the development aspirations and intentions for the town over the life of the Plan in a clear, robust, and optimistic manner which aligns with national, regional and county level planning policy objectives whilst also being tailored to fit Kildare's unique developmental attributes and challenges. The achievement of key aims such as connectivity and low carbon development, whilst considered to be highly realistic, are

also noted to be very ambitious and challenging given the current car-oriented structure of the town and the limited six-year timeframe of the Plan.

The contention that the Plan as drafted does not address the very significant identified challenges is not accepted. It is acknowledged that implementation and delivery is key to the success of the Plan and therefore it should also function as a plan of action, incorporating Specific, Measurable, Achievable, Relevant, and Time-Bound (SMART) measures and objectives, in line with best practice. In this regard, it is considered that the Draft Plan incorporates a range of provisions that clearly and definitively set out the actions needed to be taken (within identified timeframes) in areas such as, for example, the provision of social infrastructure, active travel infrastructure and town centre regeneration, which are in turn supported by specific statutory objectives.

It is noted that a submission suggests that aside from the former Magee Barracks there are no significant substantial brownfield sites to be developed in the town. However, Chapter 4 of the Draft Plan has identified a number of locations for regeneration opportunities, including backland sites, within the town centre. These include sites to be progressed as part of the Kildare Town Renewal Masterplan (Section 4.3) and the old Chilling Factory site which is addressed in Section 5.5.1 of the Draft Plan.

The comments on making the Irish language more accessible to the community and having it centric to the proposed vision is noted. The Kildare County Development Plan 2023-2029, which is the overarching policy document for the county, includes objectives to support and encourage community groups in their pursuit of *Líonra Gaeilge* (Irish Language networks) for their area (Objective SC O57), and to support and promote additional cultural, Irish language and arts spaces or centres throughout County Kildare (Objective SC O54). In acknowledgement of *Plean Teanga Chontae Chill Dara*, it is considered appropriate to include the Vision Statement as *gaeilge* in Section 2.2 of the Draft Plan. Furthermore, Objective BHO 2.2 of the Draft Plan encourages the use of the Irish language in shopfront signage. It should be noted that the Development Plan Guidelines for Planning Authorities (2022) issued by the Minister state that the statutory elements and remit of the development plan are set out clearly in the Planning Act. The guidance further states that in preparing the development plan, Planning Authorities must exercise caution not to inappropriately seek to address the operation of other statutory codes and regulatory regimes that relate to the development sector but are outside the legislative remit of a development plan.

The request that the overarching Vision statement should address deprivation factors within town is noted, however the function of this land use plan is (inter alia) to provide for balanced socio-economic development within a more sustainable and integrated settlement. Issues specifically related to reducing levels of poverty and social exclusion are outside the scope of the Plan. Such matters, at local level, generally come under the remit of the Local Community Economic Plan and are addressed through funding programmes such as the Social Inclusion and Community Activation Programme (SICAP) 2018-2023.

The request to amend the title of the strategic development principle from '*Creating Compact Connected Communities*' to '*Creating Healthy Integrated Communities*' is noted. The prioritisation of compact growth adheres to stated policy at all levels of the planning hierarchy, specifically the National Planning Framework and consequently, its inclusion as part of a Strategic Development Principle demonstrates the importance that the Plan attaches to its implementation in the settlement. Furthermore, as explained in Sections 14.3 and 14.4 of the Kildare County Development Plan 2023-2029 implementing compact growth principles within a town will also result in it becoming a more integrated and healthy settlement.

The request to include reference to 'new tourist offerings' in the Vision Statement is noted, however, it is considered more appropriate that new tourism opportunities are referenced in the relevant strategic development principle '*Enhancing Kildare Town as a Tourist Destination*'. Whilst the Vision does not specifically mention 'tourism', it does seek to harness the town's existing equine, ecclesiastical and retail assets. A Strategic Development Principle has been given to tourism - *Enhancing Kildare Town as a Tourist Destination* - to provide overarching support for the development of Kildare Town's tourism and hospitality infrastructure over the life of the Plan. The request to refer to tourism bed spaces under '*Enhancing Kildare Town as a Tourist Destination*' is not considered necessary, as this is adequately addressed in Section 5.6 and objective TCO 1.3 of the Draft Plan.

The request that the Strategic Development Principle 'Ensuring a vibrant town centre' should include a specific emphasis on the regeneration of Fairgreen/Shraud Street is noted. However, Section 4.3.1 of the Draft Plan includes Streetscape Regeneration, specifically refurbishment of shopfronts and vacant properties on Shraud Street, and Section 4.3.5 refers to improvements to the train station forecourt and Fair Green Road.

The request made to support development of quality over-the-shop residential opportunities and redevelopment of brownfield sites within town centre in the Strategic Development Principle 'Ensuring a Vibrant Town Centre' is accepted.

The request to include a further Strategic Development Principle entitled '*Enhancing the Living and Working Ratio Kildare Town*' is noted. It is acknowledged that an important aspect of the Plan relates to increasing local employment opportunities and this should feature prominently within this section. Accordingly, it is recommended that the scope of the Strategic Development Principle '*Enhancing Kildare Town as a Tourist Destination*' be broadened to include additional supporting text relating to the development of the town as an employment hub.

## Chief Executive's Recommendation

### Proposed Material Alteration

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

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

### Proposed Material Alteration

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



## Proposed Material Alteration

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

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

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

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

*Additionally, the Plan supports Kildare Town becoming an employment hub through increasing local employment opportunities not just in the important tourism and hospitality sector but also in other key areas such as bloodstock, enterprise and manufacturing. The Economic Development Strategy set out in the Plan seeks for Kildare to successfully fulfil its role as a 'Self-Sustaining Growth Town' through a range of measures including the targeting of an increased jobs ratio for the town and providing an adequate quantum of appropriately located zoned employment lands. Such an approach is also in keeping with the principles of compact growth and the 10-minute settlement by providing greater opportunities for people to both live and work in Kildare Town in order to enhance peoples' quality of life and to contribute to low carbon development.*

## Proposed Material Alteration

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

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

## Chapter 3 Compliance with the Kildare County Core Strategy

### Summary of Issues Raised

In addition to the submissions considered here under Chapter 3 of the Draft Plan, submissions received requesting the re-zoning of land also raise issues in relation to Core Strategy which are considered in Section 6 of this report.

### Function, Scale and Population of Kildare Town

Submission	Summary of Issues Raised
099 Ronan Maher	The Kildare Town boundary is much larger than the current urban footprint and warns against building outwards without first filling in sites within the town. The development of Magee Barracks must come first before Kildare Town grows beyond its current footprint.

### Chief Executive's Response

The Draft Plan has been prepared in the context of the National Planning Framework (NPF) which places a strong emphasis on compact growth. This Draft Plan is the first step in a transitional period for Kildare Town and indeed, County Kildare and other counties across Ireland, where the historical legacy of over-zoning is being addressed within an updated national, regional and county policy context. The urban footprint of the settlement is defined by the CSO and the NPF requires that at least 30% of all new housing units to be built within the defined settlement boundary. The Former Magee Barracks site accounts for 60% of all new housing units and the Draft Plan provides for ca. 65% within the defined settlement area.

### Chief Executive's Recommendation

No change recommended.

### Census 2022 and Population Projections

Submission	Summary of Issues Raised
067 John Conway	Questions why the Draft Plan is not postponed taking into account the imminent Census 2022 results.
135 Kildare Town Chamber of Commerce	Asks why the creation of a new LAP cannot wait until the census is published in the summer.
103 Seán O'Feargháil	Submits that the draft plan is seriously flawed and factually incorrect, containing data that is out of date.
107 Mark Stafford	States that population growth is based on the 2016 Census and that an updated population estimate be prepared. It is requested that same would be furnished and revised as necessary prior to the final adoption of the Plan.
128 Glenveagh Homes Ltd.	The submission states that the company is uniquely placed to help address the housing shortage. Submits that for this to happen the Plan, must be based on Census 2022 to ensure that the forecasts for housing needs are accurate so that there is sufficient zoned and serviced land available. States that by not doing so risks the planning authority failing to discharge its duties established under

Submission	Summary of Issues Raised
	<p>Section 95 of the Planning and Development Act 2000, as amended. Submits that the population targets in the Draft Plan are outdated and based on proven underestimated population projections and the resulting de-zoning and reallocation of zoned land to Phase 2 will create a shortage of zoned land.</p> <p><b>Evidence-based Planning</b>  Notes the importance of having an accurate evidence base to inform NPF as this is critical to the success of the entire planning system. Refers to the population projections set out in the NPF which has affect the Draft Plan noted an envisaged 2040 national population of 5.7 million. Submits that the population projections in the NPF are derived from an ESRI report which underestimated long term growth due to severe economic conditions at the time. Submits that the NPF baseline is technically flawed as it does not account for a sufficiently wide set of growth and contraction differentials. States that this flawed analysis has had a cascading effect on regional population projections and plans such as the Draft Plan. Notes more recent CSO statistic and states that aside from factors relating to the war in Ukraine, net migration is considerably higher than estimated in the NPF/RSES.</p> <p>Submits that using the current inaccurate NPF/RSES based population projections to formulate an 'evidence-based' core strategy for the Draft Plan is contrary to the purpose of a core strategy which is to facilitate an acceptable equilibrium between the supply of zoned, serviced land for the projected demand for new housing, over the lifetime of the Plan. State that the result of this is that the Draft Plan does not reserve an appropriate amount of land to meet the pent-up demand and population growth. Notes the provisions to review the NPF which will incorporate the results of Census 2022 and states that it will directly impact on the population targets and the quantum of land required to meet housing need, which will result in all development plans being reviewed. Accordingly, it is strongly recommended that the current LAP is extended until such time as all higher order plans are reviewed and aligned.</p> <p><b>Kildare County Development Plan 2022-2028</b>  Notes the preliminary Census 2022 population for Kildare which it states represents a +2.1% divergence when compared with the ESRI baseline projection for 2022. Submits that if this level of growth continues to 2028 then there would be a divergence of 7.2%, or an additional 18,574 people. States that assuming an Average Household Size (AHS) of 2.5 persons, this additional population would generate a requirement for 7,430 homes or circa 45% more than is currently provided for in the Development Plan.</p>

### **Chief Executive's Response**

At the outset and as a point of clarification, the population growth in the Draft Plan is not based on Census 2016 data.

Estimated and planned population growth is based on projections for County Kildare as provided by the National Planning Framework Roadmap and the Regional Spatial and Economic Strategy.

Housing targets, which are calculated under a separate methodology are determined by the Core Strategy of the County Development Plan (discussed further below) which has been prepared using the Housing Supply Target methodology prescribed by the Minister under Section 28.

Section 3.1.2 of the Draft Plan sets out a clear and detailed methodology for estimating a baseline population for Kildare Town in 2022, based on the CSO 2022 Electoral Division data (which is the most up to date and verified information available).

The population of County Kildare increased by 11% between 2016 and 2022. The Kildare Town Electoral Division (which is a geographical area that includes the Draft Plan area and surrounding rural hinterland) grew at a higher rate of 17.69%.

This growth has been factored into the Draft Plan, as set out in Section 3.1.2.

Housing targets for the plan period are required to align with the Core Strategy of the Kildare CDP (Table 2.3), which were calculated on the basis of the *Housing Supply Target Methodology for Development Planning (Dec 2020)*, issued by the Minister for Housing, Heritage and Local Government under Section 28. 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.

There is a fundamental and legal obligation on Kildare County Council, as a Planning Authority to ensure that a local area plan is consistent with the objectives of the CDP (including Core Strategy) and the Regional Spatial and Economic Strategy. The established NPF Roadmap population projections for the county, which were also incorporated into the Regional Spatial and Economic Strategy, continue to be the population parameters for local authority plan making processes. A local area plan must align with the higher-level plans, notably the NPF, RSES and the CDP Core Strategy.

It is of fundamental importance to note that there is no provision within the legislation to make amendments to the prescribed population projections through the local area plan process which are based on rudimentary or anecdotal evidence.

Any request to ignore the statutory plan making requirements creates a risk of a Ministerial Direction under Section 31 of the Planning and Development Act 2000 (as amended), impacts on the legal integrity of the hierarchical plan making obligations imposed on local authorities through the Planning & Development Act, 2000 (as



amended) and poses a significant corporate risk for a potential Judicial Review of the Plan.

Submission 128 requests that the 2012 Local Area Plan be extended. Section 19 of the Planning and Development Act 2000 (as amended) stipulates that LAPs may only be extended when they remain consistent with the objectives and core strategy of the CDP. The Kildare Town Plan 2012-2018 pre-dates the National Planning Framework (2018), the Regional Spatial and Economic Strategy 2019-2031 and Section 28 Ministerial Guidelines in relation to Local Area Plans (2013) and Development Plans (2022) and is therefore no longer consistent with the objectives and core strategy of the recently adopted Kildare County Development Plan 2023-2029 which now statutorily aligns with the national and regional policy hierarchy.

Kildare Town has a legacy of surplus residential land use zoning, which has been documented in 2012 (LAP), 2017 (KCDP) and once again in 2023 (Draft Plan), which needs to be addressed. To further delay a local area plan for Kildare Town would not be in the interests of the proper planning and sustainable development of the area and not be in the interest of the common good.

Submission 103 includes a statement that the draft plan is 'seriously flawed and factually incorrect'. The submission does not, however, qualify this statement to outline what these alleged flaws are and has not been accompanied by any data to corroborate what is alleged to be factually incorrect. The statement is considered to be unjustified and unfounded in the context of the statutory requirements for the making of a local area plan.

In the context of the above, it is considered important to refer to the submission from the Office of the Planning Regulator, the national statutory agency with responsibility for the evaluation and assessment of all statutory land use plans including local area plan, who state that they consider that "the Draft Plan is generally consistent with the RSES, in terms of compact growth, town centre renewal and local transport plans".

### **Chief Executives' Recommendation**

No change recommended.

## **Estimated Population Methodology**

<b>Submission</b>	<b>Summary of Issues Raised</b>
128 Glenveagh Homes Ltd.	<p><b>Draft Plan - Population Targets</b></p> <p>Notes that the preliminary census results identify an increase of 1,747 people within the Kildare ED over the period 2016-2022, with a total estimated population of 11,621 which it states is relevant for demonstrating the rate of growth (averaging 2.5% per annum) that is occurring within and around the Kildare Town area. Submits that based on these figures, a reasonable if conservative estimate is that the population of Kildare Town is 10,160. Notes that the Draft Plan targets population growth of 1,182 across the 6-year plan period, this equates to 197 people per annum. Submits that by applying the Census 2022 data this increases to 216 people per annum and the target should therefore be at least 1,296 persons. Notes that Census 2022 results will be available on 29 June 2023 and recommends that these be fully accounted for in the Plan.</p>

### **Chief Executive's Response**

The Draft Plan under Section 3.1.2 sets out a clear and explicit methodology for the calculation of the estimated population of 10,161 persons for 2022 based on the growth rate of the Kildare Town Electoral Division.

It is important to note that the Draft Plan provides for a population growth of 1,380 persons not the 1,182 referred to in the submission. This is to provide for an additional year to 2029 in line with the lifetime of the Draft Plan in the context of the Core Strategy of the CDP which runs to Dec 2028.

Therefore, the Draft Plan provides for a greater population than the target suggested in the submission (Table 3-2, refers). Furthermore, the population growth target for the settlement to 2029 is 11,541 and this figure has been considered across the plan area in terms of social infrastructure provision and the provision of employment lands.

### **Chief Executives' Recommendation**

No change recommended.

## **Future Population and Housing Targets**

<b>Submission</b>	<b>Summary of Issues Raised</b>
067 John Conway	Land is being de-zoned where there is an obvious need for housing. Questions where the locals will go who cannot buy houses in Kildare.
103 Seán O'Fearghaíl	<p>Objects to the down zone/de-zone of the South Green lands for the following reasons:</p> <ul style="list-style-type: none"> <li>- The land has been zoned for housing since the 1997 Development Plan and continued to be included in all subsequent LAP's.</li> <li>- The upgrading of services i.e., water, sewage, roads etc have been substantial at considerable expense including to the taxpayer.</li> </ul>

Submission	Summary of Issues Raised
	<ul style="list-style-type: none"> <li>- To alter this long-standing proposal after heavy investment would be erroneous in the extreme.</li> <li>- Undermines the very concept of medium/long-term planning and will shatter the Council's credibility.</li> </ul>
104 Irish Home Builders Association	Strongly refutes land being re-zoned where it had previously been zoned for development purposes. Unlikely to meet the increased population needs if land is not adequately zoned or removed from the original zoning plans.
128 Glenveagh Homes Ltd.	<p><b>Household Size</b></p> <p>Notes that the housing target in draft plan of 430 units equates to a 2.74 household size. States that the NPF acknowledges that the average household size is likely to reduce to 2.5 by 2040 and notes that this is not accounted for in the Draft Plan. Submits that applying the average household size in the United Kingdom which in 2021 was 2.3, the housing target in the draft LAP should be revised upwards to 514 units. Further states that applying a population growth target of 1,296 as set out in the preceding section, the housing allocation should be increased to at least 563 units i.e., 133 more units than provided for. Accordingly, the submission recommends that an average household sized at least 2.3 persons per household be applied in the Plan.</p>
128 Glenveagh Homes Ltd.	<p><b>Zoning</b></p> <p>Notes that the proposed annualised 72 units per annum represents a dramatic reduction when compared to recent housing output in the town, the quantum of land zoning in the previous LAP and the ongoing housing crisis. States that the Section 28 Guidelines for Development Plans provide clear advice to enable the zoning land in excess of that required to meet identified six-year targeted housing need and that land is zoned and serviced should not be de-zoned, to ensure that there is an adequate supply of zoned housing land. Submission recommends that the zoning of land in the Plan should align with Census 2022 and there should be no de-zoning or reallocation of zoned land until this information is incorporated into higher order plans.</p>
135 Kildare Town Chamber of Commerce	Questions the de-zoning of land when there is an obvious need for housing and where will the locals go who cannot buy houses in Kildare? Asks if the Draft Plan should follow the instruction of the Minister for Housing in relation to de-zoning?
139 Cllr. Suzanne Doyle	<p>The submitter states they struggle with how the Draft Plan complies with the Core Strategy of the CDP as the majority of the units are under construction with many occupied. That Kildare is exceeding its CDP target by 672 units / 2.5 times prescribed growth rate. The submission states that applying the 4.7% growth allocation based on the known delivery within Kildare town and not accounting for one extra planning permission until 2029, implies a projected housing unit target for the County of 23,446 when the current CDP identifies less than 10,000.</p> <p>The submission states that the data sets are not consistent especially when LAPs are statutorily required to be consistent with the core strategy and it places elected representatives into an invidious position and undermines the veracity of the planning system.</p>

### **Chief Executive's Response**

The National Planning Framework sets out how Ireland will move away from the current 'business as usual' pattern of development and seeks to disrupt trends that have been apparent for years. Kildare Town has an oversupply of residential land use zoning that has been previously referred to in land use plans in 2012 (LAP) and 2017 (CDP).

While other settlements were identified in the 2017 CDP as having a capacity surplus, none to extent of Kildare Town which indicated a capacity surplus of zoned land for 2,027 additional units over and above Core Strategy allocation<sup>6</sup>.

The current Kildare Town LAP 2012-2018 does not comply with the National Planning Framework, the Regional Spatial and Economic Strategy or the Kildare County Development Plan 2023-2029, indeed the Plan came into effect 11 years ago, during which time there has been a considerable shift in national planning and other development policy.

The Draft Plan has been prepared as a transitional land use plan that is required to align the development strategy of the town with higher level policies such as the NPF, RSES and CAP 2023. It has been prepared in the context of extant planning permissions which are in excess of the target unit allocation required for the lifetime of the Plan (Section 3.8, refers), which has required a phasing approach to land use zoning in line with the Ministerial Guidelines on Development Plans (2022).

The OPR in their submission (Section 3.0 of this Report refers) also note the historical zonings and extant permissions for residential development and recognises that there is potential for Kildare Town exceeding its core strategy housing target over the life of the Development Plan. It is notable that the OPR in their submission acknowledge the justification the Draft Plan provides for this and accept the rationale for same.

It is important to note that the NPF Roadmap states that delivering an effective alignment of plans at national, regional and local levels and shifting away from a business-as-usual scenario towards more compact growth, will require a period of transition. The NPF Roadmap also states that this will take time, which is appropriate in the context of the NPF as a long-term strategy. This Draft Plan is the first step in this transitional period for Kildare Town. It addresses the legacy of the past and aims to ensure Kildare Town develops as a compact, low carbon environment by prioritising brownfield regeneration, active travel, social infrastructure to ensure quality of life of its community, in recognition of its role as Self-Sustaining Growth Town.

In response to submission 128 and the suggested occupancy rate of 2.3 persons per household, CSO data released on the 30<sup>th</sup> of May 2023 indicates that the average household size in County Kildare is 2.97 persons and therefore, the (verified) figure is considered most appropriate for formulating local planning policy approaches and development strategies.

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<sup>6</sup> Table 3.4 of the Kildare County Development Plan 2017-2023 refers.

The comments made in relation to household size and increasing the allocation to 563 units are noted. It is important to highlight that Table 3-7 the Draft Plan provides for 1,102 units over the lifetime of the plan, nearly double the number of units requested in the submission, and any further exceedance beyond that currently provided for within the Draft Plan, is not considered appropriate.

The comments raised in respect of the growth per annum and the ability to provide for excess units is noted. Section 3.4 of the Draft Plan has applied additional provision in accordance with the Development Plan Guidelines (2022) at a rate of 25% which is the maximum allowed under the Ministerial Guidelines. Furthermore, the Draft Plan has applied phasing to residential land in accordance with the Guidelines.

**Chief Executive's Recommendation**

No change recommended.

**Population Growth (Table 3-3)**

Submission	Summary of Issues Raised
104 Irish Home Builders Association	Notes the estimated 2022 population and the projected population for the town in 2029 as outlined in Table 3.3 and states that the draft plan does not account for adequate headroom for the increase in population in its zoned land. Submits that without additional headroom the Plan will fail to meet the increased population's housing needs. Refers to IHBA's 2022 review of the NPF and notes that the Census 2022 population for County Kildare represents a +2.1% divergence when compared with the ESRI baseline projection for 2022. States that if this is sustained the divergence would grow to 7.2% and that such an increase is not budgeted for in the draft Plan. Contends that these figures would result in an additional housing requirement of approximately 7,100–7,400 homes across the county by 2028.

**Chief Executive's Response**

The population projections for the county align with those prescribed in the NPF Roadmap and the Regional Spatial and Economic Strategy for the Eastern Midlands Region.

In the absence of a review or update to these, the published NPF Roadmap population projections for the county continue to be the population parameters for local authority plan making processes. Attention is also drawn to section Future Population and Housing Targets as set out above regarding the justification for current oversupply.

The Draft Plan has included Additional Provision at a rate of 25% for Kildare Town, (Table 3-6 refers), this is the maximum allowed for in line with of the Development Plan Guidelines (2022).

**Chief Executive's Recommendation**

No change recommended.

### **Extant Planning Permissions**

<b>Submission</b>	<b>Summary of Issues Raised</b>
139 Cllr. Suzanne Doyle	There is no accounting for developments after Census 2022. Developments such as Black Miller Hill and the proposed social development on Station Road have not been accounted for.

### **Chief Executive's Response**

The CDP Core Strategy was informed by the CSO housing completions up to and including the year 2022 and aligns with the statutory requirements of the Housing Supply Target methodology for Development Planning issued by the Minister under Section 28.

Similarly, the Draft Plan makes reference to those units as per the Housing Completions database compiled by the CSO (Section 3.2, refers).

As per the Development Plan Guidelines (2022) Black Miller's Hill was not included for Core Strategy calculations as it was almost built out at the time of the survey to inform the Draft Plan. In respect of the development at Station Road the Draft Plan under Table 3-7 has allocated a residential yield of 32 units (5%) for the development of infill sites within the defined CSO boundary.

### **Chief Executives' Recommendation**

No change recommended.

### **Social Housing Requirement**

<b>Submission</b>	<b>Summary of Issues Raised</b>
099 Ronan Maher	Notes there were 637 social housing applicants in October 2022 and states that it's not clear that Part V social housing will be sufficient to meet these needs. Highlights that Table 3-5 suggests a total of 118 Part V Units and recommends that the housing targets be adjusted upwards to address this shortfall. Submits that the role of Cost Rental accommodation and Housing Associations needs to be addressed and included in the plan.
127 Kildare Greens	Notes that there were 637 social housing applicants in October 2022 and states that it is not clear from the Plan that Part V social housing will be sufficient to meet these needs. Notes that Table 3-5 suggest a total of 118 Part V units and questions how the shortfall will be met? Submission also notes that there is no mention in the Plan of the role of Cost Rental Accommodation or Housing Associations and states that perhaps this might be addressed.

### **Chief Executive's Response**

The provision of social housing through the Part V mechanism is only one method of social housing delivery in County Kildare and this provision is provided for under the Planning and Development Act 2000 (as amended). Any site zoned for residential development can deliver social housing for example the land Collaghknock Glebe

site which has already been ear marked for a PPP housing scheme with the potential to deliver 80-85 units within the lifetime of the plan.

It is also important to note in respect of the 637 social housing applicants this figure relates to those that have Kildare Town as first preference, a significant number of these applicants do not currently reside in the town. The Draft Plan has provided for additional provision at the rate of 25% (the maximum permitted) above the housing allocation as set out in the Core Strategy, in order to address the unmet social housing demand within the town.

Section 1.2 of the Draft Plan states that the policies and objectives included in the Plan do not replicate policies and objectives that are already addressed within the Kildare County Development Plan 2023-2029 as this is the higher-level planning policy document. The CDP provides information in respect of social, affordable purchase and cost rental housing (Section 3.12, refers). Furthermore, it is the policy of the Council (HO P9) to promote the provision of social and affordable housing in accordance with the Council's Housing Strategy, Housing Need Demand Assessment and Government policy.

It is of significant importance to note that Kildare County Council ensure that social housing schemes may be brought forward on lands zoned 'C: New Residential Phase 2' during the lifetime of the plan in the event that there is a significant unmet housing demand in the Kildare Town area.

### **Chief Executives' Recommendation**

No change recommended.

### **Delivering Compact Growth**

<b>Submission</b>	<b>Summary of Issues Raised</b>
104 Irish Home Builders Association	Refers to draft Plan objective HCO1.3 (relating to encouraging development within the built-up area) and the provision that that '65% of all new homes to be developed within the defined settlement boundary of the town' will be 'consolidation and infill development'. States that while it notes this is a requirement under the NPF, solely focusing on these brownfield/infill sites will not deliver the housing needed as these sites are timely and costly to develop and will not address urgent housing needs and that ultimately these increased costs are passed on to the end purchaser. Contends that it is vital that reference is made to alternative development locations to ensure a range of housing needs can be met and that future needs are taken into consideration.
107 Mark Stafford	Requests that Magee Barracks should not be classified as a brownfield site or underutilised town centre. It is submitted that the more appropriate designation for Magee Barracks would be as a former institutional site as designated in the County Development Plan, as lands with low development density which provided an important service and had as strong cultural connection with the town and with development of the site reflecting its former nature.
127 Kildare Greens	Notes that 65% of all new homes will be within the settlement boundary and states that this means 35% will continue to follow the 'dispersed pattern' identified as a challenge in section 1.5. Asks if the

Submission	Summary of Issues Raised
	number of new homes within the settlement boundary be increased to 85%? In this context, the submission notes that the proposed development of the former Magee Barracks will already account for 60% of all new housing units.

### Chief Executive's Response

The National Planning Framework requires that at least 30% of all new housing units to be built within the defined settlement boundary, to which the Draft Plan provides more than this requirement. Given the number of extant planning permissions that will be delivered during the lifetime of the Plan there can be no further increase in the housing allocation for Kildare Town other than what has been provided for in the Draft Plan.

While the point regarding the development of brownfield/infill sites being timely and costly is noted, the Draft Plan provides a combination of brown and green field sites for new housing delivery.

The re-development of the lands at the Former Magee Barracks has already commenced. The development of greenfield sites in advance of brownfield/infill sites is contrary to national planning policy.

Institutional lands and 'windfall' sites are characterised in the Sustainable Residential Development Guidelines (2009) as being a large private or institutional building set in substantial open lands and which in some cases may be accessible as an amenity to the wider community. The Former Magee Barracks site does not fall within this description. However, it aligns with the definition of a Brownfield site which is any land which has been subjected to building, engineering or other operations, excluding temporary uses or urban green spaces, generally comprising redundant industrial lands or docks but may also include former barracks, hospitals or even occasionally, obsolete housing areas (Sustainable Residential Development Guidelines 2009).

### Chief Executives' Recommendation

No change recommended.

### Projecting Residential Yield

Submission	Summary of Issues Raised
104 Irish Home Builders Association	<p><b>Densities</b></p> <p>Refers to Table 3.1 which states that the Target Residential Density (UPH) is 35-40. Whilst acknowledging the need to have a range of densities, the submission states that they should be considered on a site-by-site basis. Submits that the strategy should consider the soon to be released Sustainable and Compact Settlement Guidelines which will provide further information on density achievements whilst recognising the viability concerns over apartments.</p>
104 Irish Home	Notes Map Ref. 11.1 which outlines land within the 'Strategic Reserve' (SR) and states that they do not consider this to be



Builders Association	<p>enough of a buffer for future development. The definition for Strategic Reserve as outlined in the draft Plan does not go into detail as to how the SR designation would be reviewed over time, which essentially means these lands would not be considered for development within the lifetime of the plan. Submits that if this is the case then the land zoned will not adequately deliver housing needs, resulting in a deficit.</p>
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**Chief Executive's Response**

The densities detailed under Table 3-7 are in line with the Sustainable Residential Development Guidelines (2009), which are the current relevant Ministerial Guidelines in this regard. While it is noted there are pending Guidelines in relation to Compact Growth, these have not been published by the Minister to date. It should be noted that these densities are indicative only and are used for the purposes of calculating potential housing yield and to guide new development. The density delivered on each site should address the characteristics of the receiving landscape and pattern of existing development.

In respect of the lands zoned Strategic Reserve, these lands do not represent a potential residential yield over the lifetime of the Plan as they are in excess of the Core Strategy allocation. As stated in the Draft Plan, the inclusion of these lands (in the Draft Plan) will not in any way infer a prior commitment regarding the nature of any future zoning, such a decision will be considered within the framework of the need for additional zoned lands and the proposed planning and sustainable development of the area. Table 11-4 Land Use Zoning Objectives indicates that uses 'Permitted in Principle' and 'Open for Consideration' within the Agriculture land use zoning will be considered on SR lands provided they do not undermine the overall objective for the strategic expansion of the town.

**Chief Executive's Recommendation**

No change recommended.

## Chapter 4 Consolidation of the Town Centre

### Consolidation of the Town Centre – General Issues

Submission	Summary of Issue Raised
103 Seán O'Fearghail	States that it's essential to recognise the importance of the ancient town centre and its international heritage and that it must be protected at all costs. Submits that development peripheral to the centre should, where practicable, contain some reflection of the area's history and heritage i.e., naming of streets, schools, estates, developments etc.

### Chief Executive's Response

A key priority of the Draft Plan is to safeguard the historic and environmental assets of the town centre through the promotion of heritage-led regeneration opportunities and providing statutory support for the key projects identified in the Town Renewal Masterplan. The objectives of Chapter 8 Built Heritage and Appendix C (Statement of Character for the Architectural Conservation Area) also ensure that the town's unique architectural and archaeological profile are protected. Specific policy provisions relating to the naming of new developments within the county is dealt with in Chapter 15 of the Kildare County Development Plan 2023-2029.

### Chief Executive's Recommendation

No change recommended.

### Town Centre Objectives

Submission	Summary of Issue
107 Mark Stafford	With regard to objective TCO 1.3 (iv), the submission asks if it is intended to band these proposed uses or are they equally all permissible. Further asks if residential uses be listed as the least preferred option for town centre (ground floor) units.
139 Cllr. Suzanne Doyle	States further provisions should be included into objective TCO 1.3, as follows: <i>(v) Support Kildare town as a tourism destination town through the delivery of adequate convenient town centre parking for both coach visitors and free independent travellers.</i> <i>States that this objective needs to be supported by research on what levels of parking are provided in other successful tourism destinations with similar profile e.g. Westport.</i> <i>(vi) Re-establish the primacy of town centre, through the development of public realm activation programmes delivered through a multi-disciplinary stakeholder team, supporting Festivals, events and regular organised street entertainment etc.</i> <i>(vii) Building on the work of recently established market bye laws, actively support and promote town centre as a venue for</i>

Submission	Summary of Issue
	<p><i>contemporary attractive markets that will generate visitor numbers to town.</i></p> <p><i>(viii) Support and protect the independent retail sector, particularly outlets that improve the attractiveness of town as a tourism destination centre.</i></p> <p>Requests the removal of objective TCO 1.6 as there is no Town Regeneration Officer or Town Team and any decisions regarding the direction of the town should be made through the mandated offices of the MD in consultation with the public.</p>

### Chief Executive's Response

With regard to the question posed on the range of alternative uses set out in objective TCO 1.3 (iv), it should be noted that notwithstanding premises within designated Core Retail Area these uses are considered to be equally appropriate and there is no preference for one particular use over another, either at a ground floor level or otherwise. Residential uses within the town centre are an important component to protect vitality and provide surveillance.

The request made in Submission No. 139 to include an additional text (v) in objective TCO 1.3 to increase parking provision for both independent travellers and coaches is noted. Section 7.6 of the Draft Plan contains a detailed Car Parking Strategy for the town, which identifies potential locations for car parking. Furthermore, objective MTO 4.7 is to investigate providing a designated area for coach parking in tandem with the feasibility study for the creation of a new or upgraded town centre off-street carpark.

With regard to the request to include additional text (vi) in objective TCO 1.3, it should be noted that the Town Renewal Masterplan (TRMP) and accompanying Implementation Strategy identifies several projects to be developed to Part 8 planning approval stage. The most significant of these projects is the regeneration and renewal of the Market Square. The Part 8 planning consent process for this is due to be commenced in Summer 2023 which will include public realm improvements that will seek to create a pedestrian friendly square which celebrates the heritage of the town centre whilst also creating a more usable space adaptable to festivals, markets, events and street entertainment. It is considered that the regeneration of Market Square will rebalance pedestrian and car movements and will act as a trigger for further renewal projects within the historic core. The need for a singular Marketing and Activation Strategy is noted and agreed. The preparation of such a strategy will involve key stakeholders such as local authority, Fáilte Ireland, Kildare Fáilte, residents and businesses.

On the request to include additional text (vii) in objective TCO 1.3 to build on the work of the recently established market bye laws, it is noted that Kildare County Council has recently regularised the weekly market in Kildare Town and there are currently 6 licence holders operating on Market Square every Thursday. Applications will be invited in Quarter 3 of 2023 for additional stallholders. The upcoming Part 8 planning scheme for the square will have regard to the requirements of the weekly market stall holders and other markets that may wish to operate. The Marketing and Activation Strategy (as outlined above) will have regard to the opportunities that

markets can bring to the town in terms of visitor numbers, dwell time and overall vibrancy of the town centre.

The request made to include additional text (viii) in objective TCO 1.3 to support and protect the independent retail sector, particularly outlets is agreed and dealt with under Chapter 5 Economic Development of this report.

The request to delete objective TCO 1.6 is not considered appropriate as it is envisaged that the role of the Town Regeneration Officer and the development of Town Teams will evolve and expand over the life of the Plan to extend to settlements such as Kildare Town. Accordingly, it is considered that the inclusion of this objective is necessary to comply with the government's Town Centre First policy approach and assist in 'future proofing' the Plan over the period to 2029.

## Chief Executive's Recommendation

### Proposed Material Alteration

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

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

## Kildare Town Renewal Masterplan – General/Overarching Issues

Submission	Summary of Issue
050 Benson Ecology	Welcomes and acknowledges the success of the re-design of Market Square and support the move towards a pedestrian friendly public realm in the quarter.
107 Mark Stafford	Requests that the adoption of sections the Kildare Town Renewal Masterplan should be reviewed prior to adoption as it is submitted that priorities have shifted. States that the masterplan was indicative of certain projects that could be achieved, and concerns remain regarding certain aspects of same. Specifically refers to the following aspects: <ul style="list-style-type: none"> <li>• Nugent Street Car Park - questions if consideration has been given to the possibility of extending this car park.</li> <li>• Streetscape regeneration include Fairgreen Street and Jackie's Lane in addition to Shraud Street. Include general enhancement of the area not just the shopfronts.</li> </ul>
127 Kildare Greens	Submission welcomes and acknowledges the success of the re-design of Market Square with the resulting vibrancy and supports the move towards a pedestrian friendly public realm.
139 Suzanne Doyle	(i) Questions if the delivery of the six masterplan projects outlined under figure 4.1 are listed in accordance of priority. If so, submission requests that they should be reordered, as follows: <ol style="list-style-type: none"> <li>1. Market Sq. and environs</li> <li>2. KROV links to town</li> </ol>

Submission	Summary of Issue
	<p>3. Cycle and pedestrian improvements                      4. Public realm and enhancements                      5. Town Courthouse improvements                      6. Train station improvements.</p> <p>(ii) Requests the inclusion of a further project which would see the development of a walled walk around Cathedral in town centre, including the restoration of part of wall, and a lit walkway around Cathedral.</p> <p>(iii) With regard to the Market Square and Environs project, it is submitted that the following wording be included <i>'This plan will encompass an extension to the current Heritage offices that will facilitate necessary extended office space, public space and potential franchise hospitality/ performance space.'</i></p> <p>(iv) Also requests that instead of the Water Tower site the Plan should identify the land bank with high levels of vacancy and backland potential that sits between Claregate Street, Bride Street and Bangup Lane.</p>

### Chief Executive's Response

The comments regarding the move towards a more pedestrian-centred public realm in Submission No. 50 and No. 127 are acknowledged.

With regard to the requests for changes to the identified delivery projects and the inclusion of new projects outlined in Submission No. 107 and No. 139, it should be noted that the Draft Plan reflects the 'Delivery Projects' contained in the KCC Town Renewal Masterplan.

The delivery of projects listed in Section 4.3 of the Draft Plan are not presented in order of priority. There are no plans to remove the Water Tower Project from the Town Renewal Masterplan.

It should be noted that Section 5.5.1 of the Draft Plan incorporates a Design Framework which seeks to address the currently underutilised sites and backlands between Claregate Street, Bride Street and Bangup Lane.

The suggestion of a walk around the Cathedral is noted and it is considered appropriate to include an objective in Chapter 8 Built Heritage in support of this. It is also agreed that an extension to the Heritage Office can be facilitate and a new objective is proposed accordingly (see Public Realm Enhancements).

### Chief Executive's Recommendation

#### Proposed Material Alteration

Chapter 8 Built Heritage, Section 8.2. insert new objective after BHO 1.4:

*To support the delivery of a walking trail along the Town Walls within the curtilage of St. Brigid's Cathedral in an appropriate manner that is sympathetic to the historical context of the site.*

### **Kildare Town Renewal Masterplan – Market Square and Environs**

<b>Submission</b>	<b>Summary of Issue</b>
060 IOMST	<ul style="list-style-type: none"> <li>• How long any redevelopment works on and around Market Square will take?</li> <li>• When is it proposed that these works occur?</li> <li>• What effect will this have on street traders using the square and their normal operating routine?</li> <li>• How is it proposed to accommodate them during the works?</li> <li>• How will the redeveloped Square facilitate street traders operating in their usual manner?</li> </ul> <p>Submits that the traders using Market Square operate under a historical "market right" gives a legal right to the use of the area and cannot be unilaterally altered or extinguished.</p>
103 Seán O'Fearghail	<ul style="list-style-type: none"> <li>• Efforts should continue to develop regular artisan markets on the Square.</li> <li>• Additional planning and promotion of the markets should take place.</li> <li>• An annual plan for the promotion of the Kildare Town Market Square as an events venue should be agreed.</li> </ul>
139 Suzanne Doyle	<p>In 4.3.1 of the Plan the Burgage plots identified should also have as many pedestrian links as possible, a number of linkages exist and re-opening them should be included as an objective through future backland development from Boland's Corner to Cunninghams Pub.</p> <p>States that to successfully deliver the Market Square Project will require an objective for additional car parking spaces which is not outlined in this masterplan. Further states that the development of the Square will also need to be accompanied by an activation plan to ensure that the space is optimised.</p> <p>Submission does not support proposals for Water Tower as the access and egress is too limited given the potential car parking spaces that might be achieved. Outlines other concerns relating to the steep gradient and states that its potential development might better be delivered by the private sector. Submits that reference to Market Square should refer to 'Market Square/Cathedral'.</p>

#### **Chief Executive's Response**

The questions posed relating to the operational aspects of the redevelopment of Market Square in Submission No. 60 are noted, however logistical issues around construction works are not determined at this time or through a Local Area Plan process. Such arrangements will be addressed through the appropriate planning consent.

The inclusion of an objective in the plan in relation to Market Square and to support the principle of upgrading the public realm is agreed. The regeneration of Market Square will be the subject of a Part 8 planning application process. Public

consultation is a fundamental element of that process. The public and stakeholders will be afforded the opportunity to make a submission and engage with this process when it is published in Summer 2023. Following approval of the Part 8 application, a further detailed design stage will be undertaken which will inter alia, consider the logistical issues of construction.

The overall day-to-day operation of the market traders is an operational matter outside the remit of a land use plan. It should be noted that the Corporate Services Department of Kildare County Council is responsible for Casual Trading Bye Laws and for the issuing of licences to trade at the weekly market in Kildare. Currently, there are six permit holders operating at the weekly market in the town.

With regard to the issues raised by Submission No. 139, it should be noted that Section 4.3.1 of the Draft Plan is intended to reflect and provide support for the contents of Kildare Town Renewal Masterplan and therefore requests in this instance may be more appropriately addressed by the Strategic Projects and Public Realm team.

The comments with regard to the Market Square redevelopment are noted. Please see the Chief Executive's Recommendation on the formulation of an activation strategy in the Town Centre Objectives section above. With regard to car parking, it should be noted that Section 7.6 of the Draft Plan contains a detailed Car Parking Strategy for the town, which identifies potential locations for car parking provision within the town centre.

The Draft Plan reflects the 'Delivery Proposals' contained in the Kildare Town Renewal Masterplan. The Water Tower project is a conceptual high level design proposal which will be subject to further analysis and assessment as the project progresses. There are currently no plans to remove this project from the Town Renewal Masterplan at this stage. Inclusion of these projects within the Draft Plan provide a statutory policy platform from which funding applications may be supported.

#### **Chief Executive's Recommendation**

No change recommended.

#### **Kildare Town Renewal Masterplan – Link to Kildare Tourist Outlet Village**

<b>Submission</b>	<b>Summary of Issue</b>
050 Benson Ecology	Supports the proposed pedestrian connection to Kildare Village.
127 Kildare Greens	Supports the proposed pedestrian connection to Kildare Village.

### Chief Executive's Response

The support for the proposed pedestrian link between the town centre to Kildare Tourist Outlet Village is acknowledged. This issue is also raised in other submissions and discussed further in Chapter 7 Movement and Transportation.

### Chief Executive's Recommendation

No change recommended.

### Kildare Town Renewal Masterplan – Cycle and Pedestrian Network Enhancements

Submission	Summary of Issue
139 Suzanne Doyle	Requests that section 4.3.3 of the Plan include Irish National Stud and Kildare Retail Outlet Village (KROV) in the bike hire scheme project. Note that such a provision will make it more likely that the scheme would be successful.

### Chief Executive's Response

The requested amendments to Section 4.3.3 are accepted. It is noted that this will also have consequential amendments for objective MTO 1.7.

### Chief Executive's Recommendation

#### Proposed Material Alteration

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

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

### Kildare Town Renewal Masterplan – Public Realm Enhancements

Submission	Summary of Issue
107 Mark Stafford	Submits that the proposed laneway strategy is welcomed particularly those adjacent to the Cathedral. Suggests removal of signs at upper levels which are not in keeping with the historic area. Submits that the laneway strategy should include all laneways in the town.
139 Suzanne Doyle	Requests that section 4.3.4 includes a public realm activation programme that will resource and support development of activities that enhances the attractiveness of town centre. Also requests that this section includes an extension to Market House, which is limited by space. States that such a provision should be instead of the water tower project.



## Chief Executive's Response

The comments relating to the laneway strategy are noted. The removal of signage (including overhead signage), road markings and utilities wiring will be considered as part of the preparation of the laneway strategy. The Town Renewal Masterplan seeks to prioritise the enhancement and regeneration of laneways within the historic core of the town in the first instance. Other potential laneway projects outside the town centre may be considered at a later stage.

The request relating to the development of a public realm activation programme is accepted. As outlined in the Chief Executive's Recommendation in the Town Centre Objectives section above, it is considered appropriate that a new objective (TCO 1.7) be included to support this.

The request relating to the extension to Market House which should be developed instead of the water tower project is noted. It is the intention of the Part 8 for Market Square to identify a potential future extension footprint to the Market House. It should be noted that the extension itself will not form part of the Part 8 proposal. It is considered appropriate however, to include an additional objective supporting an extension of the Heritage Centre. There are no plans to remove the Water Tower Project from the Town Renewal Masterplan.

## Chief Executive's Recommendation

### Proposed Material Alteration

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

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

### Kildare Town Renewal Masterplan – Train Station Improvements

Submission	Summary of Issue
107 Mark Stafford	States that the Section 4.3.5 proposal for additional car parking at this location is welcomed. It is submitted no residential development will be permitted at this location or limited to certain number of apartments.
139 Suzanne Doyle	Welcomes the inclusion of section 4.3.5 but requests that reference be included to enhance the interior platform of train station (including the possible placing of a piece of public art) or effective promotional artwork on approach from both sides of track to enhance the town's important tourist identity and promote the station as a station major stop-off destination.

### Chief Executive's Response

With regard to the comments relating to the area to the north of the train station, it should be noted that this land is zoned 'B\*: Existing Residential/Infill' whereby infill residential development would be acceptable in principle and reflect the surrounding established land use. The zoning designation 'B\*' also includes a site-specific objective to incorporate significant pedestrian and cycling infrastructure and a high quality public realm to provide for a northern approach to the railway station.

The requests contained in Submission No. 139 requesting changes to the interior of the train station are noted, however this is a management and operational issue for Iarnród Éireann and is not within the remit of a land use plan.

### Chief Executive's Recommendation

No change recommended.

### Kildare Town Renewal Masterplan – Old Town Courthouse and Water Tower Site Improvements

Submission	Summary of Issue
107 Mark Stafford	States that proposals to the Old Town Courthouse (section 4.3.6) is welcomed and notes its potential to be developed as a tourist attraction similar to Wicklow Gaol or Lifford Old Courthouse. Welcomes proposal to re-use of the Water Tower site. Suggests that it should be a destination in its own right and not as a sub-office of the heritage centre. States that this is a possible location for the Kildare Craft, Creativity and Design Hub.
139 Suzanne Doyle	<p>With regard to section 4.3.6, the submission states that the redevelopment of the Courthouse is timely but notes the strong appetite for the space to be developed as an interpretative centre that recognises the significance of the equine industry. Refers to the example of the equine museum in Newmarket, England which started on a small scale and is now on its third extended iteration due to the success of the venture.</p> <p>States that the vision for water tower while very attractive, is overly ambitious, until the public realm of the town square is completed. Submits that it would be more practical to support the consolidation of the town square with an extension of Market House building. States that another alternative project would be to support the continued development of Cathedral Grounds with perhaps an interpretative centre on the site.</p>

### Chief Executive's Response

The potential for highlighting key architectural and historical features of the Courthouse will be explored as part of the overall restoration and repurposing of the building.

The comments welcoming the proposed re-purposing of the water tower site are noted. The Draft Plan includes an objective (EDO 1.4) to provide for the development of a Kildare Craft, Creativity and Design Hub within the town centre, with the old Courthouse being noted as a potential location. It is also noted that objective EDO 2.5 also provides for an investigation of the Courthouse being reused for a mix of cultural, community, leisure and/or tourism uses in conjunction with its use as the Racing Legends Museum.

The comments contained in Submission No. 139 relating to the Courthouse and water tower are acknowledged. It should be noted that the Draft Plan is designed to reflect and provide support for the 'Delivery Proposals' contained in the Kildare Town Renewal Masterplan. The Draft Plan notes that the site '*could be developed*' as a Kildare Craft, Creativity and Design Hub. Such a hub is considered an appropriate use for this historic building; however all normal planning consent processes will be required to be adhered to for any project of this nature to progress.

The Draft Plan reflects the 'Delivery Proposals' contained in the Town Renewal Masterplan. The Water Tower Project is a conceptual high level design proposal which will be subject to further analysis and assessment as the project progresses. There are no plans to remove this project at this stage.

**Chief Executive's Recommendation**

No change recommended.

**Town Renewal Projects Delivery Schedule**

Submission	Summary of Issue
107 Mark Stafford	Submits that all of the town renewal projects outlined in Table 4.1 are important and sees no need to rank them in terms of importance.
139 Cllr. Suzanne Doyle	Requests the following adjustments to Table 4-1: <ul style="list-style-type: none"> <li>• Include additional parking as a priority in conjunction with Market Square public realm.</li> <li>• Link to KROV Short Term 5</li> <li>• Courthouse Medium Term 4</li> <li>• Water Tower Long Term 1</li> </ul>

**Chief Executive's Response**

The Draft Plan reflects the 'Delivery Proposals' contained in the Kildare TRMP and should priorities change, or additional funding opportunities arise, the roll out of the projects may differ but will be an operational matter for the Special Projects and Public Realm team.

**Chief Executive's Recommendation**

No change recommended.

**Town Renewal Objectives**

Submission	Summary of Issue
139 Cllr. Suzanne Doyle	<p>Requests that additional objectives be included after TCO 2.4, as follows:</p> <p><i>TCO2.5: To select a palate of materials that will give an attractive consistent treatment for public open space throughout the town and be used through conditions of planning to ensure a consistent approach for town aesthetics.</i></p> <p><i>TCO2.6: To require all development within town centre to achieve high standards of design, working within guidelines that aim to achieve a consistent complimentary aesthetic within the urban footprint.</i></p> <p><i>TCO2.7: That any development seeking to deliver a multistorey building (above 2 floors) must use appropriately qualified design teams with experience in delivering quality buildings within heritage towns and similar environs. (This objective can be placed elsewhere and worded more appropriately if required.)</i></p>

**Chief Executive's Response**

Regarding the request to include an objective relating to a bespoke palette of materials, it should be noted that a Public Realm Strategy will be prepared once the TRMP is finalised. This strategy will prescribe a palette of materials and finishes which will be used in all public realm works going forward. Accordingly, it is considered appropriate that an additional objective be included to support the preparation of a public realm strategy as part of the implementation of the Town Renewal Masterplan.

The request to include additional objectives relating to design standards, design teams and multistorey buildings within the town centre is noted. All development proposals within the town are assessed on their own merits by the planning authority with an emphasis on achieving high standards of design, while having regard to a wide range of relevant guidelines and policies, including the provisions of Chapter 15 Development Management Standards of the Kildare County Development Plan 2023-2029 and Section 28 Ministerial Guidelines in relation to Urban Development and Building Heights (2018). Furthermore, the designation of the town centre as an Architectural Conservation Area has provided an additional layer of policy guidance and protection both at the CDP level and in the Draft Plan to safeguard the historic character and architectural heritage of the town centre (objectives BHO 2.1 to 2.6 inclusive).

There is no provision within the Planning and Development Regulations 2001 (as amended) regarding minimum professional requirements for persons preparing planning applications or design teams, and therefore to include such a statement within a local area plan would be ultra vires. The objectives of the Draft Plan, and the overarching policies contained in the CDP, strive to achieve high quality developments.

### **Chief Executive's Recommendation**

#### **Proposed Material Alteration**

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

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

## Chapter 5 Economic Development

### Economic Development – General Issues

Submission	Summary of Issue Raised
135 Kildare Town Chamber of Commerce	Asks what specific policies are there in the Plan to address the higher unemployment and higher deprivation levels in Kildare?
139 Cllr. Suzanne Doyle	The submissions states that the Census 2016 data is not reliable enough to base any conclusions on.

#### **Chief Executive's Response**

Deprivation levels are acknowledged in the Draft Plan under Chapter 6; however, the function of a land use plan is to provide the necessary and appropriate quantum of zoned land to attract economic development in line with population growth and to ensure the necessary supporting infrastructure is available during the lifetime of the plan rather than to address deprivation levels specifically. Issues related to reducing levels of poverty and social exclusion are outside the scope of the Plan. Pobal is the Government Agency with responsibility for supporting communities and local agencies toward achieving social inclusion and development and to promote quality enhancement amongst local community-based groups, develop programme and system management tools and work to ensure funded projects work within agreed guidelines. Pobal are also responsible for administration and management of Government and EU funding to address disadvantage and support social inclusion.

Such matters, at local level, are more appropriately addressed through the Local Community and Economic Plan (LECP) [which is currently being reviewed for Kildare] and through funding programmes such as the Social Inclusion and Community Activation Programme (SICAP) 2018-2023.

#### **Chief Executive's Recommendation**

No change recommended.

### Kildare Town's Economic Development Strategy

Submission	Summary of Issue
115 Teresa Harrington	This submission is concerned the Plan does not do enough to increase local employment and decrease commuting.
134 Cill Dara le Gaeilge	States that Cill Dara le Gaeilge provides support to local businesses that wish to leverage the Irish language to promote their business through signage, marketing or through the provision of services. Refers to the Gnó Chill Dara programme offered by Cill Dara le Gaeilge which is open to any business in the county and should be mentioned in the Economic Development Strategy. Submits that the table listing how the Economic Development Strategy will be achieved should include the following bullet points: <ul style="list-style-type: none"> <li>• <i>Through providing grants to businesses that wish to erect permanent Irish language or bilingual signage on their</i></li> </ul>

Submission	Summary of Issue
	<p><i>premises.</i></p> <ul style="list-style-type: none"> <li>• <i>By allocating funding to leisure/recreation/environmental/heritage projects only if Irish language or bilingual signage is erected for those projects.</i></li> <li>• <i>Through encouraging the use of the Irish language at all levels of business by funding an award scheme for businesses that use Irish.</i></li> <li>• <i>By establishing a 'Is le gach duine an Ghaeilge' initiative to encourage everyone to use whatever Irish they have and to promote businesses and organisations that provide services through Irish.</i></li> </ul>
139 Cllr. Suzanne Doyle	<p>The submission states there is a need to review the location of zoned land in the context of the Economic Development Strategy (pg43).            Contends that the Economic Development Strategy should mention Building the Brigid brand as an International USP for town.</p>

### Chief Executive's Response

As part of the preparation of the Draft Plan a full review of the land within the study area was undertaken. In relation to the zoning of land for economic land uses a Settlement Capacity Audit was carried out to ensure the land zoned could be tiered as to whether the site was serviced or serviceable during the lifetime of the plan. This element of the study is not a statutory requirement of the NPF (as it is for residential development) however, is considered best practice to ensure a robust approach to the zoning of land for economic land uses and was undertaken in the preparation of the Draft Plan.

The issue raised that not enough has been done to increase local employment is noted. The Draft Plan provides for 63 ha of land to attract a variety of sectoral employment opportunities. The objectives in the Draft Plan and those within the County Development Plan support a wide range of employment sectors. Furthermore, it is proposed to include additional zoned land for Enterprise and Employment, in response to issues raised (see Locations for Economic Development).

The comments raised in respect of Cill Dara le Gaeilge are noted. The Draft Plan under Objective BHO 2.2 encourages the use of the Irish language for shopfronts. Similarly, Section 15.14.1 and Objective REO40 of the Kildare County Development Plan 2023-2029 promotes and encourages the use of the Irish language on shopfronts and outside public buildings. However, it is outside the remit of a land use plan to promote the use of speaking the Irish language as this is not considered measurable from a planning perspective. A local area plan is focused on physical planning issues such as the location of development, the provision of infrastructure and the appropriate use of land.

The point with regard to promoting the "Brigid" brand as a unique selling point for the town is noted and accepted.

**Chief Executive's Recommendation  
Proposed Material Alteration**

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

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

**Locations for Economic Development**

Submission	Summary of Issue
033 James Johnston	<p>The submission by the owner of the lands surrounding Cherryville junction supports the development of an inland port at this location for the following reasons:</p> <ul style="list-style-type: none"> <li>• It's an ideal location between Junction 13 and 14.</li> <li>• The general area has minimal residential dwellings.</li> <li>• Would lead to extra jobs in Kildare Town.</li> </ul>
139 Cllr. Suzanne Doyle	<p>Cherryville – The submission welcomes reference to the inland port but suggest that this should be reflected in the land use zoning map.</p>
067 John Conway	<p>Kildare Town has a higher than national unemployment, it is not appropriate to de-zone land for industry or other employment uses.</p>
135 Kildare Town Chamber of Commerce	<p>Notes that the town's unemployment rate that is higher than the national rate and questions if it appropriate to de-zone land for industry or other employment uses.</p>
107 Mark Stafford	<p>States that sufficient lands need to be zoned for economic development. Submits that the need for office space should be addressed by the Plan in Section 5.5.1.</p> <p>Submits that the Enterprise and Employment zoning referred to in objective EDO 1.5 and Industry and Warehousing zoning in objective EDO 1.6 are substantial tranches of land where the cost of development may be prohibitive, and that phasing may be required. States that smaller more manageable sites particularly those to be zoned Q Enterprise and Employment should be provided in the Plan. Notes that the objective in the previous plan to promote Magee Barracks as an appropriate site to develop enterprise and employment (7.3.3, EDO1) has been removed and alternative lands should therefore be identified.</p>
139 Cllr. Suzanne Doyle	<p>The submission requests that the Modus Link site has the appropriate zoning for a hotel.</p> <p>The submission refers to the Equine Innovation Hub under Section 5.5.4 of the Draft Plan and requests numbers on what level of activity is in this centre and how many jobs it supports.</p> <p>'1': Requests enterprise and employment uses on an area of land</p>



Submission	Summary of Issue
	located on lands proposed to be zoned 'Cp2' in Draft Plan, immediately to the north of the of rail line on Dunmurray Road.

### Chief Executive's Response

The comments made in support of Cherryville Junction are noted. Development at Cherryville Junction does not form part of the development strategy for Kildare Town as it is located outside of the development boundary. However, it forms part of the County Kildare future development strategy as per Objective RE 044 of the Kildare County Development Plan 2023-2029. Given that Kildare Town is the closest urban settlement, the Draft Plan supports its development subject to the feasibility of Cherryville Junction as a transport hub and distribution centre being examined across a wide range of evidence-based assessments, to ensure proper planning and sustainable development occurs.

In relation to the request to include Cherryville Junction within the development boundary for the Draft Plan, the National Strategic Outcome (NSO) No. 1 of the National Planning Framework (NPF) provides for Compact Growth. The Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly (RSES) 2019-2031 reinforces this approach stating that Compact Growth and Urban Regeneration promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint. Furthermore, the RSES focuses on the integration of transportation and land use. The subject lands are located ca. 4km from Market Square and ca. 1km from the local area plan boundary. The inclusion of the lands at Cherryville Junction within the Draft Plan would represent the development of a significant land bank on the periphery of the town, disconnected from the town itself, without the necessary supporting infrastructure. Therefore, the inclusion within the Draft Plan would not represent a consolidation of urban land uses zonings in accordance with the requirements of the National Planning Framework and Regional Spatial and Economic Strategy.

The point raised about de-zoning land for employment uses is noted. Appendix A Section 1.4 of the Development Plan Guidelines (2022) provides details on the methodology to be applied to the zoning of land for enterprise and employment within a land use plan. The methodology has regard to the population targets, job ratio labour force participation rate and future participation rate. Applying this methodology in the Draft plan (Table 5-1, refers) concludes that 1,127 jobs are required during the lifetime of the plan to reach a job ratio of 0.70. Having regard to the issues raised in the submissions, it is considered reasonable to include additional lands for enterprise and employment at the following locations:

- Approx. 4.5 ha immediately north of the railway line and east of the Old Road (amend zoning objective from Phase 2 Residential to Enterprise and Employment).
- Approx. 6.5 ha between lands zoned 'Q: Enterprise and Employment' and 'H: Industry and Warehousing' on the Monasterevin Road (amend zoning objective from Agriculture to Enterprise and Employment).

The comment in relation to the need for office space is noted. The Zoning Matrix contained in the Draft Plan 'Permits in Principle' offices on land zoned Town Centre. Offices are also 'Open for Consideration' across a number of land uses, including the Former Magee Barracks site.

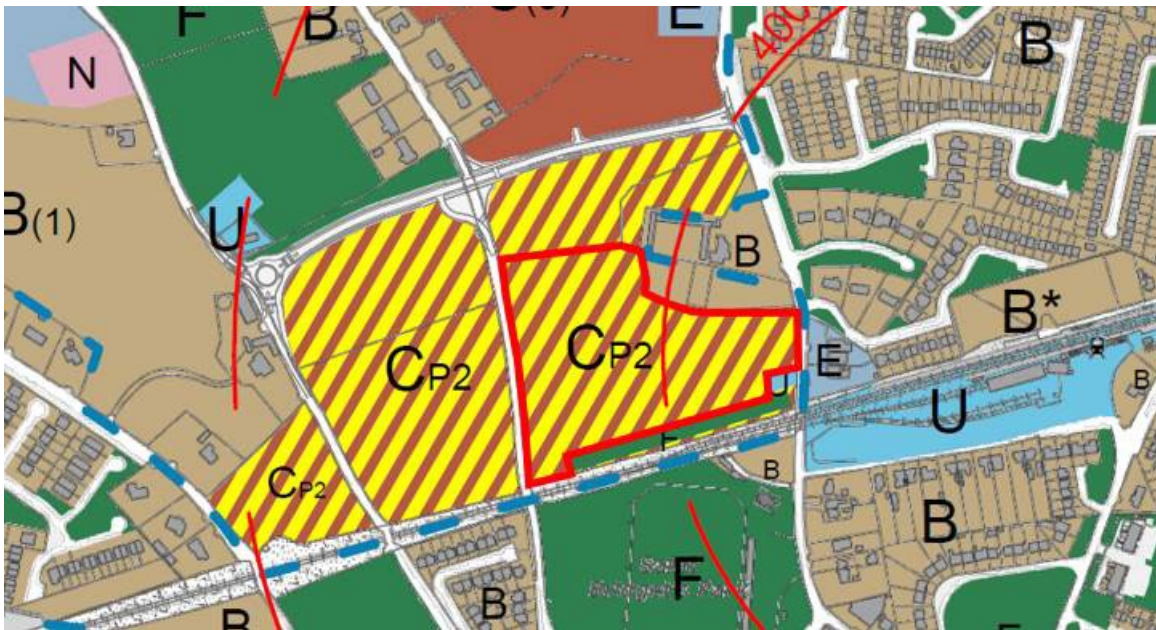
With regard to the request that the Modus Link site be considered for a hotel use, the subject lands are zoned Q: Enterprise and Employment where a guest house / hotel / hostel are 'Open for Consideration' within the specific land use zone.

The request for additional information in relation to the Equine Innovation Hub is noted. However, the details requested are not available. Kildare County Council's LEO office established the hub which was one of a number of hubs that formed part of the County Kildare Hub Strategy. Additional text is proposed to acknowledge the Council's involvement and an amendment to Objective EDO 1.3 in this regard.

### **Chief Executive's Recommendation**

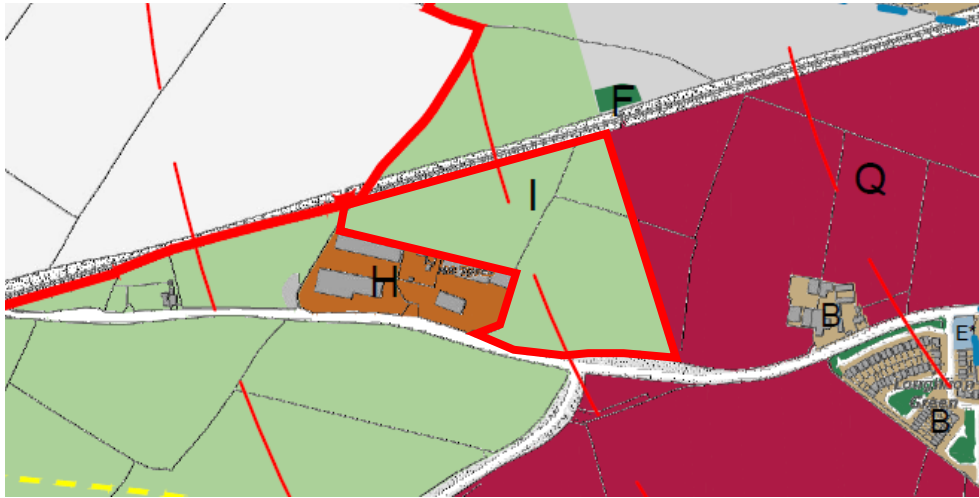
#### **Proposed Material Alteration**

Map 11.1 Land Use Zoning, amend zoning of land outlined in red below (approx. 3.6 ha) from 'CP2 New Residential Phase 2' to 'Q; Enterprise and Employment', as follows:



### Proposed Material Alteration

Map 11.1 Land Use Zoning, amend zoning of land outlined in red below (approx. 6.3 ha) from 'I Agriculture' to 'Q; Enterprise and Employment', as follows:



### Proposed Material Alteration

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

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

### Proposed Material Alteration

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

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

## **Economic Development Objectives**

<b>Submission</b>	<b>Summary of Issue Raised</b>
139 Cllr. Suzanne Doyle	The submission states that in respect of the Economic Development objectives they should include reference to; prioritising town centre regeneration, through support of independent retail and tourism activities that enhance the tourism package of town and importantly offer opportunities to extend stay of visitors to close by attractions, such as KTOV, INS and Curragh Racecourse. It is stated that this objective should be first in list.

### **Chief Executive's Response**

Section 5.6 of the Draft Plan relates to Tourism and the first objective is to encourage the development of new or the upgrading / extension of tourism activities / facilities in particular to inter alia, those associated with retail tourism. The Draft Plan also supports (Objective EDO 1.2 refers) to actively encourage the redevelopment of brownfield sites on town centre lands for enterprise and employment creation. Furthermore, it is the policy under RE P15 of the CDP to support, promote, protect, improve, encourage and facilitate the development of tourism throughout the county as an important contributor to job creation in accordance with the proper planning and sustainable development of the area. As detailed in Section 1.2. of the Draft Plan the policies and objectives included in the Plan are specific to the future development of the town of Kildare and the Draft Plan does not replicate policies and objectives that are already addressed within the Kildare County Development Plan 2023-2029 as this is the higher-level planning policy document. Section 5.6 of the Draft Plan refers to additional accommodation to increase footfall across the town for longer periods. In support, hotel accommodation is included in the Zoning Matrix across a range of land uses. However, it is acknowledged that a specific objective to promote additional tourist accommodation within the town is warranted and same shall be included.

### **Chief Executive's Recommendation**

#### **Proposed Material Alteration**

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

***EDO 2.7 Facilitate the provision of a range of additional tourist accommodation types throughout Kildare Town to facilitate the expansion of the tourism product, taking cognisance of the primacy of the Core Retail Area.***

## **Tourism**

<b>Submission</b>	<b>Summary of Issue Raised</b>
118 Senator Mark Wall	States that the Plan must concentrate on developing the massive potential of tourism that exists and can develop within the town and on its doorstep which can assist job creation and the wonderful groups in the town currently working in this area.
038 Select Vestry of St. Brigid's	Submission notes the lack of public toilet facilities in the town for tourists.

Submission	Summary of Issue Raised
Cathedral	
050 Benson Ecology	<p>Submission states that while Natural Heritage is covered in Chapter 9 there is no mention of EcoTourism in Chapter 5. Submits that Chapter 5 should acknowledge that Kildare Town is surrounded by areas of major ecological interest and in some cases international significance including the Curragh Plains, Pollardstown Fen and the Bogs and the water courses of south and west Kildare are of significant ecological and scientific interest. States that there is growing international and domestic public appreciation of the importance of nature, natural heritage and nature-based solutions in meeting our climate and biodiversity challenges. Notes that the proposed National Peatlands Park as mentioned in the County Development Plan should be referred to.</p>
127 Kildare Greens	<p>Submits that in section 5.6.1 there is no mention of EcoTourism and states that the Plan should acknowledge that Kildare Town is surrounded by areas of ecological interest including the Curragh, Pollardstown Fen and the bogs of south and west Kildare. While noting that this is considered “niche” tourism the submission states that there is a growing appreciation of the importance of nature and nature-based solutions in meeting our climate and biodiversity challenges.</p>
134 Cill Dara le Gaeilge	<p>With regard to section 5.6.1, the submission states that Irish language should be considered an additional asset to Kildare Town’s unique religious heritage and equine, retailing and recreational assets and included as a heading in this section as a unique selling point for tourism in the area.</p>
139 Cllr. Suzanne Doyle	<p>In the context of Table 5-2 the submission states that bed-space ratios of tourism towns to which Kildare Town should emulate should be included in the Plan.</p> <p>Submission states that the new Fáilte Ireland Welcome Standard should be supported.</p> <p>Submits that undoubtedly the town will be enhanced by the arrival of a large hotel, but we should have policies that support the continued supply through this organic approach already been provided in the town.</p> <p>Requests the Draft Plan identify on a map a core town centre footprint within which we would encourage property owners to explore the development of tourism bed spaces. Perhaps through LEO a pilot of running the spaces through a town co-op (potentially managed through tourism office) could be explored, where consistency of standards is achieved, economies in management where the property owners are simply responsible for investing in high quality spaces that would yield a monthly income.</p>

Submission	Summary of Issue Raised
	<p>The heritage of the town should be supported through naming policies on all new developments and the Plan should put forward a range of suggestions for developments that can build on heritage, ecclesiastical and equine tourism brands.</p> <p>In relation to Section 5.6.1.3, the submitter supports the vision but states the Plan needs policies to protect and nurture independent retail. In the context to objective TCO 1.3 the following should be included, '<i>support and protect the independent retail sector, particularly outlets that improve the attractiveness of town as a tourism destination centre</i>'.</p> <p>In relation to Section 5.6.1.4 (Food Tourism) it states that it is very good but that it needs to reflect the range of offerings.</p>

### Chief Executive's Response

Enhancing Kildare Town as a Tourist Destination is one of the Strategic Principles of the Draft Plan. Part of the Economic Development Strategy is to develop Kildare Town as a national tourism hub by expanding and protecting the Kildare Town tourism product and by supporting appropriate tourism developments and spin-off enterprises. It is considered that the Draft Plan adequately addresses the substantial potential of tourism for job creation.

The provision of public toilets is outside the remit of a land uses plan and the provision of same is wider Council policy.

The comments made in respect of eco-tourism in respect of the Curragh, Pollardstown Fen and the bogs of south and west Kildare is noted. The tourism attractions referred to are outside the development boundary for Kildare Town and fall within the remit of the County Development Plan. There are a number of policies and objectives within the CDP that supports eco-tourism as well as the Curragh, Pollardstown Fen and peatlands. Section 1.2. of the Draft Plan states that the policies and objectives included in the Plan are specific to the future development of the town of Kildare and the Draft Plan does not replicate policies and objectives that are already addressed within the Kildare County Development Plan 2023-2029 as this is the higher-level planning policy document.

The point raised regarding the Irish language in the context of the Tourism Strategy is noted. However, a local area plan is focused on physical planning issues such as the location of development, the provision of infrastructure and the appropriate use of land, rather than the issue of the Irish Language. It should be noted that the Development Plan Guidelines for Planning Authorities (2022) issued by the Minister state that the statutory elements and remit of the development plan are set out clearly in the Planning Act. The guidance further states that in preparing the development plan, Planning Authorities must exercise caution not to inappropriately seek to address the operation of other statutory codes and regulatory regimes that relate to the development sector, however, are outside the legislative remit of a local area plan.

With regard to the request on bed space ratios in Submission No. 139, it is not considered appropriate to compare Kildare Town to other settlements in the context of a land use plan. The Draft Plan supports tourism, and the Chief Executive's Recommendation proposes an additional objective to support additional tourist accommodation within the Draft Plan.

The Fáilte Ireland 'Welcome Standard Classification' has been referred to under Table 5-2 of the Draft Plan. It is considered outside the remit of a land use plan to include an objective to support a business reward system such as that offered by Fáilte Ireland, as it is outside the control of the Council to monitor its implementation.

The request regarding the identification within the core town centre footprint where bed-spaces will be encouraged is noted. The Draft Plan has identified through the Land Use Zoning map and associated Land Use Zoning Matrix (Table 11-6 and Map 11.1 refers) a range of land uses together with an indication of their broad acceptability in each land use zone. Guest house/hotel/hostel is 'Permitted in Principle' on the Town Centre zoning and 'Open to Consideration' across a range of other land uses. These are the areas where property owners can explore such a use. The establishment of a town co-op for tourism bed spaces is outside the remit of a land use plan.

The KCDP 2023-2029 acknowledges that placenames are an important part of our cultural heritage and placemaking and actively seeks to ensure that our rich heritage is protected and enhanced through the naming of new residential developments (Section 15.4.15, refers). All applications for residential development shall provide details as to the proposed naming of the estates, inter alia, that they reflect local heritage. The Draft Plan does not replicate policies and objectives that are already addressed within the Kildare County Development Plan 2023-2029 as this is the higher-level planning policy document.

With regard to the request on retail tourism, Objective EDO 3.3 refers to supporting and facilitating the development of retail, retail services and niche retailing. In response to the submission additional text referring to independent retailers is acceptable. In respect of the amendment to Objective TCO 1.3 niche retailing is already referred to in the objective and the support of independent retailers would be more appropriate in the Section of the Draft Plan that relates to retailing.

The comment from Submission No. 139 on Food Tourism is noted. The purpose of this section in the Draft Plan is to provide an overview, rather than an exhaustive list. The Draft Plan notes there is a significant food, beverage and accommodation offering in Kildare Town. It is considered that there is sufficient policy support in this regard.

## Chief Executive's Recommendation

### Proposed Material Alterations

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

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

## Tourism Objectives

Submission	Summary of Issue Raised
134 Cill Dara le Gaeilge	<p>With regard to objectives EDO 2.2 the submission states that any standardised signage and interpretation for tourism facilities and attractions in the town should be bilingual and that the council should be aware of all its obligations under Acht na dTeangacha Oifigiúla (Leasú), 2021, in this regard. Proposes the following modified wording: '<i>Facilitate the provision of standardised Irish language / bilingual signage and interpretation for tourism facilities and tourist attractions throughout the town.</i>'</p> <p>With regard to Objective EDO 2.3 (b) – creation of a walking trail/greenway, the submission states that any signage on trails of this kind should be bilingual and would add value to such important facilities.</p> <p>Recommends the addition of a bullet point to objective EDO 2.7, as follows '<i>Engage with Cill Dara le Gaeilge in seeking to ascertain how best to promote Irish language and cultural tourism to the area</i>'</p>

## Chief Executive's Response

The comments in relation to Objective EDO 2.2 are noted and accepted. The comments in relation to the signage on trails is noted. However, Objective EDO 2.2 will govern all signage to tourism facilities and attractions and therefore the change to bilingual will be applied in this regard.

In respect of the recommendation for a new objective to promote the Irish language this is outside the remit of a land use plan. A local area plan is focused on physical planning issues such as the location of development, the provision of infrastructure and the appropriate use of land.

## Chief Executive's Recommendation

### Proposed Material Alteration

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



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

### Retailing

Submission	Summary of Issue Raised
103 Seán O'Fearghail	<p>The submission states the following in relation to Kildare Village:</p> <ul style="list-style-type: none"> <li>• Value Retail/Kildare Village must be recognised as the most significant development in Kildare in modern times, attracting huge visitor numbers, providing valuable employment for people locally and from nearby towns and counties.</li> <li>• Regarding land zoning, lands should be identified and preserved to accommodate the future development of The Village.</li> <li>• Future development at Kildare Village should be contingent upon strengthening existing and providing new linkages to the town centre.</li> <li>• Future expansion of Kildare Village must avoid replication of the existing retail/hospitality offer available at the town centre.</li> <li>• Development of out-of-town retail facilities should be prohibited to avoid the doughnut affect.</li> <li>• Estate-based retailing should be avoided.</li> </ul>
107 Mark Stafford	<p>Submits that a number of commercial units and businesses at White Abbey Road and Academy Street should be included as part of the Core Retail Area.</p>
139 Cllr. Suzanne Doyle	<p>The submission recommends that Map 5.1 should be extended to include all of the identified masterplan area between Bride Street and Bang-Up Lane.</p> <p>The submission states that a map identifying the KTOV link for public realm enhancement should be included. Also contends that Academy Street will require commercial activation and enhancement and a policy that manages this in a complimentary fashion would help optimise the success of linkages.</p> <p>The submission questions the rationale behind the location of the neighbourhood centre on Map 11.1 and questions whether it is possible to support one neighbourhood centre in Southgreen but identify a number of sites. The submitter is concerned that one location creates a ransom strip and increased site acquisition costs.</p>

### **Chief Executive's Response**

The Kildare Tourist Outlet Village (KTOV) is recognised in the Draft Plan as a key tourist retail attraction in the town and its continued operation is supported by a series of appropriate retailing objectives.

Similarly, the transport objectives support the creation of the pedestrian link connecting the town centre to the KTOV. The lands for the KTOV have been zoned for Outlet Retailing in recognition of their unique retailing function, parent permission and to protect the viability and vitality of the town centre. The Draft Plan does not support the further development of out-of-town retail facilities, with the exception of appropriately sized retailing in neighbourhood centres and convenience retailing in Existing and New Residential areas, as provided in accordance with the Land Use Zoning Map and the Zoning Matrix.

The proposal in Submission No. 107 and 139 relating to Map 5.1 is noted. Map 5.1 pertains to the Core Retail Area which has been designated under the Kildare County Development Plan 2023-2029. The mapping of boundaries for the Core Retail Areas in town centres is outside the remit of a local area plan as it is a requirement of a Development Plan (similar to an Architectural Conservation Area). As a point of clarity, a note that the map has been reproduced from the CDP shall be included on Map 5.1.

As per the Retail Planning Guidelines (2012) the mapping of the Core Retail Area relates principally to the primary and secondary shopping streets in urban areas. The areas suggested in the submissions do not comprise the area of primary retail function for Kildare Town. It is important to note Objective EDO 3.2 of the Draft Plan encourages retail function at ground floor within the Core Retail Area and development that would undermine the primary use of the area for retail purposes will be carefully considered. Furthermore, the mapping of the Core Retail Area plays a vital role in protecting the viability and vitality and enhancing the performance of the town centre and any extension of same must be carefully considered in the context of the application of the sequential approach to the location of retail development and distinguishing sites as edge-of-centre and out-of-centre.

With regard to the pedestrian KTOV link, it is noted that Figure 4-4 of the Draft Plan includes a concept sketch of the pedestrian link from the town centre to the KTOV, which provides for commercial activation through the development of a split-level building on the corner of the link and Academy Street. The two residential units located at Academy Street where the proposed link is located have been zoned for Town Centre uses in order to realise a commercial activation at this location. Furthermore, Map 7.1 which relates to permeability measures also illustrates the proposed link.

**Note:** A submission was received from the owners of Kildare Tourist Outlet Village and this is considered under Section 6 of this report.

The location of the Neighbourhood Centre zoning in Southgreen was considered in the context of providing appropriately sized retailing and retail services to serve a localised catchment. It is important to note that shop-convenience is 'Open for Consideration' within the Existing Residential/Infill zoning and also the New Residential zoning subject to a net retail floor space of 100sqm. thereby providing the potential for retailing elsewhere within the Southgreen area. However, it is

considered acceptable to increase the net retail floor space to 150sqm within the Southgreen area. It is noted that Submission 103 states that 'estate-based retailing' should be avoided, however it is considered that convenience retailing serving a localised catchment is in line with the development principle of the 10-minute settlement.

**Chief Executive's Recommendation  
Proposed Material Alteration**

Chapter 5: Map 5.1 insert text in the legend that the map has been reproduced from the Kildare County Development Plan 2023-2029 as follows:

*This map has been reproduced from the Kildare County Development Plan 2023-2029.*

**Proposed Material Alteration**

Chapter 11, Section 11.4, amend footnotes under Table 11-6 Land Use Zoning Matrix as follows:

LAND USE	A: Town Centre	B: Existing Residential	C: New Residential	D: Retail Outlet Centre	E: Community and Education	F: Open Space and Amenity	G: National Stud and Green Belt	H: Industry and Warehousing	I: Agriculture	K: Commercial	N: Neighbourhood Centre	Q: Enterprise and Employment	R: Retail/Commercial	S: Equine Industry	T: Mixed Use	U: Utilities/Services
Shop - Convenience	Y	O <sup>7</sup>	O <sup>8</sup>	N	N	N	N	N	N	O <sup>91</sup>	O <sup>92</sup>	O <sup>93</sup>	Y <sup>94</sup>	O <sup>95</sup>	O <sup>96</sup>	N

<sup>7</sup> No single unit shall exceed 100sqm. of net retail space, *except within the area north of the rail line between east of Green Road and west of Dunmurray Road which shall not exceed 150sqm of net retail space.*

<sup>8</sup> No single unit shall exceed 100sqm. of net retail space, *except within the area north of the rail line between east of Green Road and west of Dunmurray Road which shall not exceed 150sqm of net retail space.*

## **Retail Objectives**

<b>Submission</b>	<b>Summary of Issue Raised</b>
134 Cill Dara le Gaeilge	Under Retailing Objectives, the submission recommends that the following provision be included: <i>'Engage with Cill Dara le Gaeilge in seeking to ascertain how best to promote local businesses that use Irish'</i>
139 Cllr. Suzanne Doyle	<p>In relation to EDO 3.1 it is submitted that the objective should be strengthened and acknowledge the particular challenges that developing a traditional retail offering in the town centre that Kildare Town has.</p> <p>The submission queries whether it would be possible to have an objective to examine the potential for working with LEO to develop a pilot of creating a co-operative of independent retailer / shop owners to work in tandem in attracting a nice independent retail centre.</p> <p>The submission would like policies that prevented the proliferation of franchise retail in preference for independent retail. It is suggested a restriction on the ratio of retail space that can be devoted to franchise activity or that perhaps 70% of retail space in core centre be dedicated to independent retail. It is stated that this is in the interest of supporting a strong tourism attraction and an identity for the town.</p>

## **Chief Executive's Response**

The request for an additional objective to promote the use of Irish in business is outside the remit of a land use plan. The promotion of the use of the Irish language is not measurable from a planning perspective. It should be noted that the Development Plan Guidelines for Planning Authorities (2022) issued by the Minister state that the statutory elements and remit of the development plan are set out clearly in the Planning Act. The guidance further states that in preparing the development plan, Planning Authorities must exercise caution not to inappropriately seek to address the operation of other statutory codes and regulatory regimes that relate to the development sector however are outside the legislative remit of a development plan.

The request regarding objective EDO 3.1 is noted; however, Section 5.7 of the Draft Plan currently acknowledges the challenges faced by traditional bricks-and-mortar stores and also referenced is the move away from in-store retailing which has been acknowledged in the Town Centre First Policy (2022). The drafting of objectives for inclusion within a land use plan should target a specific area for improvement, to be problem solving, rather than outlining challenges.

The Draft Plan supports the development of niche retailing, and various types of retailing have been considered and planned for in the context of land uses in the Draft Plan. The development of co-operatives as stated in the submission could be considered by the Local Enterprise Office, however, it is outside the remit of a land use plan.

With regard to the request to place limits on franchise retailing, it is considered that the Retail Planning Guidelines (2012) provide for the accommodation of a diversity of retail offerings in an equitable and sustainable manner. While the suggestion to cap/restrict the number of franchise retailers within Kildare Town, may create opportunities for small business to thrive and grow, it can also limit consumer choice, impact competition and contribute to vacancy. Therefore, such a proposal is not considered appropriate and would contravene the Retail Planning Guidelines (2012) issued by the Minister under Section 28 of the Planning & Development Act (2000) as amended.

**Chief Executive's Recommendation**

No change recommended.

## Chapter 6 Homes and Communities

### Residential Development: Capacity and Delivery

Submission Number	Specific Concern
050 Benson Ecology	<ul style="list-style-type: none"> <li>• Why can't at least 85% of new homes be built with the Settlement Boundary as the former Magee Barracks will already accounts for 60%.</li> <li>• Can vacant, unused or derelict properties and sites be converted for housing.</li> <li>• Welcomes the objective to create an intergenerational settlement in the former Magee barracks.</li> <li>• Questions where the shortfall in social housing will be met.</li> <li>• Questions why the role of cost rental accommodation and housing associations is not detailed.</li> </ul>
103 Seán O'Fearghaí	<ul style="list-style-type: none"> <li>• Social and affordable housing should be prioritised and trading up and trading down opportunities must be facilitated as a matter of equal importance. The current plan fails to address the needs of those who wants to move to a bungalow or supported living facilities.</li> <li>• Also states that no provision is made for larger detached or semi-detached houses to attract buyers with the potential to invest and generate employment in the area.</li> </ul>
104 Irish Home Builders Association	Residential development objectives (page 62) do not comment on changing household sizes occurring nationally and should be specifically recognised so that housing meets future population needs. Refers again to its review of the NPF stating that average household size will be 2.2 in 2040 and states that the draft Plan should reference this.
115 Teresa Harrington	Figures for current and future population do not make sense when the amount of new housing developments completed and not completed are taken into account.
134 Cill Dara le Gaeilge	New housing developments should have Irish-language name to reflect Kildare Towns high number of Irish speakers.
139 Cllr. Suzanne Doyle	<ul style="list-style-type: none"> <li>• A clear profile and graph of housing stock in Kildare Town is required. 62% of the housing stock is labelled as having 5 plus bedrooms, is this correct and can the boundary used to calculate this statistic be defined.</li> <li>• An objective seeking to achieve a balanced mix of housing typologies across the comprehensive town (within settlement boundary) housing stock should be included.</li> <li>• An objective to deliver housing stock that is suitable for the right sizing policy should be included.</li> <li>• An objective should be included to encourage the development of a high quality multi storey (not specified but recognise the need for height to achieve delivery) unit that is attractive to right sizing members of community. Such a development will not be constrained in unit size, should offer concierge facilities and recreation within the building (possibly basement swimming pool),</li> </ul>

Submission Number	Specific Concern
	<p>be in appropriate convenient town centre location (possible brownfield site) and ideally deliver a courtyard garden. The inclusion of a design framework to illustrate the concept within plan, would be helpful. A potential site to consider for this design framework is the current site of KWETB, with the exception of limited existing residential, this is a very well-located land bank within the town centre.</p> <ul style="list-style-type: none"> <li>• CDP density targets are very difficult to achieve without embracing height ambitiously at the cost of personal private space and public open space, each very important factors for personal wellbeing.</li> <li>• Policies are required to ensure historic views are not obscured by tall developments and all multi-unit applications for development should use professionally qualified architects and ideally RIAI members, having regard to the importance the heritage status of town.</li> <li>• To redress deprivation in the town an objective should be added to provide housing that would attract ABC socio economic demographics with strict adherence to Part V and protection of the existing social housing stock. This ratio of housing stock should be monitored to ensure deprivation is being addressed while not creating an elite enclave.</li> <li>• There should be reference to right sizing legislation that offers option for people whose home no longer meets their needs in the last paragraph of 6.4.2 and HCO 2.5.</li> <li>• The site identified in Magee Barracks identified for age friendly housing is welcomed, but another two should be identified. One on Station Road and another on the block of land where KWETB site is currently located. These should be co-located with crèches.</li> </ul>

### Chief Executive's Response

**Note:** Many of the issues raised pertaining to 'Capacity and Delivery' in Chapter 6 are also discussed under Chapter 3 of this report.

The National Planning Framework requires that at least 30% of all new housing units should be built within the defined settlement boundary. The Draft Plan ensures that this requirement will be doubled with approx. 65% of all new residential development taking place within the CSO defined boundary.

Reusing vacant, unused or derelict properties and sites in the town centre for housing is welcomed and supported by the objectives in Chapter 4 of the Draft Plan.

The provision of social housing through the Part V mechanism is only one method of social housing delivery but this provision is provided for under the Development and Planning Act 2000 (as amended). Any site zoned for residential development can deliver social housing for example the land Collaghknock Glebe site has already been ear marked for a PPP housing scheme with the potential to deliver 80-85 units

within the lifetime of the plan. It is also important to note in respect of the 637 social housing applicants this figure relates to those that have Kildare Town as first preference. The Draft Plan has included additional provision at the rate of 25% (the maximum permitted) above the housing allocation as set out in the Core Strategy, in order to address the unmet social housing demand within the town.

Section 1.2. of the Draft Plan states that the policies and objectives included in the Plan are specific to the future development of the town of Kildare and the Draft Plan does not replicate policies and objectives that are already addressed within the Kildare County Development Plan 2023-2029 as this is the higher-level planning policy document.

The CDP provides information in respect of social, affordable purchase and cost rental housing (Section 3.12, refers). Furthermore, it is the policy of the Council under (HO P9) to promote the provision of social and affordable housing in accordance with the Council's Housing Strategy, Housing Need Demand Assessment and Government policy.

#### Existing housing profile of Kildare Town

Census 2016 Small Area Population statistics for the settlement of Kildare Town were used to examine the housing profile of Kildare Town, as these are the most up to date and accurate statistics for this information. It is correct these Census 2016 Small Area Population statistics indicate 62%<sup>9</sup> of the housing stock within the settlement of Kildare Town was labelled as having five or more bedrooms.

The CSO Housing Completion Data by Quarter (NDA 05) has also been used to determine and assess performance.

#### Irish language name of estates

This is addressed in Section 15.4.15 in Chapter 15 Development Management Standards in the CDP.

#### Examination of extant permissions

The Core Strategy was informed by the CSO completions in the year 2022. Similarly, the Draft Plan makes reference to those units as per the Completions data base compiled by the CSO (Section 3.2, refers).

#### Change in household size not recognised.

The comments made in relation to household size being used to estimate population being too large and inconsistent with the NPF are noted. CSO data released on the 30<sup>th</sup> of May 2023 indicates that the average household size in County Kildare is 2.97 persons and therefore, the (verified) figure is considered most appropriate for formulating local planning policy approaches and development strategies.

#### 'Affluent housing'

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<sup>9</sup> <https://visual.cso.ie/?body=entity/ima/cop/2016&boundary=C03899V04650&guid=6619200D-76E1-4A3B-9B70-D0A1446FD29E&theme=5>



It is not considered appropriate for a Land Use Plan to identify areas for 'affluent housing types'.

The purchase of land for social or affordable housing is an operational matter for the Housing Department of Kildare County Council.

#### Right-sizing

Section 6.4.2 'Positive Ageing' in the Draft Plan outlines the importance of lifetime adaptable and age friendly homes. Age Friendly is universal; it is beneficial to everyone; young or old. Furthermore, in the provision of housing, it is a requirement of the Council that a minimum of 20% universally designed units in all residential schemes. This is supported by Objective HCO 2.1 and Objective HCO 2.5. However, it is accepted that Objective HCO 2.5 be amended to make provision for right-sizing housing.

#### Age-friendly housing

The Former Magee Barracks site has been identified and designated as a key area for type of accommodation.

Furthermore, the following zoning designations designate this land use as permitted in principle. These include A: Town Centre, B: Existing Residential, C: New Residential and T: Mixed Use.

#### A balanced mix of housing typologies

The Draft Plan ensures a balanced mix of housing types through Objective HCO 2.1, which requires a good mix of housing types and sizes is provided in all new residential areas and in appropriate brownfield/infill areas, to meet the needs of the population of Kildare Town, including the provision of appropriate supported housing and longer-term residential care solutions designed for older people and/or people with disabilities.

#### Ensuing high quality mix-use multi-storey developments

The Former Magee Barracks site has been identified as a location for development of this nature, as detailed in Section 11.1 of the Draft Plan.

However, the following zoning types designate this land use as permitted in principle. These include: A: Town Centre, B: Existing Residential, C: New Residential and T: Mixed Use.

Regarding this type of development within the KWETB lands, this site provides important further education resources in Kildare Town and the zoning of the site reflects this use and allows for expansion of this key facility.

#### Density of development impacting private amenity space

The CDP and Draft Local Area Plan must have regard to Section 28 Ministerial Guidelines, such as the Sustainable Residential Development in Urban Areas: Guidelines for Planning Authorities (DEHLG, 2009) and the Urban Development and Building Heights: Guidelines for Planning Authorities (DHP&LG, 2018) which highlight that land is a scarce resource and should be managed as efficiently and appropriately as possible from a planning perspective. These Guidelines set out a range of appropriate densities for different site locations having regard to the level of public and active transport modes available. As a general principle, higher densities should be located in the town centre and proximate to public transport corridors and nodes.

The Urban Development and Building Heights: Guidelines for Planning Authorities (DHPLG, 2018) contain a number of mandatory Specific Planning Policy Requirements (SPPRs) which local authorities are obliged to provide for when making their statutory plans. Of particular relevance to this Plan is SPPR 1 which requires local authorities to explicitly identify areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development and that such plans shall not provide for blanket numerical limitations on building height. Having regard to the requirements outlined, this Plan does not propose to place any height limitations on new development in Kildare Town.

Private open space is also governed by Section 28 Ministerial Guidelines and provided for in Chapter 15 of the CDP.

#### Historic views

Concerns relating to new developments obscuring historic views are addressed in Sections 8.3.1 and 8.4 in the Draft Plan and in Maps 8.3 and 8.4 in Appendix A.

### **Chief Executive's Recommendation Proposed Material Alteration**

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

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

**Social Infrastructure Audit (SIA) / General provision of Social Infrastructure**

<b>Submission Number</b>	<b>Specific Concern</b>
043 Mairead Cooney	<p>This submission outlines the following in relation to the SIA.</p> <ul style="list-style-type: none"> <li>• Given the scale of the increase in population of Kildare Town there is an existing and future requirement to provide amenities.</li> <li>• It is important to not just focus on statistics, but to consider what would best serve a community.</li> <li>• A public gym, a swimming pool and tennis courts can be used by residents of all ages.</li> <li>• Residents drive to Monasterevin, Newbridge or Naas to access facilities.</li> <li>• Access to amenities may assist in the demand on GP and hospital services, both of which are under severe pressure.</li> <li>• Considering the climate, it is not acceptable that residents (in greater numbers) continue to drive to avail of leisure facilities.</li> <li>• Playgrounds in Kildare Town should be inclusive for all children.</li> <li>• Residents of all ages and abilities should be considered in the development of future amenities and leisure facilities.</li> </ul>
072 Frank McMahon	<p>The Social Infrastructure Audit is a flawed report.</p> <ul style="list-style-type: none"> <li>• Inadequate provision of public open space and sports facilities in Kildare Town.</li> <li>• Public open space and sports facilities are confused through Kildare Town Social Infrastructure Audit as sports pitches, private lands, club lands and school facilities are included in the calculation of public open space provision.</li> <li>• The Social Infrastructure Audit confirms that Kildare Town has a young population, with lower than national average educational attainment and higher than national average unemployment. The subsequent analysis however does not take any of these factors into account in assessing the need for public open spaces or for sports facilities.</li> <li>• The provision of the Cherry Avenue Park will not address both the lack of sports facilities and public open space.</li> </ul>
087 John Spencer	<p>States that the Draft Plan shows a complete disregard for the residents of housing estates and the actual needs of the town when there is a complete lack of both educational and medical facilities to support the number of new builds in the town.</p>
103 Seán O'Fearghail	<ul style="list-style-type: none"> <li>• The provision of GP services and school places are as important as the provision of water, sewage, and roads and large residential developments are taking place without regard for social infrastructure.</li> <li>• A method needs to be found to integrate the Local Authority Planning function and the HSE and Department of Education.</li> </ul>
108 Cristina Conchi	<p>The plan does not address the current shortage of leisure facilities, medical facilities, educational facilities and overpriced shopping options.</p>
115 Teresa	<p>No new residential units should be granted until the lack of amenities</p>

Submission Number	Specific Concern
Harrington	and facilities in the town are addressed.
118 Senator Mark Wall	Lack of necessary social infrastructure to support the large number of homes built over the past number of years and a social infrastructure audit should be carried out as part of the final plan.
135 Kildare Town Chamber of Commerce	There is no strategy to provide for services in the town, particularly sports facilities for children or adults.
139 Cllr. Suzanne Doyle	<p>Up to date socio-economic information needs to be examined to establish an economic profile of the town and any issues of deprivation, such as educational attainment. Without proper analysis of up-to-date data a diagnosis cannot be made to address issues appropriately. Using such out of date data is negligent.</p> <p>More detail is required in section 6.5 and the use of non-Irish benchmarks for standards of required social infrastructure is unambitious and does not reflect the lived experience of the community.</p>

### Chief Executive's Response

The preparation of Social Infrastructure Audits to inform land use plans in County Kildare are not a statutory requirement in plan making. However, Kildare County Council is at the forefront of providing a wide evidence base for its statutory plans and the SIA is one of the suites of bespoke and tailored reports which accompany the Draft Local Area Plan.

In the absence of any national guidelines in the preparation of SIAs, much effort has been employed to ensure the most appropriate benchmarking tools. Noting that few Irish benchmarks exist in this area, best practice foreign models have been used to inform the KCC methodology.

A lack of social infrastructure within Kildare Town is one of the key findings of the SIA. Such a finding does not mean that These findings have informed many of the focused objectives and zoning objectives throughout this Draft Plan in the areas of education and training, childcare, health, open space, sports and recreation, social and community, arts and cultural facilities, faith facilities and local retail (neighbourhood centres).

While 2022 Preliminary Census results and survey work have informed this SIA, it is acknowledged some detailed data has been obtained from the 2016 Census for the Settlement Area of Kildare Town.

Whilst social deprivation is referenced in Section 6.2.7 of the Draft Plan, the function of this land use plan is (inter alia) to provide for balanced socio-economic development within a more sustainable and integrated settlement. Issues specifically related to reducing levels of poverty and social exclusion are outside the scope of the Plan. Such matters, at local level, generally come under the remit of the Local

Economic Community Plan (LECP) and are addressed through funding programmes such as the Social Inclusion and Community Activation Programme (SICAP) 2018-2023.

The formal integration of the Local Authority Planning function with the Health Service Executive and Department of Education function is a matter for Central Government. In the meantime, Kildare County Council will continue to regularly liaise with the Department Education in relation to future plans and proposed project and refer all land use plans to the statutory authorities for their review and input.

The Draft Kildare Town LAP has been informed by a series of bespoke evidence-based assessments using the most up to date factual information verified by the CSO and other sources. Allegations of negligence in the preparation of this Local Area Plan entirely unfounded and are wholly refuted.

The reference to the LAP not addressing up to date socio-economic information to establish an economic profile of the town and any issues of deprivation, such as educational attainment is also misguided. A Local Area Plan is a spatial land use plan which generally addresses the physical development of a town, village or settlement in setting more localised policy contexts for specific urban landscapes and unique receiving environments for its future development. While KCC engage with the Department of Education under an MOU agreed with the CCMA this relates only to the provision of adequate school places and the acquisition of school sites.

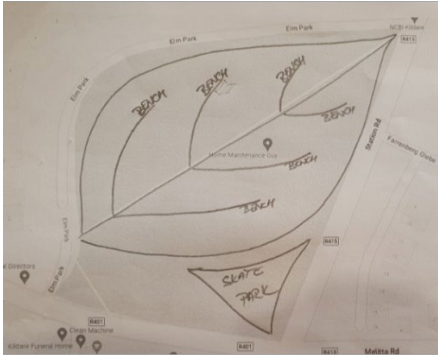
While the LAP notes that the age profile of the settlement of Kildare Town has a significantly younger population than the rest of the state with 32.66% of its population under 19. This indicates that the need for childcare and school places are greater than average in Kildare Town. In this regard, and in order to address insofar as a land use plan can, these issues, the Draft Plan seeks to address current deficits in social infrastructure provision by requiring childcare provision in Phase 1 of new residential developments and facilitating the provision of a new primary and post-primary school, in line with achieving National Strategic Outcome No. 10 (Access to Quality Childcare, Education and Health Services) of the NPF.

Addressing issues such as educational attainment requires the development of a long-term education policy strategy across the whole educational spectrum to ensure that education and continuous upskilling and development of the workforce is prioritised.

### **Chief Executive's Recommendation**

No change.

## **Sports and recreation**

<b>Submission Number</b>	<b>Summary of Issue</b>
039 Rory De Bruir	There is a lack of playgrounds.
044 Anna Hrdlickova	<p>Improvements to Elm Park (illustration showing skate park and benches).</p> 
056 Edel McGovern	<ul style="list-style-type: none"> <li>• No leisure centre.</li> <li>• Lack of a basketball courts.</li> <li>• Lack of a skate park.</li> <li>• Existing club at full capacity.</li> </ul>
067 John Conway	Not enough sports facilities for children and adults
72 Frank McMahon	<p>This submission seeks the re-instatement of zoning “E” in the previous LAP 2012 – 2018 on Old Road to be retained for the future development of a community sports campus, for the benefit of the whole town. The submission also requests that the lands to the north, comprising 18 acres, currently occupied by the Round Towers GAA Club be zoned as “E” in the current plan.</p>
102 Kildare Sports Partnership	<p>Kildare Sports Partnership had a consultative workshop with a number of sporting stakeholders on 27<sup>th</sup> February 2023. Key issues from this meeting included:</p> <ul style="list-style-type: none"> <li>• The need for an expansive campus incorporating outdoor amenities and indoor facilities to facilitate a wide range of competitive sports and physical recreation.</li> <li>• Funding / financing of running costs.</li> <li>• The need for additional pitches.</li> <li>• The current lack of (and decreasing number of) volunteer leaders and coaches.</li> <li>• The ongoing effect of Covid-19 on participation and membership.</li> <li>• The rising costs of facility rental.</li> <li>• The unavailability of indoor sports facilities</li> <li>• the challenges faced by clubs and organisations to cater for ever-increasing numbers (especially those of children and young people. In this regard, a number of clubs reported on the need to cap numbers.</li> </ul>
103 Seán O'Fearghail	<ul style="list-style-type: none"> <li>• The Draft Plan identifies open spaces within housing estates incorrectly as public amenity space.</li> </ul>

Submission Number	Summary of Issue
	<ul style="list-style-type: none"> <li>• It's essential that the park at Cherry Avenue be delivered to meet local amenity needs and to enhance the tourist experience.</li> <li>• Open space in housing developments should be better developed to include children's play facilities and adult exercise areas.</li> <li>• Pocket parks are required for apartment dwellers with lined open space.</li> <li>• Possibility of developing allotments/community gardens.</li> <li>• The Council Sport and Recreation Department should investigate the possibility of developing a local tennis club following consultation with the town community.</li> </ul>
115 Teresa Harrington	<ul style="list-style-type: none"> <li>• The town requires a sports centre, swimming pool, playing fields, parks and another playground.</li> <li>• Cherry Avenue Park is still lying idle while anti-social behaviour is increasing.</li> </ul>
118 Senator Mark Wall	<ul style="list-style-type: none"> <li>• 12-15 acres of land should be identified for a suitable sports centre that can be run by council but provide the additional playing fields.</li> <li>• The provision of a swimming pool should also be investigated.</li> <li>• Suitable locations for a skate park should be investigated.</li> </ul>
139 Cllr. Suzanne Doyle	<ul style="list-style-type: none"> <li>• It is not clear if the 1.8ha referenced in Section 6.5.1.4 of the Draft Plan to the rear of Carmelite Church is St Brigid's Park football field.</li> <li>• The plan needs to distinguish between public open space, accessible to all and private open space within housing estates as all are zoned F (Open space and Amenity). Also, a map is required of outdoor facilities.</li> <li>• All clubs in Kildare Town are currently oversubscribed and this submission has attached an excel spreadsheet outlining each club and their membership numbers. Also, the submission from Kildare Sports Partnership outlines the potential for a cooperative of voluntary recreation and amenity providers to support delivery of a multi-disciplinary centre to meet needs of town. More land zoned for recreation is therefore required in the following locations.</li> <li>• Larger zoned sites include: <ul style="list-style-type: none"> <li>○ 25/30 acres within the South Green development lands, possibly adjacent to secondary school site.</li> <li>○ 25/30 acres within the Green Belt INS lands bounding both Tully Road and Grey Abbey.</li> <li>○ 25/30 acres within the lands beyond RACE on Maddenstown Road.</li> </ul> </li> <li>• Smaller potential sites for recreation and amenity include: <ul style="list-style-type: none"> <li>○ Lands adjacent to graveyard car park that have an existing planning permission for community centre.</li> <li>○ Portion of the site identified CP2 on Dublin Road, edge of town across from Chilling factory, a site to the northwest of these lands could provide a well-located sports facility that could achieve</li> </ul> </li> </ul>

Submission Number	Summary of Issue
	<p>linkages to Melitta Road and Ruanbeg.</p> <ul style="list-style-type: none"> <li>• An international attraction should be added to the Cherry Avenue Park such as the largest treehouse in Europe.</li> <li>• An objective should be added to support the delivery of two further public playgrounds within Kildare town and the comprehensive refurbishment of current playground on Station Road.</li> <li>• An objective should be added to support the delivery of an ECO park within or on boundary of settlement.</li> <li>• An objective should be added to develop the lands adjacent to Towers football club known as Weigh bridge for delivery of a Skateboard park.</li> <li>• An objective should be added to continue to develop Sli Na Slainte routes throughout the town, including link from KROV and Tully Sli through to Cherry Ave via road to WWTP parallel to motorway.</li> </ul>
141 Fine Gael	All new developments should provide children's playgrounds, the scale to be determined by planners and county councillors.

## Chief Executive's Response

### Playgrounds and Improvements to layout of Open Spaces

In relation to playgrounds, Section 6.5.1.5 of the Draft Plan details the current under provision per capita of population. The Draft Plan seeks to address this through a number of objectives as follow; HCO 4.1 which refers to appropriately sited accessible multi-functional community facilities to meet the needs of the population of Kildare Town; including an all-weather Multi-Use Games Area (MUGA) located at the Former Magee Barracks, and HCO 4.2 which seeks to deliver a public park at Cherry Avenue (including a playground) and ensuring the delivery of Phase 1 of Cherry Avenue Park within the first year of this Plan. Furthermore, Objective HCO 4.7 is to improve existing open space areas in housing developments that have been taken in charge by Kildare County Council and to provide additional play facilities where feasible and appropriate.

### Lack of leisure centres, swimming pool and indoor sports facilities

A Local Area Plan is a land use plan. While it is not accompanied with an associated capital budget, it can be a vehicle for leveraging funding opportunities. The Draft Plan states that leisure centres and indoor sports facilities are permitted in principle in areas zoned A: Town Centre, E: Community and Education, F: Open space and Amenity and T: Mixed Use. A leisure centre is also Open for consideration is the following zoning objectives I: Agriculture, K: Commercial and N: Neighbourhood Centre.

It is considered reasonable to zone an additional site for 'E' where sports buildings are permitted in principle on the Green Road and south of the railway line (approx. 2.3 ha) in this regard, to consolidate with other lands zoned 'E' at this location.



### Lack of sporting courts and playing pitches

A lack of courts for several sports including basketball, tennis, hockey was noted in the SIA. To try and address this Objective HCO 4.1 supports a multi-use games area within the Former Magee Barracks site which caters to a wide range of age groups and sporting interests. Furthermore, the Draft Plan states that sporting courts is permitted in principle in the following zoning objectives A: Town Centre, E: Community and Education, F: Open space and Amenity, T: Mixed Use. A leisure centre is also Open for consideration in the following zoning objectives I: Agriculture, K: Commercial and N: Neighbourhood Centre.

Notwithstanding this, it is acknowledged that additional lands are required for sporting facilities, and it is proposed to include additional zoned lands accordingly.

### Lack of a skatepark

It is considered appropriate and reasonable to include an objective to support the delivery of a skatepark at an appropriate location within the plan area.

### SIA calculation of open space

Section 3.5 of the SIA lays out in detail all the different types of open space in Kildare Town, while existing sport and recreation facilities surveyed in January 2023 are listed and mapped in Section 3.6. The private National Stud is not included in any calculations of public open space and the SIA caveats that sports pitches within the Draft Plan area are mainly associated with educational premises and clubs, and therefore have very limited public access. Furthermore, it outlines Kildare Town currently only has two open spaces that qualify as public parks. All other surveyed amenity green spaces areas do not meet the criteria to be considered as a public park as they mainly comprise of open grassland that provide little or no facilities.

### Classification of the field to the rear of Carmelite Church

In the Kildare Town Local Area Plan 2012-2018 these lands were zoned E: Education and Community. However, on site surveys concluded that F: Open Space and Amenity better reflects the land use of this field. Furthermore, these site visits deduced that the football pitch is no longer in use. This is reflected in Figure 10 in the SIA which classifies this field as Parks and Gardens.

### Cherry Avenue Park

Objective HCO 4.2 commits to the delivery of Phase 1 of Cherry Avenue Park within the first year of the Plan.

### Lack of pocket parks

The Draft Plan supports the creation of a pocket park in Objective HCO 4.6 which is to develop the lands immediately north of St Brigid's Cathedral and east of Chapel Hill as a small medieval garden.

### Lack of allotments

While allotments are permitted in principle across a number of zoning objectives it is considered appropriate to add an objective to support such development in underutilised lands within Kildare Town.

### Eco-park

Cherry Avenue Park provided for in Objective HCO 4.2 of the Draft Plan will contain wetlands and extensive tree planting. Furthermore, areas zoned F: Open Space and Amenity allow for such a park.

### Increase the number of Sli Na Slainte routes.

It is an Objective in Chapter 7 of the Draft Plan to seek to improve and promote looped walks in conjunction with Slí na Sláinte and other relevant bodies, while also ensuring that the routes are clearly demarcated (Objective MTO 1.8, refers).

## **Chief Executive's Recommendations**

### **Proposed Material Alterations**

Chapter 6 Homes and Communities, include a new objective as follows:

**HCO 4.10** *Support and facilitate the provision of a skatepark at an appropriate location within Kildare Town.*

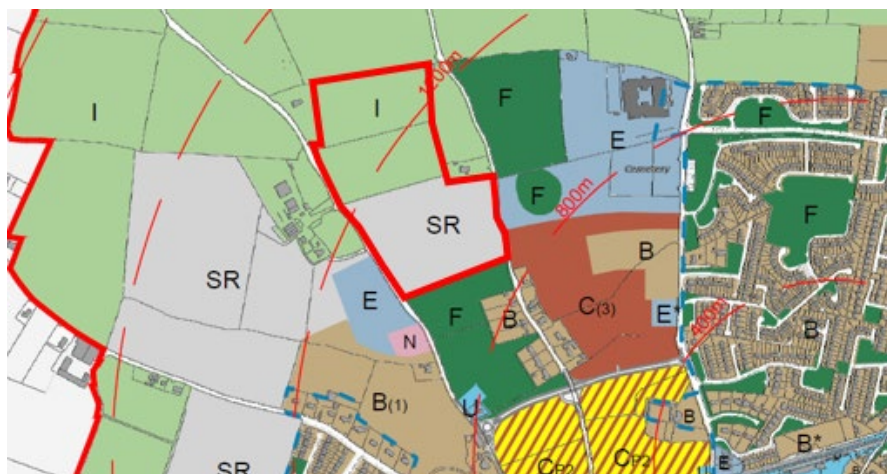
### **Proposed Material Alterations**

Chapter 6 Homes and Communities, include a new objective as follows:

**HCO 4.11** *Promote community-managed gardens/allotments at appropriate locations in Kildare Town*

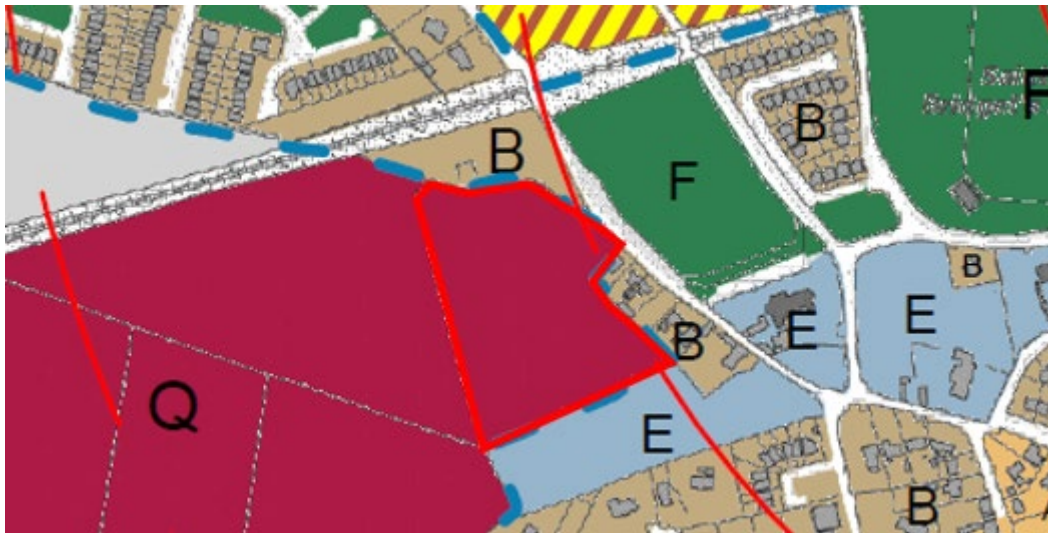
### **Proposed Material Alterations**

Map 11.1 Land Use Zoning, amend zoning objective of land outlined in red below (approx. 13 ha) from 'I: Agriculture' and 'SR: Strategic Reserve' to 'F: Open Space'.



**Proposed Material Alterations**

Amend zoning objective of land outlined in red below (approx. 2.5 ha) from 'Q: Enterprise and Employment to 'E: Community and Education'.



**The provision of social and community services**

Submission Number	Specific Concern
056 Edel McGovern	Lack of facilities for teens.
067 John Conway	No strategy for providing services.
103 Seán O'Fearghail	<ul style="list-style-type: none"> <li>• The Courthouse needs to be brought into productive public use.</li> <li>• The Hub and the CWMS Hall should be assessed for their potential to develop to meet growing demands.</li> <li>• Means must be found to develop the Community Centre on Dunmurry Road</li> </ul>
107 Mark Stafford	<ul style="list-style-type: none"> <li>• The new community hall on the South Green must be delivered to alleviate pressure at the CMWS which is at capacity.</li> <li>• It should be clear that in the Draft Plan that the intention is to deliver additional community hall type facilities in addition to the all-weather multi games area.</li> </ul>
136 4th Kildare Town Scout Group	<ul style="list-style-type: none"> <li>• The draft Plan needs to provide Kildare Town with a large community centre or facility for use by a number of groups within the town and surrounding areas.</li> <li>• Currently there is no community centre in Kildare Town.</li> <li>• The 4th Kildare Town Scout Group are currently searching for a premise to hold their weekly meetings on Monday to Thursday evenings 6.30 to 9pm.</li> <li>• Many community organisations have been struggling to find a permanent location.</li> <li>• The group have been providing a recreational, educational and community facility to the local children for nearly 40 years and</li> </ul>

Submission Number	Specific Concern
	<p>provides more information.</p> <ul style="list-style-type: none"> <li>• Currently 200+ children on the 4th Kildare Town Scout Group waiting list.</li> <li>• This year the group will only admit 20 children due to the restricted space in the rented location.</li> <li>• Many scout groups have closed (Suncroft, Monasterevin, and Portarlinton) whose members wants to join other groups.</li> </ul>
139 Cllr. Suzanne Doyle	<ul style="list-style-type: none"> <li>• There is a lack of meeting rooms in the town.</li> <li>• An objective should be added to Support the delivery of a Community Centre on Dunmurray Road in lands adjacent to cemetery car park.</li> </ul>

### Chief Executive's Response

A Local Area Plan is a land use plan, which sets out the appropriate location for various land uses and infrastructural (physical and social) requirements over the lifetime of the plan. The delivery of projects is a matter for many agents, including private developers, Government Departments, Community Groups, Kildare County Council and others. The delivery of any project is subject to funding and available resources, both of which are beyond the scope of the Local Area Plan.

In relation to facilities for teenagers, the Draft Plan contains several objectives supporting the development of new facilities such as a multi-use games area on the Former Magee Barracks site (HCO 4.1), the Cherry Avenue Park (HCO 4.2) and a garden to the north of St Brigid's Cathedral (HCO 4.6). It is considered appropriate to include an additional objective in support of a skatepark (see Recommendation in response to previous issue 'Sports and Recreation').

It is considered the development of a community centre on Dunmurry Road is critical to catering for the needs of the local community and an objective will be added to support its delivery in this regard.

In relation to the Courthouse, concerns relating to the need to bring it back into productive public use are noted. This is reflected in Objective EDO 2.5 in the Draft Plan, which is to investigate the re-use of the building for a mix of cultural, community and leisure uses.

The lack of meeting rooms is noted. It is considered appropriate to include an objective to support community meeting room proposals throughout Kildare Town.

**Chief Executive's Recommendation**

**Proposed Material Alteration**

Chapter 6 Homes and Communities, include new objective as follows:

**HCO 4.12** *Support and facilitate the development of a multipurpose community centre on the Dunmurray Road opposite St. Conleth's Graveyard.*

**Proposed Material Alteration**

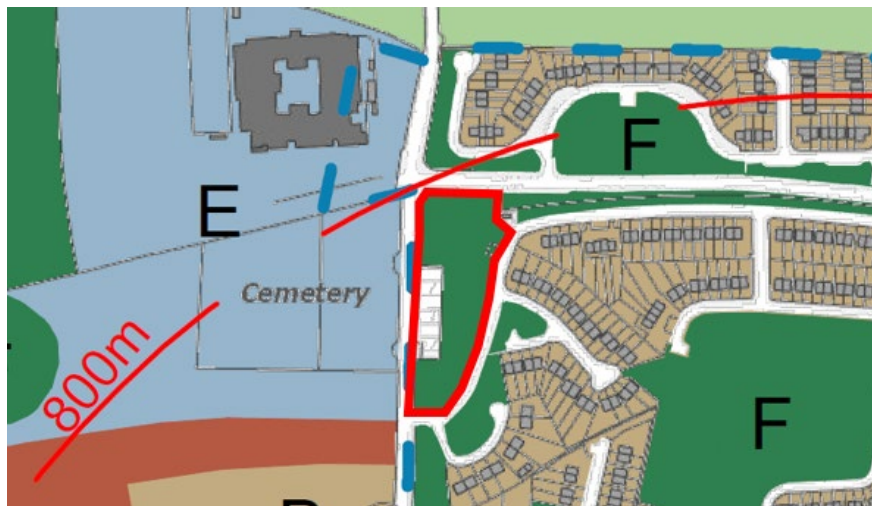
Chapter 6 Homes and Communities, include new objective as follows:

**HCO 4.13** *Support the provision of community meeting rooms at appropriate locations throughout Kildare Town.*

**Proposed Material Alteration**

Amend Map 11.1 Land Use Zoning Map as follows:

Amend zoning objective of land outlined in red below (approx. 0.9ha) from 'F: Open Space' to 'E: Community and Education'.



**The provision of education and training**

Submission Number	Specific Concern
056 Edel McGovern	<ul style="list-style-type: none"> <li>• Not enough capacity at primary level.</li> <li>• Not enough capacity at post-primary level.</li> <li>• Objective required to support special needs facilities and services.</li> </ul>
103 Seán O'Fearghail	The plan fails to provide an adequate level of primary and secondary school places.
107 Mark Stafford	A specific objective is required to support and enhance further education in Kildare Town and support should be given to provide for third level and further education in the draft plan.
115 Teresa Harrington	<ul style="list-style-type: none"> <li>• The new Curragh secondary school being built in Magee Barracks is only bringing in an extra 400 places as it already has</li> </ul>

Submission Number	Specific Concern
	<p>approximately 600 students.</p> <ul style="list-style-type: none"> <li>The site earmarked on Green/South Green Road for education purposes is not adequate.</li> </ul>
118 Senator Mark Wall	<p>Outlines that while hopefully the proposed new secondary school will address existing issues, potential associated traffic issues must be examined.</p>
139 Cllr. Suzanne Doyle	<ul style="list-style-type: none"> <li>Engagement with schools is required to determine mechanisms to address worrying trends from school populations.</li> <li>The new proposed secondary school site appears very small, it is important that we set a high standard for delivery of recreational and amenity lands on sites of any new schools and expansion of existing schools should not be at the cost of existing recreation and amenity lands associated with schools.</li> <li>Two locations should be identified for new primary schools and a further location to relocate St Brigid's School.</li> </ul>

### Chief Executive's Response

Please see Submission from the Department of Education (Sub 63), considered in Section 4 of this report.

Kildare County Council consults with the Department of Education regularly in relation to future plans and proposed projects. The delivery of schools and additional school places is a matter for the Department of Education. The role of the local area plan is to ensure that sufficient land is zoned at appropriate locations for projected need. In this regard, Section 6.5.1.1 of the Draft Plan notes that primary schools in Kildare Town are currently at capacity (average of 93%) and an additional 260 additional student places would be required over the plan period, or 11 additional classrooms. Two locations for potential new primary schools have been identified, one west of the Carmelite Friary Church and another north of the Walker Gate estate. Both areas are zoned 'E: Education and Community' as detailed in Table 6-3 in the Draft Plan.

In relation to post-primary school places, Section 6.5.1.1 in the Draft Plan acknowledges that existing post-primary school in the town is at capacity at present at 98%. Approximately 159 additional places will be required over the Plan period. The Draft Plan supports the Department of Education's proposal to replace and expand the Curragh Post-Primary school with a new 1,000 pupil school within the Former Magee Barracks site to cater for demand in the Kildare and Newbridge school planning areas. This is detailed in Table 6-3 of the Draft Plan (Note: there is a typographical error therein, as the zoning objective of Magee Barracks is T: Mixed Use where schools are Permissible in Principle). The design and scale of any associated recreation and amenity lands would be assessed during the planning application process. Similarly, any associated pedestrian, cycle and vehicular traffic would be assessed during the planning application process in the objectives contained in Chapter 7 Movement and Transportation of the Draft Plan.

Engagement with primary and secondary schools was undertaken as part of the process of formulating the SIA. For details of this consultation, please see Section 3.2 of this supporting document.

The relocation of an existing primary school is outside the remit of a land-use plan. Furthermore, it was not identified as a priority by the Department of the Education.

It is agreed that the Draft Plan should include a specific reference to further third level education in Objective HCO 3.1 in the Draft Plan.

## Chief Executive's Recommendation

### Proposed Material Alteration

Chapter 6 Homes and Communities, Amend Objective HCO 3.1 as follows:

**HCO 3.1** Support and facilitate new facilities and improvements / expansion of existing educational, *including third level and further educational opportunities which may arise*, early learning, childcare and healthcare facilities, at appropriate locations in Kildare Town.

### The provision of healthcare facilities

Submission Number	Specific Concern
103 Seán O'Fearghall	The plan fails to provide for an adequate level of medical services.
115 Teresa Harrington	There are currently no vacancies at doctors and dentists.
118 Senator Mark Wall	There are insufficient GP services.
139 Cllr. Suzanne Doyle	<ul style="list-style-type: none"> <li>The benchmark used to investigate whether the number of GPs does not reflect the reality of no GPs taking on new patients. This should be addressed.</li> <li>The Draft Plan should support the reintroduction of the public dental service on Tully Road.</li> <li>It is not clear if the 3 nursing homes reference in Section 6.5.1.3 of the Draft Plan are within the settlement boundary.</li> </ul>

### Chief Executive's Response

As stated in the SIA, there are no national standards for health provision in Ireland relating to the provision of primary care centres or the number of doctors in an area. In the absence of any standards, the Graduate Medical Education National Advisory Committee (GMENAC) standards were referred to. This is elaborated in Section 6.5.1.3 of the Draft Plan. It is also acknowledged that notwithstanding this metric, healthcare facilities in Kildare Town are currently oversubscribed, indicating they serve a larger rural catchment.

The issue of dental services is noted however the provision of any medical practice or public health service is outside the remit of a land use plan. The role of the land use plan is to ensure sufficient land is zoned to provide these uses and objectives to support such facilities.

The three nursing homes mentioned within Section 6.5.1.3 of the Draft Plan are not within the Plan area. While this is caveated by footnotes 20-22 on page 23 of the Kildare Town Social Infrastructure Audit, it has not been clarified in Section 6.5.1.3 of the Plan. This is a typographical error.

## Chief Executive's Recommendation

### Typographical error

Amend Section 6.5.1.3 accordingly (see Section 7 of this report).

### The provision of childcare facilities

Submission Number	Summary of Issue
103 Seán O'Fearghail	<ul style="list-style-type: none"> <li>The Draft Plan envisages a foolish and unsustainable level of pre-school provision.</li> </ul>
115 Teresa Harrington	<ul style="list-style-type: none"> <li>Insufficient Crèches.</li> <li>It is simply not good enough for builders to have creches in on the plans of new housing estates as these often do not go ahead and are converted into houses/apartments</li> </ul>
139 Cllr. Suzanne Doyle	<ul style="list-style-type: none"> <li>Three crèches should be co-located with age friendly housing in the following locations:                             <ul style="list-style-type: none"> <li>One on the Former Magee Barracks sites</li> <li>One on Station Road</li> <li>and another on the block of land where KWETB site is currently located. These should be co-located with crèches.</li> </ul> </li> <li>This plan needs to honestly acknowledge the challenges around delivery of quality childcare facilities. The 7 extant permissions for childcare facilities are unlikely to supply the places outlined.</li> <li>Creches should be co-located with existing/new schools, transportation hubs and elderly housing. Statements to encourage developers to act cooperatively in the delivery of large quality childcare facilities (off site) should be included as a means of directing developers to an effective solution to this problem. An objective that requires large employers to include (on site or off site) provision or contribution to same (community creche) for the provision of childcare facilities should also be included in plan.</li> </ul>

### Chief Executive's Response

Section 3.3 of the SIA outlines existing childcare infrastructure within the Draft Plan area and Section 3.3.1 of the SIA sets out how shortfalls may be addressed. Appendix 2 of the Childcare Facilities, Guidelines for Planning Authorities (June



2001) establishes an indicative national standard of one childcare facility per 75 dwellings in a new housing area as the main mechanism to deliver more childcare places. In this context, this Draft Plan has zoned areas specifically for childcare (E\*) where crèches have been permitted as part of housing developments but have still not commenced. This zoning, i.e. E\*, does not allow any other use only childcare.

For new residential developments, it is now the policy of KCC, as enshrined in objective SCO 79 of the CDP, to ensure that childcare provision is delivered in new communities prior to or in tandem with phase 1 of any residential or commercial development and is fully operational prior to the occupation of any residential units within the subject site.

Furthermore, crèches/playschools are permissible in principle in zoning objectives A: Town Centre, C: New Residential, E: Community and Education and T: Mixed Use. While crèches/playgrounds are Open for consideration in zoning objectives B: Existing Residential, K: Commercial, N: Neighbourhood Centre, Q: Enterprise and Employment, R: Retail/Commercial.

The Former Magee Barracks site has been earmarked as a key area for co-locating childcare and elderly housing, with right size housing and a community facility (see Section 11.1 of the Plan). Furthermore, crèches/playschools are permissible in principle in zoning objectives A: Town Centre, C: New Residential, E: Community and Education and T: Mixed Use. While crèches/playgrounds are Open for consideration in zoning objectives B: Existing Residential, K: Commercial, N: Neighbourhood Centre, Q: Enterprise and Employment, R: Retail/Commercial.

### **Chief Executive's Recommendation**

No change recommended.

### **The provision of Arts and Cultural Facilities**

<b>Submission Number</b>	<b>Specific Concern</b>
107 Cllr. Mark Stafford	Supports objective CUO 2 of the Draft Plan sought to ' <i>support the development of performing arts centre/theatres in the town</i> ' and states objective HCO 4.3 should be bolstered to include a more specific objective. Also requests that similar provision for the same should be included in Table 6.3.
139 Cllr. Suzanne Doyle	There is need for a theatre and multimedia facility in the town.

### **Chief Executive's Response**

The development of a theatre or performing art centre is supported by Objective TCO 1.3 bullet point (iv). Furthermore, Objective HCO 4.2 supports the delivery of an outdoor amphitheatre in Cherry Avenue public park.

### **Chief Executive's Recommendation**

No change recommended.

### **The provision of Faith Facilities**

<b>Submission Number</b>	<b>Summary of Issue</b>
139 Cllr. Suzanne Doyle	<ul style="list-style-type: none"> <li>Community space is required to accommodate worship of diverse faiths.</li> <li>Further cemetery space and a crematorium close to the motorway are also required.</li> </ul>

### **Chief Executive's Response**

Community worship spaces are Permissible in Principle in areas zoned 'E: Community and Education' in the Draft Plan. Table 6-3 outlines an extension to the existing St Conleth's Graveyard is provided for in this Draft Plan. No express requirement for a crematorium was outlined by the Environmental Section in Kildare County Council, however, should a proposal come forward, it will be considered on its own merits.

### **Chief Executive's Recommendation**

No change recommended.

### **The provision of Neighbourhood Centres**

<b>Submission Number</b>	<b>Specific Concern</b>
139 Cllr. Suzanne Doyle	Neighbourhood centres should not undermine the primacy of the town centre, should have limited opening hours and should not sell alcohol and fast food.

### **Chief Executive's Response**

Two neighbourhood centres have been proposed within the Draft Plan, one on the Melitta Road (to reflect existing established uses) and another on the Southgreen Road. Both have site areas of 0.5 hectares. This is to control the size and extent of the centres, so as not to compete with the established town centre, but to offer convenience for residents within 10 minutes of their homes. It is not considered reasonable to restrict opening hours, or the sale of alcohol and fast food as these are considered to be local convenience items.

### **Chief Executive's Recommendation**

No change recommended.

## Chapter 7 Movement and Transportation

### Accessibility and maintenance of footpaths

Submission	Summary of Issue
075 Tom Blennerhassett	Outlines issues with Kildare County Council's upkeep of footpaths particularly in the winter months. Four photos have been attached depicting dangerous slip hazards.
118 Senator Mark Wall	States that there is a need for a comprehensive audit of existing footpaths, roads and accessibility within the town.
139 Cllr. Suzanne Doyle	<p>Issue raised during a meeting held to discuss vulnerable road users in town:</p> <ul style="list-style-type: none"> <li>• Narrow, uneven and in poor repair paths in town with specific mention of the: <ul style="list-style-type: none"> <li>○ Town Centre footpaths/particularly from HIVE to BOI.</li> <li>○ Station road, entire path from Square to turn for Melitta Road.</li> <li>○ Tully Slí Na Slainte, particularly from Newtown Cross to bull testing station.</li> </ul> </li> <li>• Need to use non-slip/trip materials for paths.</li> <li>• Car chargers blocking pedestrians outside the Kildare House Hotel.</li> <li>• The high kerb heights are problematic in places.</li> <li>• All new kerbs should have a dished access point at regular convenient intervals.</li> <li>• Drainage problems at entrance to Campion Crescent.</li> <li>• Use of scooters and bicycles on footpaths with no lights.</li> </ul>

#### Chief Executive's Response

Objective MTO 1.3 of the Draft Plan relates to ensuring all footpaths in Kildare Town are accessible to all members of the community, including people with disabilities, older persons and people with young children. It is considered that this adequately addresses the accessibility issues in respect of vulnerable road users. Furthermore, it is an action of the CDP to carry out quality audits of the existing pedestrian and cycle infrastructure in the towns and villages (Action TM A20, refers). Regarding the maintenance of footpaths, Objective TM O19 of the CDP is to ensure regular maintenance of walking and cycling routes. The roll out of these is an operational matter for the Municipal District Office. Addressing the use of scooters and bicycles on footpaths without lights is not within the remit of a land use plan.

#### Chief Executive's Recommendation

No change recommended.

### **Footpaths at the entrance to Cunnaberry Hill**

<b>Submission</b>	<b>Summary of Issue</b>
032 Adele Woods	Walking along some roadways in the area is unsafe due to inadequate footpaths and highlights the footpath that abruptly stops at the front of Cunnaberry Hill along Bride Street.
037 Richard Bannister	Submits that the footpath at the entrance to Cunnaberry Hill remains a hazard six years after the estate opened and should be completed.

### **Chief Executive's Response**

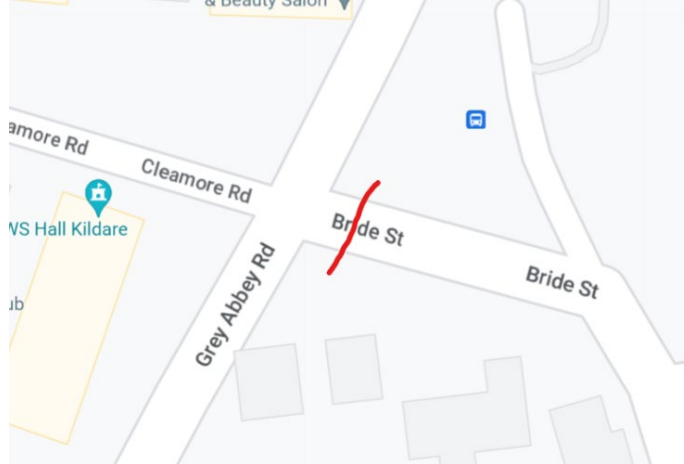
Table 7-2 and Map 7.2 of the Draft Plan includes a cycle measure (Cycle 56) for a shared cycle / walking path from the entrance of Cunnaberry Hill southwards and Cycle Measure 44, will provide for an entrance between Cunnaberry Hill and Cleamore Road.

### **Chief Executive's Recommendation**

No change recommended.

### **Complementary Active Travel Measures and Traffic Calming Measures**

<b>Submission</b>	<b>Summary of Issue</b>
001 Hugh McCarthy	In respect of the cycle infrastructure mapping, suggests outlining what junctions and links are outlined for improvement. This can also apply for pedestrian crossing improvements. If serious about achieving mode shift, improving junctions, giving more signal time to walking and cycle crossing stages would help in this regard.
018 Connell O' Donnell	Suggests a number of speed bumps and pedestrian crossing: <ul style="list-style-type: none"> <li>• Pedestrian crossings flanked by speedbumps to the western and northern corners of Market Square.</li> <li>• A pedestrian crossing between the Silken Thomas and Cunningham's bar would make the town pedestrian friendly and directly link two popular bars/restaurants.</li> <li>• Speedbumps would improve noise and also reduce traffic noise.</li> <li>• Pedestrian crossing at the northern corner between the ice cream shop and McHugh's chemist, flanked by speedbumps as poor visibility on the northern approach.</li> <li>• Crossings at all three sides of the Square.</li> </ul> The closing of Bride Street is a medium to long term objective and these measures would be a welcomed stopgap.
019 Connell O'Donnell	Suggests placing a speedbump on Dublin Street in front of the Leinster Square housing estate. It would reduce night-time noise and in keeping with the general objective to make the town centre more friendly to pedestrians.
020 Connell O'Donnell	Suggests adding a pedestrian crossing on Bride Street at the junction where it meets Grey Abbey Road in line with Objective MTO 1.2 (Walking and Cycling Objectives) which refers to developing a

Submission	Summary of Issue
	<p>pedestrian link from Kildare Village to the Market Square. The submission provides the following image:</p> 
022 Nigel Curran	<p>Use speed bumps on the Rathbride Road from the railway station to the cattle grate. Cars do not obey the speed limit and there are a lot of cyclists and e-scooters using it.</p>
028 Mihaita Stoinoiu	<p>Suggested that ramps should be installed on Tully Rd for the speeding cars.</p>
114 Jorge Rodrigues	<p>Outlines concerns relating to safety and noise issues relating to drivers speeding through Kildare Town, especially on Dublin Street in front of the Leinster Square estate. It proposes implementing traffic calming on this section of Dublin Street to address this concern.</p>
139 Cllr. Suzanne Doyle	<p>Issue raised during a meeting held to discuss vulnerable road users in town:</p> <ul style="list-style-type: none"> <li>• Traffic calming measures on Rathbride Road.</li> <li>• The junctions at Cross Quays and CWMS were highlighted for difficulty to achieve pedestrian crossing. <ul style="list-style-type: none"> <li>• Locations requiring dedicated pedestrian crossings: <ul style="list-style-type: none"> <li>○ Between ice cream parlour and Silken Thomas.</li> <li>○ Ball Alley Hill between Sq and Playground.</li> </ul> </li> </ul> </li> </ul> <p>From Garda Station to Kildare House Hotel.</p> <ul style="list-style-type: none"> <li>• Re-examine light sequences particularly at Connolly's Chemist and Tesco to introduce filter turns.</li> <li>• Need to review timelines on TL for pedestrians crossing.</li> </ul>

**Chief Executive's Response**

As part of the KTTS baseline analysis, the location of existing crossing points have been identified and it was determined that new crossing points would be beneficial to promote the active travel measures across the town. It is an objective (MTO 1.9) of the Draft Plan to *'support the implementation of complementary active travel measures such as the crossing facilities throughout the town, as identified in the Kildare Town Transport Strategy, in tandem with a review of footpaths on approach*

*roads and greater signal priority for active travel.*' These measures are an operational matter for the area engineer of the Kildare / Newbridge Municipal District.

The Draft Plan also includes a road measure (RD 5) for delivery in the short to medium term to upgrade signalised junctions to MOVA and SCOOT as appropriate. This road measure will allow for more effective traffic management and also for signal priority to be given to sustainable modes of transport, such as pedestrians or buses, to ensure that access by these modes is prioritised.

In addition to the above the CDP includes policy TM P8, objective TM O7 and objective 105 which adequately addresses complementary active travel measures and traffic calming measures.

### **Chief Executive's Recommendation**

No change recommended.

### **Active Travel Access between Grey Abbey Road and the Town Centre**

<b>Submission</b>	<b>Summary of Issue</b>
099 Ronan Maher	Notes the site at Grey Abbey Road has no active travel access and recommends that any development of the site must come with associated works on Grey Abbey Road in conjunction with those on Bride Street to link the site to the town centre.
127 Kildare Greens	Notes that the site at Grey Abbey Road currently has no active travel access and recommends that any development of this site must come with associated works on Grey Abbey Road in conjunction with those on Bride Street so that active travel infrastructure can link the site to the town centre.

### **Chief Executive's Response**

These submissions are noted and accepted. In response to the Submission from the OPR (Section 3.0, refers) it is proposed to include an additional permeability measure under Table 7-1 and Map 7.1 to provide for an active travel link from the roundabout at Grey Abbey Road linking the subject lands back to the town centre.

### **Chief Executive's Recommendation**

See Response and Recommendation to Submission from OPR.

### **Active Travel Links to the Curragh**

<b>Submission</b>	<b>Summary of Issue</b>
102 Kildare Sports Partnership	Cycle lanes and footpaths continued to the Curragh on the Melitta and Rathbride roads.
103 Seán O'Fearghail	The Rathbride Road footpath should be continued towards the Kildare Town Soccer Club grounds and Cill Dara Golf Club.

### Chief Executive's Response

Table 7-1 of the Draft Plan includes a permeability measure (PERM 1) for a shared walking/cycling path on one side of Rathbride Road from Rathbride Abbey to Cill Dara Golf Club to be prioritised for delivery in the short-term.

Regarding the proposal for cycle lanes and footpaths continued to the Curragh on the Melitta Road the following should be noted:

- The Draft Plan includes a cycling measure (Cycle 1 - Curragh Greenway) which will link Melitta Road and the Curragh.
- Kildare County Council recently completed a footpath scheme in 2022 between Collaghknock Glebe and the Curragh along Melitta Road.
- The Draft Plan includes PERM 42 to extend the footpath along Melitta Rd (R413) from Ridgewood Manor to the edge of the Curragh.

### Chief Executive's Recommendation

No change recommended.

### New footpath along the Monasterevin Road

Submission	Summary of Issue
139 Cllr. Suzanne Doyle	The requirement for a new footpath to connect the estate on Monasterevin Road was raised as an issue during a meeting held to discuss vulnerable road users in town.

### Chief Executive's Response

Objective MTO 1.11 of the Draft Plan adequately addresses the issue raised with regards to connecting the new estate on Monasterevin Road, which is to ensure the provision of footpaths and improvement works (and cycle track / cycle lane where appropriate) on both sides of the R445 Dublin Road.

### Chief Executive's Recommendation

No change recommended.

### Active Travel Proposals

Submission	Summary of Issue
102 Kildare Sports Partnership	Cycling links to the Grand Canal cycleway.
103 Seán O'Fearghail	Consideration should be given to continuing the existing footpath which ends at Newtown Cross onto the Mooretown Road.

### Chief Executive's Response

It is stated in paragraph two of Section 1.2 of the Draft Plan that it is essential that both the County Development Plan (CDP) and the Local Area Plan (the Plan) are read in tandem. Objective RE O148 of the CDP is to '*Continue to promote and develop the towpaths along the Grand Canal, the Royal Canal, the Barrow Line, the Milltown Feeder and the Corbally Line as cycleways and walkways, in co-operation with Waterways Ireland and neighbouring Local Authorities. Support the linking of these cycleways and walkways to the county's towns and villages.*'

Regarding the provision of a footpath beyond Newtown Cross, it should be noted that Mooretown Road is not located within the Local Area Plan boundary and as such is not within the remit of this Plan.

### **Chief Executive's Recommendation**

No change recommended.

### **Enhancement of Walking Routes/trails**

<b>Submission</b>	<b>Summary of Issue</b>
102 Kildare Sports Partnership	Further development of the Slí na Sláinte walking route and proposed park including lighting.
134 Cill Dara le Gaeilge	To encourage walking, nature walks and info graphs along trails enhance the experience and encourage people to return. Bilingual signage and trails would be a fantastic addition to such trails and would encourage school groups as well as many others to use such amenities.

### **Chief Executive's Response**

It is an Objective of the Draft Plan to seek to improve and promote looped walks in conjunction with Slí na Sláinte and other relevant bodies, while also ensuring that the routes are clearly demarcated (Objective MTO 1.8, refers). In respect of bilingual signage Objective EDO 2.2 of the Draft Plan relates to the provision of signage for tourism facilities and tourist attractions. A proposed Chief Executive's Recommendation in response to submissions on Chapter 5 provides for additional text in relation to 'bilingual (Irish and English) signage.'

### **Chief Executive's Recommendation**

No change recommended.

### **Pedestrian Permeability in Planning approvals**

<b>Submission</b>	<b>Summary of Issue</b>
137 Sinéad Mahon	<ul style="list-style-type: none"> <li>• Pedestrian permeability included in planning approvals must be enforced and included in the town plan.</li> </ul>



### Chief Executive's Response

The Draft Plan provides for a plan-led approach to permeability measures across the plan area which have been informed by the Kildare Town Transport Strategy. This Strategy provides for the integration of transport and land use supported by an evidence-based approach to the proposed measures. All applications for permission must have regard to any measures pertaining to the Plan in respect of a site for development. Furthermore, The Planning and Development Act 2000 (as amended) makes provision for the planning enforcement function of the Council, including for enforcement action related to development which has been, or is being, carried out in breach of conditions specified in a planning permission.

### Chief Executive's Recommendation

No change recommended.

### Guidelines for Permeability Routes

Submission	Summary of Issue
139 Cllr. Suzanne Doyle	<p>Suggests including a set of guidelines for permeability routes including standards of delivery with regards to:</p> <ul style="list-style-type: none"> <li>• safety;</li> <li>• the scale and design of the housing estates that proposed routes cross through; and</li> <li>• the cumulative impact on estates close to key destination points.</li> </ul>

### Chief Executive's Response

There are a number of national policy and guidance on permeability such as the Permeability – Best Practice Guide (NTA, 2015), the Urban Design Manual – A Best Practice Guide (DHLGH, 2009), the Design Manual for Urban Roads and Streets (DTTS and DHPLG, 2019) and the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (DHLGH, 2009). In addition to the above, the forward planning section of Kildare County Council (KCC) is currently in the process of implementing Action TM A13 of the Kildare County Development Plan 2023-2029 (CDP) which reads as follows: *'Prepare Guidelines for Permeability Connections in County Kildare to include a flagship permeability project in Kildare.'*

The purpose of this guidance document will be to demonstrate the concept, value and opportunity presented by improved permeability, to demonstrate how KCC will progress permeability projects and to demonstrate KCC's commitment to the delivery of quality and transparency to ensure all new permeability links are delivered to an excellent standard.

It is therefore considered that the preparation of *'Guidelines for Permeability Connections'* as provided for in the CDP would be more appropriately dealt with as an individual body of work separate to the local area plan process.

**Chief Executive's Recommendation**

No change recommended.

**Permeability Measures**

There have been 38 submissions received in respect of the permeability measures included in the Draft Plan.

<b>Submission Number</b>	<b>Name</b>	<b>Permeability Measure</b>
003	Tony Bonnie	PERM 2
045	Owen Kennedy	PERM 4
047	Deborah Bonnie	PERM 2
059	Mary Munnelly	PERM 4 & 8
064	Niamh Keogh	PERM 2
065	Malcolm Haig	PERM 4 & 8
068	Bill McDonald	PERM 4 & 8
071	Sara Byrne	PERM 2
075	Tom Blennerhassett	PERM 4, 8, 9 & 10
077	Mark Murphy	PERM 4, 8, 9 & 13
078	Gayle Doyle	PERM 5, 7, 8, 9, 13 & 11
080	Ailish Murphy	PERM 4, 8, 9 & 13
081	Marie-Anne Ponsard	PERM 4, 8, 9 & 13
082	Louise Rollo	PERM 8
083	Patrick Kearney	PERM 8, 9 & 13
085	Elaine McCormack	PERM 4, 8, 9 & 13
086	Jiyoun Kim	PERM 8, 9 & 13
087	John Spencer	PERM 4 & 8
088	Drumcree Residents Association	PERM 4 & 8
089	Lynda and Shane Geraghty	PERM 2
090	Chris Geoghegan	PERM 8
091	Shane Byrne	PERM 8
092	Janet Doyle	PERM 8, 9 & 13
094	Aoife Hegarty	PERM 8, 9 & 13
100	Michael Hegarty	PERM 8, 9 & 13
101	Shirley Flanagan	PERM 4 & 8

Submission Number	Name	Permeability Measure
103	Seán O'Fearghaíl	Permeability measures through established residential areas to the railway station.
107	Mark Stafford	Permeability measures through established residential areas.
110	Curragh Residents Association	PERM 4, 8, 9 & 13
112	Olive Watkins	PERM 4, 8, 9 & 13
116	Annette Irwin	PERM 9
122	Gillian Smyth	PERM 8, 9 & 13
124	Harry Seymour	PERM 4 & 8
132	Maria Barry	PERM 8, 9 & 13
133	Michael Lawlor	PERM 4, 8, 9 & 13
138	BDP Assets Ltd.	PERM 29
139	Cllr. Suzanne Doyle	PERM 1, 4, 7, 11, 15, 16, 18, 19, 26, 27
140	Catherine Gannon	PERM 4, 8, 9 & 13

A summary of each submission is included in Appendix 1 for reference.

The issues raised in these submissions are:

#### PERM 1

- Prioritise path delivery to Golf Club on Rathbride rd.

#### PERM 2

- Involves the demolition of part of the existing boundary wall and removal of trees.
- Potential to create serious safety issues.
- Will affect the privacy of residents.
- Risk of mature trees being vandalised.
- Small estate home to many families with young children who play in this part of the housing estate.
- Proposal to create an exit onto a very busy link road constitutes very bad planning in terms of health and safety, particularly for young children.
- Increases the risk of both anti-social behaviour and crime.
- Provides access and egress for those who prey on elderly in their homes.
- Alter the environment of the estate.
- Current entrance to Rathbride Abbey is more than adequate for existing pedestrian and cycle paths.
- Creating a further entrance circa 150m away from the existing entrance is a waste of taxpayers' money.

#### PERM 4, PERM 8, PERM 9 and PERM 13

- **Parking of non-residents:** Will facilitate increased parking of non-residents who use the train service and do not wish to pay for Irish Rail car park charges.
- **Street parking:** Negative effect on much needed street parking used by houses.
- **Speeding cars:** Estates already have issues with speeding cars and have requested speed ramps to be installed.
- **Greater traffic volumes:** Kildare Station now falls under the new outer Dublin Commuter Zone which will attract even greater numbers of traffic from other towns to avail of cheaper rail fares.
- **Higher volumes of pedestrian, cyclist, and scooters:** Accessing the streets on a 24-hour basis.
- **Existing access:** Adequate existing access to Rathbride Road. The current ring-road pathway is more than sufficient to accommodate children walking to school. Environs provide adequate pavements.
- **Property valuation:** Unfair impact on property values.
- **Purchase of houses:** Bought house because it's in a quiet cul-de-sac.
- **Residential amenity:** Will damage the residential amenity of the estates involved.
- **Loss of privacy:** Will need to be compensated for loss of privacy.
- **Past history of crime/vandalism:** Residents had to deal with acts of vandalism and crime in the past with youths jumping the wall between Drumcree Court and Rathbride Close and this has been stopped due to a barrier being erected.
- **Anti-social behaviour:** Promote the opportunity for miscreants to engage in anti-social activity, criminal or otherwise.
- **Vandalism**
- **Noise and light pollution.**
- **Littering:** Increased footfall will result in greater littering.
- **Security:** Heighten security concerns.
- **Safety of the elderly residents.**
- **Safety of children:** The estates have many young children playing safely in an enclosed, safe and secure environment which will be exposed to potential dangers with increased traffic and footfall through the estates.
- **Destruction/removal of existing green spaces:** Negative impact on valuable green space.
- **Felling of mature trees.**
- **Quality of Life:** Will have a negative effect on the quality of life of residents.
- **Contrary to the CDP:** Contrary to paragraph 1.1 and objective SC 21 of the Kildare County Development Plan (CDP) 2023 – 2029.
- **Kildare Transport Strategy:** Residents have already voiced objections as part of the public consultation for the Kildare Transport Strategy all of which were completely overlooked with a standard response that concerns can be mitigated through good design.
- **Imbalance of footfall:** Channels much larger estates through much smaller ones.

- **Engagement with residents:** Requests engagement with residents before any statutory process takes place and before any decision is taken.
- **Maintenance:** Pathways through estates would not be maintained.
- **SEA:** Failed to comply with the SEA, the aim of the RSES, core strategy objectives 7,13 and 20 of the Kildare County Development Plan 2023-2029 and paragraph 7.3.1 of the Draft Plan.

#### PERM 7

- Achieves minimum in increased accessibility.

#### PERM 11

- Result in over burden of footfall through Curragh Finn, Drumcree Court and Dunmurray View and it will require the train station to orient public access on both sides of the platform.

#### PERM 15

- Should be located to access through or on the boundary of the local industrial estate.

#### PERM 16

- Will be difficult to achieve due to the significant difference in ground level.

#### PERM 18

- Needs to be progressed in the short term.

#### PERM 19

- A condition needs to be attached to the delivery of the new post primary school to deliver PERM 19 in a similar time frame.

#### PERM 26

- PERM 26 should be supported with more extensive cycle links through KTOV.

### PERM 27

- PERM 27 should be mapped, notes very limited permeability through this site and states that this site has the capacity to deliver in reducing car journeys to work in KTOV and in encouraging walking from the bus terminal at KTOV.

### PERM 29

- Provision of a pedestrian/cycle access route would devalue the lands and constrain potential future uses. Wish to retain the option of developing the lands in the future.

### All permeability measures between Dunmurray Rd and Rathbride Rd

- Only achieve a short reduction on maximum times to the train station.
- States that data on statistics outlining the merit of including these routes would be helpful to support the merit for inclusion of these routes.

## **Chief Executive's Response**

### Overarching Advisory on all Movement and Transport Measures

Developing an improved and permeable sustainable network of cycling and pedestrian routes to encourage alternative options, providing for an improved public transport network and alleviating traffic congestion in the town centre are priorities of the Plan. In Kildare Town, there is a well-documented reliance on the private car across the plan area. One of the most critical elements in addressing climate change is to reduce the level of carbon pollution from transportation and to bring about a modal shift. Therefore, the Draft Plan seeks to develop and encourage more sustainable travel modes including walking, cycling and public transport and to reduce the existing over-reliance on the private car.

As part of the preparation of the Draft Plan, the Kildare Town Transport Strategy was undertaken. The role of the Strategy is to inform the revision of the plan, by providing a comprehensive, evidence-based approach to placing sustainable transport considerations at the forefront of land use planning considerations in the formulation of the Draft Plan.

The Transport Strategy presents a comprehensive analysis of the current transport situation in Kildare Town, outlines the impact of future proposed land development on transportation and presents potential solutions to improve conditions for active modes, public transport and private vehicles. The focus is on revitalising the town centre, improving the transport functionality by facilitating a significant modal shift from vehicular traffic to public transport, in addition to increasing walking and cycling, thereby making Kildare Town a more attractive place to live, work, visit and do business.

The strategy provides an insight into the existing transport patterns and constraints in Kildare Town and also identifies the interventions that are required to effectively accommodate the anticipated increase in demand due to planned population growth, ensure the optimal transportation interventions can be planned, and drive a shift towards sustainable movement. Key outputs of the Transport Strategy are a series of proposed measures to improve the active modes of transport (walking and

cycling) and vehicular movement in Kildare Town and to inform the contents and objectives in Chapter 7.

However, it must be remembered that the objectives of the Draft Plan form the basis for individual projects. The major projects outlined in the Draft Plan still needs to be examined on own merits and is still subject to the rigorous analysis requirements of the Public Spending Code (PSC) and the Common Appraisal Framework for Transport Projects and Programmes (CAF). The PSC and CAF require the identification and examination of various options.

While the Kildare Town Transport Strategy includes some high-level Multi Criteria Analysis (MCAs), these would not be sufficient for the purpose of assessing an individual project developed from an objective within the Draft Plan. They do not proprot to be a definitive analysis of all the options for the possible objectives, but rather a broad reckoning which indicates they are suitable for inclusion as potential transport objectives.

The progression of these measures in future will be subject to a separate statutory procedure either Section 38 of the Road Traffic Act 1994 or as a Part 8 process, in accordance with the Planning and Development Act 2000 (as amended) (or any subsequent Planning Act) which includes for detailed design and appraisal, consultation with the relevant statutory stakeholders and public consultation.

#### Overall Response to Permeability Measures

The public consultation survey carried out as part of the Kildare Transport Strategy found that 64% of respondents travel by car to commute and 81% travel by car for non-commuting trips. When asked how often their children travel to school using active modes, 45% of the respondents with primary school age children and 42% of the respondents with secondary school age children indicated 'rarely/never'. The two main issues that was highlighted as barriers to walk or cycle to school was 73% - 'distance – it's too far to walk' and 53% 'lack of cycling facilities between home and school'.

The Draft Kildare Local Area Plan provides an opportunity to encourage healthier mobility choices in Kildare Town, to relieve traffic congestion, to improve the urban environment and to help tackle the climate crisis. The identified permeability measures across the Draft Plan are crucial to the delivery of safe and convenient pedestrian/cycle routes to destinations in Kildare Town.

#### PERM 1

PERM 1 (shared walking/cycling path on one side of Rathbride Road from Rathbride Abbey to Cill Dara Golf Club) is prioritised for delivery in the short-term as per Table 7-1 of the Draft Plan.

#### PERM 2, 4, 7, 8, 9 and 13

The permeability strategy seeks to create convenient, efficient routes to key trip attractors and to reduce walking trip distances to give non-motorised modes a competitive advantage over private cars.

Baseline catchments were assessed to identify the barriers which lengthen walking distances to key trip attractors such as the train station. The boundary walls between various estates north of the railway line was identified as barriers affecting permeability to the railway station. PERM 2, 4, 7, 8, 9 and 13 are included in the Draft Plan to address these barriers.

The delivery of these measures is dependent on the delivery of Public Transport Measure PT 5 to create a northern entrance to the train station. In turn the delivery of PK 5 will also be dependent on the delivery of permeability measures 2, 4, 7, 8, 9 and 13 in order to increase the catchment area of the train station and to achieve improved permeability from the houses north of the railway line to the train station.

It should however be noted that the Draft Plan contains indicative permeability measures only. Should these measures be progressed at any stage in the future it would be subject to rigorous comprehensive assessment which will include for detailed design and careful appraisal.

Section 11.1.4 of the Kildare Town Transport Strategy quantifies the benefits of implementing the permeability strategy and includes a series of maps to display the reduction in walk distance from buildings in Kildare Town to key destinations.

For example, the Strategy highlights that the implementation of the identified permeability measures will result in a 20.2% increase of homes brought into the 1km catchment area of the train station and an overall reduction in walking distance to the train station for 40% of buildings within Kildare Town.

#### PERM 11

The Draft Plan contains indicative permeability measures only. Should this measure be progressed at any stage in the future it would be subject to rigorous comprehensive assessment which will include for detailed design and careful appraisal. Furthermore, the Draft Plan includes a measure to create a northern entrance to the train station (Public Transport Measure PT 5, refers).

#### PERM 15

Through the rigorous analysis required to advance this measure to the next stage, alternative locations in the area as suggested will be examined in greater detail through the detailed assessment of the measure.

#### PERM 16

The Draft Plan contains indicative permeability measures only. Should this measure be progressed at any stage in the future it would be subject to rigorous comprehensive assessment which will include for detailed design and careful appraisal.

#### PERM 18 and 19

Permeability measure 18 will be delivered in tandem with the development of the Former Magee Barracks Settlement Consolidation Site and as such the delivery



schedule of PERM 18 will be dependent on the schedule of the overall development of the site.

Permeability measure 19 will be delivered in tandem with the development of a Post-Primary School and as such the delivery schedule of PERM 19 will be dependent on the delivery schedule of the overall school development. The responsibility of which lies with the Department of Education.

However, there is an Objective (TM O21) in the Kildare County Development Plan to *'ensure site layout proposals detail present and possible future connections to pedestrian/cycle links and improve permeability between existing and proposed developments including adjacent developments thereby facilitating the '10-minute settlement' concept.'*

It is also an objective of the Draft Plan (MTO 1.6) to *'ensure attractive walking and cycling routes are a fundamental element of the redevelopment of the Former Magee Barracks in conjunction with the measures detailed in Table 7-1 and 7-2 and illustrated on Map 7.1 and 7.2.'*

#### PERM 26

PERM 26 and PERM 28 will provide for cyclist access to the Kildare Tourist Outlet Village. It is however not considered appropriate to propose the delivery of cycle paths through the Kildare Tourist Outlet Village (KTOV) due to its pedestrian nature.

#### PERM 27

The internal pedestrian link has not been mapped as it was delivered as part of Phase 3 of the Kildare Tourist Outlet Village (KTOV) since the Kildare Town Transport Strategy was finalised. The delivery of PERM 26 will link KTOV with the bus stop and the delivery of PERM 28 will link KTOV with the town centre.

#### PERM 29

The Draft Plan contains indicative permeability measures only. Should this measure be progressed at any stage in the future it would be subject to rigorous comprehensive assessment which will include for detailed design and careful appraisal.

### **Chief Executive's Recommendation**

#### **Proposed Material Alteration**

Chapter 7 Movement and Transportation, amend Section 7.2 Kildare Town Transport Strategy, paragraph two, to make reference to the Road Traffic Act 1994.

The progression of the measures in the future will be subject to a separate statutory procedure *either by Section 38 of the Road Traffic Act 1994 or as a Part 8 process*, in accordance with the Planning and Development Act 2000 (as amended) (or any subsequent Planning Act) which includes for detailed design and appraisal, consultation with the relevant statutory stakeholders and public consultation.

**Connectivity between Kildare Tourist Outlet Village, Kildare Town Centre and the Irish National Stud and Japanese Gardens**

Submission	Summary of Issue
103 Seán O'Fearghail	Connectivity between The Village, Kildare Town and the National Stud needs to be regularised and maintained.

**Chief Executive's Response**

It is an objective (MTO 1.1) of the Draft Plan to support and promote the use of sustainable active transport modes in Kildare Town and seek to implement a connected network of walking and cycling infrastructure in the town as detailed in Table 7-1 and 7-2 and illustrated on Map 7.1 and 7.2. Of particular relevance in terms of improving connectivity between Kildare Tourist Outlet Village, the Town Centre and the National Stud is permeability measure 28 and cycle measures 6, 18,19, 42,43,44, 56 and 4.

It is also an objective (MTO 2.3) of the Draft Plan to ensure the Kildare Tourist Outlet Village complimentary shuttle bus service is retained as part of the operation of Kildare Tourist Outlet Village.

In addition to the above, it is an objective (MTO 1.7) of the Draft Plan to 'investigate the provision of a bike hire scheme to connect Kildare Town Train Station - Market Square - Cherry Avenue (when completed) and to historic sites.' It is however considered appropriate to also include the Irish National Stud and Japanese Gardens and Kildare Retail Outlet Village as part of this objective.

**Chief Executive's Recommendation**

**Proposed Material Alteration**

Chapter 7 Movement and Transportation, Walking and Cycling Objectives, amend Objective MTO 1.7, as follows:

- MTO 1.7** Investigate the feasibility of the provision of a bike hire scheme to connect Kildare Town Train Station - Market Square - Cherry Avenue *Park (when completed) - Kildare Tourist Outlet Village - Irish National Stud and Japanese Gardens. and Connections* to other historic sites will also be examined as part of the project.

**General Issues Related to Cycling**

Submission	Summary of Issue
139 Cllr. Suzanne Doyle	Bicycle lanes stop without notice, impacts vulnerable road users.
139 Cllr. Suzanne Doyle	The very low levels of cycling within Kildare Town might be explained by the many narrow carriageways and poor public

Submission	Summary of Issue
	lighting.

### Chief Executive's Response

Map 7.2 of the Draft Plan shows the proposed cycle measure and the continuous network of cycle tracks/lanes proposed for delivery. As progressed, these measures will be subject to rigorous comprehensive assessment which will include for safety audits, detailed design, and careful appraisal. The detailed design of these measures will address the issue of bicycle lanes stopping without notice and poor public lighting, where feasible.

### Chief Executive's Recommendation

No change recommended.

### Separate and Segregated Cycling Infrastructure

Submission	Summary of Issue
099 Ronan Maher	Any cycle path/track mentioned in the plan must be separate and segregated cycling infrastructure.
102 Kildare Sports Partnership	<ul style="list-style-type: none"> <li>Require dedicated cycle lanes throughout the town.</li> <li>Creation of the town as a national cycle hub.</li> </ul>
127 Kildare Greens	Any cycle path/track mentioned in the plan must be separate and segregated cycling infrastructure as line of paint on a road does not constitute adequate cycling infrastructure.
139 Cllr. Suzanne Doyle	Regarding Cycle 4, it is submitted that the width of the carriageway often struggles to support buses and cars and questions it's capacity to support a dedicated cycle lane.
139 Cllr. Suzanne Doyle	Submits that route Cycle 5 would need dedicated safe passage for cyclists, and motorised scooters. Expressed concern about pedestrians and vulnerable road users on a shared cycle lane.
139 Cllr. Suzanne Doyle	Submits that route Cycle 6 would need dedicated safe passage for cyclists, and motorised scooters. Expressed concern about pedestrians and vulnerable road users on a shared cycle lane. Submits that this route should be prioritised for pedestrian users and should be located within the lands marked F.

### Chief Executive's Response

As highlighted in Section 7.3.2 of the Draft Plan, the exact degree of segregation to be provided for the proposed cycle tracks/cycle lanes will be best determined at detailed design stage. The overall objective is to ensure that to the greatest extent possible, the degree of protection provided from vehicular traffic ensures a high level of perceived, as well as actual, safety, as this is an essential component of achieving modal shift.

It should be noted that Cycle 6 is proposed to be located in the F: Open Space and Amenity lands.

### Chief Executive's Recommendation

No change recommended.

### Queries related to the Cycling Measures

Submission	Summary of Issue	Cycling Measure
139 Cllr. Suzanne Doyle	States that the identified cycle routes outlined in blue seems to indicate a degree of difficulty in accommodating these routes.	All
139 Cllr. Suzanne Doyle	Question what is meant by 'middle section' in the description of Cycle 4 and Cycle 9.	Cycle 4 & 9

### Chief Executive's Response

A number of links within the study area have been categorised as 'to be determined (TBD) by detailed study'. On these links, some improvements will be required to improve safety and/or comfort for cyclists. However, more detailed analysis is needed to develop appropriate solutions for these streets, most of which are quite constrained with regard to available road width and/or the potential for land take. It is likely that some of these streets will need to be designated as 'Shared Streets'. Mixed/shared streets are most suitable where there are low traffic speeds and low traffic volumes, also where the traffic function is subordinate to vulnerable road user requirements. However, it should be acknowledged that the criterion of low traffic volumes will not be achievable on all of the streets which have been allocated the category of 'TBD by detailed design' within the strategy, particularly in the short to medium term. For example, traffic volumes on Nugent Street/ Station Road are higher than desirable for a Shared Street, but as the space on most of this link is very constrained it may also not be possible to provide dedicated cycling facilities.

Regarding the references to 'middle section' as part of the descriptions of Cycle 4 and Cycle 9, these descriptions refer to the specific sections of the full lengths of Tully Road and Melitta Road. However, in the interest of clarity it is proposed to omit the references to 'middle section'.

### Chief Executive's Recommendation

#### Proposed Material Alteration

Chapter 7 Movement and Transportation, amend Table 7-2 in respect of Cycle 4 and Cycle 9 as follows:

<b>Cycle 4</b>	Tully Road ( <del>middle section</del> )
<b>Cycle 9</b>	R413 Melitta Road ( <del>middle section</del> )

**Cycling Measures**

Submissions have been received in relation to this topic as follows:

<b>Submission</b>	<b>Summary of Issue</b>	<b>Cycling Measure</b>
022 Nigel Curran	Upgrade Cycle 13 to short term in line with the Perm 1, path from Rathbride Road to Chill Dara Golf Club. The path is used by pedestrians and e-scooters, upgrading would make it impossible for pedestrians with buggies to use given the sheer volume of e-scooters heading towards the soccer club.	Cycle 13
032 Adele Woods	Commends the plan and proposals such as cycle and pedestrian tracks in Cherry Avenue.	Cycle 58 and 5
073 Joan Conlan	<p>The submission supports Cycle 33. It outlines this will benefit school children cycling to Kildare Community College thus avoiding the ever-congested railway bridge on the Dunmurray Road which has no cycle lane under it.</p> <p>It also outlines KCC should resurface this existing roadway and include proper road markings and states it is essential that KCC ensure that cyclists have safe access onto the new Oak Church Road without being impeded by parked/stationary vehicles and temporary dwellings.</p> <p>Furthermore, it states access to the field, alongside the railway track, between Old Road and Dunmurray Road, where the local sewage pumping station is located needs to be maintained as it is checked on a daily basis.</p>	Cycle 33
139 Cllr. Suzanne Doyle	Questions why Cycle 14 and Cycle 15 isn't continuous.	Cycle 14 and 15
139 Cllr. Suzanne Doyle	Concern raised with regards to the capacity of Cycle 17 to safely support a cycle route.	Cycle 17
139 Cllr. Suzanne Doyle	Questions what the distinction is between Cycle 4 (blue) and Cycle 21 (red).	Cycle 4 and 21
139 Cllr. Suzanne Doyle	<p>Cycle 34 should be delivered as part of the imminent development of Fairview cottages and states that the route is currently the subject of ASB.</p> <p>Highlights that the removal of vehicle access to Palace Field Cottages will be problematic.</p>	Cycle 34
139 Cllr. Suzanne	Cycle 35 may not be compatible with the plans to	Cycle 35

Submission	Summary of Issue	Cycling Measure
Doyle	pedestrianise town Square and create vehicle access to service local business.	
139 Cllr. Suzanne Doyle	Cycle 42 and 43 will be very difficult to deliver due to the carriage width and footpath width and poor site lines.	Cycle 42 & 43
139 Cllr. Suzanne Doyle	Cycle 53 should be moved to the boundary of Woodside Park and the industrial estate.	Cycle 53
139 Cllr. Suzanne Doyle	The following comment is made in relation to Cycle 56: <i>'Not wide enough.'</i>	Cycle 56

### Chief Executive's Response

Refer to the overarching advisory on all movement and transport measures.

The Draft Plan contains indicative cycling measures only. Should these measures be progressed at any stage in the future it would be subject to rigorous comprehensive assessment which will include for detailed design and careful appraisal. The implementation of the Kildare Town Transport Strategy is carefully phased to ensure all measures (permeability, cycle and roads) are mutually supportive in achieving the objectives of the strategy.

Submission 139 questions why Cycle 14 and Cycle 15 is not continuous. As per Map 7.2, there is an existing cycle track/lane along the section of road between Cycle 14 and Cycle 15 located near the junction of recently constructed link road between Southgreen Road and the Dunmurray Road and also the entrance to Oak Church

Regarding Cycle 4 (blue) and Cycle 21 (red), Cycle 4 refers to a dedicated cycle path (greenway) alongside Tully Road and Cycle 21 refers to the provision of a cycle track/lane on Tully Road. Cycle 34 shall not restrict vehicle access to Palace Field Cottages. However, it will prioritise active travel modes to rule out the potential use of this route as a through road as a result of the proposed development of the Northern Link Street scheme.

### Chief Executive's Recommendation

No change recommended.

**Active Travel - South of Cunnaberry Hill and parallel to the motorway**

Submission	Summary of Issue
139 Cllr. Suzanne Doyle	<ul style="list-style-type: none"> <li>• Cycle 46 should be relocated to use the route to the WWTP.</li> <li>• Cycle 32 should drop south and link with an extended cycle 6 to be delivered as a safe and separate route from pedestrian link on same path.</li> <li>• Cycle 58 would not be necessary if Cycle 46 is dropped to connect with Cycle 6.</li> </ul>

**Chief Executive's Response**

To promote active travel and to move towards a low carbon environment, it is considered prudent that the cycle links (Cycle 46, 32 and 58, illustrated on Map 7.2) are retained within the Draft Plan, to encourage residents to walk or cycle to the proposed Cherry Avenue Park and amenities located on Hospital Street/Dublin Road and further afield, including the school campus within the Former Magee Barracks.

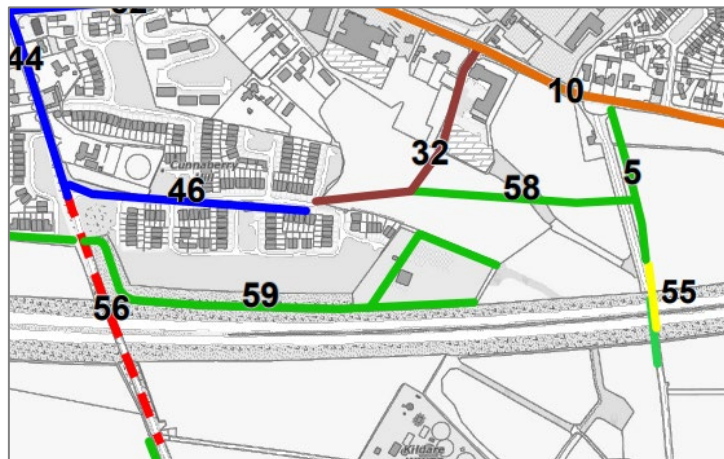
However, it is considered appropriate to include an additional cycle/pedestrian link, south of Cunnaberry Hill and parallel to the motorway between Tully Road and the proposed Cherry Avenue Park to facilitate additional south-west access points to the proposed new park.

**Chief Executive's Recommendation**

**Proposed Material Alteration**

Chapter 7 Movement and Transportation, insert new cycling measure in Table 7-2 and on Map 7.2 (as outlined in black below) as follows:

Ref. No.	Description	Proposed Link Type	Proposed Timeframe
<b>Cycle 59</b>	<i>Link between Tully Road and Cherry Avenue Park, south of Cunnaberry Hill and parallel to the motorway.</i>	<i>Greenway</i>	<i>Long-term</i>



**Bus and Rail Services**

<b>Submission</b>	<b>Summary of Issue</b>
103 Seán O'Fearghail	Strive to ensure that bus and rail services, are used to the maximum through the provision of frequent, regular, and affordable services.
139 Cllr. Suzanne Doyle	Proposes the following new public transport measure: <ul style="list-style-type: none"> <li>• 'PT 8 Reinstate the town link bus service required as a condition of KTOV planning. This bus link looped between the rain station, town centre, INS, and KTOV. It is an important service in supporting tourism objectives and reducing traffic to each of these locations.'</li> </ul>

**Chief Executive's Response**

The Kildare Town Transport Strategy has proposed a range of measures to improve public transport throughout the town. It is considered that these measures will create the potential for a larger proportion of trips to be completed via public transport by improving the quality, frequency and coverage of services. These measures are detailed in Table 7-3 and illustrated in Map 7.3 of the Draft Plan. However, the frequency and affordability of services is a matter for service providers and outside the remit of a land use plan.

It is an objective of the Draft Plan to ensure the complimentary shuttle bus service is retained as part of the operation of Kildare Tourist Outlet Village (Objective MTO 2.3, refers). The Planning and Development Act 2000 (as amended) makes provision for the planning enforcement function of the Council, including for enforcement action related to development which has been, or is being, carried out in breach of conditions specified in a planning permission.

**Chief Executive's Recommendation**

No change recommended.

**Dublin Commuter Zone Ticket Arrangements**

Submissions have been received in relation to this topic as follows:

<b>Submission</b>	<b>Summary of Issue</b>
118 Senator Mark Wall	States that the Plan should welcome the proposed new Dublin Commuter Zone ticket arrangements, given as commentary has indicated that Kildare Train Station will be included in the zone.

**Chief Executive's Response**

The submission is noted and accepted.

The National Transport Authority (NTA) recently announced the 'short hop zone' is to be replaced by a new Dublin Commuter Zone which will include Kildare Town. It is therefore considered appropriate to omit all references to the 'short hop zone' in the Draft Plan and to refer to the new Dublin Commuter Zones in the Draft Plan.

**Chief Executive's Recommendation**



### Proposed Material Alteration

Chapter 7 Movement and Transportation, amend paragraph two of Section 7.4 as follows:

The train station that serves Kildare Town is located on the main southern rail line which connects Dublin with the regional cities of Cork, Galway, Limerick and Waterford. All inbound services that stop at Kildare terminate at Heuston Station and do not use the Phoenix Park Tunnel. ~~Potential changes to the train infrastructure that were highlighted across the survey analysis were improved facilities at the train station and an extension of the 'short hop' rail fare zone.~~

*In January 2023 the National Transport Authority (NTA) published its National Fares Strategy for commuter and inter-urban journeys on Public Service Obligation (PSO) bus and rail services. In Dublin a City Zone will be introduced and a new Outer Dublin Commuter Zone will be introduced which will include Kildare Town. Under the new strategy lower fares will be made available for passengers travelling from the Outer Dublin Commuter Zone into the Dublin City Zone (or vice-versa).*

### Proposed Material Alteration

Chapter 7 Movement and Transportation, Section 7.4, amend the paragraph immediately below Table 7-3 Public Transport Measures, as follows:

A number of ancillary measures are also proposed to ensure the effective operation of public transport within Kildare Town. However, many of these are outside the remit of a local area plan but are important at a county strategic level which will in turn favourably impact Kildare Town. For example, working with the NTA ~~to achieve Leap Card Integration at Kildare Train Station will involve extending the 'short hop zone' to Kildare Town. Thereby, allowing local residents to avail of lower rail fares which would increase the appeal of the train for commuter and non-work trips to Dublin City. Currently the 'short hop zone' stops at the Sallins and Naas station. The other measures that would benefit Kildare Town are an extension to~~ *pursue the delivery of extending the rail services to Kildare Town* using the Phoenix Park Tunnel to further increase the appeal of rail travel for residents.

### Proposed Material Alteration

Chapter 7 Movement and Transportation, Public Transport Objectives, amend Objective MTO 2.4 as follows:

Work with the NTA to pursue the delivery of the following:

a) Improvements to the quality and coverage of the bus stops and achieve more frequent bus services in Kildare Town.

~~b) Achieve Leap Card integration at Kildare Train Station.~~

~~e)b)~~ Extension of the Phoenix Park tunnels rail services to Kildare Town.

### Reopening of the Curragh Train Station

Submission	Summary of Issue
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Submission	Summary of Issue
107 Mark Stafford	Refer to the objective in the County Development Plan for the reopening of the Curragh Train Station and potential benefits for Kildare Town residents.

### Chief Executive's Response

Objectives relating to areas outside of the local area plan boundary such as the Curragh Train Station are not appropriate for the Kildare Town Local Area Plan.

### Chief Executive's Recommendation

No change recommended.

### Extension of the Electrification of the Kildare Southwest Rail Line

Submission	Summary of Issue
139 Cllr. Suzanne Doyle	Add a further objective to MTO 2.4: <ul style="list-style-type: none"> <li>To get the third rail route, reaching Hazelhatch at present, to be extended to Kildare Train Station.</li> </ul>

### Chief Executive's Response

It is an objective of the Draft Plan under Objective MTO 2.8 to actively support the extension of the electrification of the Kildare Southwest Rail Line from Hazelhatch to Kildare Town.

### Chief Executive's Recommendation

No change recommended.

### Roads Strategy

Submission	Summary of Issue
103 Seán O'Fearghail	States that the local authority should ensure new residential development provides for direct access to the town centre as a priority, together with access to the Railway Station and the M7 motorway.
114 Jorge Rodrigues	The Draft Plan should have greater emphasis managing pedestrian, cyclists and parking. It states heritage is an important aspect of Kildare and must be preserved by prioritizing residents and its people as opposed to investing resources to build more roads and increase traffic problems.
129 Brian Murphy	Notes that the railway line has created a division within the town with four of the five bridge crossings restricted to one-way traffic and the fifth limited to pedestrian traffic. States that a lot of heavy vehicles will be transferred to different parts of the town using northern link road but that this has several 90 degree turns to be negotiated. In this regard, the submission notes proposals to add cycle lanes to these routes which would mix with the heavy goods traffic will create difficulties.

Submission	Summary of Issue
	Access around the town is becoming increasingly difficult and needs to be constantly monitored for assessment before major changes are made. States that Kildare is an important 'historic town' which needs to facilitate tourist traffic also. Also states that the cathedral is a working cathedral, that hosts services and concerts, in addition to tourists.
137 Sinéad Mahon	Welcomes the overall plan to increase pedestrian and cycleway accessibility but states that the proposed new road infrastructure is not in keeping with the green agenda.
139 Cllr. Suzanne Doyle	<p>Raised the following concerns regarding the intentionally restrained roads strategy of the Draft Plan:</p> <ul style="list-style-type: none"> <li>• Opportunity for the delivery of road infrastructure to support the medium to long-term growth of the town will be lost.</li> <li>• While the modal shift to active travel is meritorious, the elimination of the motor vehicle is not foreseen.</li> <li>• With the ability of the current WWTP to be upgraded to 45,000 PE, routes need to be secured to service a town that may potentially grow to this size.</li> </ul>

### Chief Executive's Response

Refer to the overarching advisory on all movement and transport measures.

The road strategy in the KTTS focuses on reducing unnecessary vehicular trips through the town centre, to facilitate infrastructure improvements for active modes and safety. In respect to future development, the road strategy seeks to ensure that Kildare Town will have sufficient road capacity to support additional population and ensure the efficient movement of vehicles on the road network. The roads strategy is intentionally restrained, seeking to only deliver new road projects when they are absolutely essential to the growth of the town and complement the multi-modal transport strategy in line with the national climate action approach.

The progression of road measures in future will be subject to a separate statutory procedure either Section 38 of the Road Traffic Act 1994 (as amended) or as a Part 8 process, in accordance with the Planning and Development Act 2000 (as amended) or any subsequent Planning Act) which includes for detailed design and appraisal, consultation with the relevant statutory stakeholders and public consultation.

### Chief Executive's Recommendation

No change recommended.

**Road Safety and Maintenance**

Submission	Summary of Issue
103 Seán O'Fearghail	The local access road to the soccer grounds requires substantial upgrading and restoration.
139 Cllr. Suzanne Doyle	Issue raised during a meeting held to discuss vulnerable road users in town: <ul style="list-style-type: none"> <li>• Safety concerns regarding the right of way at the top of Priests Lane meeting Green road &amp; Firecastle.</li> <li>• Sight lines at Cross Quays.</li> <li>• Require clear road markings throughout town for people with vision problems.</li> </ul>

**Chief Executive's Response**

It is considered that objectives MTO 3.1 (a) and MTO 3.2 adequately address road safety, improvements, and maintenance.

MTO 3.1 (a) *Maintain and improve, as required, the local road network to ensure a high standard of road quality and safety in accordance with the requirements of the Design Manual for Urban Roads and Streets (DMURS) or any subsequent guidelines.*

MTO 3.2 *Co-operate and liaise with the Department of Transport, the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII) in relation to securing appropriate improvements/extensions to the transport network within Kildare Town.*

It should also be noted that the maintenance of roads is an operational issue for the Council and the detailed specifics are outside the remit of a land use plan.

**Chief Executive's Recommendation**

No change recommended.

**Road Measure RD 1 - Closure of Old Road Bridge to vehicular traffic**

Submission	Summary of Issue
107 Mark Stafford	Refers to measure RD 1 and states that given the number of existing dwellings on the Old Road it is submitted that the closure of the Old Road Bridge to vehicular traffic would not serve any useful purpose. Suggests that a one-way system be introduced instead which would provide room for safe cycle and pedestrian routes. Notes that the direction would need to be determined.
130 Garvan de Bruir	RD1 – Closure of Old Bridge Road: Requests that consideration be given to keep it one-way.

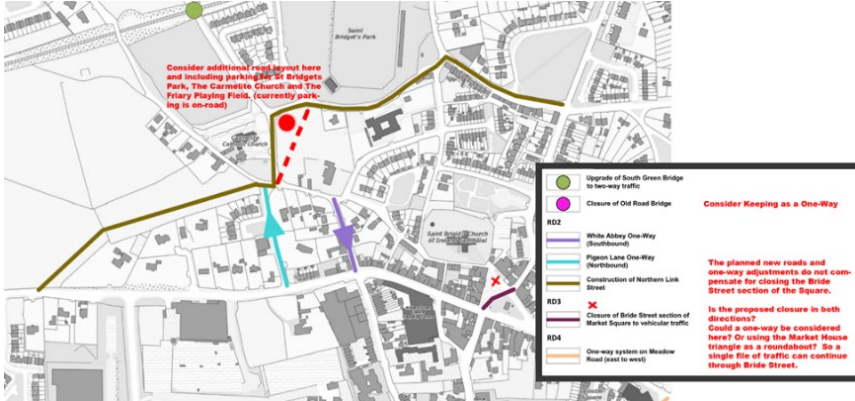
**Chief Executive's Response**

The road measure RD1 as provided in the Draft Plan is not a definitive analysis of the road measure, but rather a broad reckoning which indicates that it is suitable for inclusion as potential transport objectives. As provided for in the overarching advisory on all movement and transport measures, the projects outlined in the Draft Plan will still be subject to assessment on their own merits.

**Chief Executive's Recommendation**

No change recommended.

**Road Measures RD 2 - Construction of Northern Link Street**

Submission	Summary of Issue
107 Mark Stafford	Submits that measure RD2 should include one way system on section of White Abbey Road at the Education centre. Further notes that consideration should be given to one-way system at Chapel Lane and Priests Lane.
130 Garvan de Bruir	<p>Construction of Northern Link Street, states that the planned new roads and one-way adjustments do not compensate for closing the Bride Street section of the Square. Also states that consideration should be given for altered road layout within a portion of the route which would also provide for parking for St. Bridget's Park, the Carmelite Church and the Friary playing field. See map below.</p> 
142 David Hanley	Objects to Pigeon Lane and Road up by the HARP bar made one-way. States that both roads are wide enough for two way and will lead to more congestion at busy school times.

**Chief Executive's Response**

Refer to the overarching advisory on all movement and transport measures.

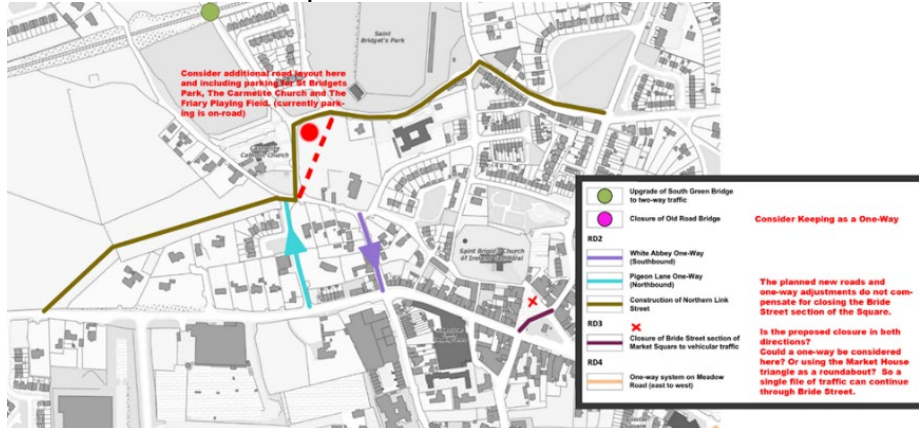
The Greater Dublin Area Transport Strategy (2022-2042) in respect of destination parking standards states that the National Transport Authority, in cooperation with the local authorities, will ensure that the quantum of parking provided at destinations (non-residential commercial developments) will be significantly reduced at all locations in the Greater Dublin Area (GDA). Kildare Town is located within the GDA. In this context and the need to transition to a low carbon society by reducing transport usage and promoting active travel it is not considered appropriate to

provide more destination parking in Kildare Town for existing facilities above what is provided for in the Parking Strategy in the Draft Plan.

**Chief Executive's Recommendation**

No change recommended.

**Road Measures RD 3 – Closure of Bride Street Section for Vehicular Traffic**

Submission	Summary of Issue
130 Garvan de Bruir	<p>RD3 – Closure of Bride Street section of Market Square: Asks if this proposed closure is for both directions and whether a one-way closure could be considered, using the Market House as a roundabout? See map below.</p> 
142 David Hanley	<p>Objects to closing off the square to traffic as turning at Silken Thomas is too severe.</p>

**Chief Executive's Response**


Refer to the overarching advisory on all movement and transport measures.

**Chief Executive's Recommendation**

No change recommended.

**Road Measure RD 4 - One-way system on Meadow Road**

Submission	Summary of Issue
053 Adam Doyle	<p>Instead of limiting the Meadow Way to a one-way system, consider proper enforcement of parking restrictions at the junction of Meadow Way and Dublin Street, thus allowing it to remain two-way. See figure below.</p>

Submission	Summary of Issue
	
054 Aoife O'Connor	<p>Instead of limiting the Meadow Way to a one-way system, consider proper enforcement of parking restrictions at the junction of Meadow Way and Dublin Street, thus allowing it to remain two-way. See figure in the row above.</p>
107 Mark Stafford	<p>With regard to measure RD 4 the submission states that this street is sufficiently wide to take existing two vehicle traffic and is not particularly heavy trafficked.</p> <p>Submission concludes by recommending amendment to objective MTO 3.2 following further investigation and consideration.</p>

### Chief Executive's Response

In relation to the proposed one-way system on Meadow Road (RD 4 in Table 7.4), Kildare County Council will be conducting a trial to investigate its feasibility. Regarding the enforcement of parking at the junction, objective MTO 4.5 of the Draft Plan supports the enhancement of parking enforcement.

### Chief Executive's Recommendation

No change recommended.

### Road Measures PA 1 & PA 4 - Former Magee Barracks Phase 1 and 2 Roads

Submission	Summary of Issue
030 Daniel Meaney	<p>The Former Magee Barracks Phase 1 and Phase 2 roads should be completed simultaneously in order to:</p> <ul style="list-style-type: none"> <li>• Facilitate a safer entrance/exit to Lidl.</li> <li>• Reduce traffic into the town by creating an alternative route for all estates feeding into Mellita Road (R413).</li> </ul>
139 Cllr. Suzanne Doyle	<p>Road Measure PA 4 needs to be fast tracked through the delivery of the new post primary school.</p>

### Chief Executive's Response

The development of the Former Magee Barracks Settlement Consolidation Site and the associated road schemes are developer led. As such the delivery schedule of PA

1 (Phase 1 the Former Magee Barracks Roads) and PA 4 (Phase 2 of the Former Magee Barracks Road) are dependent on the schedule of the overall development of the site.

### Chief Executive's Recommendation

No change recommended.

### **Road Measure PA 3 – Hospital Street to Tully Road Link**

There have been 42 submissions received in relation to the Hospital Street to Tully Road link from the following people, which included children living in Oaktree, Cunnaberry Hill.

Submission Number	Name
004	Silviu Munteanu
005	Anil Vetsa
006	Elaine Keating
007	Lalit Suryawanshi
008	Zuhair Ahmed
009	Peter Daniel
010	Aoife Hand
011	Tikkina Ananda Bai
012	John Nicol
013	Rosita Pavlova
014	Slavi Pavlov
015	Olga Postolachi
016	Hazel Nolan
021	Kaushal Adarsh
024	Sean Donegan
025	Caroline Christie
026	Cathal Mahon
027	Victoria Vaughan
028	Mihaita Stoinoiu
029	Gaurav Verma
035	Dylan Byrne
037	Richard Bannister
032	Adele Woods
043	Mairead Cooney
048	Han Wang
049	Eimear O'Brien
051	Pamela Fletcher
052	Livia Maria Bida
053	Adam Doyle



Submission Number	Name
054	Aoife O'Connor
055	Frances Van Oirschot
066	Rebecca Jones
074	Anastassia Pinzariu
079	Cunnaberry Hill, Oaktree Residents Association
084	Ricardo Olguin
093	Kieran Conboy
103	Sean O'Fearghail
108	Christina Conchi
120	Darren Christie
121	Deborah Quigley Daly
137	Sinead Mahon
139	Cllr. Suzanne Doyle

A summary of each submission is included in Appendix 1 for reference.

The issues raised in these submissions are:

- **Safety of children:** A public road through an established residential estate would have a detrimental impact on the safety of children playing (from 160 houses), particularly given the proximity of the playground and green areas to the road. Children should have the freedom to play safely near their homes.
- **Impacts on amenity:** The proposed road will have negative impacts on the aesthetics of the area, resulting in loss of green spaces and trees, and loss of sense of community or 'meitheal'. There will be risks for privacy, crime and quality of life. There are no other estates with public roads running through them. Emergency services will be impacted.
- **Traffic and Congestion:** There will be additional traffic hazard and risks from increased traffic levels, HGVs and speeding which will result in higher risks of injuries and roads fatalities. The road could be used as a ring road or rat run. There will be safety implications for pedestrians and cyclists.
- **Pollution:** The new road link would increase noise and fuel emissions, which would have a detrimental impact on the environment and amenity for residents, as well as damage to local ecosystems. There is already significant noise from the motorway. The proposal would be contrary to statements made in the plan relating to lowering carbon emissions in sections 2.1.1, 2.2, MTO 3.3, 7.1, MTO 1.5, MTO 1.3.
- **Impacts on nature:** There are birds, hares, foxes and rabbits in the undeveloped field adjoining Cunnaberry Hill, as well as protected bats in nearby trees. The proposal would have a significant impact on flora and fauna especially in thriving hedgerows / shrubbery and trees which are protected in sections 9.3, NHO 2.4 and NHO 2.2 of the LAP.

- **Estate design:** The narrow width of the estate road with open plan driveways and without hard borders is not conducive to a new road layout for two-way traffic. The existing road was not built for the purposes of a public road.
- **Estate entrance:** Safety at the entrance to the estate from the Tully Road, particularly for children walking to school, is already an issue. The entrance would not permit two lorries to pass each other. The entrance has blind spots for traffic coming from both left and right, and with extra traffic it will only be a matter of time before there is an accident. The entrance is much more akin to a housing estate than a through road.
- **Parking:** The road could give rise to more cars parking in the estate, which is currently uncontrolled, on footpaths for example, which would be hazardous. Cars already reverse onto the road and there is no visitor parking in the estate. As a direct result, cars park along both sides of the road. People could use the estate as a car park to avoid paying parking fees at the Medical Centre.
- **Surface water drainage:** This is already an issue in the estate and on adjoining lands. There could be damage from build-up of water splashing onto properties.
- **Property valuation:** House values could be negatively impacted by the proposed road.
- **Active Travel:** Some submissions were in favour of a walking and cycling connection, while other submissions were opposed to this.
- **Taking in Charge:** The estate has not been taken in charge and therefore no right exists to a public roadway through the estate.
- **Purchase of houses:** The road and connection to Hospital Street were not included on estate agents plans when the homes were purchased in September 2017.
- **Costs:** Should the road proceed, mitigation works would be required, the cost of which should be incurred by the Council (e.g. walls around green areas and all properties facing onto Oaktree Road, compensation to residents, lighting, widening the entrance to the estate, pedestrian crossings etc.).
- **Meadow Road:** Making Meadow Road one-way at the expense of the safety and wellbeing of the Oaktree Residents is unacceptable. Instead of limiting Meadow Way to a one-way system, consideration should be given to widening it, the proper enforcement of parking restrictions at the junction of Meadow Way and Dublin Street, allowing it to remain two-way.
- **Alternatives:** An alternative road should be considered, along the county council road from Tully Road to the pumping station (which runs parallel to the motorway).

### Chief Executive's Response

The number of submissions received in relation to this proposed road objective, and the significant turnout of people to the public consultation event at Áras Bhríde to discuss this matter and the concerns raised regarding this objective, are noted and acknowledged. The range of issues included (but not limited to) child safety,

residential amenity, pollution, traffic congestion, estate design, impacts on nature, property valuation and active travel are all noted.

The Tully Road to Hospital Street link is a legacy objective from the Kildare Town Local Area Plan 2012-2018. It was envisaged that this connection would relieve traffic travelling through the town centre and offer an alternative east – west route for traffic to facilitate a one-way system on Meadow Way.

However, having regard to the design of the estate, as constructed, it is considered that the retrospective installation of a road for two-way vehicular traffic would have a significant impact on existing residential amenity. Furthermore, in relation to the proposed one-way system on Meadow Road (RD 4 in Table 7-4), Kildare County Council will be conducting a trial to investigate its feasibility in the short term. Should an alternative east-west route be required for vehicular traffic, it is considered reasonable that an alternative route be considered south of Cunnaberry Hill, parallel to the motorway.

Therefore, it is considered appropriate to remove Road Measure PA 3 (Hospital Street to Tully Road link) from Table 7-4 and Map 7.4 of the Plan.

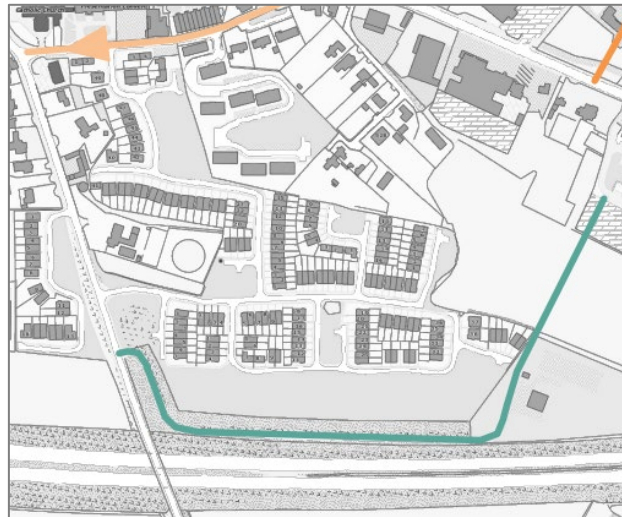
To promote active travel and to support the move towards a low carbon environment, it is considered prudent that the related pedestrian link (PERM 34 on Map 7.1) and cycle link (Cycle 32 Map 7.2) are retained within the plan, to encourage residents to walk or cycle to amenities located on Hospital Street/Dublin Road and beyond, including the school campus within the Former Magee Barracks.

### Chief Executive's Recommendation

#### Proposed Material Alteration

Chapter 7 Movement and Transportation, Table 7-4 and from Map 7.4, remove PA 3 (Hospital Street to Tully Road link), insert a new road measure to Table 7-4 and Map 7.4 and amend RD 4 (one-way system on Meadow Road) in Table 7.4 as follows:

Ref. No.	Short Description	Delivery Timescale
<b>RD 4</b>	One-way system on Meadow Road running east to west ( <del>to be delivered after the development of the Hospital Street – Tully Road link road to ensure an alternative route is available</del> ).	Short-term
<b>RD 6</b>	<i>Potential future link from Hospital Street to Tully Road south of Cunnaberry Hill and parallel to the motorway (to support the implementation of a one-way system on Meadow Road, if required)</i>	<i>To be determined</i>
<b>Previously Approved Measures</b>		
<b>PA 3</b>	<del>Hospital Street to Tully Road link</del>	<del>Developer led</del>



**Road and Street Network Objectives**

Submission	Summary of Issue
139 Cllr. Suzanne Doyle	Proposes the following new objective: MTO 3.7 - <i>‘Working with the NTA, Irish Rail and TII, examine the feasibility of delivering an inland port at Cherryville junction just beyond settlement boundary.’</i>

**Chief Executive’s Response**

Objective EDO 1.10 of the Draft Plan supports the examination of the feasibility of Cherryville Junction as a transport hub and distribution centre. The National Transport Authority (NTA) in their submission (Section 4.0, refers) recommended consultation with the key relevant stakeholders including the NTA, TII and Irish Rail in respect of this objective. A proposed material alteration has been proposed in this regard in response to the submission from the NTA.

**Chief Executive’s Recommendation**

No change recommended.

**One-way Systems Throughout Kildare Town**

Submission	Summary of Issue
139 Cllr. Suzanne Doyle	Encourages the use of one-way systems to facilitate footpaths and cycle lanes. Proposes the following new road measures for inclusion in the Draft Plan:  <i>‘To create a series of one-way systems throughout the town that will facilitate DMURS footpaths and cycle lanes throughout town and create a ready flow of traffic designed to remove congestion and unnecessary traffic from town centre.’</i>

Submission	Summary of Issue
	Suggests including graphs outlining the necessary road widths of key routes (Melitta Road, Tully Road, Rathbride Road, Dublin Road,.) to demonstrate their capacity to support pedestrian, cycle, and motor movements.

### Chief Executive's Response

Refer to the overarching Advisory on all Movement and Transport Measures.

The issue of delivering cycling infrastructure due to the width of streets in the town centre and the potential to implement one-way systems in the town in order to create space for footpaths and cycle facilities, were raised at a Councillor Meeting (01/07/2020) during the stakeholder engagement process of the Kildare Town Transport Strategy. As provided for in the overarching advisory on all movement and transport measures, the projects outlined in the Draft Plan still need to be examined on own merits.

### Chief Executive's Recommendation

No change recommended.

### Introduction of Roundabouts

Submission	Summary of Issue
103 Seán O'Fearghail	Traffic lights or a roundabout should be provided at Newtown Cross.
139 Cllr. Suzanne Doyle	Supports the introduction of roundabouts in certain locations to relieve congestion.

### Chief Executive's Response

The comments are noted. It should also be noted that roundabouts are generally not suitable for vulnerable road users such as cyclists and pedestrians. Furthermore, traffic controls are not within the remit of a local area plan but rather a function of the Roads and Transportation Department and/or of the Municipal District.

### Chief Executive's Recommendation

No change recommended.

### Outer Orbital Route

Submission	Summary of Issue
103 Seán O'Fearghail	Submits that removing the orbital route is a retrograde step and will lead to massive congestion at critical junctions. States the orbital route in Naas and Athy has proved to be essential.

Submission	Summary of Issue
139 Cllr. Suzanne Doyle	<p>Submits that Cycle 7 and PERM 5 should be upgraded into an orbital route and needs to be connected to Monasterevin Road at appropriate locations, shifted north to run adjacent to the post primary school linking to cycle 16, plotted further to cycle 54 (upgraded to bridge for pedestrians, cyclists and motorists) and further plotted to meet Dublin Road.</p> <p>Proposes the following new road measures for inclusion in the Draft Plan: <i>'Identify an outer orbital vehicle route to be protected for future delivery.'</i></p>

### Chief Executive's Response

The road measures identified in the Draft LAP are based on evidence-based transport modelling assessment that was carried out to inform the Transport Strategy. A detailed route selection process was completed for the Northern Link Street project in 2019 which considered nine potentially feasible orbital route options. These options were brought through a Stage 1 Preliminary Options Assessment process and a Stage 2 Route Options Appraisal (including traffic modelling assessment). An option was identified as the Emerging Preferred Route (EPR) which was the subject of a non-statutory public consultation in June 2019 and included a presentation to local elected representatives. Following feedback from residents and Elected Members, three alternative modifications of the EPR were identified and assessed using a refined traffic model which identified the Northern Link Street scheme, which is included in the Draft Plan as Road Measure RD 2. It is therefore not considered appropriate to include a road measure for an orbital route as the Northern Link Street is already included in the Draft Plan as an alternative north-south route.

### Chief Executive's Recommendation

No change recommended.

### Cycle Parking

Submission	Summary of Issue
099 Ronan Maher	<p>Submits that the plan lacks the provision for bike parking and recommends the following:</p> <ul style="list-style-type: none"> <li>• The inclusion of Sheffield stands at all major destinations.</li> <li>• The construction of a secure bike garage at Kildare Train Station</li> <li>• The inclusion of secure bike lockers in Market Square.</li> </ul>
127 Kildare Greens	<p>The plan lacks any provision for bike parking and recommends the inclusion of the following:</p> <ul style="list-style-type: none"> <li>• Sheffield stands at all major destinations in the town such as all grocery shops, public buildings and Market Square.</li> </ul>

Submission	Summary of Issue
	<ul style="list-style-type: none"> <li>The construction of a secure bike garage at Kildare Train Station</li> <li>The inclusion of secure bike lockers in Market Square.</li> </ul>

### Chief Executive's Response

It is considered that objectives MTO 4.1, 4.2 and 4.3 of the Draft Plan adequately address in the issues raised in these submissions.

*MTO 4.1 Apply the cycle parking and car-parking standards in the Kildare County Development Plan, and relevant Section 28 Guidelines, to all applications for planning permission in Kildare Town.*

*MTO 4.2 Ensure that cycle parking should be appropriately designed into the public realm and new developments at an early stage to ensure that adequate cycle parking facilities are provided.*

*MTO 4.3 To provide adequate, secure and sheltered bicycle parking facilities subject to demand analysis, at appropriate locations at:*

- o Town centre*
- o Kildare Town Train Station*
- o Adjacent to heritage, community and amenity destinations.*

### Chief Executive's Recommendation

No change recommended.

### Town Centre Car-Parking

Submission	Summary of Issue
038 Select Vestry of St. Brigid's Cathedral	Lack of parking in the town.
103 Seán O'Fearghail	<ul style="list-style-type: none"> <li>Off street, town centre, accessible car parking must be provided in the immediate future.</li> <li>Advises KCC to examine what has been done by the Manx authorities in Douglas where several low rise (2 storey) parking areas have been built on back land and alongside streets. In this regard the vast back land area stretching from behind Cunningham's Gastro Pub on Dublin Street to Boland's along Bride Street could be considered. Additionally, the Chilling Factory site could be considered for this or other beneficial development.</li> </ul>
115 Teresa Harrington	More parking is required to allow people to park and walk to the centre of town. The parking situation on the square needs to be addressed as it is very dangerous and taking away a much needed civic and social amenity.
118 Senator Mark Wall	States that people have identified the lack of public parking facilities within and near the town and the Plan should address this by mapping current car parks and identify suitable locations

Submission	Summary of Issue
	where additional parking can be accommodated.
129 Brian Murphy	<p>Contends that parking restrictions on Market Square seriously affected both visitors to the cathedral and businesses in the area. Submits that more thought is needed on this as the Draft Plan does not resolve the issue. Recommends further discussion with interested parties before the Plan is agreed.</p>
137 Sinéad Mahon	<p>Kildare Town should have an overall objective to move parking to the town periphery, specifically town square parking with exception for wheelchair and accessibility parking.</p>
138 BDP Assets Ltd.	<p>Wish to retain the option of developing the lands in the future and not to restrict the lands to just supplementing parking requirements due to the removal of car parking from the Market Square area.</p>
139 Cllr. Suzanne Doyle	<p>The corner at the ice cream parlour is too tight, need to remove a car space.</p>
139 Cllr. Suzanne Doyle	<p>Issue raised during a meeting held to discuss vulnerable road users in town:</p> <ul style="list-style-type: none"> <li>• Poor lighting and safety concerns expressed around Top Nolan's carpark.</li> <li>• Insufficient car parking in town, very limited convenience for disabled or elderly drivers.</li> </ul> <p>Issues regarding car parks:</p> <ul style="list-style-type: none"> <li>• Car park 1 is already in use and does not represent additional parking.</li> <li>• Car park 2 will be difficult to deliver with limited access and space.</li> <li>• Car park 3 is not conveniently located.</li> <li>• Objective MTO 4.4 - the town centre needs to offer parking equally convenient to that at edge of town centre sites, albeit this parking will be charged.</li> </ul> <p>Tourism:</p> <ul style="list-style-type: none"> <li>• The provision of adequate appropriately located car parking is essential to developing a key tourism hub within Kildare Town.</li> <li>• Needs to set out what the parking quantum is, need to be above the guidelines for non-tourist towns.</li> <li>• Need to research successful tourism towns such as Westport.</li> </ul> <p>Alternatives to be considered:</p> <ul style="list-style-type: none"> <li>• May be delivered in multi storey development or through the re-location of existing uses within the town.</li> <li>• An extension of the current Nugent street car park through the relocation and upgrade of the playground.</li> <li>• Lands at Tower View.</li> </ul>



Submission	Summary of Issue
	<ul style="list-style-type: none"> <li>• Derelict site across from HARP bar.</li> <li>• Extension into rear of Old Convent site.</li> <li>• Link a number of brownfield sites to the rear of properties in town centre with linkages through old burgage plot access routes.</li> <li>• The relocation of school sites close to KTOV could potentially service visitors to KTOV while affording them convenient access to town.</li> </ul> <p>Street Parking</p> <ul style="list-style-type: none"> <li>• A one-way system should afford more on street parking which will provide for the elderly and disabled.</li> <li>• Supporting the town centre first principles is not sustainable without adequate car parking.</li> </ul>

### Chief Executive's Response

Refer to the overarching advisory on all movement and transport measures.

The Parking Strategy support a balanced approach and is integrated with the public transport, walking, cycling and road strategies to ensure that mutually supportive measures are implemented. To support the town centre, particularly in respect to retail, the total parking stock in central areas is not reduced. Instead, where on-street parking spaces are removed from the Main Street to improve the operation of the transport network or the public realm, it will be relocated to a new or upgraded town centre off-street car park.

The Kildare Town Transport Strategy identified three sites which could be suitable for the provision of additional off-street parking. The preferred site/sites will be identified by a Kildare County Council feasibility study at a later date. This feasibility study will consider Objective TM O120 of the Kildare CDP 2023-2029 to 'promote appropriate parking arrangements for specific user requirements including age friendly parking, hidden disabled, disabled parking, bicycle parking and motorcycle parking in towns, public transport nodes and other destinations.'

It should also be noted that the Movement and Transport chapter of the Draft Plan is underpinned by policy at a national, and regional level including, but not limited to, the Greater Dublin Area Transport Strategy 2022-2042. Measure TM14 of this Strategy relates to destination parking standards and states that the NTA, in cooperation with the local authorities, will ensure that the quantum of parking provided at destinations (non-residential commercial developments) will be significantly reduced at all locations in the GDA.

Regarding the request for additional street parking, Measure TM19 of the Transport Strategy for the Greater Dublin Area 2022-2042 states that 'the NTA will support local authorities in seeking to reduce the level of free or cheaply available on-street parking with a view to the reallocation of the road space to sustainable modes,

and/or the implementation of charging regimes which facilitates motorists contributing to the local economy.'

Considering the above it is not considered appropriate to increase the rate of parking provision in Kildare Town Centre.

Regarding the issues raised with regards to the Top Nolan's carpark, car-parking Measure PK 6 is prioritised for delivery in the short term. The Nugent Street car-park upgrade will include improved navigability to Market Square with improved lighting, signage and landscaping.

### Chief Executive's Recommendation

No change recommended.

### Car parking and Access to the Cathedral

Submission	Summary of Issue
038 Select Vestry of St. Brigid's Cathedral	<p>Submission 38 relates to St. Brigid's Cathedral access problems following the realignment of the Kildare Town square.</p> <ul style="list-style-type: none"> <li>• General access is impeded by parking of cars, vans, etc.</li> <li>• Particular problems arise with: <ul style="list-style-type: none"> <li>○ Weekly Sunday services</li> <li>○ Special services such as confirmation, harvest, Christmas, etc.</li> <li>○ Funerals</li> <li>○ Concerts and events.</li> </ul> </li> <li>• Access for Emergency Services.</li> <li>• When the Cathedral grounds are full, there is nowhere to divert the cars to as Southwells has been blocked off. Could lead to health and safety problems.</li> <li>• Access for tourists especially during the summer months.</li> </ul>
129 Brian Murphy	States that the cathedral is a working cathedral, that hosts services and concerts, in addition to tourists.

### Chief Executive's Response

Refer to the Chief Executive's response on 'Town Centre Parking' above. Table 4-1 of the Draft Plan outlines the Town Renewal Projects and the delivery schedule. Market Square Public Realm Improvement scheme is identified for delivery in the short term with the highest importance rating. It is anticipated that this project will address the issues raised related to access to St. Brigid's Cathedral.

### Chief Executive's Recommendation

No change recommended.

### Train Station Car-Parking

Submission	Summary of Issue
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Submission	Summary of Issue
118 Senator Mark Wall	Further submits that given this prospect the train station should be given priority in the development of transport infrastructure. States that parking should be controlled and only allocated where it will not affect current local residents and current problems with such parking must be investigated within the development of this Plan.
139 Cllr. Suzanne Doyle	<ul style="list-style-type: none"> <li>• Appears as though the upgrade of the train station car park does not deliver more space.</li> <li>• Need to set adequate targets for parking.</li> <li>• Both a north and south side car park will be required.</li> <li>• Previous plans conditioned developers to acquire lands for a northside car park, these need to be re-investigated.</li> <li>• The submission is accompanied by a map which highlights the site marked in black for the extension of train station parking.</li> </ul>

### Chief Executive's Response

Refer to the Chief Executive's response on 'Town Centre Parking' above.


When considering the above and specifically Measure TM14 it is not considered appropriate to provide an additional train station car park. Car-parking measure PK 4 as per Table 7-5 to upgrade the Kildare Town Train Station Car Park will allow for a slightly higher parking capacity which would help to encourage more people to travel by sustainable modes.

However, it is acknowledged that there are a substantial number of people in the catchment settlements who do not have ease of access to the Kildare Town Train Station by walking or cycling. These numbers could potentially increase even further with the recent announcement by the NTA of the inclusion of Kildare Train Station in the New Dublin Commuter Zone. The Draft Plan has included the lands identified B\* located immediately north of the railway station, as 'Open to Consideration' in the Land Use Zoning Matrix (Table 11-6, refers) for a carpark, as well as to provide significant pedestrian and cycling infrastructure (Table 11-4, refers).

### Chief Executive's Recommendation

No change recommended.

**Car-Parking along Fairview Road**

Submission	Summary of Issue
<p>044 Anna Hrdlickova</p>	<p>The lack of parking along Fairview Road is identified as a big issue for the businesses and residents of the street with people leaving their cars there for the day. The following ideas for improvement were attached to the submission.</p> 
<p>139 Cllr. Suzanne Doyle</p>	<p>Issue raised during a meeting held to discuss vulnerable road users in town:</p> <ul style="list-style-type: none"> <li>• All day parking at Fairview restricts access and business activity.</li> <li>• Extend regulation to include Fairgreen in Kildare.</li> </ul>

**Chief Executive's Response**

The comments in relation to the provision of parking along Fairview Cottages is noted. Measure TM19 of the Transport Strategy for the Greater Dublin Area 2022-2042 states that 'the NTA will support local authorities in seeking to reduce the level of free or cheaply available on-street parking with a view to the reallocation of the road space to sustainable modes, and/or the implementation of charging regimes which facilitates motorists contributing to the local economy.' It is therefore not considered appropriate to increase the provision of parking along Fairview Cottages. The Parking Strategy as provided in the Draft Plan was devised from the Kildare Town Transport Strategy which underwent extensive consultation with members of the public and key stakeholders. In the context of Kildare Town, the measures proposed are considered those most suitable.

**Chief Executive's Recommendation**

No change recommended.

### **Car-Parking Provisions for New Homes**

<b>Submission</b>	<b>Summary of Issue</b>
107 Irish Home Builders Association	Notes that the Plan references a ' <i>range of measures to encourage active travel, reduce car dependency...</i> '. States that whilst this is a key component of sustainability in the long term, appropriate infrastructure must be in place for reduced car dependency to be introduced and that this must be factored in if development decisions are made requiring reduced car parking provisions for new homes.

#### **Chief Executive's Response**

Section 1.2 of the Draft Plan states that it is essential that both the County Development Plan (CDP) and the Local Area Plan (the Plan) are read in tandem. It is therefore considered Parking provisions for new homes are adequately dealt with in Section 15.7.8 of the Kildare County Development Plan (CDP) 2023-2029. This section of the CDP provides maximum parking standards and states that residential development within walking distances of town centres and high-capacity public transport services 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.

#### **Chief Executive's Recommendation**

No change recommended.

### **Car-Parking Infrastructure Measures**

<b>Submission</b>	<b>Summary of Issue</b>
139 Cllr. Suzanne Doyle	Issue raised during a meeting held to discuss vulnerable road users in town: <ul style="list-style-type: none"> <li>• Loading bay on Market Square close to ice cream parlour, too close to junction.</li> <li>• Support for limited stay use of disabled bays and age friendly spots.</li> <li>• Inadequate school parking at St Brigid's Primary School.</li> </ul>

#### **Chief Executive's Response**

It is considered that Objective MTO 4.5 of the Draft Plan adequately address the issues of loading bays, parking durations and school parking. Furthermore, Objective MTO 1.10 of the Draft Plan seeks to improve active travel routes to school to encourage more children to walk /cycle to school which will reduce the demand for school parking.

#### **Chief Executive's Recommendation**

No change recommended.

**Coach Parking**

Submission	Summary of Issue
139 Cllr. Suzanne Doyle	Proposes the following new public transport objective for inclusion in the Draft Plan: <i>'To provide dedicated coach parking in appropriate location in Kildare town to facilitate tourist coach travel passengers complemented by a convenient set down area in the town centre.'</i>

**Chief Executive's Response**

The provision of coach parking is addressed by MTO 4.7 of the Draft Plan and TM O123 of the Kildare County Development Plan 2023-2029.

*MTO 4.7 Investigate the provision of a designated area for coach parking in tandem with the feasibility study for the creation of a new or upgraded town centre off-street carpark (PK 3, refers).*

*TM O123 Facilitate the provision of appropriately sized bus parking facilities at appropriate locations in all towns (Key Towns, Self-Sustaining Growth Towns and Self-Sustaining Towns).*

**Chief Executive's Recommendation**

Chapter 11, Table 11-6 Land Use Zoning Matrix, amend as follows:

Car Park (other than ancillary) / *Bus Parking*

## Chapter 8 Built Heritage

### Summary of Issues Raised

Note: Built heritage issues are also addressed with other issues raised in Chapter 4 Consolidation of the Town Centre and Chapter 5 Economic Development.

### Protection of Heritage Assets

Submission	Summary of Issue Raised
103 Seán O'Fearghail	<ul style="list-style-type: none"> <li>• The protection of the ancient St Brigid's Cathedral and Round Tower site requires priority as does access to the site itself. Means need to be found to restore, to an appropriate level, the collapsed boundary wall, while the remainder of the structure requires continuous management.</li> <li>• Needs to be guaranteed protection of the Abbey sites including White Abbey, Grey Abbey and Black Abbey. Attention needs to be given by the Local Authority to the graveyards at Grey Abbey and Dunmurry.</li> <li>• Any works of an environmental nature around the Market Square should ensure that a particular focus remains on the St Brigid's Cathedral complex.</li> </ul>

### Chief Executive's Response

St. Brigid's Cathedral (Ref. B22-45), the White Abbey (Ref. B22-56) and the Grey Abbey (Ref B22-61) are all Protected Structures as contained in Table 8-1 of the Draft Plan, protected in accordance with the Planning and Development Act 2000 (as amended). The Round Tower (KDO22-029020) and the Black Abbey (KD22029002-) are included on the Sites and Monuments Record as contained in Table 8-5 and Map 8-1 of the Draft Plan, protected under the National Monuments (amendment) Act 1994.

The Heritage Section of KCC has worked closely with the Representative Church Body (as owners of the Cathedral and Round Tower), through the Community Monuments Fund in 2022 and 2023, to oversee the repair and consolidation of the round tower. Funding has also been secured through the Walled Town Network this year to conserve and repair the Town Wall within the curtilage of the Cathedral. It is considered appropriate to include an objective in this regard. Objective BHO 1.3 specifically refers to supporting and promoting the preparation of a management or conservation strategy for the Cathedral, the Castle and the Presentation Convent lands to inform future developments. Furthermore, Chapter 8 contains a suite of objectives to protect the towns built and archaeological heritage including BHO 1.1 (Protected structures) and BHO 4.1 (archaeological heritage).

**Note:** The church site and graveyard in Dunmurry is located outside of the Draft Plan area however is protected under the County Development Plan and noted in Appendix 5 Record of Monuments and Places under (reference KD022-002---).

**Chief Executive's Recommendation  
Proposed Material Alteration**

Chapter 8: Built Heritage, include a new Objective as follows:

**BHO 4.6** *To support the repair and conservation of the Kildare Town Walls within the curtilage of St. Brigid's Cathedral.*

**Potential additional heritage asset**

Submission	Summary of Issue
076 Barry Waters	The submission states that there is a myth/belief that there is a tunnel that stretches from the cathedral in Kildare town to Grey Abbey beside the Kildare Village (outlet centre) that was used for escape from the town when under attack. Now is the time to investigate if this could be a unique tourism opportunity prior to any more investment put into St Bridget's Square.
129 Brian Murphy	This submission refers to a system of old tunnels and cellars and evidence of below surface living quarters in some buildings around Market Square and adjacent areas. These should be considered or explored if only to research and record and add to the overall 'mystique' of the town.

**Chief Executive's Response**

Market Square is located within the Zone of Archaeological Potential (ZAP) illustrated in Map Ref 8.1 of the Draft Plan. Accordingly, any subterranean works within the ZAP will be required to be archaeologically monitored. The full excavation of Market Square would have significant resource implications for Kildare County Council and is not a priority project at this time.

**Chief Executive's Recommendation**

No change recommended.



## Chapter 9 Natural Heritage and Green Infrastructure

### Designating Sites for Nature Uses

Submission	Summary of Issue Raised
139 Cllr. Suzanne Doyle	<p>Add NHO2.7</p> <p>To designate an appropriate site in Kildare that will secure the service delivered by Kildare Wild Animal Rescue Centre, which plays an important role in local biodiversity, having treated and released over 400 animals into the wild last year. The service is currently operated on a short-term lease within the Grey Abbey Veterinary practice in Kildare town.</p> <p>Add NHO2.8</p> <p>To designate lands for the development of a Natural Eco Park within Kildare town to be delivered and managed by KCC.</p>

#### **Chief Executive's Response**

The submission is requesting that sites are designated for a Wild Animal Rescue Centre and a Natural Eco Park.

In relation to the Animal Rescue Centre, Table 11-6 of the Draft Plan is the Land Use Zoning Matrix. Table 11.6 sets out that veterinary practices (a use which is akin to an animal rescue centre) are open for consideration across a range of land use zonings, including I: Agriculture and S: Equine Industry (for large veterinary practices) in addition to areas zoned H: Industry and Warehousing, K: Commercial, N: Neighbourhood Centres, Q: Enterprise and Employment, R: Retail/Commercial, T: Mixed Use, B: Existing Residential and C: New Residential. These uses are also Permissible in Principle in areas zoned A: Town Centre. Whilst the designation of one site for this use would be overly prescriptive, it is considered reasonable to include an objective to support the relocation of the Rescue Centre on appropriately zoned lands.

In relation to a natural Eco park, Cherry Avenue Park provided for in HCO 4.2 will include wetlands and extensive tree planting. Furthermore, areas zoned F: Open Space and Amenity throughout the plan area would also be considered appropriate for such a use, should resources allow.

#### **Chief Executive's Recommendation**

##### **Proposed Material Alteration**

Chapter 9 Natural Heritage and Green Infrastructure, insert a new objective after NHO 2.6 as follows:

***NHO 2.7 Support the relocation of the Kildare Wild Animal Rescue Centre on appropriately zoned land.***

## **Tree Planting**

<b>Submission</b>	<b>Summary of Issue Raised</b>
039 Rory De Bruir	All developments should make provision for the planting of Oak Trees at a scale and ratio to be determined by planners, county councillors and tidy towns. There is limited oak tree planning in Kildare Town which owes its name to the Oak Tree.
099 Ronan Maher	Submits that any additional tree coverage should come in the form of native trees.
127 Kildare Greens	Submits that any additional tree coverage should come in the form of native trees.
139 Cllr. Suzanne Doyle	<p>Add a new objective NHO4.4:</p> <p>As a legacy project for Brigid 1500 require all developments in excess of 50 units to plant at least one well established mature tree in prominent appropriate location (determined in consultation with Parks Dept) either on or off site. Given the heritage of Kildare town 'Church of the Oak', if possible, these should be Oak Trees.</p> <p>Add a new objective NHO4.5:</p> <p>Prepare and plant a tree planting landscape plan to establish an avenue of mature trees from Roundabout at KROV up to Monasterevin Road Junction on both sides of road. Adequate ducting should also be provided to support lighting trees for Christmas season.</p>
141 Fine Gael	All new development should make provision for planting oak trees to enhance the environment and special character of Kildare. The scale of planting should be determined by planners, county councillors and Tidy Towns.

### **Chief Executive's Response**

Section 9.9 of the Draft Plan refers to Tree Coverage and it contains the following objectives in relation to tree planting:

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

**NHO 4.3** Increase native tree planting and pollinator friendly planting, in accordance with the recommendations of the All-Ireland Pollinator Plan, throughout Kildare Town and in open spaces in new developments in order to enhance local biodiversity, visual amenity and surface water management.

Having discussed this matter with the Parks Section of Kildare County Council, it is agreed that specific reference to Oak Trees could be included in this regard, noting

that a mix of species and a higher quantity of trees (rather than a single oak) will ultimately present the best opportunity for successful planting and longevity. The scale of planting required for new developments shall be determined at project stage having regard to the requirements of Objective NHO 4.2 (as amended, see below).

In relation to the avenue linking Kildare Village to the Monasterevin Road, it is noted that this is already planted with young trees and their establishment will take time to mature. Furthermore, these trees are shown in Map 9.1 Natural Heritage and Green Infrastructure.

**Chief Executive's Recommendation  
Proposed Material Alteration**

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

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

**Curragh Buffer Zone**

Submission	Summary of Issue Raised
30 Daniel Meaney	The National Stud/Green Belt (Zoned G) is commended and the importance of protecting the Curragh is highlighted. The submission commends the Curragh Buffer zone and recommends that native semi-mature trees be used.
050 Benson Ecology	<ul style="list-style-type: none"> <li>• Agree that “An important part of this Plan is ensuring that the development of Kildare Town does not impinge upon this special character of the Curragh Plains”.</li> <li>• Support the proposed “Curragh buffer zone” with appropriate native tree and native understory planting.</li> <li>• Oak trees should have priority given the association with Cill Dara.</li> <li>• The draft Conservation Management Plan for the Curragh Plains and Wayfinding Strategy is likely to be completed during the lifetime of the Kildare LAP. This will further underpin the important linkage between the Curragh and the town of Kildare.</li> </ul> <p>Consideration should be given to a safe pathway or greenway linking the town to the Curragh (See NHO 1.3)</p>

**Chief Executive's Response**

Section 9.8 of the Draft Plan refers to Kildare Town and The Curragh Plains and this requires the planting of native trees, including oak in this regard, as follows:

**NHO 3.1** Require all development proposals located within the ‘Curragh Buffer Zone’ as identified on Map 9.1 to include a tree planting programme of

native trees (to primarily include tree canopy of Scot's pine (*Pinus sylvestris*) / Pedunculate oak (*Quercus robur*) and underplanted with hazel (*Corylus avellane*) / birch (*Betula pubescens*) to protect the ecological and amenity value of the Curragh.

In relation to providing a greenway linking the town to the Curragh, Objective EDO 2.3 of the Draft Plan already encourages and supports such a link, through the delivery of projects identified in the Thoroughbred Country: Destination Experience Development Plan, including the creation of a walking trail / greenway from Kildare Town to the Curragh, as part of the International Thoroughbred Trail.

**Chief Executive's Recommendation**

No change recommended.

## Chapter 10 Infrastructure and Environment

### Summary of Issues Raised

#### Waste and surface water drainage

Submission	Summary of Issue Raised
139 Cllr. Suzanne Doyle	The shared waste and surface water drainage system of the old historic town is causing regular occurrences of a malodourous environment. This issue should be identified and objectives to address it included in the plan.

#### Chief Executive's Response

Uisce Éireann (formerly Irish Water) is the body responsible for the operation and management of public wastewater services. Kildare County Council is responsible for the management of surface water.

Section 4.1 of the Surface Water Study (Stage 1) refers to the combined drainage system that operates in the town centre and a map of the known network is included. In order to reduce the surface water loading on this combined system, the Draft Plan includes objectives to ensure that surface water run-off from new developments is not discharged to the wastewater network (IO 1.2) and that nature-based water drainage solutions are implemented (IO 2.3). Furthermore, objective IO 2.2 of the Draft Plan is to prepare a detailed Surface Water Masterplan for Kildare Town, which will involve *inter alia* carrying out additional surveys, including surveys of existing culverted surface water pipes through the town centre and consideration of the feasibility of additional connections which could further reduce loadings to the combined drains.

#### Chief Executive's Recommendation

No change recommended.

#### Water

Submission	Summary of Issue Raised
139 Cllr. Suzanne Doyle	The high levels of lime in water should be acknowledged, and an objective should be included to have a polishing filtration system put back into operation.

#### Chief Executive's Response

This is an operational matter for Uisce Éireann and can not be addressed through a land use plan.

#### Chief Executive's Recommendation

No change recommended.

## **Flooding**

<b>Submission</b>	<b>Summary of Issue Raised</b>
139 Cllr. Suzanne Doyle	Certain areas within the town frequently experience flooding including areas with a shared surface and wastewater drainage system, such as Campion Crescent, Chapmans Garage and occasionally at CWMS.

### **Chief Executive's Response**

Map 10.2 Strategic Flood Risk Assessment indicates the locations in Kildare Town which are affected by pluvial flooding. This area includes Campion Crescent and Chapmans Garage, as referenced in the submission.

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

In order to reduce surface water loading on the combined sewer system, the Draft Plan includes objectives to ensure that surface water run-off from new developments is not discharged to the wastewater network (IO 1.2) and that nature-based water drainage solutions are implemented (IO 2.3).

### **Chief Executive's Recommendation**

No change recommended.

## **EPA Licenses**

<b>Submission</b>	<b>Summary of Issue Raised</b>
117 Ciaran Brannock	This submission requests Kildare County Council add an objective to ensure Kildare Chilling is fully compliant with its EPA licences and to ensure it has an appropriate Environmental Odour Management Plan

### **Chief Executive's Response**

Industrial Emissions (IE) Licences are issued by the Environmental Protection Agency (EPA). Monitoring of compliance with the terms and conditions of licenses, which includes odour management, is an operational matter for the EPA and not appropriate for a Local Area Plan.

### **Chief Executive's Recommendation**

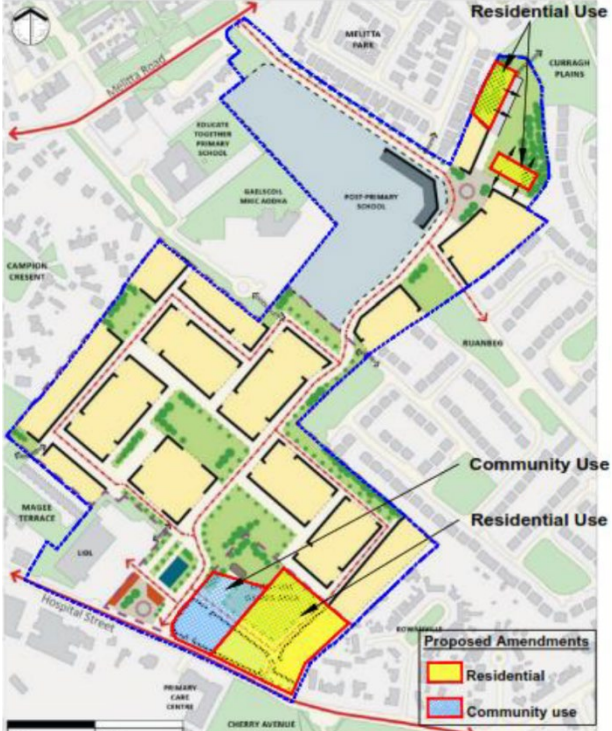
No change recommended.

## Chapter 11 Implementation

### Summary of Issues Raised

#### Former Magee Barracks Settlement Consolidation Site

Submission	Summary of Issue Raised
<p><b>131 Columbia Estates Management (IE) Ltd.</b></p>	<p>Submission by John Spain Associates on behalf of Columbia Estates Management (IE) Ltd. relates to lands at the former Magee Barracks. Refers to the planning permission granted for a Strategic Housing Development (SHD) consisting of 375 no. residential units (Phase 1) by An Bord Pleanála on part of the subject lands on which construction has commenced. States that the northern portion of the lands have been identified for a new secondary school campus, and it is the intention of the owners to make an application for the remainder of the landholding based on an update of the previously proposed masterplan for Magee Barracks. Submission seeks minor amendments in the proposed framework which it states are intended to provide maximum <i>'flexibility and viability'</i> for the development of the remainder of the lands.</p> <p>The submission requests that Figure 11-2 be amended (see Map below) to provide for a realignment and an increase in the extent of the community and residential uses (both in the southeast and northern portions of the site), the reinstatement of the open space as per the permitted SHD (Phase 1) and the previously prepared masterplan for the overall lands, which includes Phase 2 residential development (now partially superseded by the new secondary school campus designation), and provides for public open space at a rate in excess of 15% of the total site. Also seeks amendment of relevant text in Section 11 to reflect these changes. States that the changes will ensure that the LAP is more closely aligned with the permitted SHD and overall masterplan for the lands. Contends that the new school campus has sufficient land designated to provide a new multi-use games area (MUGA) within the school campus, and this can then be made available to the public outside school hours, which aligns with current best practice, as reflected in Chapter 10 of the County Development Plan (CDP) and the 2008 Guidelines on the Provision of Schools and the Planning System.</p> <p>Notes the provisions of the Draft Plan including the zoning objectives for the site (<i>T: Mixed Use</i>), its designation as a Settlement Consolidation Site and the provisions of the Design Framework. Also notes the strategic location of the site within the town and its designation as a 'Settlement Consolidation Site'. Further notes the provisions of the Design Framework which incorporates provision for specific uses including housing for older people, supported by additional community infrastructure,</p>

Submission	Summary of Issue Raised
	<p>including childcare and recreational facilities. Refers to various relevant objectives and provisions such as permeability measures which provide for new routes to be created through the site. The identification of the need for a MUGA in the town and its proposed location on the former Magee Barracks is also noted.</p> <p>Submission concludes by reiterating its justification for the amendments it is seeking to make, noting that its proposals will maximise the potential of these brownfield lands for residential and community uses. This submission also states that with regard to objectives HCO 2.1 and HCO 3.3, the requested amendments will still ensure that housing for older people and additional community infrastructure, including childcare/recreational facilities, can be brought forward on the lands. Submits that the requested amendments would not impact on the objective to increase the urban canopy coverage by 30% in accordance with the CDP.</p> 
<p><b>139 Cllr. Suzanne Doyle</b></p>	<p>Welcomes the detail of this chapter and its focus on delivery. Outlines the history of the site from its use as an army barracks, its closure in the 1990s, its use as a refugee centre and traveller accommodation site and its then subsequent sale to a private developer. The submission welcomes the inclusion of a parkland within site.</p> <p>Further states that despite the clear objectives in current (2012-2018) LAP that the site should primarily deliver job creation opportunities, an application for substantial housing has been</p>



Submission	Summary of Issue Raised
	<p>granted permission. Stresses the importance of Magee Barracks being developed in a manner that delivers for the future development of Kildare Town. Submits that reference to Magee Barracks as a designated Settlement Consolidated Site is at complete variance with vision for site within the 2012-2018 LAP as primarily an employment generating location due to its highly attractive for potential investment. States that the displacement of this very important objective needs to be re-designated to an alternate optimum site within settlement boundary, ideally on lands close to train station, potentially some of the 'CP2' lands. Notes that in previous Plan a portion of this land had an enterprise and employment zoning.</p> <p>States that the provisions of the Plan as outlined in 11.1 has merit, however, submits that given the western direction in which town has already begun to develop, it is going to create an east and west side of town. Submits that in previous plans they were advised that the westerly direction of growth of the town was preferable for the following reasons:</p> <ul style="list-style-type: none"> <li>• There was natural boundary constraining town on the Curragh side.</li> <li>• There was natural boundary on the southern side with the Irish National Stud and it was also considered inappropriate to go beyond the motorway.</li> </ul> <p>Notes that an IFPLUT study was presented that advised against development on the Southwest Quadrant on Monasterevin Road, for various reasons and that the planning advice informed the decision to develop lands in the Southgreen area.</p> <p>States that the framework map does deliver important and valuable linkages from Hospital Street to Melitta Road but submits that it needs stronger linkages to the existing town centre or otherwise it may run risk of competing with the town centre. Suggest the identification of both a pedestrian and vehicle link through Magee Terrace. Requests more detail to design objectives, for example in creating a strong streetscape with the potential to develop 3/4 storey executive style on street housing, indicated within this framework.</p> <p>Further submits that the land identified for multi-games area is welcome but needs to be considered in terms of a detailed accurate needs analysis for town. Submission refers to an attached report from Kildare Sports Partnership outlining a need for a 20/30-acre site to adequately meet growing recreational needs.</p> <p>Welcomes location of the crèche but wonders if it would be better to place both the green space and crèche possibly beside schools where the co-location might be more advantageous.</p>

Submission	Summary of Issue Raised
	<p>Notes that the development of Cherry Avenue close by will result in two parks in proximity. Suggests that the location of landscaped plaza might be replaced and extended to deliver a Performance and Arts Centre over at least 3 floors (see model of theatre in Waterford). Notes the potential shared use of Lidl car park for evening performance could be efficient use of surface car parking.</p> <p>Understands that plans are in place to relocate Fitzpatrick's Garage which is currently located opposite the former Barracks. States that it would be important to determine what might go on that site that could potentially run the risk of sandwiching historic town centre between two behemoths or indeed require an AAP for any future development of such a large site.</p>

### Chief Executive's Response

The request in Submission No. 131 to make amendments to Section 11.1 and Figure 11.2 of the Draft Plan is noted. It is not accepted that the changes requested will ensure that the new LAP is more closely aligned with the permitted SHD and overall masterplan for the lands. In this regard, Section 11.1 of the Draft Plan already fully acknowledges and incorporates all elements of the approved SHD (Phase 1) scheme into the Design Framework. Furthermore, as noted in the submission, the 'masterplan' prepared as part of the SHD application has already been partially nullified by the identification of a large portion of the remaining lands for a Post Primary School.

It is considered that the Design Framework for the former Magee Barracks site contained in the Draft Plan offers a responsive solution to achieving the optimal planning outcomes for the site given the present realities created with the commencement of construction of the approved SHD development on the lands. Additionally, as acknowledged in the submission, Section 11.1 has incorporated provisions to provide for a '*degree of flexibility*' for the remaining lands outside the SHD approved scheme on the stipulation that any such deviations would still comply with best practice in terms of urban design and layout.

Overall, the requested amendments are not considered to be minor in nature, having regard to the strategic location and scale of this designated Settlement Consolidation Site, the Design Framework seeks to optimise the best planning and design outcomes not just for the former Magee Barracks site itself but also for the town as a whole. In this regard, it is not accepted that the provisions to make a meaningful contribution towards increasing urban tree canopy coverage can still be realistically achieved within the overall site given the request to replace the lands located in the north of the site identified for new tree planting with additional residential units. Furthermore, the development of housing at this location is considered inappropriate due to the significant difference in levels in the area directly adjacent to Curragh Plains.

The request to reduce the quantum of open space within the southern area of the site is also not accepted. It is considered that the larger area of public open space

(which also incorporates a MUGA) will create a critically important design feature and social infrastructure amenity which will significantly assist in the delivery of a new and genuinely people-centred urban neighbourhood within the town. Additionally, the public open space and MUGA takes account of, and fully integrates with, an area of open space within the adjacent SHD scheme.

The request to reduce the area dedicated to community uses is partially accepted. It should be noted that the provisions contained in the Vision on supporting intergenerational living, and in objectives HCO 2.1 and HCO 3.3 on assisted living, and the delivery of services for older people must be fully applied to the former Magee Barracks. However, it is acknowledged that the size of the area dedicated to community uses can be reduced without either compromising the principles underpinning the Design Framework or compliance with the stated Vision and objectives discussed above.

The comments from Submission No. 139 regarding the land uses designated for the former barracks in the 2012-2018 LAP for the town are noted. The designation of this strategically located brownfield site as a Settlement Consolidated Site is entirely consistent with the criteria set out for the designation of such sites as stated in Section 6.4.2 of the Ministerial Guidelines for Planning Authorities on Development Plans (2022) and reflects the permitted development on site.

Given the current extant permission for Strategic Housing Development (SHD) that has been granted permission by An Bord Pleanála on the site, which is currently under construction, it is considered that the provision of employment lands for the small remaining portions located at opposite ends of the site would not lead to be most appropriate design outcomes for this single strategic landbank. The provision in the framework for further residential elements and education/community provisions on the non-SHD portions of the site are considered the most optimal uses for integrating with the large-scale housing development being progressed on the site and also with surrounding land uses.

The request regarding the designation of employment lands to an alternate optimum site within the settlement boundary, ideally on lands close to train station, is dealt with under Section 5 of this report. It is agreed that lands formerly zoned 'K: Commercial' should be re-integrated into the draft Plan as employment lands.

With regard to the comments in Submission No. 139 on the physical growth of the town taking place in a particular geographical direction, the land use zoning proposals contained in the Draft Plan are evidence-based and comply with current national and regional planning policy on compact growth and sequential development. In this regard, a tiered approach was used to zone residential and employment lands that was underpinned by, inter alia, an infrastructure assessment for the town in accordance with National Planning Objective (NPO) 72 a-c and Appendix 3 of the National Planning Framework (NPF) and section 4.5.2, Settlement Capacity Audit, of the *Development Plan, Guidelines for Planning Authorities* (2022).

The comments on the Former Magee Barracks Design Framework are noted. While a pedestrian link through Magee Terrace to the site has been included, the

consideration of a vehicular link was not considered as part of the Kildare Transport Strategy.

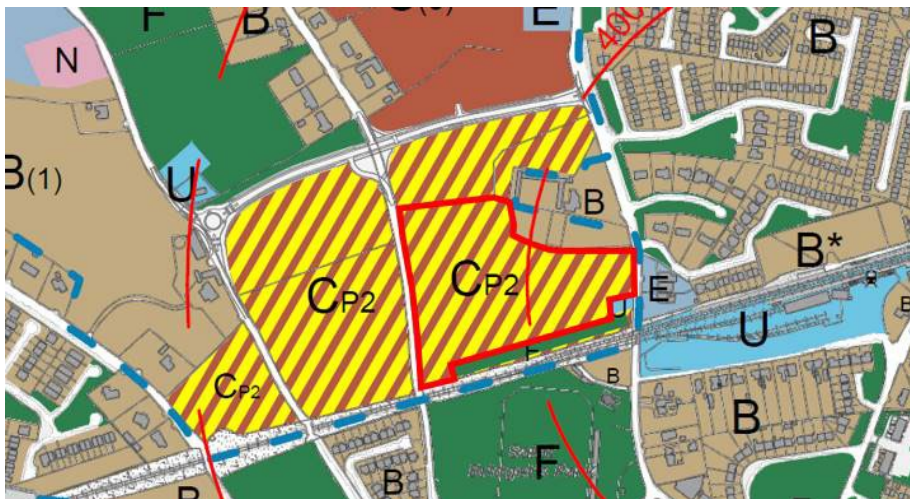
The request for changes to the design framework including the delivery of executive housing and a performance and arts centre on the site are noted. However, as is outlined in Section 11.1, the design framework seeks 'to fully incorporate the Strategic Housing Development (SHD) that has been granted permission by An Bord Pleanála (Case Ref.: TA09.305007)' which is currently being developed on the site. The changes requested therefore cannot be incorporated into the Framework. This is similarly the case regarding the request to relocate the green space and the crèche. However, should such a proposal come forward, the zoning objective for the area would consider such uses as permitted in principle.

It should be noted that the need for a multi-use games area (MUGA) has been identified in the Social Infrastructure Audit (SIA) which has been published alongside the Draft Plan. The potential delivery of a MUGA within Magee Barracks is considered to represent an opportunity to incorporate a key piece of community infrastructure within a strategically important, locationally appropriate site.

The comments regarding the potential redevelopment of the Fitzpatrick's Garage site are noted. However, any future development proposals forthcoming for this site will be assessed separately through the development management process on the basis of (inter alia) the zoning objective for the site, which is designated for 'K: Commercial' land uses in the Draft Plan, along with the usual planning and design considerations.

### Chief Executive's Recommendation

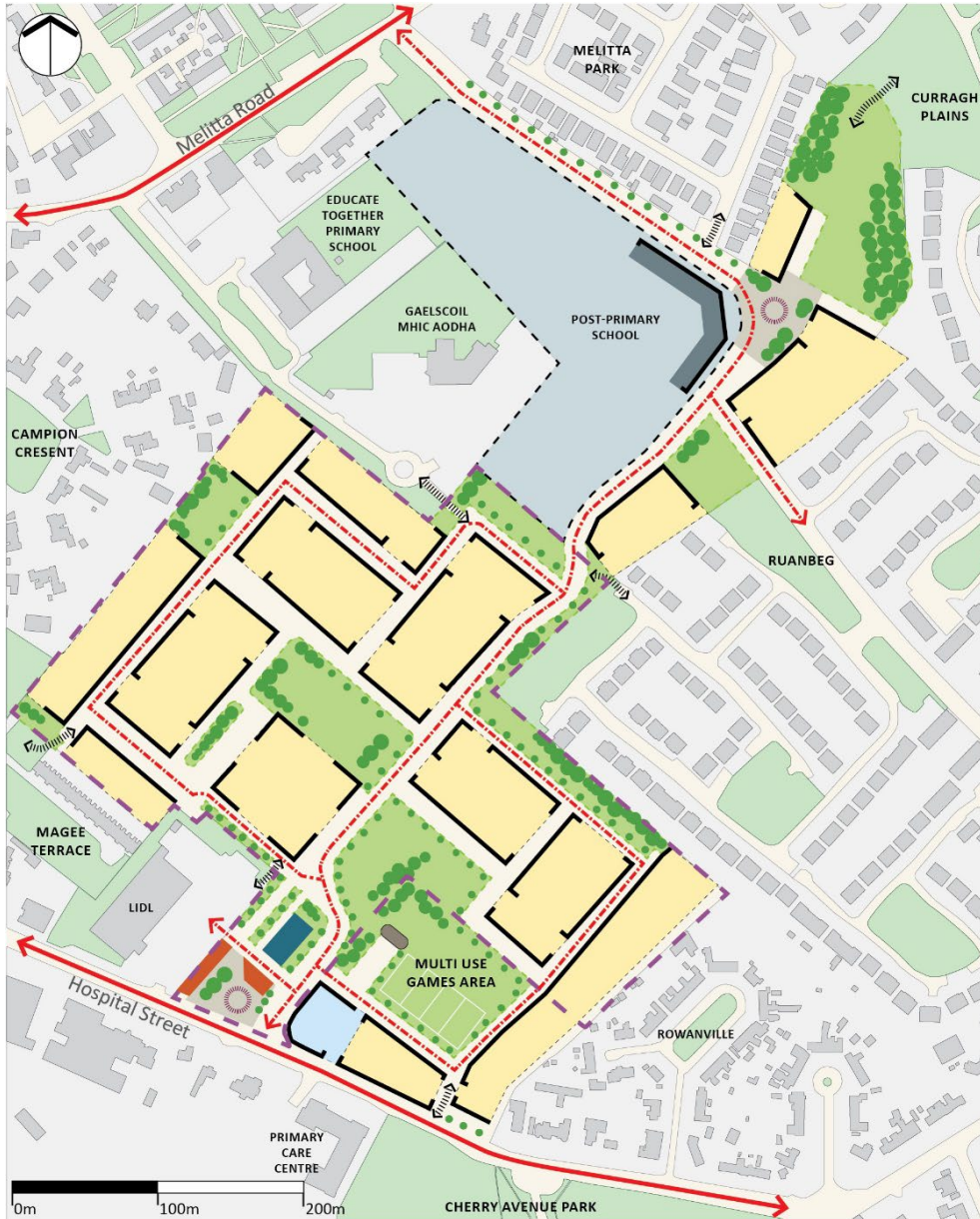
Amend Map 11.1 Land Use Zoning Map to amend the zoning objective of lands outlined in red below (approx. 3.6 ha) from 'C New Residential Phase 2' to 'Q: Enterprise and Employment.



### Proposed Material Alteration

Chapter 11 Implementation, amend Figure 11-2 Former Magee Barracks Design Framework, to reduce the area specifically dedicated to community uses fronting on to Hospital Street and replace with an increase in the provision of residential uses, as follows:

**Figure 11-2 Former Magee Barracks Design Framework**



**Key**

Local street		Community uses (including age friendly housing)	
Pedestrian connections		Commercial Uses	
Residential block		Crèche	
Key building frontage		Local Recycle Facility	
Strategic open space		Approved SHD boundary	
Landscape reinforcement		Landscaped Plaza	

**Land-Use Zoning Objectives**

Submission	Summary of Issue
103 Seán O'Fearghail	Notes the inappropriate zoning of the Carmelite Lands adjacent to White Abbey and proposes that these lands i.e., the two fields in the ownership of the Carmelite Order, be zoned residential and be targeted for low density, high quality and/or purpose-built accommodation for older people.
139 Cllr. Suzanne Doyle	Suggests that the 'F: Open Space and Amenity' land use zoning objective needs to be broken up into the following sub-categories: <ul style="list-style-type: none"> <li>• <i>F/O: Open space, identifying passive green space within town that is developed and easily accessible to all.</i></li> <li>• <i>F/OV: Open space, identifying passive green space within town that is private open space delivered as part of a residential development.</i></li> <li>• <i>F/R: Identifying appropriate green space that is suitable for the development of active recreation.</i></li> </ul>

**Chief Executive's Response**

With regard to the zoning of the Carmelite lands it should be noted that on the portion of the lands zoned 'E: Community and Education' residential uses are permitted under *footnote 77* of the Land Use Zoning Matrix provided they are '*ancillary to health/community use, and/or to meet group/special needs housing*'. The general request relating to the proposed zoning of these lands is dealt with under Chapter 6 in response to Submission No. 113.

The request to subdivide the open space and amenities zoning objective is noted. It is considered having a single and well-established land use zoning designation covering all open space and amenity lands provides an appropriate level of flexibility in the Plan for the assessment of individual applications for development on these lands. Any further breakdown of this zoning designation is considered to be overly prescriptive and would add further complexity to the Plan, and potentially could have the unintended consequences of restricting optimal planning outcomes for particular open spaces/amenity areas within the town.

**Chief Executive's Recommendation**

No change recommended.

### **11.4 Land Use Zoning Matrix**

Submission	Summary of Issue
139 Cllr. Suzanne Doyle	<p>Requests the following amendments:</p> <ul style="list-style-type: none"> <li>• Amusement Arcade: remove optional in town centre and have consistency in all categories.</li> <li>• Betting Office: Replace 'O' with 'N' under Neighbourhood centre.</li> <li>• Hot Food Takeaway: replace 'Y' with 'N' under neighbourhood centre.</li> <li>• Pub: Other than town centre with 'Y' all other categories should be 'N'.</li> <li>• Emergency residential accommodation: replace 'Y' with 'N' under town centre.</li> <li>• Restaurant: Replace 'N' with 'Y' under National Stud.</li> </ul>

#### **Chief Executive's Response**

The request to amend '*Amusement Arcade*' to '*Not Normally Permitted*' in town centre is accepted in order to protect high quality town centre activities.

The request to amend '*Betting Office*' and '*Hot Food Takeaway*' within the '*Neighbourhood Centre*' land use category is noted. It is considered that such uses are generally accepted established uses within neighbourhood centres, subject to normal planning and design considerations, and the amendment from '*O: Open for consideration*' to '*N: Not Normally Permitted*' would undermine the realisation of the principle of a 10-minute settlement. The request for amendments to be made to '*Pub*' in the land use zoning matrix also not accepted for similar reasons.

The request to make amendments to '*Emergency residential accommodation*' within the '*Town Centre*' land use category are not accepted as it is considered that the widest possible range of uses including residential-based uses should always be promoted with a settlement's urban core, in keeping with various Town Centre First provisions of the County Development Plan and the Draft Plan.

The request to amend '*Restaurant*' from '*N*' to '*Y*' under '*National Stud and Green Belt*' is noted. It is acknowledged that the National Stud is an established tourism destination of significant importance. It is therefore considered that '*O: Open for Consideration*' would be an appropriate designation for '*Restaurant*' under the '*National Stud and Green Belt*' category. However, this should be accompanied by a specific footnote in order to protect the integrity of the rest of the Green Belt zoning.

### Chief Executive's Recommendation

#### Proposed Material Alteration

Chapter 11 Implementation, Table 11-6 Land Use Zoning Matrix, amend as follows:  
Under the 'Town Centre' land use category amend 'Amusement Arcade' from 'O: Open for Consideration' to 'N: Not Normally Permitted'.

LAND USE	A: Town Centre	B: Existing Residential	C: New Residential	D: Retail Outlet Centre	E: Community and Education	F: Open Space and Amenity	G: National Stud and Green Belt	H: Industry and Warehousing	I: Agriculture	K: Commercial	N: Neighbourhood Centre	Q: Enterprise and Employment	R: Retail/Commercial	S: Equine Industry	T: Mixed Use	U: Utilities/Services
Amusement Arcade	ON	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N

#### Proposed Material Alteration

Chapter 11 Implementation, amend Table 11-6 Land Use Zoning Matrix, as follows:  
Under the 'National Stud and Green Belt' land use category amend 'Restaurant' from 'N: Not Normally Permitted' to 'O: Open for Consideration'.

LAND USE	A: Town Centre	B: Existing Residential	C: New Residential	D: Retail Outlet Centre	E: Community and Education	F: Open Space and Amenity	G: National Stud and Green Belt	H: Industry and Warehousing	I: Agriculture	K: Commercial	N: Neighbourhood Centre	Q: Enterprise and Employment	R: Retail/Commercial	S: Equine Industry	T: Mixed Use	U: Utilities/Services
Restaurant	Y	O	O	N	N	N	NO	O	N	O	O	O <sup>85</sup>	O	O <sup>86</sup>	O	N

This amendment should be accompanied by the insertion of the following additional footnote:

*'To be provided within the established visitor amenities area of the Irish National Stud only.'*



### **Map Ref: 11.1 Land Use Zoning**

<b>Submission</b>	<b>Summary of Issue</b>
139 Cllr. Suzanne Doyle	<p>Submission includes a copy of the Draft Land Use Zoning Map (Map Ref: 11.1) containing handwritten annotations for the following requests:</p> <ol style="list-style-type: none"> <li>1. 'Y': which relates to a number of sites in the town for which it is requested that there should be a zoning objective for shared use facilities for both childcare and elderly stepdown facilities.</li> <li>2. 'Y': Requests zoning for crèche facility on Southgreen Road beside site zoned for neighbourhood centre.</li> <li>3. '2': Community centre to be located on a site on the Dunmurray Road in the north of the town, opposite the cemetery zoned 'F' in Draft Plan.</li> <li>4. '2': Lands located to the east of the town on proposed to be zoned 'Cp2' in Draft Plan, requested to be zoned community centre / 5 acres.</li> <li>5. 'K': An area extending to c. 25 acres located to the south of the Motorway on the Irish National Stud lands requested to be zoned for open space and amenity.</li> <li>6. 'K': An area extending to c. 25 acres located on RACE lands and to the south of the M7 Motorway.</li> <li>7. 'K': Requests 'Open Space and Amenity' to be located on lands located between the Southgreen and Old Roads beside the secondary school.</li> <li>8. 'I': Requests enterprise and employment uses on an area of land located on lands proposed to be zoned 'Cp2' in Draft Plan, immediately to the north of the of rail line on Dunmurray Road.</li> <li>9. 'A7': Requests wildlife sanctuary at a location outside the proposed LAP boundary to the west of the town on the Monasterevin Road.</li> </ol>

### **Chief Executive's Response**

1. The request to zone specific sites within the town for shared use facilities for both childcare and elderly stepdown facilities is acknowledged. It should be noted that the Draft Plan already contains specific land use objectives for childcare facilities, as denoted by 'E\*' on Map Ref: 11.1 Land Use Zoning. Furthermore, the Urban Design Framework for the Former Magee Barracks Settlement Consolidated Site incorporates specific provision for additional childcare facilities and purpose-built housing for the elderly. This also is supported by objectives HCO 2.5 and HCO3.3.
2. Noting the comments of this submission and Childcare Facilities Guidelines for Planning Authorities (2001) relating to crèches in areas zoned Neighbourhood Centre, it is considered pertinent to alter the land use zoning matrix to better allow for crèches in lands zoned N: Neighbourhood Centre.
3. It is accepted that the zoning on Dunmurray Road be altered to better reflect this approved community centre use. This amended zoning of 'E: Community and

*Education* accepts crèches as *'Permitted in Principle'* in this location. This is shown in response to issues raised in Chapter 6.

4. This site is zoned *'B: Existing Residential'* to reflect its current use and allow for some infill development in this central location. A community centre is considered *'O: Open to Consideration'* in this location.
5. This location is considered geographically detached from the Kildare Town by the barrier of the M7 Motorway and therefore inappropriate for open space use.
6. This location is considered geographically detached from the Kildare Town by the barrier of the M7 Motorway and therefore inappropriate for open space use.
7. This request is dealt with under Chapter 6.
8. This request is dealt with under Chapter 5 and reflected in comments above regarding Former Magee Barracks.
9. This request is dealt with under Chapter 8.

### Chief Executive's Recommendation

#### Proposed Material Alteration

Chapter 11 Implementation, amend Table 11-6 Land Use Zoning Matrix, as follows:  
 Under the 'N: Neighbourhood Centre' land use category amendment  
*'Crèches/Playschool'* from *'O: Open to Consideration'* to read *'Y: Permitted in Principle'*.

LAND USE	A: Town Centre	B: Existing Residential	C: New Residential	D: Retail Outlet Centre	E: Community and Education	F: Open Space and Amenity	G: National Stud and Green Belt	H: Industry and Warehousing	I: Agriculture	K: Commercial	N: Neighbourhood Centre	Q: Enterprise and Employment	R: Retail/Commercial	S: Equine Industry	T: Mixed Use	U: Utilities/Services
Crèche/ Playschool	Y	O	Y	N	Y	N	N	N	N	O	Y	O	O	N	Y	N

## Miscellaneous Issues

### Summary of Issues Raised

#### Public Notices for New Developments

Submission	Summary of Issue Raised
039 Rory De Bruir	A comprehensive review is needed of the nature and extent of the requirement to put all interested parties and those who are likely to be become interested parties on full notice of major developments in the town.
141 Fine Gael	The standard size of site notices should be reviewed.

#### Chief Executive's Response

The publication of public notices for new developments is a statutory requirement of the Planning and Development Regulations 2001 (as amended). Any review of public notice requirements that would affect national legislation is a matter for the Government. It is not a matter that can addressed in a Local Area Plan.

Kildare County Council publishes a list of planning applications received on a weekly basis on the Kildare County Council website:

<https://kildarecoco.ie/AllServices/Planning/PlanningWeeklyLists/2023/>

#### Chief Executive's Recommendation

No change recommended.

#### Height of proposed structures/developments

Submission	Summary of Issue
039 Rory De Bruir	Suggests that proposed developments over three storeys should have their height designated by flags on poles /scaffolding as part of the planning application process (as in Kilkenny). This would put all interested parties 'on notice' as to the ultimate height of a building, especially in a historic town such as Kildare.
141 Fine Gael	Submits that the height of proposed structures should be designated by flag poles/scaffolding which should be erected on the same date as the site notice.

#### Chief Executive's Response

The requirement to erect flag poles to indicate the height of structures is not a requirement of planning legislation. The relevant guidance comes in the form of Section 28 Ministerial Guidance in the Urban Development and Building Heights Guidelines for Planning Authorities (2018). The provisions of these Guidelines are transposed into Section 14.8 of the County Development Plan which specifically addresses Urban Design and Building Heights, and this is the appropriate policy context for Kildare Town.

Note: It is not a policy requirement of the Kilkenny City or County Development Plan to erect flag poles or scaffolding to illustrate a proposed building height.

**Chief Executive's Recommendation**

No change recommended.

**Dereliction**

Submission Number	Summary of Issue
103 Seán O'Fearghail	Kildare County Council should make active use of the Derelict Site Act to address problematic sites such as: <ul style="list-style-type: none"> <li>• The terrace of red brick cottages on Fair Green and Sraíd.</li> <li>• O'Mahony House and land at Station Road.</li> <li>• Tadhg Hayden's house at White Abbey Road.</li> <li>• Cill Dara Housing Associations 2 vacant properties and land at Cleamore Terrace Academy Street, Kildare.</li> <li>• The former Water Systems site on Melitta Road.</li> </ul>

**Chief Executive's Response**

The implementation of the Derelict Site Act is an operational matter for the Environment Department of Kildare County Council.

**Chief Executive's Recommendation**

No change recommended.

## Supporting Documents

### Summary of Issues Raised

#### **Settlement Capacity Audit (SCA)**

The Settlement Capacity Audit is addressed in many submissions which request the re-zoning of land. Please see Section 6 of this report in this regard.

<b>Submission</b>	<b>Summary of Issue Raised</b>
030 Daniel Meaney	The submission commends the SCA and the conclusion that enough land is zoned for housing and employment.

#### **Chief Executive's Response**

Noted.

#### **Chief Executive's Recommendation**

No change recommended.

#### **Social Infrastructure Audit**

Issues pertaining to the SIA are discussed under Chapter 6 Homes and Communities.

## 6.0. Summary of Submissions/Observations Seeking Re-Zoning Requests or Amendments to Zoning Objectives

During the public consultation period 16 submissions<sup>10</sup> were received seeking the re-zoning of land or requesting amendments to specific land use zoning objectives. Table 6-1 includes a summary of the submissions or observations received which contained requests for alternative land use zonings and the associated miscellaneous issues raised. The Chief Executive's Response and any recommended amendments to the Draft Kildare Local Area Plan 2023-2029, are set out under each submission.

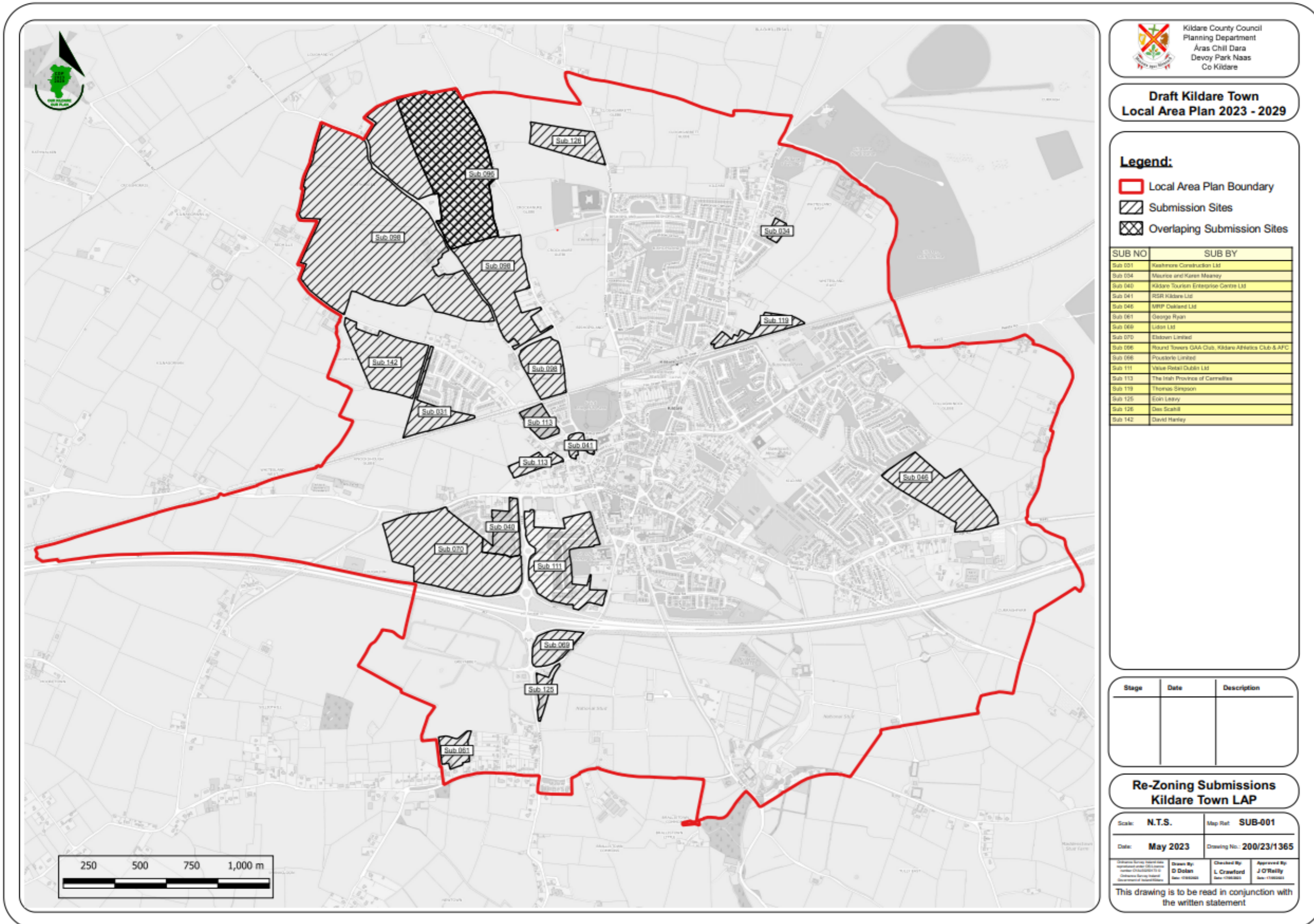
A map showing the location of all the sites relating to a re-zoning request is contained below.

The Chief Executive's recommended deletions to the Draft Plan are shown in ~~striketrough blue~~ and recommended new text is shown in *italics red*.


It is important to note in respect of re-zoning requests that Section 19 (6) of the Planning and Development Act 2000 (as amended) states that '*there shall be no presumption in law that any land zoned in a particular local area plan shall remain so zoned in any subsequent local area plan*'.

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<sup>10</sup> All submissions start with the reference KCC-C127 and the final digits have been detailed as the submission number under this section of the report.



**Table 6-1 Submissions Seeking Re-zoning or Alteration of Land Use Objectives**

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
31	<b>Keshmore Construction Ltd</b>	<p>This submission relates to 2 hectares of land at Knockshough Glebe (east) and Whiteland West (west) and seeks the re-zoning of the subject lands from Strategic Reserve to Phase 1 New Residential lands.</p>  <p>The site in the 2012 Plan is zoned as Phase 2 lands. The submission references a refusal on the site for 64 houses in 2020 which was refused because new residential development should be prioritised on Phase 1 lands and having regard to the quantum of extant permission in the town the proposed development would contravene the Core Strategy allocation for Kildare Town. It is stated that apart from the zoning objective there were no other concerns about the development.</p> <p>The case put forward for the re-zoning of the subject lands are as follows:</p> <ul style="list-style-type: none"> <li>• Lands are described as greenfield and vacant with vehicular access via an established residential area over which there is a right of way.</li> <li>• The site is 1.5km to the bus stop in Market Square and 1.8km to the train station.</li> <li>• Foul infrastructure constraints in the town have been addressed.</li> </ul>




Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<ul style="list-style-type: none"> <li>• The submission references that the population figure in the CDP for Kildare Town is a holding figure and the submitter states that this means that 'it is highly likely that the population projection for Kildare Town will be increased and ergo the housing target will also be increased'.</li> <li>• The Strategic Reserve zoning is not detailed in the zoning matrix which mean the lands are effectively sterilised under the Draft Plan.</li> <li>• The site is in a Pluvial Flood Risk Area, however the planning application refused had no flood risk concern after a detailed flood risk assessment was submitted.</li> <li>• The site is closer to the town centre that other zoned lands.</li> <li>• Uisce Éireann provided a Confirmation of Feasibility for the refused application.</li> <li>• The SCA included the site as part of a larger land parcel and therefore resulted in the site being scored lower resulting in the designation as Strategic Reserve.</li> <li>• The site is ready to go.</li> </ul> <p><b><u>Chief Executive's Response</u></b></p> <p>The re-zoning request is noted. The Draft Plan under Section 3.8. states that the plan has been prepared in the context of extant planning permissions which are in excess of the target unit allocation required for the lifetime of the Plan. The OPR in their submission (Section 3.0, refers) also recognises that there is the potential of Kildare Town exceeding its core strategy housing target over the life of the Development Plan due to historical legacy zonings and extant permissions for residential development. In this context, no further additional lands are required for development to meet the requirements of the CDP Core Strategy, as sufficient lands have been identified for development.</p> <p>The definition of 'Strategic Reserve' zoning objective is included in Table 11-4 Land-use Zoning Objectives and this states that SR lands are required to provide for the future strategic expansion of the town. It also highlights that uses 'Permitted in Principle' and 'Open to Consideration' within the Agriculture Land use zoning will be considered on these lands provided they do not jeopardise the overall objective for the strategic expansion of the town.</p> <p>The point raised in relation to the population figure in the CDP being a 'holding figure' is noted. However, the</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>Draft Plan was prepared in the context of the Kildare Electoral Division population figure from Census 2022 which is considered appropriate and verifiable for the purposes of the preparation of a Local Area Plan.</p> <p><b><u>Chief Executive's Recommendation</u></b> No change recommended.</p>
34	<b>Maurice and Karen Meaney</b>	<p>This submission seeks the re-zoning of land (0.67 ha) east of the Rathbride Road to B: Existing Residential / Infill. The site is zoned as Greenbelt in the 2012 Plan and are zoned G: National Stud/Green Belt in the Draft Plan. The site is currently in agricultural use in an area dominated by residential development.</p> <div data-bbox="904 703 1615 1171" data-label="Image"> <p>The image is an aerial photograph showing a residential neighborhood. A large, roughly rectangular plot of land is outlined in red. This plot is situated between residential streets and a larger green area. A black box with the word 'Site' in white text has a line pointing to the red-outlined area. The surrounding area includes houses, roads, and some green spaces.</p> </div> <p>The submission outlines a number of reasons that the subject lands should be rezoned, namely; the site is within the CSO boundary, represents compact growth and urban infill, is located 800m from the train station, an infill site surrounded by housing on three sides, serviceable, no heritage constraints, would not impact the greenbelt buffer zoning, established footpath and plans to improve, part of a larger landholding within the same ownership to the west and are ready to go lands.</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>The submission notes that there is no planning history associated with the site, however a pre-planning meeting was carried out in 2021 to discuss a proposal for 21 units on the subject lands and adjoining land which are zoned Existing Residential. General pre-planning application advice was provided.</p> <p>The submission notes that a desktop engineering report was conducted which concluded that site access is feasible, surface water can go to ground, a Confirmation of Feasibility has been received from Irish Water and a Pre-Connection Enquiry for 40 units has been submitted.</p> <p>The submission states the subject lands were zoned for residential development in 2002.</p> <p>The submission also notes the Core Strategy in the KCDP, in particular that the population estimate for Kildare Town was a holding figure and states that it is considered likely that there will be an increase in housing targets for all towns.</p> <p><b>Supporting Document</b>                      The submission includes a desktop Engineering Constraints and Feasibility Report for the subject lands and the site immediately to the west. The report refers to a development of 40 units on both sites. The report in relation to surface water states discharge to ground through deep lying infiltration trenches and soakaways in the gardens of each house in conjunction with rainwater harvesting to reduce runoff and green or blue roofs where the building design accommodates. In terms of foul drainage, a wastewater connection is feasible without infrastructure upgrade and a water connection is also feasible without an upgrade. The report also concludes that there is no risk of flooding pertaining to the site and pluvial flooding will be mitigated. The report considers that access to the site will be achievable and continuity of the footpath with will require agreement within neighbouring properties.                      Uisce Éireann maps and Confirmation of Feasibility letter have been submitted. Infiltration test details have also been provided.</p> <p><b><u>Chief Executive's Response</u></b>                      The contents of the re-zoning request are noted. Section 3.8. of the Draft Plan states that the Plan has been prepared in the context of extant planning permissions which are in excess of the target unit allocation required</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>for the lifetime of the Plan. The OPR in their submission (Section 3.0, refers) also recognises that there is the potential of Kildare Town exceeding its core strategy housing target over the life of the Development Plan due to historical legacy zonings and extant permissions for residential development. In this context the subject lands were not assessed under the Settlement Capacity Audit which is a requirement of the National Planning Framework to provide an evidence-based approach to the zoning of residential land. Furthermore, no additional lands are required for development to meet the requirements of the CDP Core Strategy, as sufficient lands have been identified for development. However, it is noted that the site is located within the CSO settlement boundary and therefore, in the context of Objective 3c of the NPF, it presents well for consideration in the future beyond the lifetime of this Plan.</p> <p>The point raised in relation to the population figure in the CDP being a 'holding figure' is noted. However, the Draft Plan was prepared in the context of the Kildare Electoral Division population figure from Census 2022 which is considered appropriate and verifiable for the purposes of the preparation of a Local Area Plan.</p> <p><b><u>Chief Executive's Recommendation</u></b> No change recommended.</p>
40	<p><b>Kildare Tourism Enterprise Centre Limited</b></p>	<p><b><u>Issues Raised</u></b></p> <p>This submission relates to the Former Modus Link Building site and seeks to ensure there is flexibility in the Draft Plan to attract new employment to the site including retail warehouse, garden centre and tourism uses. The submission references a tourism/lifestyle/heritage type retail warehouse use.</p> <p>The submission requests a zoning change for a new Retail (Warehouse) Park or alternatively a site-specific objective pertaining to a retail (warehouse) park or garden centre.</p> <p>The site occupies a highly prominent key location upon entry into the town off the motorway and extends to 3.38ha and contains a large 12,414 sqm building, which is now subdivided with short term lettings with low headcount and below average value employment. Efforts for a high value employer have been fruitless to date</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>(letter from Lisney's refers).</p> <p>The subject lands are zoned Enterprise and Employment in which Retail Warehouse is 'Not Permitted'. Retail warehouse is only permissible in town centre zoned lands and the submission requests that the existing building on the site be used for the purpose of Retail (Warehouse) Park.</p>  <p>The submission makes reference to the planning history on site. The most notable being the 17/1261 permission to relocate the existing vehicular entry/egress to a new vehicular entry/egress further north on the R415 and providing a new, two-way road (for public use) along the southern portion of the site. This was a road objective in the LAP 2012-2018 which has now been permitted.</p> <p>As part of this planning permission the applicant was requested to prepare a Masterplan for the wider Q1 zoned lands. The applicant engaged urban design experts, Loci Urban Design, Architecture and Planning, to prepare a masterplan – copy enclosed with the submission. This masterplan provides a framework to guide future development of the remaining Q1 zoned lands and how this development can connect into the permitted road</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>and roundabout junction to the south of the subject site.</p> <p>The submission makes reference to a traffic assessment for Phase 3 of the KTOV which had to assess the impact of the full development of the Q1 zoned lands to the west side of the Nurney Road (300,000sq.m of office development) on the road network, including the motorway interchange. It is stated the report stated there was sufficient capacity. Therefore, it is submitted that the conversion of the building to a Retail (Warehouse Park) would have no material impact on the public road network. It is stated that the existing building at c.12, 000sq.m represents only 15% of the 80,000sq.m retail warehouse floorspace for the entire Q1 zoned lands in the transport assessment.</p> <p>The submission states the site is approx. 10-minute walk from the town centre and that the site could be described as edge of centre.</p> <p>The submission states there are no permitted uses in the Draft Plan for Q lands but rather a number of uses Open to Consideration. Retail Warehouse and Tourism uses remain Not Permitted. Reference is made to the Newhall Retail Park in Naas which extends to 6 hectares and there is no town centre site in Kildare Town that would accommodate a retail warehouse park of this size. There already is a large car-park available on the site.</p> <p>The submission suggests the following Site -Specific Objective.  <i>“To provide a retail (warehouse) park or garden centre at the former Moduslink building on the Nurney Road”.</i></p> <p>Reference is also made to including the site within the Southern Expansion Area. It is also suggested that a zoning change be applied to the site and if not, then the zoning matrix be amended to include tourism/lifestyle/heritage type retail warehouse uses.</p> <p><b>Appendix</b>  Two items were in an Appendix to the submission as follows:  A- Letter from Lisneys outlining the limited appeal for the building in its current form.</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>The letter states the building in its current configuration does limit its appeal particularly the area surrounding the building which in order to be more functional from a trucking and general industrial point of view would require more external hard standing space. Enquiries have been furniture, crèche, semi retail occupiers.</p> <p>B- Photomontages of an indicative retail warehouse park.</p> <p><b>Enclosures:</b></p> <p><b>Urban Design Framework</b> Outline Urban Design Framework for a wider landholding (31 ha) that the subject site, showing future development of the lands. The Vision is to create a sustainable extension to the established town centre.</p> <p><b>Potential Future Road Layout</b> – showing how the subject site would integrate with the surrounding existing and proposed road network.</p> <p><b>Letter from DBFL Consulting Engineers in respect of Planning Ref. 17/0136</b> The report relates to a review of previous traffic assessments submitted as part of the planning application and it is stated that the conclusions on each planning application continue to be applicable and justified.</p> <p><b>Drawing from DBFL Engineering</b> The drawing relates to the letter in terms of the traffic modelling Scenarios and illustrates the Peak data across Thursday and Saturday.</p> <p><b><u>Chief Executive's Response</u></b> The contents of the submission are noted. The Retail Planning: Guidelines for Planning Authorities (2012) reassessed the policy context in relation to Retail Parks and Retail Warehouses. It was considered that they were reaching saturation point and given the blurring of the definition of goods permitted there was the potential for detrimental impact on town centres and therefore there is now a presumption against further out-of-town retail parks. However, a local authority can identify a need for a retail park through the County Development Plan. There has been no need identified in Kildare Town or elsewhere in the county. It is noted that the submission states the subject lands would be edge-of centre however given that the site is further than 400 metres from the Core Retail Area it would not be considered edge of centre but rather out-of-town, in the context of the Retail Planning Guidelines.</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>The request for a site-specific objective to support a retail warehouse park or garden centre at this location is noted, however it is not considered appropriate having regard to the foregoing retail policy context, potential implications on the town centre and traffic implications when combined with other proposals contained within the Plan for the area.</p> <p>The comments in relation to the Land Use Zoning Matrix not containing any land uses as Permitted in Principle on lands zoned 'Q: Enterprise and Employment' is noted. It is considered appropriate to amend Table 11-4 Land Use Zoning Matrix so that Offices are "Permitted in Principle".</p> <p>CDP objective ET O79 requires the undertaking of a Retail Impact Assessment/Retail Impact Statement and/or other appropriate studies, for all proposals for new garden centres or agri-businesses or extensions to either (which include retail and restaurant/cafe floorspace) to enable an assessment of their potential impact on nearby small towns and villages, in particular. In addition, such proposals may also require the submission of a Traffic and Transport Assessment. Where ancillary uses are proposed and where it is considered that such uses would negatively impact upon the vitality and vibrancy of nearby towns and villages, these uses (either in whole or in part) may not be permitted as part of the overall development scheme.</p>



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		<p><b><u>Chief Executive's Recommendation</u></b>  <b>Proposed Material Alteration</b>                      Chapter 11 Implementation, amend Table 11-6 Land Use Zoning Matrix as follows:</p> <table border="1" data-bbox="472 389 1765 959"> <thead> <tr> <th data-bbox="472 389 696 895">LAND USE</th> <th data-bbox="696 389 763 895">A: Town Centre</th> <th data-bbox="763 389 831 895">B: Existing Residential</th> <th data-bbox="831 389 898 895">C: New Residential</th> <th data-bbox="898 389 965 895">D: Retail Outlet Centre</th> <th data-bbox="965 389 1032 895">E: Community and Education</th> <th data-bbox="1032 389 1099 895">F: Open Space and Amenity</th> <th data-bbox="1099 389 1167 895">G: National Stud and Green Belt</th> <th data-bbox="1167 389 1234 895">H: Industry and Warehousing</th> <th data-bbox="1234 389 1301 895">I: Agriculture</th> <th data-bbox="1301 389 1368 895">K: Commercial</th> <th data-bbox="1368 389 1435 895">N: Neighbourhood Centre</th> <th data-bbox="1435 389 1503 895">Q: Enterprise and Employment</th> <th data-bbox="1503 389 1570 895">R: Retail/Commercial</th> <th data-bbox="1570 389 1637 895">S: Equine Industry</th> <th data-bbox="1637 389 1704 895">T: Mixed Use</th> <th data-bbox="1704 389 1765 895">U: Utilities/Services</th> </tr> </thead> <tbody> <tr> <td data-bbox="472 895 696 959">Offices</td> <td data-bbox="696 895 763 959">Y</td> <td data-bbox="763 895 831 959">O<sup>11</sup></td> <td data-bbox="831 895 898 959">O<sup>12</sup></td> <td data-bbox="898 895 965 959">N</td> <td data-bbox="965 895 1032 959">N</td> <td data-bbox="1032 895 1099 959">N</td> <td data-bbox="1099 895 1167 959">N</td> <td data-bbox="1167 895 1234 959">O</td> <td data-bbox="1234 895 1301 959">N</td> <td data-bbox="1301 895 1368 959">O</td> <td data-bbox="1368 895 1435 959">O</td> <td data-bbox="1435 895 1503 959">⊕Y</td> <td data-bbox="1503 895 1570 959">O</td> <td data-bbox="1570 895 1637 959">N</td> <td data-bbox="1637 895 1704 959">O</td> <td data-bbox="1704 895 1765 959">N</td> </tr> </tbody> </table>	LAND USE	A: Town Centre	B: Existing Residential	C: New Residential	D: Retail Outlet Centre	E: Community and Education	F: Open Space and Amenity	G: National Stud and Green Belt	H: Industry and Warehousing	I: Agriculture	K: Commercial	N: Neighbourhood Centre	Q: Enterprise and Employment	R: Retail/Commercial	S: Equine Industry	T: Mixed Use	U: Utilities/Services	Offices	Y	O <sup>11</sup>	O <sup>12</sup>	N	N	N	N	O	N	O	O	⊕Y	O	N	O	N
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41	RSR Kildare (Ireland) Ltd.	<p><b><u>Issues Raised</u></b>                      This submission seeks the re-zoning of land (1.01 hectares) at Bothair Na gCorp for residential use applying the zoning objectives for either; New Residential, Town Centre, Existing Residential/Infill or Mixed Use.</p>																																		

<sup>11</sup> Proposals of this nature shall be restricted to a gross floor area of 100sqm.

<sup>12</sup> Proposals of this nature shall be restricted to a gross floor area of 100sqm.


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		<div data-bbox="920 284 1599 807" data-label="Image"> </div> <p data-bbox="465 847 2045 1177">The submission states the site is a large infill site and has remained undeveloped for several decades despite a number of planning applications which have been denied. The last grant of permission was 25 years ago. The site is underutilised and serviced and is within convenient walking distance to the train station and town centre. Prior to the Draft Plan the site was zoned for Community/Education (E1) with a specific objective for a nursing home or residential scheme for the elderly. The submission states there is no demand for either. The Draft Plan intends specific community and recreation facilities at other locations; yet the same zoning of Community/Education prevails. However, the previously stated intention for it to be the site of a nursing home has been removed and no specific intention is stated for the site. It is suggested that there is no evidential basis for assigning the “Community and Education” zoning to the subject lands.</p> <p data-bbox="465 1219 2045 1362">It is considered the site is appropriate for housing as it is within the CSO defined boundary, circa 365m to the north-west of the town centre, circa 560m from the train station, no constraints, represents sequential development, extensive road frontage, walking distance of schools. The submission states there is no viable health, education, recreation or community development for the subject lands.</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>Residential development on the site would be in accordance with Rebuilding Ireland and NPF which seek to increase private housing supply. The Sustainable Development in Urban Area Guidelines (2009) recommend higher densities within 1km of train stations and the Development Plan Guidelines 2022 state that 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. This approach recognises that a degree of choice in development sites to be provided locally is desirable to avoid restricting the supply of new housing development through inactivity on a particular landholding or site.</p> <p>The Draft Plan assigns residential zoning to unserviced greenfield sites outside the town boundary. Two separate ABP inspectors reference the site as suitable for apartments within a parkland setting. The proximity to the Protected Structures of the Carmelite Catholic Church and Carmelite Priory, are noted and will be carefully designed into any potential scheme.</p> <p>The submission outlines several planning applications lodged with KCC and subsequent appeals. The 90-bed nursing home was refused on design as being excessive in scale and monolithic design, it was also considered that the design layout proposed would negatively impact the proposed residents of the nursing home. The submission states that the inspectors report stated the site was a key infill site which should be developed.</p> <p>A mixed-use application was refused for overdevelopment. The submission states that the ABP inspectors agreed with the previous report on site that that the zoning was wrong as the site is not located in the town centre and that a residential zoning would be more appropriate. In 2003 another refusal related to a mixed-use development refused on design and lack of a residential element.</p> <p>The submission states that the SCA should examine the capacity for new residential development within the built-up footprint. Therefore, brownfield and infill sites should be identified and estimated. There was no evidence that the subject lands were considered as part of the SCA and it is considered the site would be Tier 1. The site has not been considered as Phase 2 or Strategic Reserve lands either.</p> <p>The submission makes reference to the sequential approach to zoning for residential development. The development of the subject site for residential development would represent compact urban development given</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>its close proximity to the town centre. The submission notes that the Draft Plan requires a site-specific flood risk assessment for the site. The site is not shown in the Settlement Consolidation site, the submission states in this context it is superior to peripheral residential zonings. The submission states that there are extensive and mandatory obligations on KCC with regard the prioritisation of infill sites.</p> <p><b>Appendix</b>  An Appendix to the submission includes the following:</p> <ul style="list-style-type: none"> <li>- Copy of Property Registration Authority Ireland map showing folio owned by RSR Kildare (Ireland) Ltd.</li> <li>- Details pertaining to the lack of a need for a nursing home facility or housing for the elderly. <ul style="list-style-type: none"> <li>o 459 bed surplus over the identified need in County Kildare</li> <li>o HIQA review of the three existing nursing homes confirm that there is no need for an additional nursing home (link to inspection reports provided).</li> <li>o A number of website links have been provided, however only two currently exist the link to Planning for Health (HSE) and the link to the HIQA inspection reports.</li> </ul> </li> <li>- Individual Housing Units for the Elderly <ul style="list-style-type: none"> <li>o Available data from the housing department of Kildare County Council confirms that there is not an identified need for a residential scheme of housing units exclusively for the elderly on the subject site at issue in Kildare Town. The submission states that out of an overall need of 5103 people in 2017, 73 people were identified in the “aged 65 or more” category across the county.</li> <li>o Link to document titled Meeting Older People’s Preference for Care - Older persons requiring care and support in many instances have no choice but to move into residential care settings, due to the under-development of community-based services and inconsistency of provision across the country. This is despite the overwhelming preference of older people for ‘ageing in place’.</li> </ul> </li> </ul> <p><b><u>Chief Executive’s Response</u></b>  The contents of the submission are noted. The site is zoned ‘E’ in the Draft Plan for Community and Education land uses, the objective for which is to provide for education, recreation, community and health. It is noted that the zoning objective for this site in the previous Local Area Plan was ‘E1’, the objective for which was ‘to provide for the needs of the Elderly’ whereby the development of individual housing units and/or nursing home</p>

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		<p>facility to meet the needs of the Elderly was facilitated.</p> <p>A Social Infrastructure Audit accompanies the Draft Plan which outlines a deficit across a range of social infrastructure provision within the plan area. A wide range of land uses are 'Permitted in Principle' and 'Open to Consideration' within the Draft Plan for the subject lands, such as cultural uses, cultural tourism, library, dwellings ancillary to health/community uses, group/special needs housing, funeral homes, playground, health care centre, nursing home, school, crèche/playschool. Given the subject lands infill location within the defined CSO boundary, immediately adjacent to the town centre, it is considered that it would be ideal site for a range of community and educational uses and therefore did not form part of the Settlement Capacity Audit. The 'E' zoning objective reflects existing established uses within the urban block, including Kildare Education Support Centre and the Further Education and Training Centre.</p> <p>The Draft Plan under Section 3.8. states that the plan has been prepared in the context of extant planning permissions which are in excess of the target unit allocation required for the lifetime of the Plan. The OPR in their submission (Section 3.0, refers) also recognises that there is the potential of Kildare Town exceeding its core strategy housing target over the life of the Development Plan due to historical legacy zonings and extant permissions for residential development. In this context, no further additional lands are required for development to meet the requirements of the CDP Core Strategy, as sufficient lands have been identified for development.</p> <p>Dwellings are not excluded from consideration on this site, as they open for consideration when they are ancillary to health/community use, and/or to meet group/special needs housing, in accordance with the 'E' zoning objective.</p> <p><b><u>Chief Executives' Recommendation</u></b> No change recommended.</p>
61	George Ryan	This submission seeks the re-zoning of 1.9 hectares of land in Tully West from Agriculture (I) to New Residential (arrow added by KCC on image).

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<div data-bbox="1003 276 1503 871" data-label="Image"> </div> <p data-bbox="465 874 2045 1058">The submission states that the reasons for the re-zoning are that the subject site is surrounded on three side by residential properties, including to the north a large new housing scheme. It is stated that there is a great demand for housing and the housing to north are sale agreed before they are complete. There are no heritage constraints relating to site. The submission states that it is an anomaly that it hasn't been zoned and the subject lands are no longer suitable for agriculture.</p> <p data-bbox="465 1134 898 1169"><b><u>Chief Executive's Response</u></b></p> <p data-bbox="465 1171 2033 1383">The contents of the re-zoning request are noted. In the context of the suitability of the subject lands for residential development, it is important to note that the lands to the north referred to in the submission did not perform well in the Settlement Capacity Audit accompanying the Draft Plan, inter alia, they do not represent compact growth given their distance removed from the defined urban settlement. However, given that planning permission was previously granted, and construction had commenced, the lands were zoned for New Residential and formed part of the current proposed Development Strategy for the town.</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>Furthermore, the Draft Plan under Section 3.8. states that the plan has been prepared in the context of extant planning permissions which are in excess of the target unit allocation required for the lifetime of the Plan. The OPR in their submission (Section 3.0, refers) also recognises that there is the potential of Kildare Town exceeding its core strategy housing target over the life of the Development Plan due to historical legacy zonings and extant permissions for residential development. In this context, no further additional lands are required for development to meet the requirements of the CDP Core Strategy, as sufficient lands have been identified for development. Notwithstanding core strategy allocations, this site does not present well in terms of promoting compact growth and would compound urban sprawl at this location.</p> <p><b><u>Chief Executives' Recommendation</u></b> No change recommended.</p>
46	MRP Oakland Ltd	<p>This submission relates to three different land use zonings on the subject site (10.2ha) at Ruanbeg, Curragh Road. The submission seeks the re-zoning of land from New Residential Phase 2 to New Residential, from Open Space and Amenity zoning to New Residential, and from the Industry and Warehousing zoning to Community and Education.</p>  <p>The image is an aerial photograph showing a residential area on the left and a larger green field on the right. A red outline delineates a specific site area. Within this site, two sub-areas are marked with white letters: 'A' is a large, roughly rectangular area in the upper and middle parts of the site, and 'B' is a smaller, irregularly shaped area at the bottom right corner of the site, adjacent to a road and some buildings.</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>The lands were acquired in September 2022 and a LRD application has been advanced on the subject lands, initial meeting in July 2022, formal LRD pre-planning in September 2022 and LRD opinion issued in November 2022. The majority of the lands are zoned C1: New Residential (Phase 1) under the Kildare Plan 2012-2018. It is stated that an LRD application will be lodged in May 2023 for a new residential development of 295 units, including age-friendly housing for people over 55 years of age, social and affordable housing and a large crèche.</p> <p>If the new zoning is adopted the lands will be restricted for six years or until after a review of the Plan takes place. The re-zoning makes no sense in a housing crisis. It is stated that zoning moratorium is a direct result of the reliance in the Draft LAP on statistical information on population growth and housing demand that is out of date and inadequate. The submission refers in this context to the ESRI population projections used for the NPF. It is noted that the Minister has instructed a review of the NPF. The submission also refers to the preliminary Census 2022 figures and that in June the individual settlement figures will be available. It is stated that the release of this data should give rise to a change in the population and housing targets contained within the Draft LAP. The submission refers to Section 3.1.1. of the Draft Plan which states that it is important for the preparation of a land use plan that there is a clear understanding of the existing population and the allocated future population. In this context the submission argues there is no clear understanding until the Census 2022 figures are published.</p> <p>The submission requests the following:</p> <p style="text-align: center;"><i>KCC are requested to ensure that the final LAP is based on a revised Core Strategy (following publication of the Census 2022 results in June 2023), and that provides correct population and housing targets for Kildare Town for the 6-year life of the new LAP.</i></p> <p>The submission discusses the subject lands in terms of being bounded by residential areas, direct road access to the south with possible connections to adjoining residential areas to the north and west. The submission states the lands have been zoned for residential (and employment) development for over 20 years and have maintained this zoning through successive plans. Permission was granted in 2009 but due to the economic downturn was never commenced. The submission also notes that other residential zoned lands which have</p>



Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>been zoned for years have not advanced, in contrast to the subject lands.</p> <p><b>Grounds of Submission</b>  Once further data from Census 2022 results are published in June 2023 and the NPF projections up-dated (as promoted by Minister O'Brien) the Core Strategy will need to be revised. It is stated that once the actual number of residential units built in the town since the 2016 Census is factored in, it shows a population growth significantly greater than the populations estimates and projections currently being relied upon. It is argued the <i>projections and growth targets for Kildare Town in the current Core Strategy are significantly underestimated</i>. The submission states in respect of the underestimation that 830 additional units will have been completed by the end of this year which equates to an additional population of 2,240 adding this to the 2016 population equates to 10,874.</p> <p>It also suggests that the Core Strategy population and housing growth allocation for the town of 1,182 pop / 430 units between 2023 and 2028 will already have been surpassed by the end of this year. The Core Strategy growth rate for 2023-2028 of only c.72 units per year for Kildare town is a drastic reduction in housing output compared to the previous period, when, as noted above, at least 830 units will have been built.</p> <p>The submission state that the current Draft LAP is based on populations estimates and projections that are completely incorrect and underestimated, which is a "fool's errand", and detrimental, as it involves unnecessary rezoning of available and serviced/serviceable residential lands, including the subject lands to Phase 2.</p> <p>The submission refers to Section 4.4.3 of the Development Plan Guidelines where <i>it is stated a local authority can provide zoned residential land in addition to those required to meet the settlement housing supply target</i>. It is also stated that whilst the Council may contend that it has still zoned for more land in excess of requirements (given in particular the number of sites with extant permissions), the actual number of residential units to be delivered from the Phase 1 zoned lands over the life of the Draft Plan is much less than estimated, given the rates of completion that have already occurred.</p> <p>The submission states that the <i>Draft Plan overestimates the number of additional units that will be delivered on Phase 1 sites during the lifetime of the Plan and additional sites are required</i>.</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>The submission places emphasis on houses that will be completed towards the end of the year and should be removed from the Table 3-7. It is stated that Walker's Gate (56) Greyabbey View (207) should be removed in its entirety. Phase 1 of the Former Magee Barracks site will be completed before the end of 2023 and should be revised down to 324 units. The submission states that 245 units were granted at Oak Church not the 260 as stated but that it should be revised down to 151 units. With these changes it is stated that the correct Residential Yield of the zoned sites for the life of the new LAP (Dec 2023 onwards) should therefore be 679, and not 1,102 as stated.</p> <p>The submission suggests that where the sites are/will be completed this year, then those sites (or portions of same where phases have been completed) should be correctly rezoned to "B: Existing Residential" and not misleadingly remain as "C: New Residential". The submission suggests that this in turn should allow the zoning of our client's lands at Curragh Road to be maintained at "C: New Residential" and not "C: Phase 2 New Residential".</p> <p><b>Settlement Capacity Audit</b></p> <p>It is stated that the subject lands should be Tier 1 and not Tier 2 and the SCA should be updated. In respect of the SCA it is stated that certain sites were not assessed at all in the SCA whilst others that were assessed were given high/lower scores than other comparable sites. The items highlighted in the submission were that Oak Church was not subjected to SCA analysis. Site E is Tier 2 lands however has been zoned as New Residential in the Draft Plan, similarly, so have Sites G and H which are Tier 2. Greyabbey has been listed as No Development however has been zoned New Residential. It is also noted that a score of 200 has been given to Climate Adaptation and Biodiversity, however the application of the criteria, is not explained in the SCA. It is suggested that this relates to the potential for development sites to protect existing biodiversity on site. The submission states the Former Magee Barracks sites get a maximum score under this category, with no explanation and questions why largely brownfield sites would score greater than other sites in particular where permission exists to include the mass removal of existing trees and hedgerows.</p> <p>It is also stated that other sites appear to be given higher scores than adjoining sites in relation to various infrastructure criteria without further explanation or justification. Also referred to in relation to Surface</p>

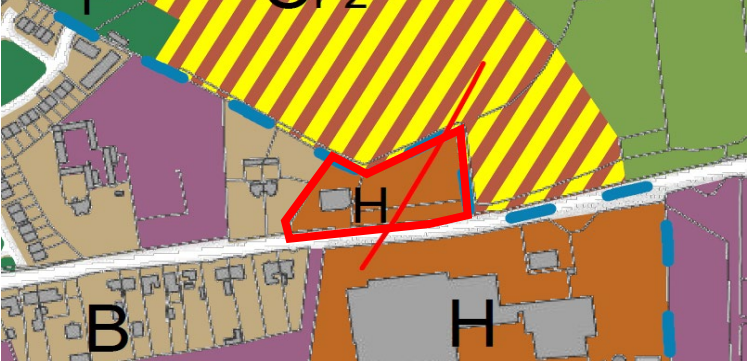
Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>Water/Flood Risk it is noted that most sites receive a relatively similar score, despite the fact that several of the sites are located within the Pluvial Flood Risk Assessment Area.</p> <p>The submission queries the scoring of land in respect of the Nature Based Management Areas on particular sites. With the NBMA to be provided on our client's lands then it would be expected that a higher score under "Surface Water/Flood risk" would be given compared to the adjoining lands that will be reliant on the NBMA being provided. However, this has not occurred.</p> <p>The submission makes the following points:</p> <ul style="list-style-type: none"> <li>- The subject lands ranking should be higher and the site should be ranked Tier 1. In comparison to other sites outside the town centre, the lands score equally well in terms of roads/transport, water supply, and wastewater, parks and social infrastructure.</li> <li>- The subject lands are assigned to provide an NBMA to serve the area, its Surface Water score should be higher.</li> <li>- The subject lands should also score higher in relation to the associated concerns of biodiversity protection/enhancement and climate adaptation, which are all being factored into the current LRD application to be lodged shortly.</li> <li>- In relation to Roads/Transport it is also noted that the forthcoming LRD application will also contribute to the provision of additional pedestrian/cyclist connection along the Dublin Road (Map 7.2 Objective 10) and with adjoining residential estates (Map 7.1 Objective 24).</li> </ul> <p><b>Replace the Open Space Zoning with a Site-Specific Objective</b></p> <p>The submission notes the Open Space zoning is in respect of the Nature Based Management Area but highlights that in relation to Roads/Transport the forthcoming LRD application will also contribute to the provision of additional pedestrian/cyclist connection along the Dublin Road (Map 7.2 Objective 10) and with adjoining residential estates (Map 7.1 Objective 24).</p> <p>The submission notes the Surface Water Study and the titling of the 'Conceptual Overview' map. It is suggested that at individual site level the correct/exact extent of NBMA required in each instance will be determined at detailed design stage. It is stated that applying strict Open Space zonings at this stage to</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>“potential” NBMA areas which may well need to be resized (or slightly relocated) following detailed design may render the zoning boundary incorrect and ineffective. A map-based objective is considered more appropriate.</p> <p><b>Re-zone the Industry and Warehousing Lands to Community and Education</b>                      The submission states the zoning in the current and the Draft Plan of 0.6ha of land facing the Dublin Road is zoned Industry and Warehousing and has been since 2002 but nothing has been brought forward. It is stated that community and educational uses would be a welcome addition to the area by complementing the residential communities. Reference is made to the SIA in terms of the areas to the east of the town could be better served in terms of certain social infrastructure. The submission states there is no nursing home in the east of the town.</p> <p><b>Conclusion</b>                      Concluding the submission quotes the Minister for Housing Darragh O’Brien as stating “I believe that we need more land zoned. I’ve told all of our local authorities through the development plans that no zoned serviced land should be de-zoned”.</p> <p><b>Appendices</b>                      Three tables have been included in the submission as an Appendix to the main submission.</p> <ul style="list-style-type: none"> <li>- Table 1: Commenced residential developments.</li> <li>- Table 2: List of commenced development on sites listed in Table 3-7.</li> <li>- Table 3: Planning status of residential site on table 5.6 of the SCA.</li> </ul> <p><b>Table 1: Commenced residential developments.</b>                      The Table detail the residential units permitted amounted to 1,317 units and from 2017-2023 it is stated that 830 units will be built. A map accompanies this table in the report showing location and units relative to the CSA residential map.</p> <p><b>Table 2: List of commenced development on sites listed in Table 3-7</b>                      This table refers to Table 3-7 of the Draft Plan and states that from 1,014 permitted units 539 will be commenced/ completed by the end of 2023.</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p><b>Table 3: Planning status of residential site on table 5.6 of the SCA.</b>                      This table reviews the sites detailed in the SCA that are Tier 1, Tier 2 and No Development. Site history, units granted, current and proposed zonings are detailed.</p> <p><b><u>Chief Executive's Response</u></b>                      The issues raised and the re-zoning requests in the submission are noted. In relation to the population figure used in the County Core Strategy and the Draft Plan it is important to note that the established NPF Roadmap population projections for each county continue to be the population parameters for local authority plan making processes. The Census 2022 preliminary county population figure and the CSO housing completions have informed the current Core Strategy which in turn provides for the distribution of the housing unit allocations across the Settlement Hierarchy. Therefore, any change to the settlement population figure for Kildare Town as a result of Census 2022 will not impact the housing unit allocation for Kildare Town. As per Section 19(2) of the Planning and Development Act 2000 (as amended) a local area plan shall be consistent with the objectives of the development plan, its core strategy, and any regional spatial and economic strategy that apply to the area. Therefore, no deviation to housing unit allocations (within the exception of Additional Provision as per Table 3-6 of the Draft Plan) can be made without a variation to planning policy at national, regional and county level.</p> <p>The submission refers to Section 3.1.1. of the Draft Plan which states that it is important for the preparation of a land use plan that there is a clear understanding of the existing population and the allocated future population. The Draft Plan qualifies this statement by saying that population forms the fundamental basis for identifying the quantity of a range of land uses such as economic lands (Table 5-1, refers), school, childcare facilities and public open spaces (the Social Infrastructure Audit refers).</p> <p>The submission refers in detail to the number of units which will be completed by the end of 2023 and at such should be removed from the Draft Plan. It is important to note the Core Strategy covers the period from January 2023 until December 2028. Kildare Town has a housing allocation of 430 units for this period. The units constructed during the year 2023 represent housing delivery and cannot be discounted or ignored, the units and residents need to be considered in terms of the overall provision of services within the plan area. Furthermore, Section 4.4.1. of the Development Plan Guidelines (2022) states where a site with planning</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>permission has commenced it should not be wholly excluded from the core strategy calculation unless almost fully built-out.</p> <p>It is noted that the site was purchased in 2022 and there have been a number of pre-planning meetings in respect of the subject lands prior to and after this date and the historical residential land use zoning associated with the site. However, it is important to note the allocation of 430 units was detailed in the Draft Core Strategy which went on public display in March 2022. Furthermore, the 2017 Kildare County Development Plan acknowledged that the town had a surplus of lands zoned which could provide for 2,027 units above the Core Strategy which needed to be addressed through a local area plan. Therefore, it is considered there was sufficient planning context established publicly in relation to the extent of the excess of residential zoned land in Kildare Town. It is noteworthy that the Kildare Town LAP 2012-2018 could not have been extended under the provisions of Section 19 of the Planning and Development Act 2000 (as amended) as it did not comply with national, regional and county planning policy as it pre-dated the National Planning Framework (2018), the Regional Spatial and Economic Strategy 2019-2031, the Kildare County Development Plan 2023-2029 and Section 28 Ministerial Guidelines in relation to Local Area Plans (2013) and Development Plans (2022).</p> <p>The comment made in the submission in respect of the reduction in housing output compared to the previous period is also noted. However, the NPF clearly states that its Framework sets out how Ireland will move away from the current, 'business as usual' pattern of development and seeks to disrupt trends that have been apparent for years.</p> <p>The submission refers to Section 4.4.3 of the Development Plan Guidelines, which relates to Additional Provision. The Draft Plan has provided Additional Provision at a rate of 25%, Table 3-6 refers.</p> <p>The comments in relation to the Settlement Capacity Audit are noted. The assessment criteria which the sites are assessed against are wide-ranging, which include serviceability, along with other criteria such as climate resilience, green infrastructure, efficiency and sustainability of land use. The legacy of over-zoning and extant planning permissions were key challenges in the preparation of the Draft Plan. The OPR in their submission (Section 3.0, refers) also recognises this challenge. The Oak Church development and Walker's Gate were not assessed under the Audit as construction on both sites were considerably progressed. In relation to the</p>

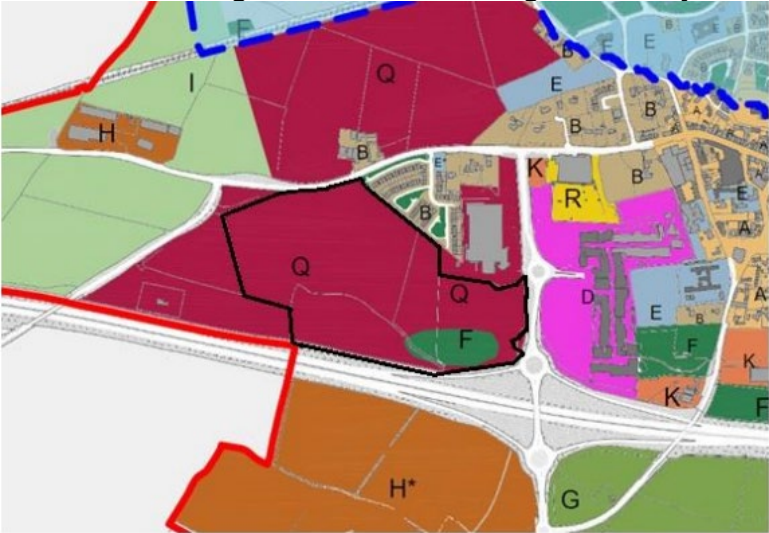
Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>Greyabbey View, construction had already commenced on site and therefore the 207 units will form part of the housing allocation for the town. The National Transport Authority (Submission 105, refers) queried the New Residential zoning at Greyabbey View in the absence of a positive score under the SCA and in response additional text is proposed to clarify their inclusion in the Development Strategy.</p> <p>Fundamentally, while the subject lands could be developed within the lifetime of the Plan, no further additional lands are required for the LAP to meet the requirements of the CDP Core Strategy, as sufficient lands have been identified for development, many of which had secured planning permission prior to the preparation of the Draft Plan. The Land Use Zoning Objectives are defined in Table 11-4 of the Draft Plan. The 'New Residential Phase 2' zoning objective, as defined and footnoted, indicates that social housing schemes may be brought forward on lands zoned 'C: New Residential Phase 2' during the lifetime of the plan in the event that there is a significant unmet housing demand in the Kildare Town area.</p> <p>The comments in relation to replacing the Open Space zoning with a site-based objective on the subject lands is noted. It was considered in the preparation of the Draft Plan on receipt of the Surface Water Study that a water compatible land use was most appropriate for the Surface Water Management Areas, to reflect the proposed use and prevent encroachment and/or loss of the management areas. Therefore, no change to the Open Space and Amenity zoning is recommended.</p> <p>The request to re-zone the Industry and Warehousing Lands to Community and Education is noted. It is considered that the addition of a community use to the east of the town on the subject lands would be appropriate.</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p><b><u>Chief Executive's Recommendation</u></b>  <b>Proposed Material Alteration</b></p> <p>Amend Map 11.1 to amend the zoning objective of the land outlined in red (Site Area 0.7 ha) below from 'H: Industry and Warehousing' to 'E: Community and Education'.</p> 
69	Lidon Limited	<p>This submission relates to lands (c. 2.8 ha) at Greyabbey Road and seeks the re-zoning of the subject site to K-Commercial or Q- Enterprise and Employment from the G- National Stud / Greenbelt as provided in the Draft Plan.</p>



Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<div data-bbox="913 284 1599 762" data-label="Image"> </div> <p data-bbox="465 767 2045 874">The submission states that the zoning in the Draft Plan is a downgrading and that the lands are suitable for a mixed-use development comprising a hotel and employment related uses. A Design Team has been appointed to bring forward these proposals to a planning application in the short term.</p> <p data-bbox="465 914 2045 1058">Reference is made to permission 04/2974 which expired in 2022. It is stated this permission related to a hotel, service station, retail and commercial units and residential units. It is submitted that it has previously been demonstrated that there are no environmental constraints and development on the lands can be accommodated outside of the motorway setback.</p> <p data-bbox="465 1098 2045 1209">The submission states that the lands at Grey Abbey Road have been zoned for development for over 20 years and there is Regional and Local Planning Policy support for the zoning of additional lands for commercial and employment related uses to ensure Kildare Town meets the objective of being a Self-Sustaining Growth Town.</p> <p data-bbox="465 1249 2045 1393">The subject lands are surrounded on all sides by roads. The lands are closely associated with the motorway interchange and the mixed use and residential zoned lands to the west across the R415. In this regard, it is noted that the subject lands are the only lands adjoining the motorway interchange that are not zoned for development. The submission states there is no physical or functional basis for the green belt zoning and have</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>no connection to the National Stud and over 1km from the stud complex.</p> <p>The submission notes the SCA and that the subject lands scored poorly in terms of suitability for development and serviceability and were not zoned. However, it is stated that this is not justified considering the zoning to the west for Industry and Warehousing and New Residential. There is no discernible difference between the subject lands and those zoned to the west. It is stated that the subject lands are more suitable as they are physically closer to the town centre and therefore offer sequential and compact development. The lands should be considered Tier 2 like the lands to the west.</p> <p><b><u>Chief Executive's Response</u></b></p> <p>The comments in the submission are noted. Planning policy in Ireland has changed significantly since the 2012 LAP was prepared and adopted, most notably with the publication of the National Planning Framework (2018), the Regional Spatial and Economic Strategy 2019-2031, the Kildare County Development Plan 2023-2029 and Section 28 Ministerial Guidelines in relation to Local Area Plans (2013) and Development Plans (2022). The focus on plan making now is towards compact sequential growth and sustainable mobility, moving towards a low carbon future.</p> <p>The Settlement Capacity Audit is one tool which is used to devise a development strategy for a settlement. Cognisance must also be had to permitted developments (i.e., the planning permission for 207 units at Greyabbey View). It is considered that the principal differences between this site to which this submission refers and the lands zoned 'H' on the western side of the Nurney Road is scale and location. It was considered appropriate to contain development to the south of the motorway and west of the regional road, and to prevent further sprawled development south of the motorway east of the regional road. The land east of the regional road is of a different character and functions as a Green Belt.</p> <p>It is important in the context of the lands to the west and the Settlement Capacity Audit that the land zoned for New Residential south of the motorway performed poorly against the criteria in the SCA. However, the lands were zoned New Residential as there is a live permission being developed on the site and therefore the units being constructed form a significant portion of the allocated housing units to Kildare Town for the period 2023 – 2029 and could not be excluded from the core strategy calculations.</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>The Draft Plan provides for ca. 63 ha of land to attract economic development to achieve the job ratio of 0.70 over the lifetime of the Plan. Appendix B details that there is sufficient zoned land to achieve a job ratio of 0.70 during the lifetime of the Plan.</p> <p><b><u>Chief Executive's Recommendation</u></b> No change recommended.</p>
70	<b>Elstown Limited</b>	<p>This submission relates to the lands (17.5 ha) to the west of Kildare Town and the immediately north of the motorway. The vision of the land is a business tourism complex. The overall proposal for the land bank incorporates a significant hotel development close to the R415, the Kildare Exhibition Centre and the other areas developed for logistics/business park use. The submission states the main themes that need addressing are tourism infrastructure, the land use zoning matrix and a strategic local objective.</p>  <p>Elstown Limited and Podium Events and Conferencing envisage a permanent exhibition centre (offering all the</p>

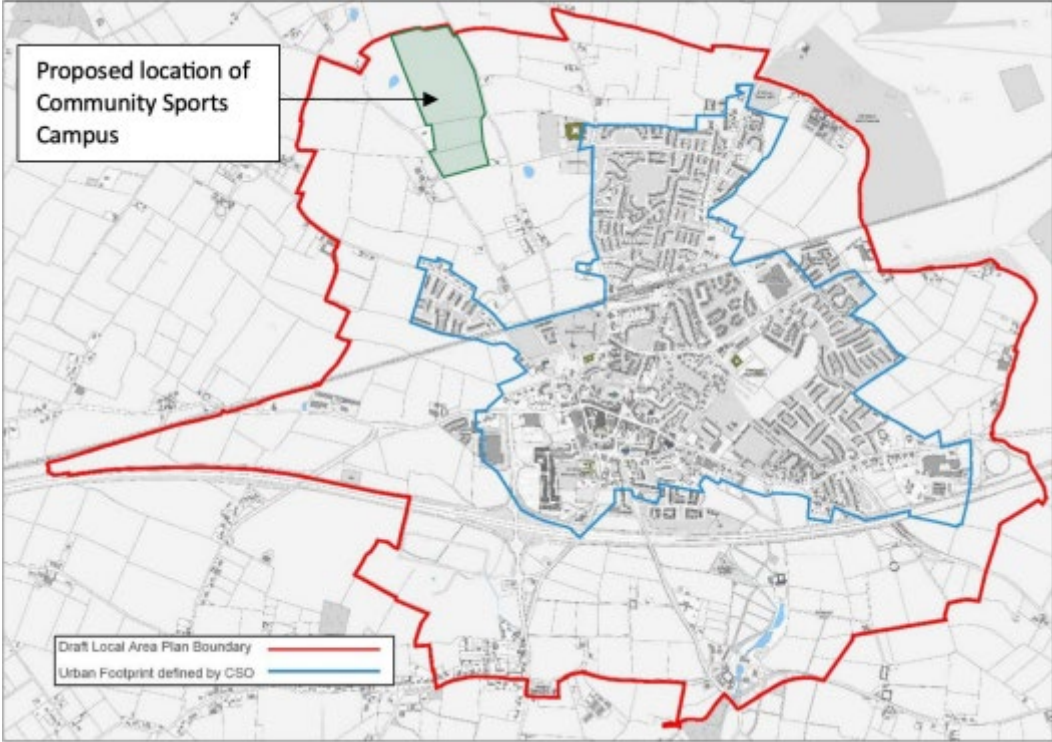
Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>associated disciplines on site including event management, catering, set production, event lighting, audio visual, event printing and floristry) on the subject lands - the Kildare Exhibition Centre (KEC), in contrast to the scattered exhibition and events throughout Ireland. It would be the first dedicated facility of its kind in Ireland. It is stated that the KEC would contribute to the development of Kildare Town as a tourism hub.</p> <p>It is stated that Podium Events and Conferencing has identified a business tourism market need for a state of the art, bespoke event facility to service the corporate sector offering conferences, trade shows, hospitality and television/film production (industrial activity defined in the Act).</p> <p>It is stated that a permanent base of this kind would reduce the need for transportation of equipment and facilities across the national road network and thereby remove the need for the traffic /carbon footprint and it is stated that the TII would appreciate the potential for traffic reduction. Furthermore, the area is well-served by rail and public transport and accessible for coach transportation. It is stated that the proposed exhibition/conference operation will create 40-50 full time local jobs, 80-100 casual part time positions, as well as supporting local business opportunities for those operating in the creative arts economy.</p> <p>The submission states that stakeholders have liaised with KCC since 2017 to bring these lands into development, however, business and enterprise markets do not align with the business park vision. It is stated the Land Use Matrix is very non-directional.</p> <p>The submission states that the economic development of the town is tied in with capitalising on becoming a nationally important tourism destination. It is considered that this clearly needs to put in place substantial infrastructure capacity to meet this goal. A strong strategic vision of the town is required to achieve the national tourism hub objective.</p> <p>The submission references the existing planning permission (Ref. 23/102) for transport infrastructure through the site in line with the current road objective. It is stated that the application could be adapted to provide a further traffic lane from the motorway junction north directly into the subject lands, which would add significant stacking and dispersal capacity to ensure against tailback congestion on the motorway main lanes at the occasional peaks that occur at Junction 13. Therefore, it is submitted that improvements to capacity, including</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>the M7 junctions and associated roads, can be delivered in conjunction with development subject to an appropriate vision, viable zoning and phasing, active travel measures can also be facilitated.</p> <p>The submission considers the Spatial Planning and National Road Guidelines, the KCDP 2023-2029, the 2020 Vision for Kildare Tourism and the Draft Plan Written Statement and Appendix B as the supporting policy context for the development of the subject lands.</p> <p>In terms of road infrastructure as previously stated as part of the planning application an additional slip is proposed. The provision of this additional lane has also been recommended in the Traffic and Transport Assessment of the proposed KTOV extension, planning reference 17/764.</p> <p><b>Tourism Infrastructure</b>                      The submission states the Draft Plan in its support of Kildare Town as a national tourism hub is not ambitious or wide-ranging enough, particularly by accommodating areas of business tourism and hotel accommodation provision. It is requested that these parts of the Draft Plan be strengthened and made more wide-ranging and opportunistic. It is stated that a review of tourism accommodation supply in 2022 indicated a very limited and poor supply. Hotels provide significant employment and boost economic activity and should be permitted in employment zones.</p> <p><b>Land Use Zoning Matrix</b>                      It is submitted that the vision for the Economic and Employment does not include reference to accommodating or encouraging tourism infrastructure. As per Appendix B the subject lands are indicated as having capacity for circa 485 jobs. In respect of EDO 1.5 it is stated that the lands to the south should not be limited to industry and offices but should be expanded to accommodate as permitted development business tourism and hotel development.</p> <p>The zoning Matrix for the Economic and Employment land use does not include any use that is Permitted in Principle. The submission requests that a change to the zoning matrix to accommodate business tourism and hotel uses to the northwest of the M7 junction.</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p><b>Specific Local Objective (SLO)</b>                      The submission suggests that the land use zoning on the subject lands could remain the same with the addition of a SLO to accommodate tourism infrastructure development in order to facilitate and promote Kildare Town as a Tourism Hub. Furthermore, a tourism symbol could be added to the subject lands on Figure 2-3 of the Draft Plan. It is considered that that context, a permanent Exhibition and Events Centre could be accommodated on the lands – the KEC.</p> <p><b><u>Chief Executive's Response</u></b>                      The issues raised in the submission are noted. It is important to clarify that guest house / hotel / hostel is 'Open for Consideration' within the Land Use Zoning Matrix (Table 11-6, refers), which is a change from the 2012 Plan where the use was 'Not Permitted'. Given the extent of the undeveloped lands designated for Enterprise and Employment, and their proximity to the national motorway network and main arterial routes within the town no specific use is 'Permitted in Principle' as development of the lands need to be carefully considered in the interest of the proper planning and sustainable development of the overall area, therefore land uses are 'Open to Consideration'.</p> <p>The Draft Plan under Objective EDO 2.1 is supportive of new tourism activities/facilities including supporting infrastructure that respect, respond and enhance their physical locations, environmental quality and community setting. It is considered that a Conference /Exhibition Centre on the subject lands would be 'Open to Consideration' and shall be reflected in the Zoning Matrix.</p> <p><b><u>Chief Executive's Recommendation</u></b>  <b>Proposed Material Alteration</b>                      Chapter 11, Implementation, amend Table 11-6 Land Use Zoning Matrix, by inserting a new land use 'Conference / Exhibition Centre', as follows:</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation																
		LAND USE	A: Town Centre	B: Existing Residential	C: New Residential	D: Retail Outlet Centre	E: Community and Education	F: Open Space and Amenity	G: National Stud and Green Belt	H: Industry and Warehousing	I: Agriculture	K: Commercial	N: Neighbourhood Centre	Q: Enterprise and Employment	R: Retail/Commercial	S: Equine Industry	T: Mixed Use	U: Utilities/Services
		<i>Conference / Exhibition Centre</i>	Y	N	N	N	N	N	N	N	O	N	O <sup>13</sup>	N	N	O	N	
96	The Round Towers GAA Club, Kildare Town Athletics Club and Kildare Town AFC	This submission is made by three organisations that are described as ‘together they represent the majority of those engaged in recreational sport in Kildare Town’. The submission seeks the re-zoning of lands from Agriculture to Open Space and Amenity to facilitate a community sports campus.																

<sup>13</sup> A conference centre will be considered in the eastern section of lands zoned Q: Enterprise and Employment.

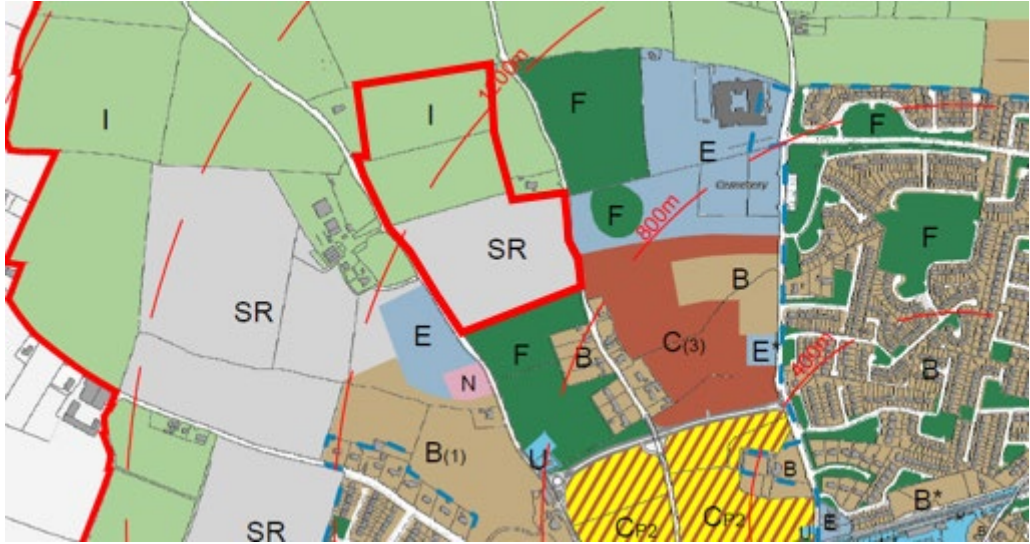
Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		 <p>The submission states that the Social Infrastructure Audit does not accurately reflect the up-to-date situation in the Kildare Town, the examination is cursory, its methodology flawed and its results incorrect. The submission also states that there was no engagement with anyone involved in sport prior to its compilation and the public consultation for the Draft Plan was undertaken over 4.5 years ago, making any findings based on it of little value.</p> <p>There was no evidence of any assessment of the capacity of existing sports infrastructure in the town. The</p>

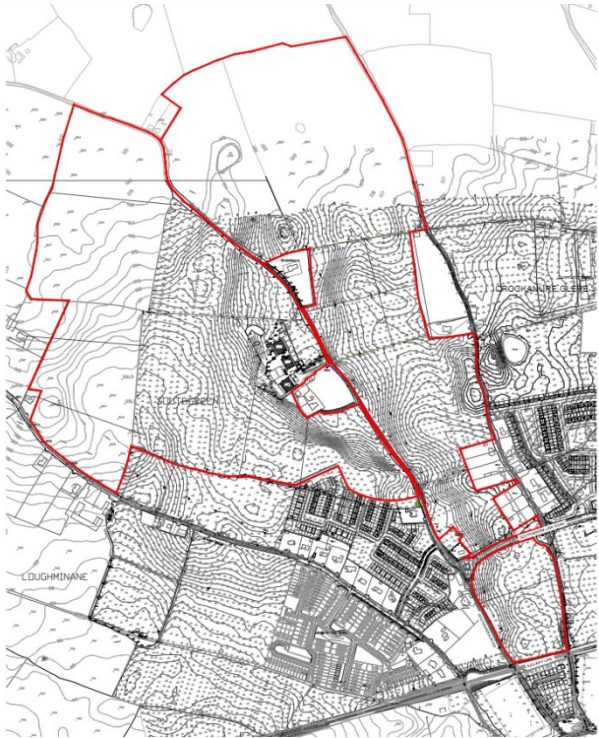
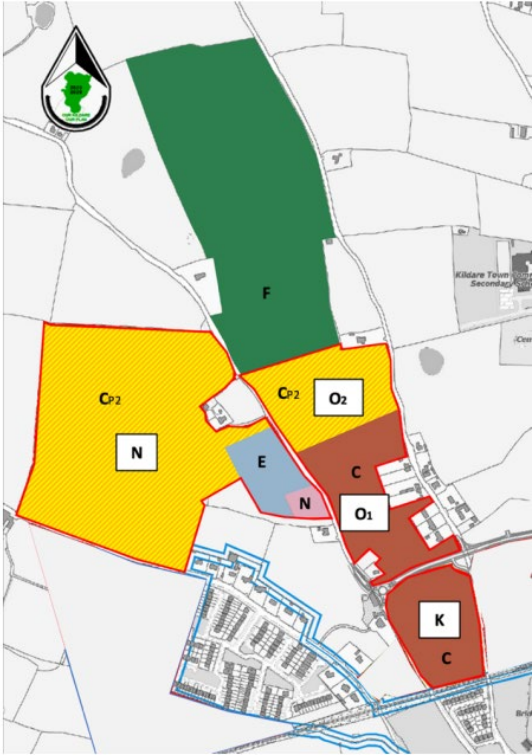


Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>study recognises that Kildare has a young socially deprived, poorly educated population, more likely to be unemployed than the national average, however, these findings are not used in determining what social and sports provision should be provided, and this represents a significant gap in the Draft Plan.</p> <p>It is stated that the figure of 25.14 ha is not a realistic measure of areas available for non-school sporting activity.</p> <p><b>Analysis of Sport Facilities</b>  The submission raised a number of concerns in relation to the SIA.</p> <p>Section 3.5:</p> <ul style="list-style-type: none"> <li>• Public open space and sports facilities are confused and, in some cases, double counted, concluding that there is sufficient space, which is not the case.</li> <li>• The inclusion of the National Stud, the Carmelite Friary field, sports pitches outside the study area and facilities yet to be developed, give the impression that there is sufficient public open space.</li> <li>• A figure of 55.4 ha for public open space is provided, but no breakdown or location provided.</li> <li>• At least 25.75 ha of this is sports pitches, not available for public use and should be excluded from any discussion on provision of amenity areas.</li> </ul> <p>Section 3.6:</p> <ul style="list-style-type: none"> <li>• Use of the schools' facilities by clubs is limited and does not contribute significantly to providing access to sporting activity.</li> <li>• One of the playgrounds is in a private entity for use by those using the Retail Outlet.</li> <li>• National Stud in private ownership and has no sports facilities.</li> <li>• Cill Dara Golf Club is outside the study area.</li> <li>• The Community School is privately owned and caters for 900 students, public access is limited.</li> <li>• No analysis of indoor sporting facilities except for the Community School and they are not fit for purpose.</li> </ul> <p><b>Compliance with Development Plan Standards</b></p> <ul style="list-style-type: none"> <li>• If the areas included in error, where excluded Kildare's outdoor sports area would not comply with the</li> </ul>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>CDP.</p> <ul style="list-style-type: none"> <li>• The SIA suggests using Cherry Avenue to address the issue while at the same time using the lands to address the public open space deficit, which is not an appropriate duplication.</li> <li>• Section 4.4 of the SIA, states that the quantity of public open space complies with the CDP standards, if the errors and double counting outlined above are reversed, this no longer complies.</li> </ul> <p><b>Current Conditions of Facilities</b>  The submission disagrees with Section 4.5 which states that there is more than adequate provision of sporting facilities.</p> <ul style="list-style-type: none"> <li>• <b>The Round Towers</b> - have a long-term base in St Brigid's Park, comprising of one pitch. The club has 1,634 members, fields 52 teams, from under 7 to senior football, ladies' football, camogie and hurling.</li> <li>• <b>Kildare Athletics Club</b> - has the use of St Brigid's Park for three hours a week, no athletics facilities apart from a shot-put area in a car park and a long jump area. Members are mostly juvenile, because of the poor facilities and their inability to improve them.</li> <li>• <b>Kildare Town AFC</b> - 20 teams using 2 full size pitches and 2 6-a-side pitches, in poor condition, with substandard changing facilities. They have c.500 members, but lose members to clubs in Naas and Newbridge, which have better facilities.</li> </ul> <p><b>Vision for Community Sports Campus</b>  The submission supports the zoning of 13.36 ha to provide for community sports campus on land owned by Pousterle Ltd. It is stated that there is no better option as the lands are; 1.5km / 18 minutes from the train station, a contiguous parcel of land, close to the Community School and designation site for the new primary school, easy extension of active travel route, flat free draining lands, create integrated community development. The submission is accompanied by a proposed site layout plan indicating an athletic track, sports hall, play area and multi-purpose pitches.</p> <p><b>Chief Executive's Response</b>  The contents of the submission are noted. A Social Infrastructure Audit (SIA) is not a requirement of the local area plan making process; however, Kildare County Council provide a wide evidence basis for its statutory plans, within a suite of reports which accompany this Draft Plan to inform the overall development strategy and</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>the land use zoning provisions for same.</p> <p>Much effort has been put into using the most appropriate benchmarking tools, in the absence of an established Irish standard in the area. Therefore, best practice models have been used such the UK Fields in Trust (FIT) benchmark guidance for open space.</p> <p>Section 3.5 of the SIA sets out in detail all the different types of open space in Kildare Town, while existing sport and recreation facilities surveyed in November 2022 are listed and mapped in Section 3.6. The National Stud is not included in any calculations of public open space and the SIA caveats that sports pitches within the Draft Plan area are mainly associated with educational premises and clubs, and therefore have very limited public access. Furthermore, it outlines Kildare Town currently only has two open spaces that qualify as public parks. All other surveyed amenity green space areas do not meet the criteria to be considered as a public park as they mainly comprise of open grassland that provide little or no facilities.</p> <p>The comments made in relation to the public consultation in the Draft Plan are noted. There have been a number of studies prepared which relate to background data gathering and building of consensus on the issues for Kildare Town namely, the Kildare Town Transport Strategy, the Kildare Town Renewal Masterplan and key stakeholders were also consulted through the preparation of the Settlement Capacity Audit and the Social Infrastructure Audit.</p> <p>It is considered that the northern part of the subject lands are a significant distance from the town centre and are agricultural in nature. However, it is considered that part of the landholding would be appropriate for open space purposes.</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p><b>Chief Executive's Recommendation</b>  <b>Proposed Material Alteration</b>                      Map 11.1 Land Use Zoning, amend zoning objective of land outlined in red below (approx. 13 ha) from 'I: Agriculture' and 'SR: Strategic Reserve' to 'F: Open Space'.</p>  <p>The map shows a land use zoning plan with various zones labeled: I (Agriculture), SR (Strategic Reserve), F (Open Space), E (Employment), B (Business), C (Community), N (Neighborhood), and U (Urban). A red outline highlights a specific area of approximately 13 hectares, primarily consisting of zones I and SR, which is the subject of the proposed material alteration to zone F.</p>
98	Pousterle Limited	<p>This submission relates to lands in South Green and the main submission is also accompanied by a Settlement Capacity Audit review.</p> <p>The submission seeks the re-zoning of the subject lands as follows:</p> <ul style="list-style-type: none"> <li>• Site 'K' to be zoned 'C' – Residential development.</li> <li>• Site shown 'O1' to be zoned 'C' – Residential development.</li> <li>• Site 'N' and site shown as 'O2' to be zoned 'C' – Residential Development (Phase 2 or CP2).</li> <li>• Zoning 'F' to be fully removed from Site 'O' and added to lands to the north of Site 'O'.</li> </ul>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<ul style="list-style-type: none"><li data-bbox="517 284 1626 316">• The lands to the north of Site 'O' and occupied by the GAA to be zoned 'F'.</li></ul> <div data-bbox="568 347 1164 1088"></div> <div data-bbox="1388 352 1917 1110"></div>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation																					
		<p>The submission provides a snapshot commentary on the changes to the subject lands in the Draft Plan:</p> <table border="1" data-bbox="477 352 1344 911"> <thead> <tr> <th data-bbox="477 352 757 400">Kildare Town LAP 2012</th> <th data-bbox="757 352 1043 400">Kildare Town LAP 2023</th> <th data-bbox="1043 352 1344 400">Submission Comment</th> </tr> </thead> <tbody> <tr> <td data-bbox="477 400 757 480">C1 – Residential</td> <td data-bbox="757 400 1043 480">CP2 – Phase 2 New Residential</td> <td data-bbox="1043 400 1344 480">Unwarranted rezoning of subject site</td> </tr> <tr> <td data-bbox="477 480 757 560">C2 – Phase 2 Residential</td> <td data-bbox="757 480 1043 560">F – Open Space and Amenity</td> <td data-bbox="1043 480 1344 560">Unwarranted rezoning of subject site</td> </tr> <tr> <td data-bbox="477 560 757 639">C2 Phase 2 Residential</td> <td data-bbox="757 560 1043 639">Strategic Reserve</td> <td data-bbox="1043 560 1344 639">Unwarranted rezoning of subject site.</td> </tr> <tr> <td data-bbox="477 639 757 719">C2 – Phase 2 Residential</td> <td data-bbox="757 639 1043 719">Strategic Reserve</td> <td data-bbox="1043 639 1344 719">Unwarranted rezoning of subject site</td> </tr> <tr> <td data-bbox="477 719 757 799">C2 – Phase 2 Residential</td> <td data-bbox="757 719 1043 799">Neighbourhood Centre</td> <td data-bbox="1043 719 1344 799">Support rezoning in line with infill development designations</td> </tr> <tr> <td data-bbox="477 799 757 911">C2 – Phase 2 Residential</td> <td data-bbox="757 799 1043 911">Community &amp; Education</td> <td data-bbox="1043 799 1344 911">Support rezoning in line with infill development designations</td> </tr> </tbody> </table> <p>The submission states the de-zoning of the subject lands are contrary to Ministerial Direction, Guidelines, the opinion of the Chief Executive in 2018 and to the OPR in March 2023. In this context, the submission refers to Circular Letter NRUP 03/2022, Section 4.4.1 of the Development Plan Guidelines 2022 and an article in the Irish Times referencing the OPR (March 2023), all which refer to de-zoning of serviced and available lands should not take place.</p> <p>It is submitted that the subject lands conform to planning policy, represent an infill sequential site, the sites represent Tier 1 lands, located between 5000 and 1.5km from the train station, the Draft Plan does not support fully the principles of compact growth and the subject lands are a logical location for infill development.</p> <p>It is submitted that the published 'Settlement Capacity Audit' is hard to agree with based on available evidence. Zoning proposals appear to be based on incorrect analysis and assumptions and are without due regard to current government policies relating to sustainable development within 15 minutes of key active travel and</p>	Kildare Town LAP 2012	Kildare Town LAP 2023	Submission Comment	C1 – Residential	CP2 – Phase 2 New Residential	Unwarranted rezoning of subject site	C2 – Phase 2 Residential	F – Open Space and Amenity	Unwarranted rezoning of subject site	C2 Phase 2 Residential	Strategic Reserve	Unwarranted rezoning of subject site.	C2 – Phase 2 Residential	Strategic Reserve	Unwarranted rezoning of subject site	C2 – Phase 2 Residential	Neighbourhood Centre	Support rezoning in line with infill development designations	C2 – Phase 2 Residential	Community & Education	Support rezoning in line with infill development designations
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		<p>social infrastructure nodes.</p> <p><b>Current Planning Context</b>                      The Submission refers to the Kildare LAP 2012 which identified South Green lands as the most logical and appropriate location for the expansion of the town. The land is zoned for a range of uses, predominantly C1 and C2 residential. The submission states that these lands clearly correspond with Tier 1 and Tier 2 designations as per the NPF.</p> <p><b>Proposed Local Area Plan Zoning</b>                      The submission states that the current Plan 2012-2018 and the Chief Executive Report on the Issues Paper for the Draft LAP (2018) identified the South Green lands as the most logical and appropriate location for the expansion of Kildare Town and where the bulk of residential development can take place, the submission supports this.</p> <p>The submissions states that the proposed zoning changes as outlined, particularly the proposed residential areas would provide for a clear opportunity for more appropriate infill development and will provide for the logical expansion of Kildare Town. These 'C' zoned lands will make best use of the existing infrastructure and will provide the best opportunity to develop social and sporting facilities and vulnerable road user travel links for the benefit of the whole town.</p> <p>The submission states that the landowners have been in discussions with KCC since 1998 regarding the development of their site; the funding / delivery of infrastructure and the roll out of residential development. It is stated that substantial advancements in terms of planning applications, development on the ground and the frontloading of infrastructure has taken place since initial discussions began. The submission also states that it would be inappropriate to allow serviced, well-connected land to lie idle with no return on investment on infrastructure. It is also stated that the East West Link Road and all associated upgrade and junction works, including active cycle paths and footpaths, have been delivered through significant expenditure of the landowner.</p> <p>The submission believes the subject lands are a natural extension to Kildare Town. The submission refers to a</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>LRD application (23/416) lodged on part of the subject lands that are designated as C1. The proposed development comprises of 168 units with a childcare facility. The submission describes the site as “ready to go” subject to planning. It is submitted that the application addresses many points relevant to the ‘Settlement Capacity Audit’ and ask that the information provided be incorporated into the final audit.</p> <p><b>Kildare Town – A Strategic and Serviced Location</b>                      The submission states that available, serviced and appropriately zoned lands should take priority in development strategies. Kildare is served by good road and rail network, will only be two stops from an electrified rail track after DART+ South West implemented.</p> <p><b>Overall Vision</b>                      The submission states that the Strategic Vison for the Draft Plan should include the provision of sustainable, well-located development at appropriate densities which capitalise on the efficiencies provided by existing infrastructure, along with delivering infrastructure that benefits the whole community. In this context it is stated that subject lands would deliver on this.</p> <p><b>15-Minute Settlement</b>                      The submission states that the lands are a comfortable walking distance of the town centre (800m – 10-minute walk) and Kildare Train Station (950m – 11-minute walk).</p> <p><b>Infrastructure</b>                      The submission supports the retention of exists zonings (in the context of infrastructure) for the following reasons:</p> <ul style="list-style-type: none"> <li>• Inappropriate to allow serviced, well-connected land to lie idle with no return on investment.</li> <li>• Sites would be sequential and infill in nature.</li> <li>• Under-utilised lands available proximate to public transport and local amenities providing a logical extension to built-up area.</li> <li>• Immediate opportunities for comprehensive residential development supply.</li> <li>• Provision of much needed social and sporting infrastructure.</li> </ul>



Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<ul style="list-style-type: none"> <li>Facilitate development in line with the Planning Authority's long-term vision for the area.</li> </ul> <p><b>Open Space and Amenities</b>                      The submission states that the part of the subject lands is governed by an open space zoning. They state they are happy to deliver the full quantum of this provision, but not in the location proposed by the Draft Plan. The submission suggests the c. 13.25ha should be zoned to accommodate a community and sports campus, catering for all the sporting activities in the town, which has 'buy-in' from the largest sporting organisation in the town. It is also envisaged that a significant greenway and bicycle route is envisaged through the subject lands.</p> <p><b>Section 9 Points of Submission</b>  <b>9.1 Issues Papers</b> – the submission refers to the Development Plan Guidelines in relation to Issues Papers stage being critical for drawing together the evidence base and views of the community. In this regard the submission notes the timeframe of 4.5 years between the issues Papers (2018) until the Draft Plan was published in 2023. It is stated that this does not represent good practice. The submission states that Section 20(1) of the Planning Acts contemplates preliminary steps to the making of a draft LAP, but the two should be close in time or, as expressed in the Act, "as soon as may be". The Draft Plan is not "as soon as" at all. It is submitted that the process has been delayed to the point that the earlier consultation on relevant issues is so stale and out of date as to be no longer be relevant to the process. Reference is also made that the LAP Guidelines which states that LAPs should be based on effective public participation and consultation with interested bodies'.</p> <p><b>9.2 Draft Plan is Premature</b> – the submission states the Draft Plan is premature given the key issues with national and county policy at present, namely the Judicial Review on the Core Strategy of the CDP. It is stated that the CDP has been prepared without taking account of the existing population of the area, the future population of the area, the average size of a household in Ireland, the rate of migration into the State, the rate of obsolescence of existing housing stock and/or the actual or likely periods of time for translation of lands zoned for residential use, the grant of planning permission through to the eventual completion of the development of units available for residential use. Reference is also made to the Census 2016 figures, which the Draft Plan refers to as outdated.</p>

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		<p>The submission states <i>'whilst final figures have not yet been published, it is known that there will be a significant increase of the population numbers when they are released. These have not been accounted for within the draft LAP. Furthermore, the Census itself does not take account of a vast majority of the displaced Ukrainian persons who have arrived in Ireland since the Russian invasion of Ukraine. Therefore, even the published Census figures will not reflect the inward migration has taken place in 2022.</i></p> <p>The submission argues that the Draft Plan fails to the requirements under Section 19(2) of the Act and is ultra vires in law. The submission considers the CDP is flawed and requires to be updated when new population figures ae published. It is stated that the implications of a de-zoning strategy on the subject lands is significant for the orderly and efficient development of Kildare Town, when such decisions are based on outdated analysis and are considered premature pending due process, we respectfully suggest that such a move is contrary to stated property rights.</p> <p>The submission states the preparation of the Draft Plan and associated process, should not have commenced until the matters have been resolved and also states the effective de-zoning of our clients' site is not based on a sound rationale.</p> <p><b>9.3 Planning and Development Bill 2023</b></p> <p>The submission states that the new Bill identifies the replacement of the LAPs with Urban Area Plans or Priority Area Plan and these may be a better format for Kildare Town. Therefore, the Bill and the proposed new format coupled with the elapsed time since the Issues Papers the Draft Plan is considered premature.</p> <p><b>9.4 Settlement Capacity Audit</b></p> <p>The submission states that they disagree with the findings of the SCA and have submitted a report (discussed below) which provides robust analysis and rebuttal of the Council's findings. It is argued that the Development Strategy does not support compact growth, the phasing of infrastructure does not correspond with the phasing of residential development and the scoring matrix is not accurate.</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p><b>9.5 Structural Housing Demand in Ireland and Housing Supply Targets</b> It is not sensible to de-zone development ready land.</p> <p><b>9.6 Core Strategy</b> The Core Strategy and the SCA were the rationale behind the de-zoning of the subject lands, both which are considered flawed. The submission argues that Table 3-4 is incorrect as a number of schemes are nearly built out and should not be excluded. The submission states that the Council should <i>'revisit Walker's Gate, Oak Church and Greyabbey View which should be excluded as they are nearing completion, thereby removing 523 units from the core strategy analysis, leaving a significant gap in terms of the residential units available for delivery'</i>. The submission references Section 3.4. Social Housing Requirement and that states if the de-zoning strategy is pursued that the demand for social housing will not and cannot be met. The submission also refers to Section 3.3 in respect of Part V social housing units at the early stages of development/commencement and it is submitted that presumably this is in respect of the Stage 2 LRD application on the subject lands, but yet have de-zoned the lands. The submission states it is a failing to rely on part of the subject lands for social housing and then de-zoning this very same site.</p> <p><b>a. Failure to Capitalise on Recently Constructed Infrastructure</b> The submission states the Draft Plan has disregarded the opportunities and capacity provided by the infrastructure permitted and delivered, in part and full on the subject lands, such as the southern internal link road, key junction upgrades and new pumping station under 17/764 which has been implemented. The submission refers to infrastructure required in the 2012 Area Action Plan for the South Green area, and states that it now has been provided. The submission states, 'there is now no impediment to development of these lands and the decision of the Council to de-zone the lands are contrary to long held stated objectives and infrastructure delivery. It is also stated that key infrastructure was frontloaded, including a €17.5million wastewater treatment plant, pumping station, and road infrastructure and improvement works including a Southern Internal Link Road at a cost of €5m to our client. Any return on this significant public and private investment has been curtailed by the limits now being proposed on development.</p> <p><b>Conclusion</b></p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>The submission concludes that the subject lands should be prioritised as the type of land bank to be developed in the short to medium term, and not de-zoned. It is stated the lands are serviced or serviceable and the owner has financial backing. The conclusion also reiterates the points raised previously in the submission.</p> <p><b>Appendix A</b> – CE Report on the Issues Papers the summary of the Makros Limited submission. The submission in 2018 refers to the subject lands as Tier 1 ‘ready to go’, population analysis and forecasting confirms the requirement for the continued zoning of serviced lands in Kildare Town, no impediment to development of the lands as the deficit infrastructure outlined in the Action Area Plan 2004 have been addressed, inappropriate not to have return on investment and South Green preferred location of housing and community facilities.</p> <p>The submission includes the CE Report, response to issues raised under the theme of housing and community; as follows: <i>The Draft LAP will seek to ensure that sustainable neighbourhoods are designed and created with an efficient use of land, high quality urban design and the effective integration in the provision of physical and social infrastructure in order to create places where people want to live. The Council will adhere to national policy guidance when devising densities for particular sites within the town. The LAP will be informed by the emerging Regional Spatial and Economic Strategy (RSES) which once adopted will inform a variation to the Core Strategy of the Kildare County Development Plan 2017 -2023, which in turn will set the housing growth for the town.</i></p> <p><b>Appendix B</b> – Makros Limited submission made on the Issues Papers.</p> <p><b>Appendix C</b> – Letter from the OPR in The Irish Times (March 2023). The letter states firstly, local authorities should ensure their development plans reserve sufficient residentially zoned and serviced lands. Secondly, zoned housing land in an existing development plan that is serviced and can be developed for housing within the life of the new development plan should not be subject to de-zoning when such plans are reviewed. The letter notes that analysis of plans will show large swathes of suitable zoned land for housing. The letter also refers to excessive zoning contributing to ghost estates and patterns of suburban development and how the Oireachtas introduced reforms zoned lands is in suitable location, proportionate to infrastructure and services and be consistent with national and regional growth forecasts. The</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>role of the OPR is to ensure this happens.</p> <p><b>Appendix D – Land Ownership Map</b></p> <p><b>Planning Review of Settlement Capacity Audit</b>                      This report has been prepared by Brock McClure Planning and Development Consultants and Waterman Moylan Consulting Engineers in support of the requests made in their main submission document. It contains an executive summary detailing the findings of the alternative Settlement Capacity Audit (SCA) that they have undertaken in order to support changes to land use zoning designations in the Southgreen area of Kildare Town. The report notes that the exercise it has undertaken has rigorously examined the SCA accompanying the Draft Plan and proposes a series of adjustments to the scoring of residential sites in the town, which it states is based on further analysis and subsequent planning information contained in Planning Ref. 23/416. Based on its proposed adjustments to the criteria scoring it finds that a number of residential sites should be re-categorised as follows:</p> <ul style="list-style-type: none"> <li>• Site K - West of Old Road: To Tier 1</li> <li>• Site O1 - Between Old Road and South Green Road: To Tier 1</li> <li>• Site O2 - Between Old Road and South Green Road: To Tier 2</li> <li>• Site N - South Green: To Tier 2</li> </ul> <p>The report contains an overview of the policy context to the settlement capacity audit note the provisions of the NPF which requires a tiered approach to zoning and the more detailed guidance provided for in the Section 28 Ministerial Guidelines on Development Plans.</p> <p>The report reviews in detail the scoring criteria contained in the SCA prepared by the council and notes the residential land use zoning designations in the Draft Plan which are based on the results of the SCA. It also notes the recent planning history linked to a number of sites that have been reviewed. Furthermore, it notes that on the basis of the SCA the resulting development strategy contained in the Plan has a number of areas in which residential development is located, including in the area of subject lands, which is referred to as the '<i>North West Residential Axis</i>'. States that this axis is within walking distance from both the town centre and the</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>train station. In summarising its overarching review of the SCA accompanying the Draft Plan, the report contends the SCA has significant inconsistencies as it is absolutely clear that Sites D, E and P to the east are clearly preferred over sites to the northwest, without adequate demonstration of their merits. Further states that this allocation is mistaken, and the zoning strategy should consequently be challenged.</p> <p>The report goes into further detail in analysing and challenging the SCA methodology and the resulting scoring that has been applied to sites K and O (split in to O1 and O2 in the report) with regard to the various categories assessed within both '<i>Stage 1: Planning Criteria</i>' and '<i>Stage 2: Infrastructure Criteria</i>'. In this regard, it reiterates its alternative scoring for the sites under each criterion used in the SCA. Under the '<i>planning criteria</i>' it notes that particular residential sites that further in distance from the town centre than the subject lands have been granted planning permission. Accordingly, it contends that Sites K and O1 can be considered as sequential infill development. The report goes into some detail in referring to a range of provisions of both past and present planning policy and notes the development of servicing infrastructure in the area. States that the deprioritising the development of Sites K and O represents a serious shift from a previous vision, leaving infrastructure underutilised and investment wasted. It notes that Uisce Éireann has confirmed that a connect to the wastewater network can be facilitated on sites K, N and O. Report states that they have developed a multi-disciplinary approach to assess the site hydrogeology and determine the most appropriate way to dispose of surface water from Site K. It further notes that site K also has no history of pluvial flooding.</p> <p>Report concludes by reiterating the revised scoring for the subject lands which shows that Sites K and O1 should be changed to a Tier 1 status. Report emphasises that Site K in particular is '<i>fully serviceable</i>'.</p> <p>Report includes a number of appendices, as follows:</p> <ul style="list-style-type: none"> <li>• Appendix 1 - Planning History: This details the planning history of particular sites, the majority of which have been zoned for residential development under the Kildare Town Local Area Plan 2012-2018. It notes the sites subject to a live planning application, sites where development has been permitted and sites where it commenced. It also shows sites that were zoned as Phase 2 (Residential or Commercial) in the LAP.</li> <li>• Appendix 2 – Confirmation Feasibility: This letter details the response of Uisce Éireann to a pre-connection enquiry by the applicant for a housing development consisting of 168 units at '<i>South Green, Newbridge, Co.</i></li> </ul>

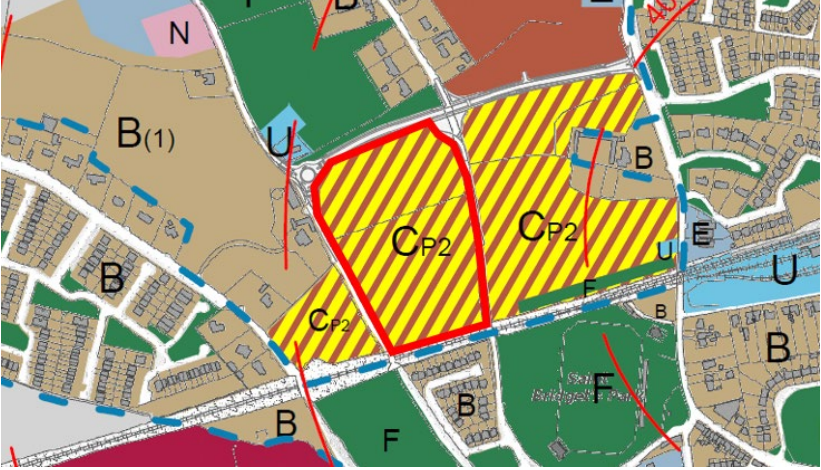
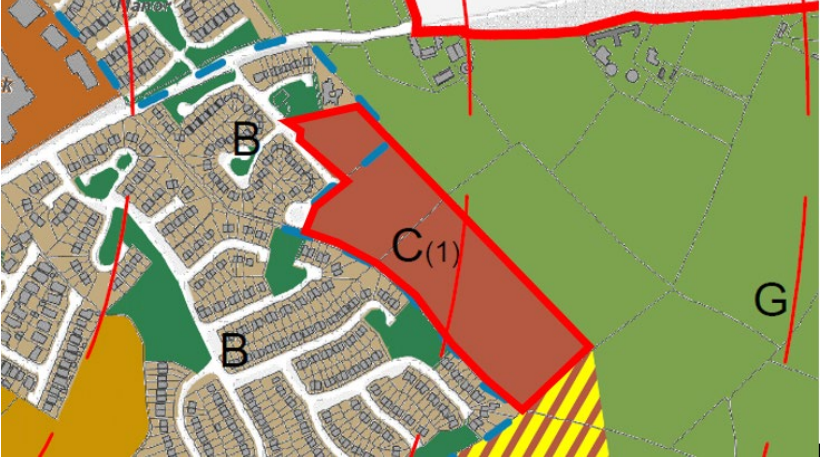
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		<p><i>Kildare</i>'. The letter states that based on the details provided it can advise that a water connection is '<i>feasible subject to upgrades</i>' and a wastewater connection is '<i>feasible without infrastructure upgrade by Irish Water</i>'.</p> <p><b>Chief Executive's Response</b> The points raised in the submission are noted.</p> <p>It is important in the context of the last twenty years (which have been referred to in the submission in relation to the subject lands) to highlight the significant pivot in direction in terms of National and Regional planning policy.</p> <p>The National Planning Framework clearly sets out the strategy on how Ireland will move away from the current, 'business as usual' pattern of development and seeks to disrupt trends that have been apparent for years. Similarly, the OPR's letter in the Irish Times, also refers to how the Oireachtas, in order to address excessive zoning, introduced sensible reforms to ensure lands zoned are in a suitable location, proportionate to infrastructure and services, while also consistent with national and regional growth forecasts.</p> <p>In this context, as noted under Section 3.8. of the Draft Plan, the plan has been prepared having regard to extant planning permissions which are in excess of the target unit allocation required for the lifetime of the Plan. The OPR in their submission (Section 3.0, refers) also recognises the impact the historical legacy zonings and extant permissions for residential development had on the preparation of the Draft Plan, and the potential of Kildare Town exceeding its core strategy housing target over the life of the Development Plan. As a result, no further additional lands are required for development to meet the requirements of the CDP Core Strategy, as sufficient lands have been identified for development.</p> <p>Having regard to the comments made in respect of the SCA and the associated findings, the criteria the sites are assessed against are wide-ranging, which include the serviceability, along with other criteria such as climate resilience, green infrastructure, efficiency and sustainability of land use. Furthermore, the Settlement Capacity Audit highlighted that there are many extant permissions which have recently commenced on site which may not have performed well under this Settlement Capacity Audit and phasing (the application of New Residential Phase 2 or Strategic Reserve zoning) is required when land is not required to meet the current</p>

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		<p>housing allocation (Section 6., refers). In the context of the subject lands, Uisce Éireann in their submission note that significant network reinforcements are likely to be required to service the Strategic Residential Reserve Lands, which re-enforces the serviceability of these lands in contrast to other lands within the Plan area.</p> <p>The comments made in relation to the Issues Papers and the associated timeline are noted. In contrast to Development Plans where pre-draft consultation is statutory, local area plans are not required to carry out pre-draft consultation under the Planning and Development Act 2000 (as amended). However, the Local Area Plan Guidelines (2013) outline best practice for consultation with communities and stakeholders. While it is noted the Issues Paper was published in 2018, there have been a number of studies pertaining specifically to Kildare Town regarding background data gathering and building of consensus in the intervening years. Namely the Kildare Town Transport Strategy, the Kildare Town Renewal Masterplan and key stakeholders were also consulted through the preparation of the Settlement Capacity Audit and the Social Infrastructure Audit. The County Development Plan process has recently been completed (Dec 2022), also involved extensive public consultation over a 2-year process (including consultation for the Open Space Strategy) whereby many issues pertaining to Kildare Town were determined (e.g. amendments to the Kildare Town Core Retail Area and Architectural Conservation Area, as well as Core Strategy allocation figures). These studies and consultations provided up-to-date information across many of the core issues, which in turn informed the preparation of the Draft Plan. Indeed, in the context of the subject lands the points raised in the submission on the Draft Plan are similar to those raised back in 2018, such as the subject lands have addressed the deficits highlighted back in 2006 and are considered 'ready to go'.</p> <p>It is also important to clarify that the Chief Executive Report on the Issues Paper for the Draft LAP (2018) did not identify the South Green lands for future development. The purpose of the Issues Paper is to gather information and the response to the issues raised is strategic in nature. The Draft Plan ultimately sets out the Council's Vision for the overall Development Strategy for a settlement after extensive evidence-based analysis.</p> <p>The comments in relation to the Draft Plan being premature are noted. In relation to the population figures used in the County Core Strategy and the Draft Plan it is important to note that the established NPF Roadmap population projections for each county continue to be the population parameters for local authority plan making</p>



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		<p>processes, until such a time as they are reviewed. The Census 2022 preliminary county population figure and the CSO data on housing completions have informed the current Core Strategy which in turn provides for the distribution of the housing unit allocations across the Settlement Hierarchy. In the context of historical zonings, the Draft Plan provides for in excess of the Core Strategy allocation ca. 75% and at such, any additional units for Kildare Town would not be warranted. Therefore, any further delay of a land use plan for Kildare Town would be contrary to proper planning and sustainable development of the area. It is also important to clarify that the Core Strategy covers the period from January 2023 until December 2028. The units constructed during the year 2023 cannot be discounted or ignored as suggested in the submission. Furthermore, with regards the pending Judicial Review of the CDP, there is no legal impediment to publishing the Draft Plan pending the determination by the Courts of a judicial review of the County Development Plan.</p> <p>The comments in relation to the proposed Planning Bill are noted. Planning, by its very nature, is constantly evolving and given this state of flux, delaying plan making for all changes at national, regional and local level to be fully resolved is to the detriment of settlements such as Kildare Town where legacy zoning issues and deficits in social infrastructure have to be tackled. It is imperative that the legacy of historical zoning is addressed, which was highlighted in 2012, 2017 and once again in 2023.</p> <p>The comments relating to 'compact growth', 'natural extension' and 'residential infill' in the submission are noted. However, the north-western swathes of the subject lands do not represent compact growth but rather an extension to the existing urban form as they are located significantly beyond the defined Settlement Boundary. The subject lands, in their entirety, are also not considered residential infill as the South Green lands do not comprise of under-utilised parcels of land within the existing defined settlement area. However, it is acknowledged that the southern-most parcel of land within this landholding (immediately north of the railway line) which is zoned 'New Residential Phase 2' presents well in terms of compact growth.</p> <p>The comments in relation to de-zoning development-ready land and allowing serviced, well-connected land to lie idle with no return on investment on infrastructure as inappropriate, is noted. The Draft Plan has applied phasing of lands though the application of both New Residential Phase 2 and Strategic Reserve in line with phasing as detailed in Development Plan Guidelines (2022). As previously stated, the subject lands in their entirety are not required to meet the requirements of the CDP Core Strategy and require significant</p>

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		<p>infrastructure provision/upgrades in some areas.</p> <p>The point raised in relation to the demand for social housing 'will not and cannot be met' is noted. Kildare County Council has an ambitious housing delivery programme and, in this regard, Footnote 74 of Table 11-4 states "in relation to the New Residential Phase 2 lands that in the event that there is a significant unmet social housing demand in the Kildare Town area, proposals for social housing schemes on Phase 2 may be considered during the plan period subject to all other assessments". This provides a safeguard for social housing delivery and supply throughout the plan period and beyond.</p> <p>It is also important to clarify a point in the submission in relation to the claim that social housing in respect of a Stage 2 LRD were relied on for social housing figures. This is incorrect, Table 3-5 clearly outlines the Part V pipeline units which were considered in the preparation of the Draft Plan.</p> <p>Taking all matters into consideration, it is considered appropriate to bring forward a Proposed Material Alteration to amend the zoning of the southernmost portion of the landholding referred to in this submission to 'C: New Residential'. It is also considered appropriate to amend the zoning of the lands identified as C(1) Collaghknock as Phase 2 lands, and to amend Table 3-7 accordingly.</p> <p><b><u>Chief Executive Recommendation</u></b>  <b>Proposed Material Alteration</b>                      Chapter 11, Map 11.1 Land Use Zoning, amend the zoning of lands outlined in red below (approx. 4.53ha) from 'C: New Residential Phase 2' to 'C: New Residential'.</p>

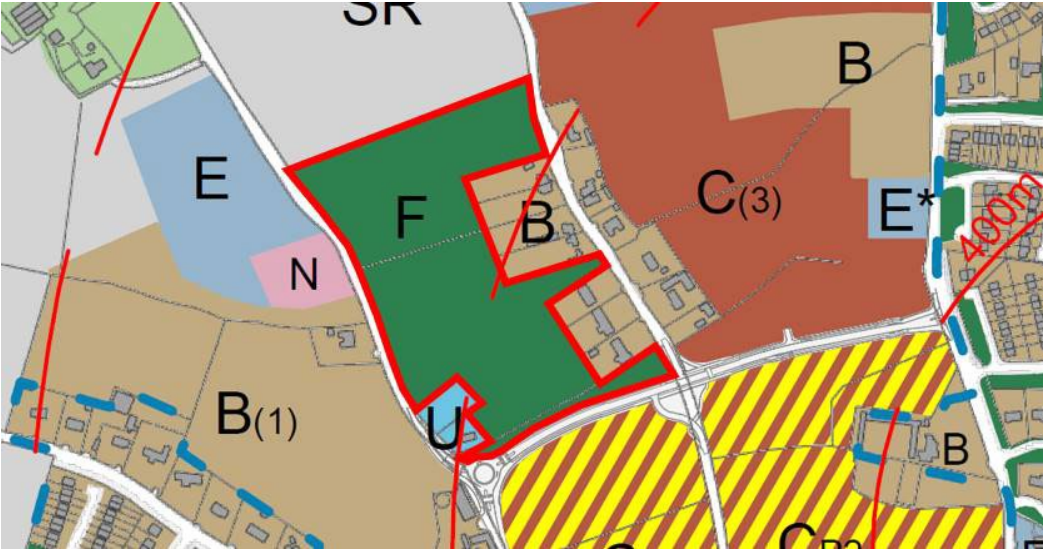
Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		 <p data-bbox="472 791 2047 858">Chapter 11, Map 11.1 Land Use Zoning, amend the zoning of lands outlined in red below (approx. 4.87ha) from 'C: New Residential' to 'C: New Residential Phase 2'.</p> 

Sub. No.	Name	Summary of Submission, Opinion and Recommendation					
		And Consequential Amendments to Table 3-7 Residential Development Capacity Audit as follows:					
		Site Ref.	Location	Site Area (Ha.)	Site in Built-up area	Residential Yield	Net Density
		N/A	Infill Sites within CSO boundary	-	Yes	32 <sup>14</sup>	35-50
		T	Former Magee Barracks	11.35	Yes	375 <sup>15</sup>	39*
		<del>C (1)</del>	<del>Gollaghknoek</del>	<del>4.87</del>	<del>Partially within</del>	<del>85</del>	<del>80-85<sup>16</sup></del>
		<del>C (1)</del>	<del>West of Old Road</del>	<del>4.53</del>	<del>No</del>	<del>158***</del>	<del>35-50</del>
		C (2)	Greyabbey View	8.5	No	207	23*
		B (1)	Walker's Gate	10.3	No	56	31*
		C (3)	Oak Church	7.8	No	260	35*
		C (4)	Rathbride Road	3.7	No	87	28**
		<b>Total Area</b>		<del>47.88 ha</del> <b>46.18</b>	<b>Total Units</b>	<del>1,102</del> <b>1175</b>	
		* Permitted Development.					
		** Application at appeal with An Bord Pleanála.					
		*** Average density at 35 units per hectare.					

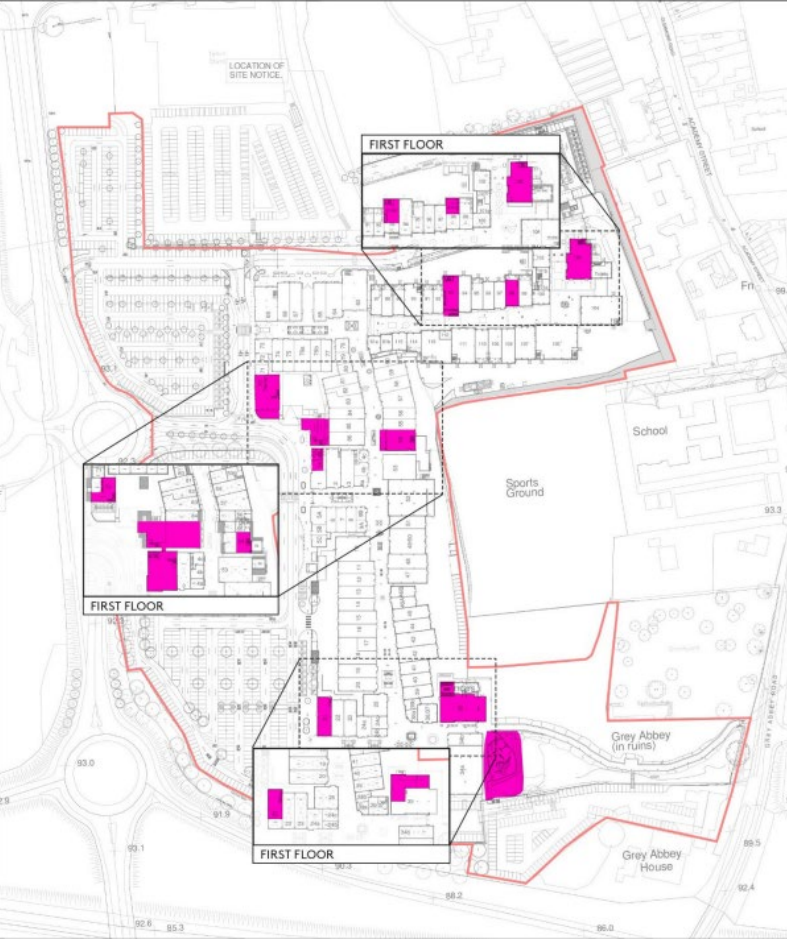
<sup>14</sup> Allocation of 5% of the allocated units for Kildare Town for various sites within the Town Centre and Existing Residential / Infill lands land use zonings for potential yield from infill development.

<sup>15</sup> The residential yield of 375 units relates to the permitted development under Phase 1 only.

<sup>16</sup> Public Private Partnership to be subject of a Part 8 application.

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p><b>Proposed Material Alteration</b>                      Chapter 11, Map 11.1 Land Use Zoning Map, amend the zoning of lands outlined in red below (5.2 ha) from 'F: Open Space' to 'C: New Residential Phase 2'.</p> 
111	<p><b>Value Retail Dublin Ltd</b></p>	<p>The submission requests a zoning amendment to a standard retail /commercial zoning for the KTOV to align with uses on the site and to omit the Retail Outlet Centre zoning and policy objectives contained in the Draft Plan.</p> <p>The issues Value Retail want to be considered in the final Plan are as follows:</p> <ul style="list-style-type: none"> <li>• Recognition of the role the KTOV plays in relation to retail and tourism which should continue to be supported.</li> <li>• Omit the Retail Outlet Zoning - the zoning is inappropriate and would result in a number of conflicts and the creation of non-conforming uses.</li> <li>• To protect the existing retail facilities, zone the lands R: Retail / Commercial and include shop-</li> </ul>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<ul style="list-style-type: none"> <li>comparison as permitted in principle.</li> <li>• Omit Objective EDO 3.6.</li> <li>• Value Retail will continue to support Kildare Town Centre as a complimentary use and supports Kildare County Council's objective to provide a future pedestrian link with the Town Centre and increased connectivity to public transport routes.</li> <li>• KCC should support KTOV as a tourist centre and should enable the Village to evolve to changing market patterns.</li> </ul> <p>The submission states that during its 17+ years of ownership, Value Retail has tailored its offer at the KTOV to meet the changing needs of its visitors and to curate a unique retail led experience destination. With the rise in online retailing and other global consumer/retail trends, it requires Value Retail to continuously evolve to remain relevant in the ever-changing global retail market.</p> <p>The submission requests that KCC fully support the KTOV in the ever-changing retail context as they support more than 1,500 jobs and are a key tourism attraction.</p> <p><b>Land Use Zoning</b></p> <p>The new Retail Outlet Centre zoning only contains two uses; shop – comparison as 'Permitted in Principle' in line with definition of Outlet Centre in the Retail Guidelines and utility structures 'Open to Consideration'. It is submitted that the Retail Outlet Centre zoning is more restrictive and will impact investment, job security and future operations. It is submitted that the non-standard zoning has unintended consequences. It is stated the definition is out-dated and the Guidelines were first produced 20 years ago. The submission states that it is inappropriate to restrict the KTOV under the new zoning which does not have regard to the existing and permitted retail offer.</p> <p>It is submitted that the 'Town Centre' and 'Commercial' zoning allowed for significantly more land uses. It is submitted that the most appropriate zoning is R: Retail/Commercial in line with the adjacent established retail centre, with the objective "to support continued operation of existing retail commercial uses". Furthermore, the</p>

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		<p>KTOV has a number of governing planning permissions on the site, including the parent permission as an 'outlet centre', as well as for other non-retail uses such as café/restaurant, tourism information, part convenience retail and customer service areas, as detailed in the following map.</p>  <p>The map shows a large site with a red boundary. It includes a parking area at the top left, a central building complex, a 'Sports Ground' to the right, and 'Grey Abbey (in ruins)' and 'Grey Abbey House' at the bottom right. Three inset boxes labeled 'FIRST FLOOR' show detailed floor plans of specific building sections. The map also includes a 'LOCATION OF SITE NOTICE' label and various street names and elevation markers.</p>

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		<p>The zoning will result in non-conforming uses on the subject lands. The submission questions why the alteration to a more restrictive, unique, and non-standard zoning objective. It is requested that the KTOV are able to maintain the land uses already permitted for the site and for the site to be zoned entirely under one consistent objective.</p> <p>The submission references the Naas Plan and the application of the R-Retail/Commercial zoning in the Newhall Retail Park and the Globe Retail Park, where this is used to zone all retail and commercial areas outside of the Town Centre zoning. It is further requested that under the 'R – Retail/Commercial' zoning objective sought for the KTOV, that 'shop-comparison' is made permitted in principle. It is stated that the A: Town Centre or K: Commercial zonings are not being sought as the KTOV wishes to maintain, evolve and protect the existing commercial operations in place, aligning with the provisions of Zoning Objective 'R – Retail/Commercial'.</p> <p>It is submitted that the KTOV will remain in full compliance with the Retail Guidelines, and the relevant planning permissions with is the appropriate mechanism to control development, rather than by way of an unnecessary new zoning.</p> <p><b>Future Pedestrian Link</b>                      The submission states that they are fully supportive of the objective to create a pedestrian link between KTOV and the town centre or any additional connections with the subject lands. They support both PERM 28 and Objective MTO 1.2. However, it is submitted that Value Retail are not in a position to facilitate the provision of the link, which is identified across third-party lands which are not in the control of the KTOV.</p> <p><b>Future Public Transport Connection</b>                      Value Retail welcomes and supports the increased connectivity of public transport routes in the town and with the KTOV as identified under PERM 26, Objective MTO 2.2, and Objective MTO 2.3. However, the submission states                      the viability of such connections would require input and agreement from Value Retail, in respect to third party</p>



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		<p>bus operations, maintenance, frequency and impact on existing car park layout/use. Therefore, the submission requests that the objectives are amended to affect the potential viability/feasibility of such works and direct consultation and engagement will also be required with Value Retail at all stages of these future projects.</p> <p><b>Additional Policy Objectives</b>                      The submission seeks the support of KTOV's ambition to protect and enhance its unique retail and tourism offer. In this regard the submission supports EDO 2.1, TCO 2.1, TCO 2.3 and CSO 1.5.</p> <p>It is requested that EDO 3.6 is omitted as it is considered outdated and restrictive. Additional objectives are proposed as follows:</p> <p>Objective: <i>To protect and support the enhancement and evolution of the retail and tourist led offer and associated services at the Kildare Tourist Outlet Village.</i></p> <p>Objective: <i>Encourage and facilitate the evolution of existing retail developments in the Town 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.</i></p> <p>The submission also seeks to maintain Policy Objective R6 as per the 2012 Plan in the proposed plan.</p> <p>R6: To encourage and facilitate the delivery of tourism related retail developments and initiatives in and around Kildare town centre.</p> <p><b><u>Chief Executive's Response</u></b>                      The comments in the submission are noted. The Draft Plan acknowledges the significant role the KTOV plays in the retail, economic and tourism profile of the county (Chapter 5, refers~).</p> <p>The unique role the KTOV as a national and international shopping destination because of the specialist trade it offers was specifically referred to in the Draft Plan (Section 5.6.1.3, refers). Objective EDO 2.1 encourages the upgrading /extension of tourism activities/facilities in particular those relating to retail tourism.</p>

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		<p>As acknowledged in the submission, the KTOV is a unique retail led experience destination and as such a specific land use zoning has been applied, which reflects the predominant permitted land use as a retail outlet centre.</p> <p>The Retail Impact Assessment which formed part of the Environmental Impact Statement (EIS) of Phase 2 of the KTOV (Planning Ref. 12/61) discusses how the outlet village concept is distinctive and unique within the retail market. Furthermore, Section 12.1.4 of the Report stated that 'the specialised comparison nature and tourist function of the KTOV is very different to a conventional retail function'. The Inspectors' report notes that at the Oral Hearing, the first party, during cross-questioning, stated that all the goods purchased in the KTOV were considered surplus stock or end of season and as such complied with the conditions stipulated in the parent planning permission. The Inspector notes in the report that the existing KTOV is an 'outlet centre' (Section 11.2.2.6 refers). Similarly, the applicant's Planning Report accompanying the application for Phase 3 (Planning Ref. 17/539, ABP ref. ABP -300795-18) also refer to 'Outlet Centres' as the policy context for the development (Section 2.1.4 refers). While the submission argues that the definition of Outlet Centre is outdated, the Retail Planning: Guidelines for Planning Authorities (2012) continue to be the policy parameter for local authority plan making and development management processes. Therefore, given the unique retailing experience not found elsewhere in Kildare a singular land use zoning in keeping with the governing permissions is considered prudent to regularise the current disjointed mix of land use zonings across the three phases of the complex and apply a Retail Outlet Centre land use zoning objective.</p> <p>A standard 'Retail' zoning objective is not appropriate to the unique Retail Outlet land use.</p> <p>The comments raised in the submission in relation to non-conforming uses are noted. As detailed in Table 11-5 of the Draft Plan existing established uses which are inconsistent with the primary zoning objective, where legally established by continuous use for the same purpose by planning permission will not be subject to legal proceedings under the Act in respect of their continued use. Furthermore, it is stated that where extensions or improvements of premises accommodating these uses are proposed each shall be considered on its merits in</p>

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		<p>accordance with the proper planning and sustainable development of the area. Notwithstanding this, it is considered appropriate to amend Table 11-6 Land Use Zoning Objectives to allow café/restaurants/eateries/food sales outlets, ancillary offices and playgrounds to be Open for Consideration, in accordance with the definition of the 'Retail Outlet Centre' zoning objective contained in Table 11-4.</p> <p>The comments in respect of the pedestrian link and future transport connections are noted. The concerns raised in relation to third party bus operators within the KTOV are accepted. Therefore, amendments to the objectives in respect of consultation with the relevant landowners is warranted.</p> <p>The additional policy objectives submitted are noted. It is considered that existing objectives in the Draft Plan will protect the primacy of the town centre and will also provide for the continued growth and operation of the KTOV in accordance with the parent planning permissions and national policy. However, it is considered reasonable to amend Objective EDO 3.6 in recognition of the Council's overall support the KTOV.</p> <p><b><u>Chief Executive's Recommendation</u></b>  <b>Proposed Material Alteration</b></p> <p>Chapter 5, Economic Development, amend objective EDO 3.6 and insert new Objective EDO 3.7, which will result in subsequent re-numbering of other objectives:</p> <p style="padding-left: 40px;"><b>EDO 3.6</b> <i>Protect and support the continued operation</i> <del>Ensure the development</del> of the Kildare Tourist Outlet Village <del>is carried out</del> in accordance with the definition of outlet centres as detailed in the Retail Planning Guidelines (2012) (or any subsequent guidelines). <del>to ensure that the products sold are not in competition with those on sale typically in town centre locations.</del></p> <p><b>Proposed Material Alteration</b></p> <p>Chapter 11 Implementation, amend 'D: Retail Outlet Centre' zoning objective in Table 11-4 as follows:</p> <p style="text-align: right;"><i>Consider the Limited provision of Café/Restaurant/Eateries and other food sales outlets</i></p>

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		<p><del>uses shall be considered</del> on a case-by-case basis, having regard to the principal function of the KTOV as a Retail Outlet Centre, <i>the existing level of these uses currently in operation within the centre, in the context of enhancing the overall offer of Kildare Town as a visitor and tourist destination while protecting</i> <del>to</del> the primacy of <i>and enhancing</i> Kildare Town Centre for town centre activities.</p> <p><b>Proposed Material Alteration</b></p> <p>Chapter 7 Movement and Transportation, amend Objective MTO 2.2, as follows:</p> <p><b>MTO 2.2</b> Support and facilitate the implementation of an extension of route 126 to the R415 to create a bus transfer point in the short term and in the longer term establish a transfer point within Kildare Tourist Outlet Village (<i>subject to consultation / engagement with landowners and bus operators</i>) after the connectivity route between Kildare Tourist Outlet Village with Academy Street and the Cleamore Road area has been secured.</p>

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		<p><b>Proposed Material Alteration</b></p> <p>Chapter 11, Implementation, amend Table 11-6, as follows:</p> <table border="1" data-bbox="472 379 2040 1046"> <thead> <tr> <th data-bbox="472 379 678 884">LAND USE</th> <th data-bbox="678 379 763 884">A: Town Centre</th> <th data-bbox="763 379 848 884">B: Existing Residential</th> <th data-bbox="848 379 934 884">C: New Residential</th> <th data-bbox="934 379 1019 884">D: Retail Outlet Centre</th> <th data-bbox="1019 379 1104 884">E: Community and Education</th> <th data-bbox="1104 379 1189 884">F: Open Space and Amenity</th> <th data-bbox="1189 379 1274 884">G: National Stud and Green Belt</th> <th data-bbox="1274 379 1359 884">H: Industry and Warehousing</th> <th data-bbox="1359 379 1444 884">I: Agriculture</th> <th data-bbox="1444 379 1529 884">K: Commercial</th> <th data-bbox="1529 379 1615 884">N: Neighbourhood Centre</th> <th data-bbox="1615 379 1700 884">Q: Enterprise and Employment</th> <th data-bbox="1700 379 1785 884">R: Retail/Commercial</th> <th data-bbox="1785 379 1870 884">S: Equine Industry</th> <th data-bbox="1870 379 1955 884">T: Mixed Use</th> <th data-bbox="1955 379 2040 884">U: Utilities/Services</th> </tr> </thead> <tbody> <tr> <td data-bbox="472 884 678 928">Restaurant</td> <td data-bbox="678 884 763 928">Y</td> <td data-bbox="763 884 848 928">O</td> <td data-bbox="848 884 934 928">O</td> <td data-bbox="934 884 1019 928">N O<sup>17</sup></td> <td data-bbox="1019 884 1104 928">N O<sup>18</sup></td> <td data-bbox="1104 884 1189 928">N</td> <td data-bbox="1189 884 1274 928">N</td> <td data-bbox="1274 884 1359 928">O</td> <td data-bbox="1359 884 1444 928">N</td> <td data-bbox="1444 884 1529 928">O</td> <td data-bbox="1529 884 1615 928">O</td> <td data-bbox="1615 884 1700 928">O<sup>19</sup></td> <td data-bbox="1700 884 1785 928">O</td> <td data-bbox="1785 884 1870 928">O<sup>20</sup></td> <td data-bbox="1870 884 1955 928">O</td> <td data-bbox="1955 884 2040 928">N</td> </tr> <tr> <td data-bbox="472 928 678 973">Offices</td> <td data-bbox="678 928 763 973">Y</td> <td data-bbox="763 928 848 973">O<sup>21</sup></td> <td data-bbox="848 928 934 973">O<sup>22</sup></td> <td data-bbox="934 928 1019 973">N O<sup>23</sup></td> <td data-bbox="1019 928 1104 973">N</td> <td data-bbox="1104 928 1189 973">N</td> <td data-bbox="1189 928 1274 973">N</td> <td data-bbox="1274 928 1359 973">O</td> <td data-bbox="1359 928 1444 973">N</td> <td data-bbox="1444 928 1529 973">O</td> <td data-bbox="1529 928 1615 973">O</td> <td data-bbox="1615 928 1700 973">O</td> <td data-bbox="1700 928 1785 973">O</td> <td data-bbox="1785 928 1870 973">N</td> <td data-bbox="1870 928 1955 973">O</td> <td data-bbox="1955 928 2040 973">N</td> </tr> <tr> <td data-bbox="472 973 678 1046">Park/Playground</td> <td data-bbox="678 973 763 1046">Y</td> <td data-bbox="763 973 848 1046">Y</td> <td data-bbox="848 973 934 1046">Y</td> <td data-bbox="934 973 1019 1046">N O</td> <td data-bbox="1019 973 1104 1046">Y</td> <td data-bbox="1104 973 1189 1046">Y</td> <td data-bbox="1189 973 1274 1046">N</td> <td data-bbox="1274 973 1359 1046">N</td> <td data-bbox="1359 973 1444 1046">O</td> <td data-bbox="1444 973 1529 1046">O</td> <td data-bbox="1529 973 1615 1046">O</td> <td data-bbox="1615 973 1700 1046">N</td> <td data-bbox="1700 973 1785 1046">N</td> <td data-bbox="1785 973 1870 1046">N</td> <td data-bbox="1870 973 1955 1046">Y</td> <td data-bbox="1955 973 2040 1046">N</td> </tr> </tbody> </table>																LAND USE	A: Town Centre	B: Existing Residential	C: New Residential	D: Retail Outlet Centre	E: Community and Education	F: Open Space and Amenity	G: National Stud and Green Belt	H: Industry and Warehousing	I: Agriculture	K: Commercial	N: Neighbourhood Centre	Q: Enterprise and Employment	R: Retail/Commercial	S: Equine Industry	T: Mixed Use	U: Utilities/Services	Restaurant	Y	O	O	N O <sup>17</sup>	N O <sup>18</sup>	N	N	O	N	O	O	O <sup>19</sup>	O	O <sup>20</sup>	O	N	Offices	Y	O <sup>21</sup>	O <sup>22</sup>	N O <sup>23</sup>	N	N	N	O	N	O	O	O	O	N	O	N	Park/Playground	Y	Y	Y	N O	Y	Y	N	N	O	O	O	N	N	N	Y	N
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<sup>17</sup> Subject to compliance with zoning objective defined in Table 11-4.

<sup>18</sup> Only when ancillary to a community use.


<sup>19</sup> Ancillary to an enterprise and employment function or part of a mixed-use enterprise facility.

<sup>20</sup> Ancillary to the existing use on site.

<sup>21</sup> Proposals of this nature shall be restricted to a gross floor area of 100sqm.

<sup>22</sup> Proposals of this nature shall be restricted to a gross floor area of 100sqm.

<sup>23</sup> Ancillary only to supporting operations of KTOV.

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
113	Irish Province of Carmelites	<p>This submission seeks the re-zoning of land (3.41 ha) from E: Community and Education and F: Open Space and Amenity to C: New Residential.</p>  <p>The submission states that the zoning change would ensure that the delivery of critical housing can be delivered in an area which is eminently served by the requisite services and infrastructure. It is stated that the delivery of critical housing can be delivered in an area which is eminently served by the requisite services and infrastructure.</p> <p>The submission states that the proposed rezoning of these ancillary lands would assist the local Carmelite Community to carry the significant financial burden associated with the upkeep and maintenance of the Church, an iconic building which is of important architectural heritage. The subject lands are surplus to requirements of the landowners.</p> <p>The submission states in relation to the subject lands that the lands to the east of Green Road and north of the</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>Church have ceased to be used by Round Towers G.A.A. since 2020. The lands to the west of Green Road are in agricultural use and have been for many years.</p> <p>It is stated that the re-zoning of the lands would act to increase the synergy of the proposed new Northern Link Street which is proposed to pass through the eastern lands.</p> <p>The general environment in the vicinity of the site comprises typical urban edge conditions common in regional towns throughout Ireland and includes single residential dwellings, multiple housing developments, institutional, community, commercial and agricultural uses.</p> <p>The submission references the CDP in terms of the 10-minute settlement, the need to provide sufficient residential zoned land and increased densities on backlands sites. The submission states the zoning in the Draft Plan reflect the historic ownership of the sites and the sites are more centrally located than more peripheral sites zoned.</p> <p>The rational for the re-zoning of land relates to accessibility and proximity by road and rail, natural extension of the town, unlocking residential opportunity, zoning reflects the historic uses, release of the lands will provide revenue for the Carmelite Order to continue their activities and ministry in the town. The submission also states that the remainder of the Carmelite lands and the relevant zoning is not being requested to be changed.</p> <p><b><u>Chief Executive' Opinion</u></b></p> <p>The points raised in the submission are noted. The Draft Plan under Section 3.8. states that the plan has been prepared in the context of extant planning permissions which are in excess of the target unit allocation required for the lifetime of the Plan. The OPR in their submission (Section 3.0, refers) also recognises that there is the potential of Kildare Town exceeding its core strategy housing target over the life of the Development Plan due to historical legacy zonings and extant permissions for residential development. In this context, no further additional lands are required for development to meet the requirements of the CDP Core Strategy, as sufficient lands have been identified for development.</p> <p>A Social Infrastructure Audit accompanies the Draft Plan which has indicated there are deficits across social</p>

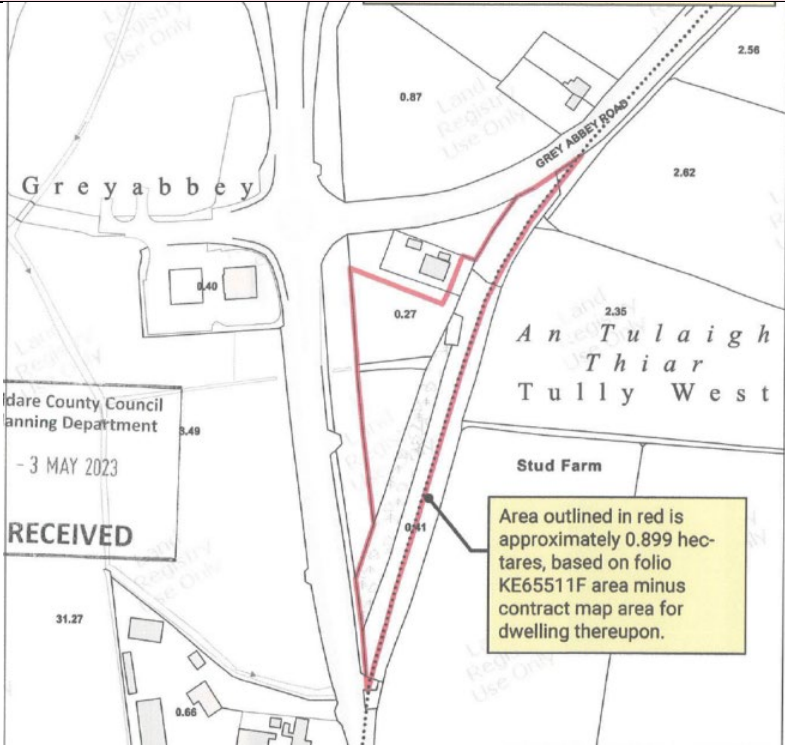
Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>and community infrastructure. Part of the subject lands has been counted towards the existing open space provision. While it is noted that the lands are currently not used for this purpose, many submissions indicate the deficit in open space and sporting facilities across the Draft Plan area. Therefore, until there is sufficient open space and sports facilities across the town the re-zoning of land recently used for such purposes it not considered in the best interests of proper planning and sustainable development of Kildare Town.</p> <p>In relation to residential uses, Table 11-6 Land Use Zoning Matrix indicates that there are many residential-type uses 'Permitted in Principle' (Y) or 'Open for Consideration' (O) on lands zoned 'E: Community and Education', including emergency residential accommodation (Y), nursing home (Y) and dwellings which are ancillary to health/community uses, and/or to meet group/special needs housing (O).</p> <p><b><u>Chief Executive's Recommendation</u></b> No change recommended.</p>
119	Thomas Simpson	<p>This submission seeks the re-zoning of land at Whitelands (ca. 2.43 ha) to New Residential from a mix of three land uses zonings; B: Existing Residential / In-fill, F: Open Space and Amenity and Phase 2 New Residential as per the Draft Plan.</p>



Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<div data-bbox="840 280 1671 775" data-label="Image"> <p>The image is an aerial photograph of an urban area. A specific site is highlighted with a red outline. The site is located between a residential area on the left and a railway line on the right. The site itself appears to be a mix of open space and some structures. The surrounding area includes residential buildings, roads, and green spaces.</p> </div> <p>The submission details that from March 2020 to May 2022 there have been ongoing engagement with KCC and Irish Water in relation to the site, part of which was an appeal to An Bord Pleanála regarding the Vacant Site Levy. It is stated they have been actively engaged in progressing development on the site (the site is zoned for New Residential in the 2012 Plan). Also, they have no difficulty incorporating objectives that relate to the site on natural heritage, green infrastructure, and active travel.</p> <p>The submission states that the zoning in the Draft Plan is not interconnected and prevents the land from being developed. The lands are within easy access of services and within the 400 m interval on the land use zoning maps. It is submitted that lands surrounding the site are zoned as New Residential however these are located at a greater interval from the core. It is argued the site must be designated as a Settlement Consolidation site given it's within the established urban form and can unlock congestion in the town centre and it near the train station and bus routes.</p> <p>The submission is concerned over potential road access over the portion of the subject lands zoned for Open Space and Amenity, that it will restrict access to the portion of site zoned Phase 2. Furthermore, it is submitted</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>that any residential scheme will incorporate open space rather than dictating on an irregular shaped site. The railway line setback of 25m will also need to be incorporated and there is no need to zone for such.</p> <p>It is stated the Existing Residential zoning is inappropriate as it doesn't form part of an established residential area. It is considered that the Phase 2 zoning is an impediment to development and queries why lands further out have priority status.</p> <p>The submission refers to planning ref. 17/1018 for residential development on adjoining lands, regarding the transfer of land to KCC for future permeability links (to the subject lands).</p> <p><b><u>Chief Executive's Response</u></b></p> <p>The points raised in the submission are noted. The Draft Plan under Section 3.8. states that the plan has been prepared in the context of extant planning permissions which are in excess of the target unit allocation required for the lifetime of the Plan. The OPR in their submission (Section 3.0, refers) also recognises that there is the potential of Kildare Town exceeding its core strategy housing target over the life of the Development Plan due to historical legacy zonings and extant permissions for residential development. Similarly, the Settlement Capacity Audit which informed the Draft Plan highlighted that there are many extant permissions that have recently commenced on site that did not perform adequately under this Settlement Capacity Audit and phasing (the application of New Residential Phase 2 or Strategic Reserve zoning) is required when land is not required to meet the current housing allocation (Section 6., refers). In this context, no further additional lands are required for development to meet the requirements of the CDP Core Strategy, as sufficient lands have been identified for development.</p> <p>The comments raised in relation to the Open Space and Amenity zoning on the subject lands are noted. The proposed location of the Open Space and Amenity zoning correlates within the Nature-Based Management Area as detailed on Map 10.1. These areas play a key role in relation to surface water attenuation given their connection with the natural drainage paths throughout Kildare Town. It is an objective of the Draft Plan (Objective IO 2.4, refers) to ensure the areas are reserved free from development and integrated into design proposals for nature-based surface water drainage purposes.</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>The Land Use Zoning Objectives are defined in Table 11-4 of the Draft Plan. The 'New Residential Phase 2' zoning objective, as defined and footnoted, indicates that social housing schemes may be brought forward on lands zoned 'C: New Residential Phase 2' during the lifetime of the plan in the event that there is a significant unmet housing demand in the Kildare Town area.</p> <p><b><u>Chief Executive's Recommendation</u></b> No change recommended.</p>
125	Eoin Leavy	<p>This submission seeks the re-zoning of land (0.899 ha) from National Stud / Green Belt to New Residential.</p> <p>The submission states that it is the intention to develop the site at a modest ratio of housing for private use. The lands are described as edge-of centre, within 10-minute walk from the town centre and are proximate to existing settlements, has access to services and is an efficient use of land. The subject lands are described as infill; given the existing residential development adjacent and the Grey Abbey development under construction.</p> <p>The submission notes Policies HO P7, HO P5 and HO P4 in the CDP, which refer to need for a range of housing typologies, the need to promote densities at appropriate location and the need to ensure sufficient lands is zoned.</p> <p>It is submitted the site has the potential to strengthen the streetscape on the Sli na Slainte.</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		 <p><b>Chief Executive's Response</b></p> <p>The contents of the submission are noted. The National Strategic Outcome (NSO) No. 1 of the National Planning Framework (NPF) is Compact Growth, which will be achieved by managing the sustainable growth of compact cities, towns and villages. The Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly (RSES) 2019-2031 reinforces this approach stating that 'Compact Growth and Urban Regeneration promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint'. The subject lands are situated to the south of the M7 motorway, removed from the town centre and the defined settlement boundary. Therefore, the subject lands</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>do not represent consolidation of the existing built urban form. Furthermore, the lands to the west currently under construction did not perform adequately under the Settlement Capacity Audit however given the legacy zoning which pre-dates the NPF, the extant permission and the fact construction had commenced, the lands formed part of the Development Strategy of the Draft Plan.</p> <p>In this regard, it is important to note the Draft Plan was prepared in the context of extant planning permissions which are in excess of the target unit allocation required for the lifetime of the Plan. The OPR in their submission (Section 3.0, refers) also recognises that there is the potential of Kildare Town exceeding its core strategy housing target over the life of the Development Plan due to historical legacy zonings and extant permissions for residential development. Therefore, no further additional lands are required for development to meet the requirements of the CDP Core Strategy, as sufficient lands have been identified for development.</p> <p><b><u>Chief Executive's Recommendation</u></b> No change recommended.</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
126	Des Scahill	<p>This submission is seeking the re-zoning of greenfield land at Crockanure Glebe (3.8 ha) from Agriculture to New Residential.</p> <div data-bbox="817 389 1700 887" data-label="Image"> </div> <p>The reason for the re-zoning is that there is a need to zone residential land to meet the population growth, the subject lands are within the development boundary of the Plan and 1km from the town. The site is beside lands zoned as Community and Education, Open Space and Amenity and Existing Residential. It is also stated the lands are 140m from the Community School.</p> <p>It is submitted that lands that is available, serviced (adequate wastewater treatment capacity) and will facilitate sustainable growth in line with national, regional and local policy.</p> <p>Reference is made to the CDP Housing Strategy that need to zoned land for housing and a mix of tenures and the requirement for social and affordable housing provision. The submission provides an overview of the Kildare 2025 Economic Strategy. In respect of transportation links, the submission notes Kildare Town's location on the M7 motorway, and highlights that it will be two stops from the Dart+ Southwest project and therefore strategically located to accommodate population and economic growth.</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>The submission notes that extensive residential development has taken place along the Dunmurray Road and Southgreen, which has extended the boundary of the built-up area of the town to within about 200 metres of the subject site.</p> <p><b>Analysis and Rationale for Rezoning</b>                      Need to zone additional lands in close proximity to public transport corridors and the subject lands is located within the development boundary. The current zoning will not allow residential development and expansion of the town which is stated as being the most logical due to the ability to access these lands via existing regional and local roads. It is also stated that the subject lands would form an appropriate physical, visual, and infrastructural extension of the zoned residential lands within their part of the town, represent an opportunity for future residential development in tandem with the provision of economic/employment-based development.</p> <p>The submission states that it is their opinion that the general policy direction should favour a further extension of the zoned lands in a northerly direction to include my lands and the land should be zoned and used for appropriate densities.</p> <p><b>Accompanying Maps</b>                      The submission has included maps from the Draft Plan and indicated where the subject site is within the various maps (Maps 8.4, 9.1, 10.1, 10.2, 10.2a, 11.1, 11.2).</p> <p><b>Chief Executive's Response</b>                      The contents of the submission are noted. The National Strategic Outcome (NSO) No. 1 of the National Planning Framework (NPF) is Compact Growth, which will be achieved by managing the sustainable growth of compact cities, towns and villages. The Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly (RSES) 2019-2031 reinforces this approach stating that 'Compact Growth and Urban Regeneration promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint. The subject lands represent an isolated site to the north of the town towards the periphery of the plan area. The subject lands are removed from the town centre and the defined settlement boundary and therefore, do not represent consolidation of the existing built urban</p>

Sub. No.	Name	Summary of Submission, Opinion and Recommendation
		<p>form. The subject lands were not considered as part of the Settlement Capacity Audit which is required to apply a tiered approach to residential land zonings A as per the NPF (NPO 72(a) refers). The re-zoning of the subject lands is contrary to the proper planning and sustainable development of the area.</p> <p><b><u>Chief Executive's Recommendation</u></b> No change recommended.</p>
142	David Hanley	<p>Objects to the downgrading of the writers zoned land at Green Road adjacent to Loughminane Green.</p> <p><b><u>Chief Executive's Response</u></b> Note: This submission was not accompanied by a map specifying the land in question. The submission raised other issues in relation to traffic, which are considered in Section 5 of this report (Chapter 7 of the Draft Plan).</p> <p>Having regard to the description of land, it is understood that the lands in question are those which were zoned C2 in the 2012 LAP. The lands are designated as 'Strategic Reserve' in the Draft Plan 2023-2029.</p> <p>The Draft Plan was prepared in the context of the National Planning Framework (NPF), the Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly (RSES) 2019-2031, the recently adopted County Development Plan 2023-2029 and a legacy of over-zoning with related extant planning permissions which are in excess of the target unit allocation required for the lifetime of the Plan. The OPR in their submission (Section 3.0, refers) also recognises that there is the potential of Kildare Town exceeding its core strategy housing target over the life of the Development Plan due to historical legacy zonings and extant permissions for residential development. Therefore, no further additional lands are required for development to meet the requirements of the CDP Core Strategy, as sufficient lands have been identified for development.</p> <p><b><u>Chief Executive's Recommendation</u></b> No change recommended.</p>



## 7.0. Typographical errors in the Draft Plan.

### Chapter 1 Introduction and Context

#### Typographical Error No. 1

##### Section 1.5. first paragraph, third sentence:

The Kildare County Development Plan 2017-2023 acknowledged that the town had a surplus of land zoned (*which amounted to for* a surplus of 2,027 units over and above Core Strategy figures at that time) that needed to be addressed through the ~~L~~Local ~~a~~Area ~~p~~Plan.

#### Typographical Error No. 2

##### Section 1.5. first paragraph, last sentence:

The town must transition to a low carbon and climate resilient society ~~by ensuring the enabling environment is strengthened~~ by ensuring the required policy approach and infrastructure is in place to meet this challenge.

### Chapter 3 Compliance with the Kildare County Core Strategy

#### Typographical Error No. 3

##### Footnote 11:

<sup>11</sup>Annualised growth (430/6 *years x 7 years*) for the additional 12 months.

#### Typographical Error No. 4

##### Section 3.5. second sentence:

A priority of national planning policy is to ensure that these sites are utilised ensuring consolidation and effective density is achieved throughout our urban areas, rather than the historical patterns of urban ~~sprawling~~ development.

#### Typographical Error No. 5

##### Section 3.6. first sentence:

Local Area Plans, in order to provide the clarity and transparency necessary to ensure the effective delivery of compact growth, in accordance with Regional Policy Objectives 3.1, 3.2 and 9.8, need to quantify the *potential* residential ~~potential yield~~ of all zoned residential land, including land zoned for a mix of residential and other uses.

### Chapter 4 Consolidation of the Town Centre

#### Typographical Error No. 6

##### Section 4.1. third paragraph, last sentence:

Growing the population of people living in the town centre is also a clear priority for Government across many policy documents; namely, Town Centre First (*2022*), Housing for All ~~Plan~~ (2021) and Bringing Back Homes: Manual for the Reuse of Existing Buildings (2018).

### Typographical Error No. 7

#### Section 4.1.1. second paragraph, last sentence:

However, the recent re-design of Market Square during the COVID-19 pandemic has resulted in vibrancy returning to the area, bolstered by local businesses such as Firecastle and Agapé Cafe (Barret House) now occupying previously vacant buildings and sites *fronting* onto Market Square / Dublin Street.

## Chapter 5 Economic Development

### Typographical Error No. 8

#### Section 5.4. Economic Development Strategy (10<sup>th</sup> bullet point):

- Encouraging the flexible re-use of the Former Magee Barracks through the provision of a mix of education, residential and community uses, *featuring a* high-quality public realm, open spaces and *a* built environment *that reflects both the military history of the site and the existing urban fabric of the town.*

### Typographical Error No. 9

#### Section 5.7.2. first paragraph, third sentence:

The Plan has zoned (Map 11.1, refers) 0.5ha off the Southgreen Road to provide for regular convenience and lower order comparison shopping and retail services for the needs of surrounding communities, particularly having regard to the *implementation of the* 10-minute settlement *concept* as enshrined in the County Development Plan (Chapter 6, also refers).

### Typographical Error No. 10

#### Objective EDO 3.8:

Encourage the upkeep of retail properties within Kildare Town through the application of the Kildare County Council Shop*front* ~~Front~~ Improvement, Accessibility and Age Friendly ~~Scheme~~ *Grant*, or any successor of same.

## Chapter 6 Homes and Communities

### Typographical Error No. 11

Amend Section 6.5.1.3. of the Draft Plan to read:

Healthcare facilities include GPs, health centres, dentists, pharmacies, care and other related facilities. The Audit indicated a total of 21 health facilities including: comprising of one Primary Healthcare Campus (including Health Service Executive, a General Practitioner Surgery, and a Pharmacy), three General Practitioners (GPs), two Dentist Practices, three Physiotherapists, one Optician and Hearing Centre, ~~three Nursing Homes~~, five Pharmacies and four other Specialist Services which provide mental health services for adults, a service for intellectual disability, an infant health service and an acupuncturist. Healthcare facilities are poorly dispersed throughout the town, with clustering around the town centre or at the Primary Care Centre to the east of the town centre.

## Chapter 7 Movement and Transportation

### Typographical Error No. 12

#### Section 7.1.1. fourth sentence:

~~From a road's perspective, t~~The town has excellent access to the national road network via Junction 13 on the M7.

### Typographical Error No. 13

#### Section 7.1.3. second sentence:

It is further considered that a universally ~~accessibly~~ *accessible* transport system can play a vital role in promoting healthy lifestyles and wellbeing, along with realising integrated sustainable communities.

### Typographical Error No. 14 a

#### Section 7.3. Fourth paragraph, third sentence:

A fundamental element of the Plan is the concept of a 10-minute settlement, where an 800-metre catchment equates to a 10-*minute* walk depending on walking pace and a range of facilities and services are accessible within this timeframe.

### Typographical Error No. 14 b

#### Section 7.4. fourth sentence:

The pre-*transport* strategy survey work revealed that bus travel was rated relatively poor, with a combined 40 percent of respondents rating it as poor or very poor.

### Typographical Error No. 15

#### Objective MTO 2.8:

Actively support ~~for~~ the extension of the electrification of the Kildare Southwest Rail Line from Hazelhatch to Kildare Town.

### Typographical Error No. 16

#### Table 7-1 and footnote 50:

Ref. No.	Measure	Delivery Timeframe
PERM 26	Creation of pedestrian / cyclist link connecting Kildare <i>Tourist Outlet</i> Village ( <i>KTOV</i> ) Car Park to <del>Kildare Village</del> <i>KTOV</i> Bus Stop on the R415	Short-term - to improve access to Bus Stop
PERM 28 <sup>50</sup>	Creation of pedestrian / cyclist link from Phase 3 of Kildare Tourist Outlet Village to Academy Street.	Medium-term

<sup>50</sup> PERM 27- internal pedestrian link delivered as part of Phase 3 of *the* Kildare *Tourist Outlet* Village, has been deleted as it has been implemented since the Kildare Town Transport Strategy was finalised.

**Typographical Error No. 17**  
**Footnote 52 which relates to Table 7-3:**

Measure	Type	Short Description	Timescale
PT 2	Bus Transfer Point	Extend Dublin Coach services and route 126 to serve a transfer point within the Kildare Tourist Outlet Village. <sup>52</sup>	Medium to long-term

<sup>52</sup> It should be noted that implementation of PT2 is contingent on the opening of the permeability link that would connect Kildare *Tourist Outlet* Village with Academy Street and the Cleamore Road area of Kildare Town.

**Typographical Error No. 18**

In order to provide consistent references throughout the Draft Plan references to the closure of Bride Street should state 'within Market Square' as already stated under Section 7.5. and Table 7-4.

Chapter 7 Movement and Transportation, amend reference to 'closure of Bride Street' under Objective MTO 3.2 and Objective MTO 3.6, as follows:

**MTO 3.2** Ensure the implementation of the following road measures contained in Table 7-4 and illustrated in Map 7.4 in accordance with the DMURS standards for urban roads and streets and where necessary to preserve the identified routes free from development:

- (i) Closure of Old Road Bridge to vehicular traffic and upgrade of Southgreen Bridge to two-way traffic
- (ii) Northern Link Street and associated one-way streets.
- (iii) Closure of Bride Street *within Market Square*
- (iv) One-way system on Meadow Road
- (v) Upgrade signalised junctions to MOVA and SCOOT as appropriate.

All road measures shall incorporate nature-based surface water management as a solution for surface water management.

**MTO 3.6** Investigate the possibility of ancillary road measures such as the potential for a one-way system on Nugent Street, as part of the closure of Bride Street *within Market Square* and also the possibility of a future HGV ban in the town centre within the lifetime of the Plan and/or under future land uses plans for the town.

**Typographical Error No. 19**

Renumber the second objective MTO 3.2 and renumber the road and street network objectives that follow accordingly.

MTO ~~3.2~~ 3.3 Co-operate and liaise with the Department of Transport, the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII) in relation to securing appropriate improvements/extensions to the transport network within Kildare Town.

## Chapter 8 Built Heritage

### Typographical Error No. 20

#### Section 8.1. second sentence:

It is an excellent example of the progression of a settlement from a prehistoric habitation, into the 1400s up to the ~~4200s~~ 1900s and beyond.

## Chapter 9 Natural Heritage and Green Infrastructure

### Typographical Error No. 21

#### Section 9.4., Section 9.6.1 and Section 9.6.2.:

Replace 'steppingstones' with *stepping stones* in all instances

## Chapter 11 Implementation and Appendix A

### Typographical Error No. 22

In order to provide consistent references throughout the Draft Plan references to the closure of Bride Street should state 'within Market Square' as already stated under Section 7.5. and Table 7-4.

Chapter 11 Implementation, amend Table 11-1 Implementation and Delivery Schedule Town Centre (Please note the full extent of Table 11-1 has not been reproduced in this instance, all remaining aspects will remain the same) as follows:

<i>Town Centre</i>		
<b>Movement and Transportation</b>		
Link to Kildare Tourist Outlet Village	Medium term	RRDF
Nugent Street carpark upgrade	Short Term	KCC
Road closure of Bride Street <i>within Market Square</i>	Medium to long-term	KCC
Feasibility study for an off-street carpark	Short to medium-term	KCC

**Typographical Error No. 23**

Typographical Error, amend Table 6-3 of the Draft Plan to reflect Map 11.1 Land Use Zoning as follows:

Theme	Zoning	Land Use	Potential Location	Requirement	Delivery Mechanism
Education					
Post-primary school	ET	Education Mixed use	Magee Barracks	4.57ha Capacity for 1,000 pupils	Dept. of Education

**Typographical Error No. 24**

**Section 11.3., Section 11.4., and Appendix A:**

Amend the colours of the Land Use Zonings in Table 11-4, Table 11-6 and on Map 11.1 to ensure ease of differentiation between the various land use zoning on Map 11.1.

## 8.0. Chief Executive's Proposed Material Alterations.

### Chapter 1 Introduction and Context

#### Proposed Material Alteration

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

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

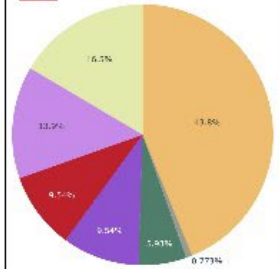
Incorporate the following Kildare Town Centre land use survey and vacancy survey maps as: *Appendix D - Kildare Town Centre Land Use Survey and Vacancy Survey*.



**Draft Kildare Town  
Local Area Plan 2023 - 2029**

**Legend:**

- Town Centre Zoning Boundary
- Building Use Ground Floor**
- Civic / Cultural
- Commercial
- Educational
- Food & Hospitality
- Religious
- Residential
- Retail
- Sport & Recreation
- Under Development
- Vacant



- Residential
- Food & Hospitality
- Civic / Cultural
- Retail
- Vacant
- Commercial

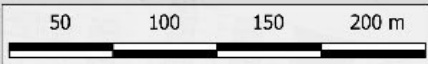
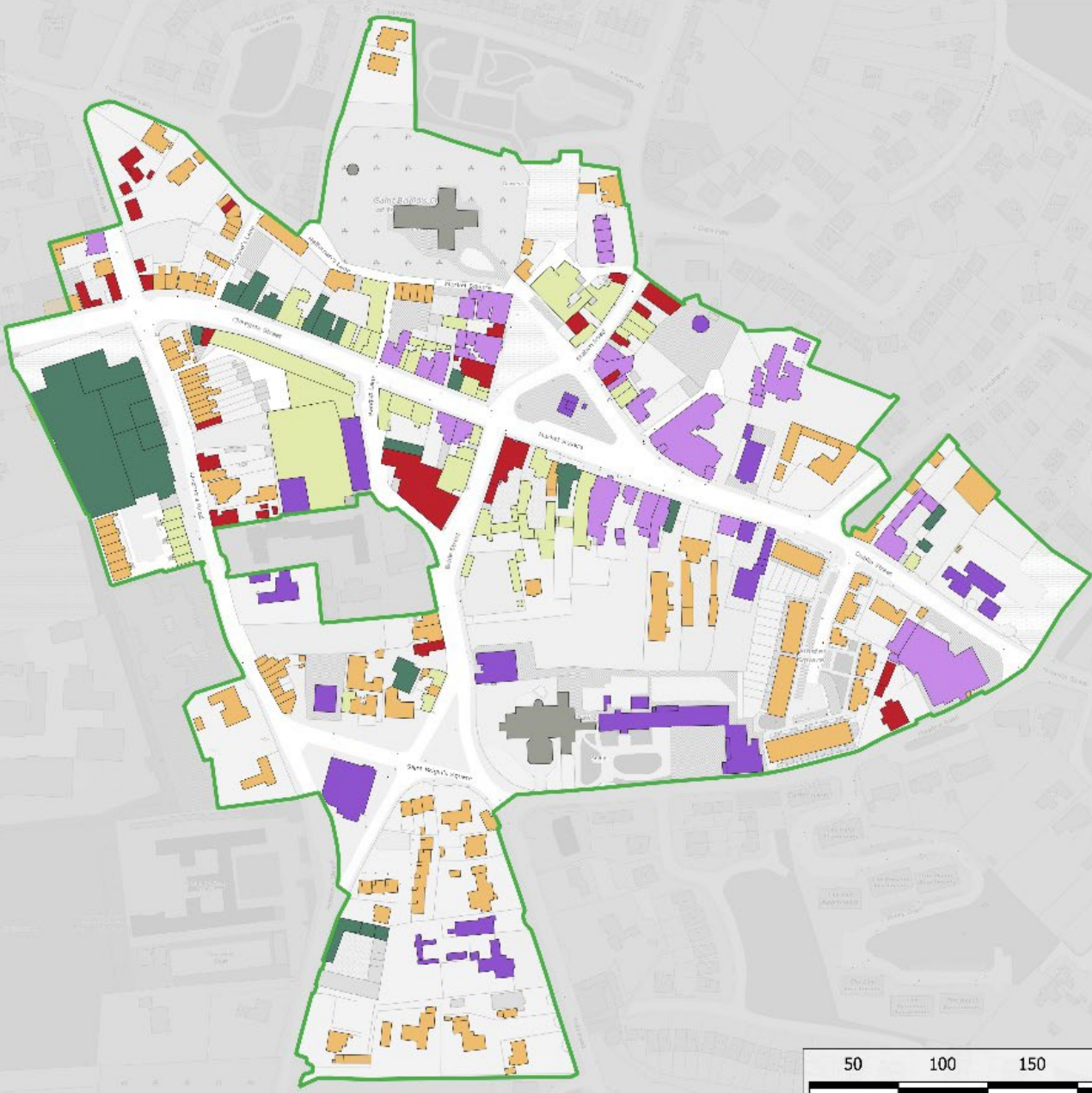
Stage	Date	Description

**Building Use - Town Centre  
Ground Floor**

Scale: <b>N.T.S.</b>	Map ID: <b>BU-001</b>
Date: <b>May 2023</b>	Drawing No: <b>200/23/1376</b>

Drawn By: <b>U. O'Sullivan</b>	Checked By: <b>L. O'Sullivan</b>	Approved By: <b>J. O'Sullivan</b>
Scale: <b>1:1000</b>	Date: <b>15/05/2023</b>	Date: <b>15/05/2023</b>

This drawing is to be read in conjunction with the written statement







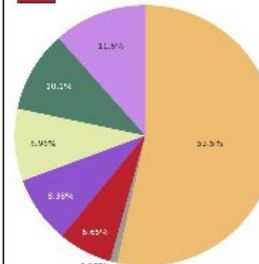
**Draft Kildare Town  
Local Area Plan 2023 - 2029**

**Legend:**

Town Centre Zoning Boundary

**Building Use First Floor**

- Civic / Cultural
- Commercial
- Educational
- Food & Hospitality
- Religious
- Residential
- Retail
- Sport and Recreation
- Under Development
- Vacant



- Residential
- Food & Hospitality
- Commercial
- Retail
- Educational
- Vacant
- Religious

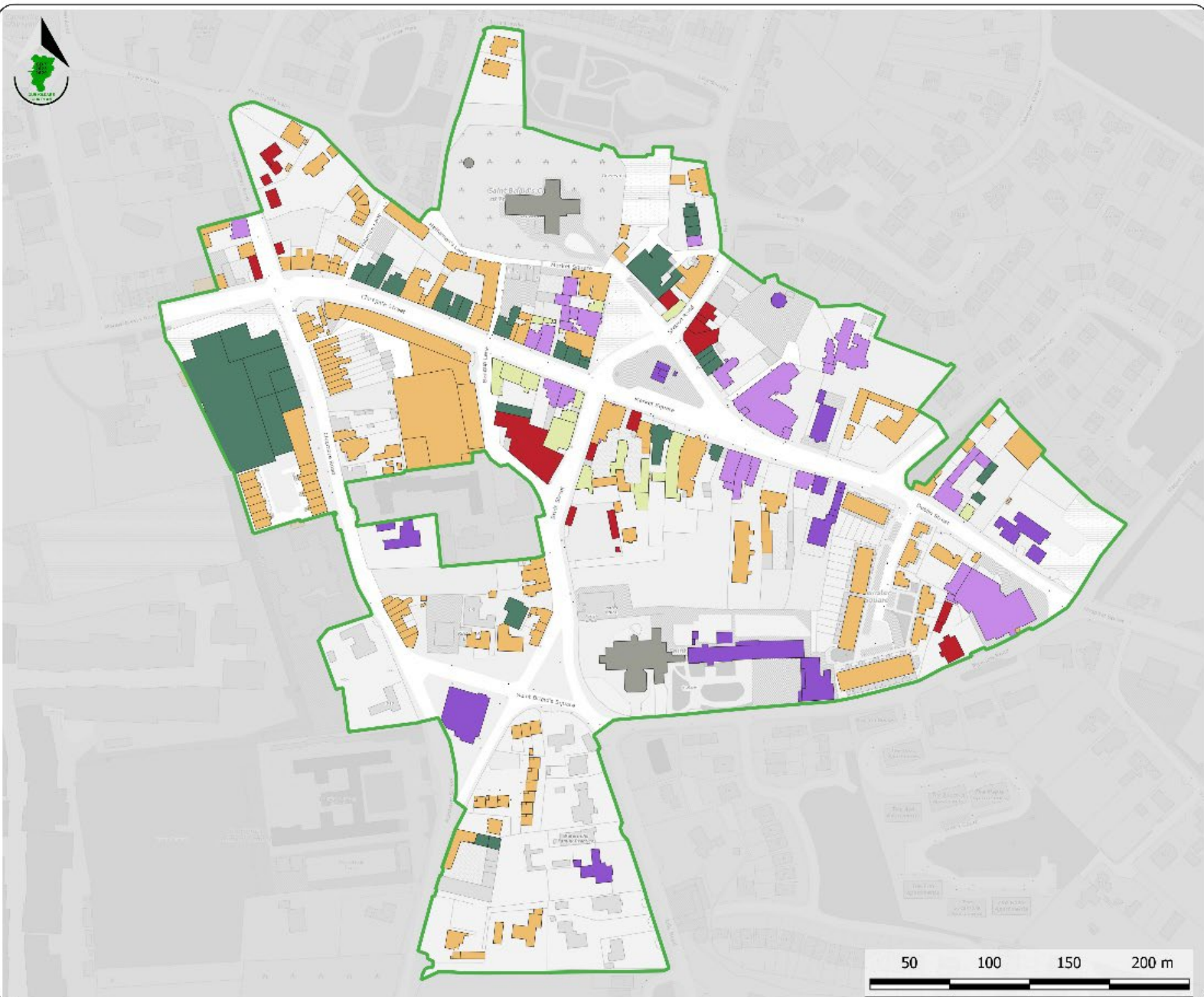
Stage	Date	Description

**Building Use - Town Centre  
First Floor**

Scale: <b>N.T.S.</b>	Map No: <b>BU-002</b>
Date: <b>May 2023</b>	Drawing No: <b>200/23/1376</b>

Drawn By: <b>Michael O'Connell</b>	Checked By: <b>L. O'Connell</b>	Approved By: <b>J. O'Connell</b>
Drawn Date: <b>15/05/2023</b>	Checked Date: <b>15/05/2023</b>	Approved Date: <b>15/05/2023</b>

This drawing is to be read in conjunction with the written statement





Kildare County Council  
Planning Department  
Anas Chuil Dara  
Devoiy Peik Naeis  
Co. Kildare

**Draft Kildare Town  
Local Area Plan 2023 - 2029**

**Legend:**

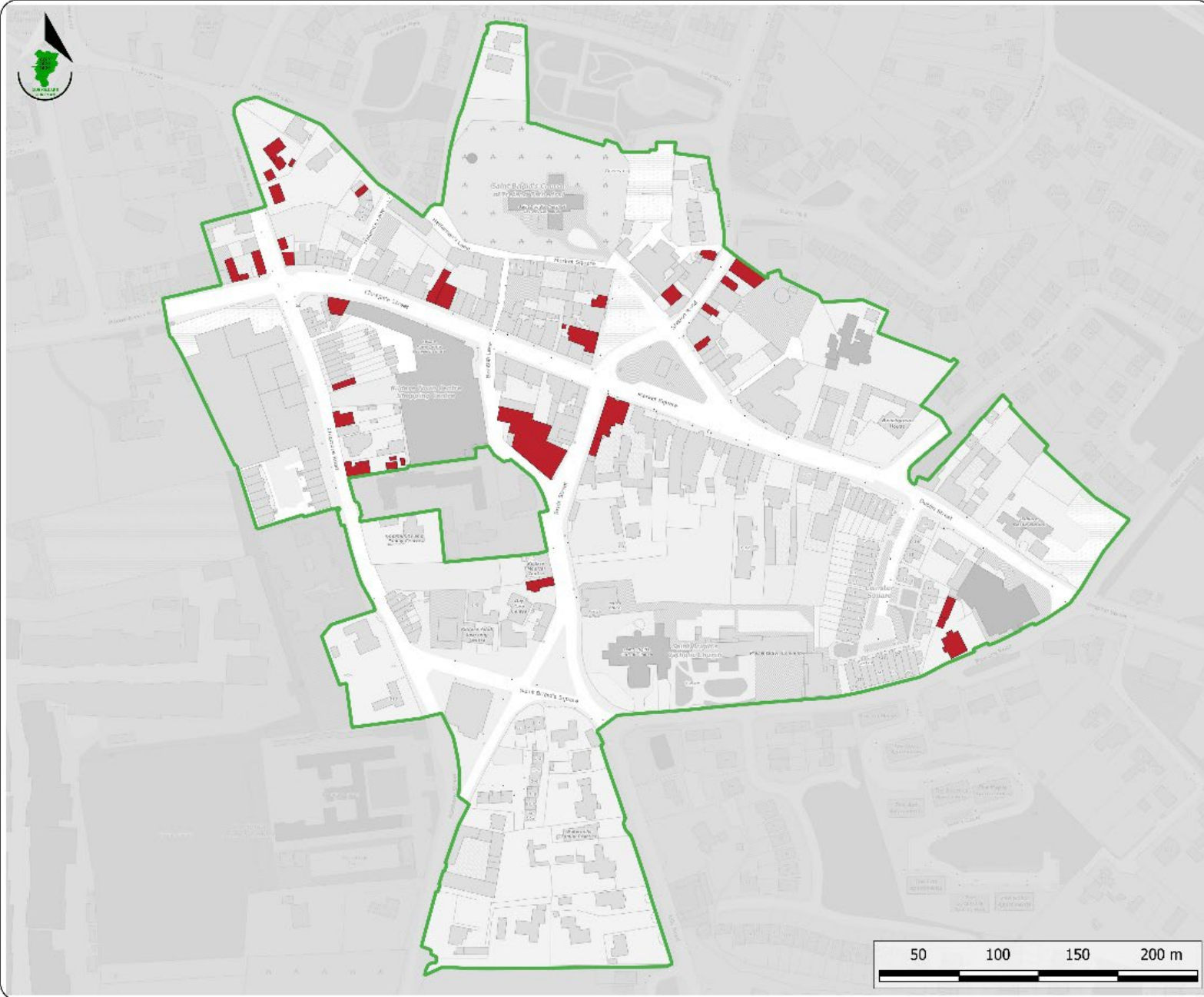
- Town Centre Zoning Boundary
- Vacant Units

Stage	Date	Description

**Building Use - Town Centre  
Vacancy Ground Floor**

Scale: <b>N.T.S.</b>	Map Ref: <b>BU-003</b>
Date: <b>May 2023</b>	Drawing No: <b>200/23/1376</b>
<small>Author: M. O'Loughlin</small> <small>Checked: M. O'Loughlin</small> <small>Drawn: L. Crawford</small> <small>Scale: 1:1000</small>	<small>Checked: J. O'Reilly</small> <small>Scale: 1:1000</small>

This drawing is to be read in conjunction with the written statement





**Draft Kildare Town  
Local Area Plan 2023 - 2029**

**Legend:**

- █ Town Centre Zoning Boundary
- █ Vacant Units

Stage	Date	Description

**Building Use - Town Centre  
Vacancy First Floor**

Scale: <b>N.T.S.</b>	Map Ref: <b>BU-004</b>
Date: <b>May 2023</b>	Drawing No: <b>200/23/1376</b>
Author: <small>Prepared for the Council by</small> <b>M O'Loughlin</b> <small>Senior Planning Officer</small>	Checked By: <b>L Crawford</b> <small>Senior Planning Officer</small>
Drawn By: <b>M O'Loughlin</b> <small>Senior Planning Officer</small>	Approved By: <b>J O'Reilly</b> <small>Senior Planning Officer</small>

This drawing is to be read in conjunction with the written statement



## Chapter 4 Consolidation of the Town Centre

### Proposed Material Alteration

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

#### 4. Consolidation *and Renewal* of the Town Centre

### Proposed Material Alteration

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

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

### Proposed Material Alteration

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

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

## Chapter 5 Economic Development

### Proposed Material Alteration

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

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

## Chapter 6 Homes and Communities

### Proposed Material Alteration

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

The population of Ireland is ageing. According to Census ~~2016~~ **2022** there are more than ~~637,000~~ **776,315** people aged 65 years or older in the country, an increase of more than ~~19%~~ **21.7%** over the last ~~five~~ **six** years, and now representing ~~13.4%~~ **15.1%** of the population.

### Proposed Material Alteration

Chapter 6 Homes and Communities, amend the second paragraph of Section 6.5.1.6 as follows:

The location of future community services should be provided relative to the location of target user groups and their level of accessibility insofar as practical. ~~Based on benchmarks used in Northern Ireland (Causeway Coast and Glens Borough Council, Strategic Framework for Community Centre Provision, 2016) there is no requirement for additional facilities in the town as the existing number will exceed the benchmark of 0.30 per 1,000 people in 2029 at 0.55 per 1,000 (based on existing facilities excluding the Garda Station).~~ *The Plan ensures that lands are appropriately zoned and located for community purposes throughout the plan area to support the provision of social and community services as the need and funding opportunities arise.*

## Chapter 7 Movement and Transportation

### Proposed Material Alteration

Chapter 7 Movement and Transportation, Section 7.3 Active Travel - Walking and Cycling, amend the fourth sentence to provide up to date information as follows:

In relation to cycling, there are ~~no~~ *very limited* cycle *infrastructure* ~~paths~~ in the town such as the recently constructed link road between *Southgreen Road and the Dunmurray Road*. *In many instances*, ~~with~~ cyclists use ~~ing~~ footpaths instead ~~in some instances~~.

### Proposed Material Alteration

Chapter 7 Movement and Transportation, insert additional text (after Table7-1) under Section 7.3.1. Walking to provide further information, as follows:

The above referenced permeability measures will bring a 42.5% increase in the number of homes within the 1km catchment of the primary schools. However, there will only be a minor increase (2%) in the 1km catchment of the post-primary school. *However, there will be a substantial reduction of over 100m in school trips distances for 1,469 buildings, which represents a reduction in walking distance for 46% of buildings within Kildare Town for post-primary schools*. The measures will bring a 20.2% increase (237) in the number of residential addresses within 1km of the train station and 14.9% (227) increase in the number of homes within 500m of a bus stop.

## Chapter 10 Infrastructure and Environment



### Proposed Material Alteration

Replace Map 10.2 with the following map based on recent pluvial flood modelling as recommended in the Surface Water Study.



**Draft Kildare Town  
Local Area Plan 2023 - 2029**

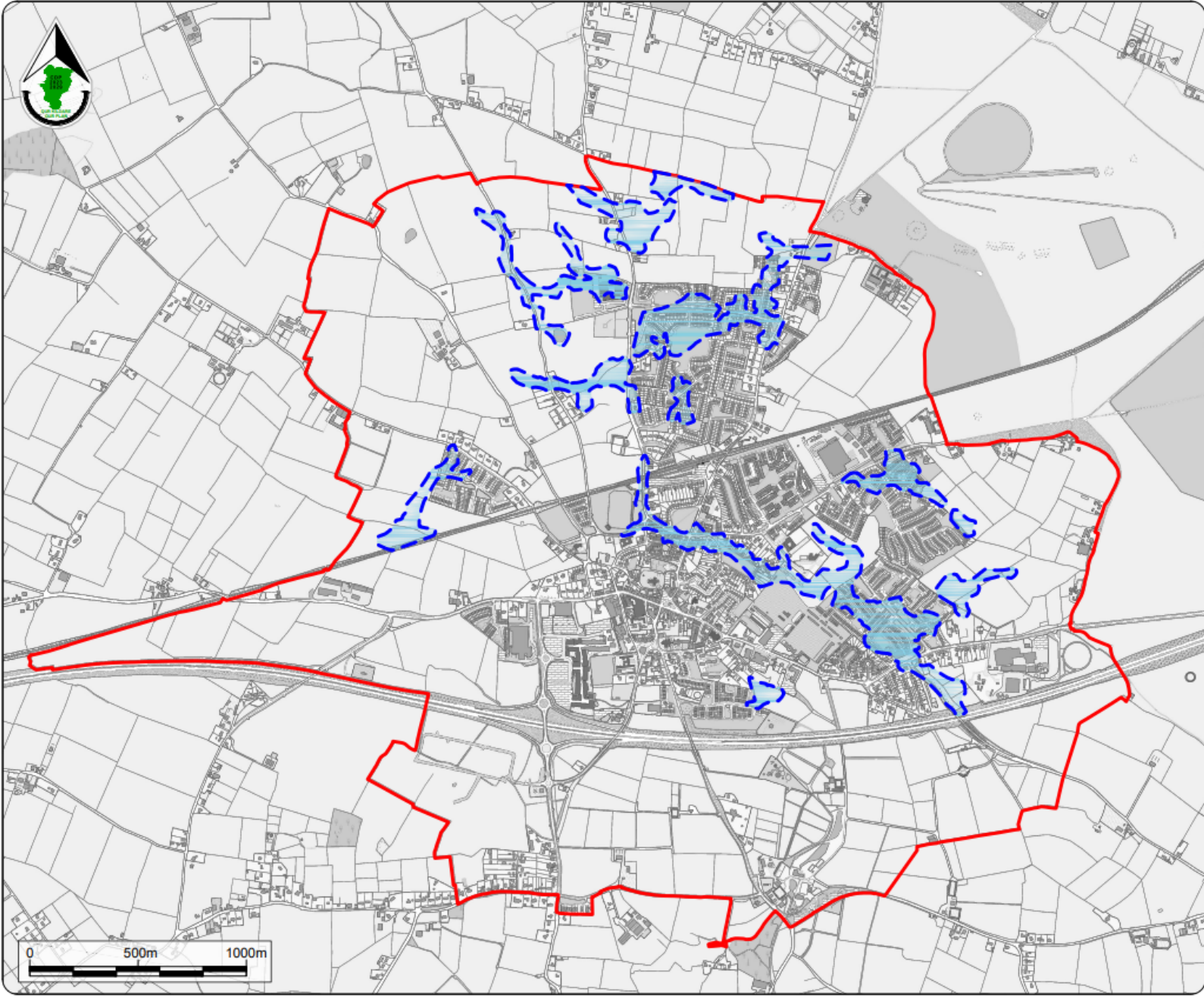
**Legend :**

-  Local Area Plan Boundary
-  Pluvial Flood Risk Assessment Zone

Stage	Date	Description
Draft	21/03/2023	Draft Plan Published
Material Alterations	01/06/2023	Material Alterations to the Draft Plan Published

**Infrastructure and  
Environmental Services  
Strategic Flood Risk Assessment**

Scale: N.T.S.	Map Ref.: 10.2
Date: June 2023	Drawing No.: 2020/23/1379
<small>Prepared by:</small> M O'Loughlin <small>Date:</small> 06/06/2023	<small>Checked by:</small> L Crawford <small>Date:</small> 06/06/2023
<small>Approved by:</small> J O'Reilly <small>Date:</small> 06/06/2023	
This drawing is to be read in conjunction with the written statement	



## Chapter 11 Implementation

### Proposed Material Alteration

Chapter 11 Implementation, delete footnote 68 in its entirety as follows, and renumber all subsequent footnotes accordingly:

~~<sup>68</sup> Planning permission has been granted for Phase 1 of the development which at the time of writing (February 2023) construction had not commenced and permission expires ca. December 2024. This framework provides guidance in the event that any subsequent applications are made on the site and for the remaining portions of the overall land bank to ensure a cohesive overall approach.~~

### Proposed Material Alteration

In order to provide consistent references throughout the Draft Plan references to the Land Use '*B: Existing Residential*' should be amended to '*B: Residential / Infill*' as already stated on Map 11.1.

Chapter 11 Implementation, amend Table 11-6 Land Use Zoning Matrix, as follows:

**B: Existing Residential / *Infill***



## 9.0. Composite list of the recommended Proposed Material Alterations to the Draft Kildare Town Local Area Plan 2023-2029.

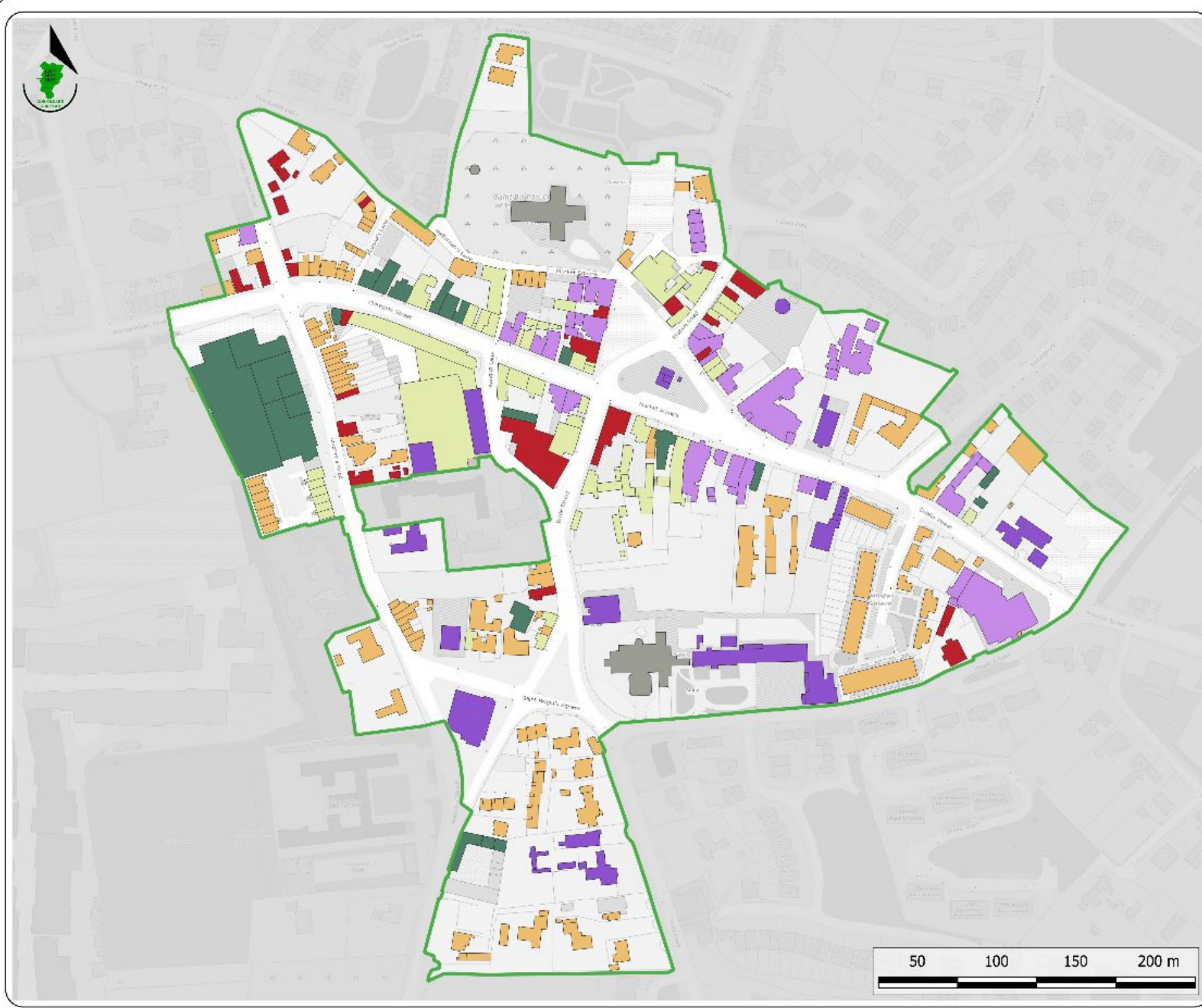
### Chapter 1 Introduction and Context

#### Proposed Material Alteration

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

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

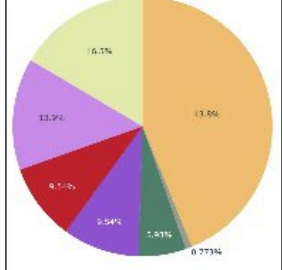
Incorporate the Kildare Town Centre land use survey and vacancy survey maps below as: *Appendix D - Kildare Town Centre Land Use Survey and Vacancy Survey*.



**Draft Kildare Town  
Local Area Plan 2023 - 2029**

**Legend:**

- Town Centre Zoning Boundary
- Building Use Ground Floor**
- Civic / Cultural
- Commercial
- Educational
- Food & Hospitality
- Religious
- Residential
- Retail
- Sport & Recreation
- Under Development
- Vacant



- Residential
- Food & Hospitality
- Civic / Cultural
- Religious
- Retail
- Vacant
- Commercial

Stage	Date	Description

**Building Use - Town Centre  
Ground Floor**

Scale: <b>N.T.S.</b>	Map No: <b>BU-001</b>
Date: <b>May 2023</b>	Drawing No: <b>200/23/1376</b>
Prepared by: <b>M O'Loughlin</b> Checked by: <b>L O'Connell</b> Approved by: <b>J O'Reilly</b>	Date: <b>20/05/2023</b> Date: <b>20/05/2023</b> Date: <b>20/05/2023</b>

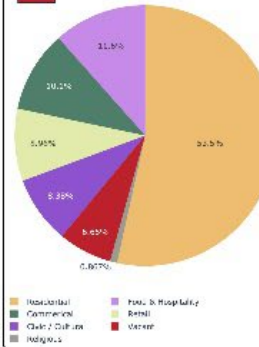
This drawing is to be read in conjunction with the written statement.



**Draft Kildare Town  
Local Area Plan 2023 - 2029**

**Legend:**

- Town Centre Zoning Boundary
- Building Use First Floor**
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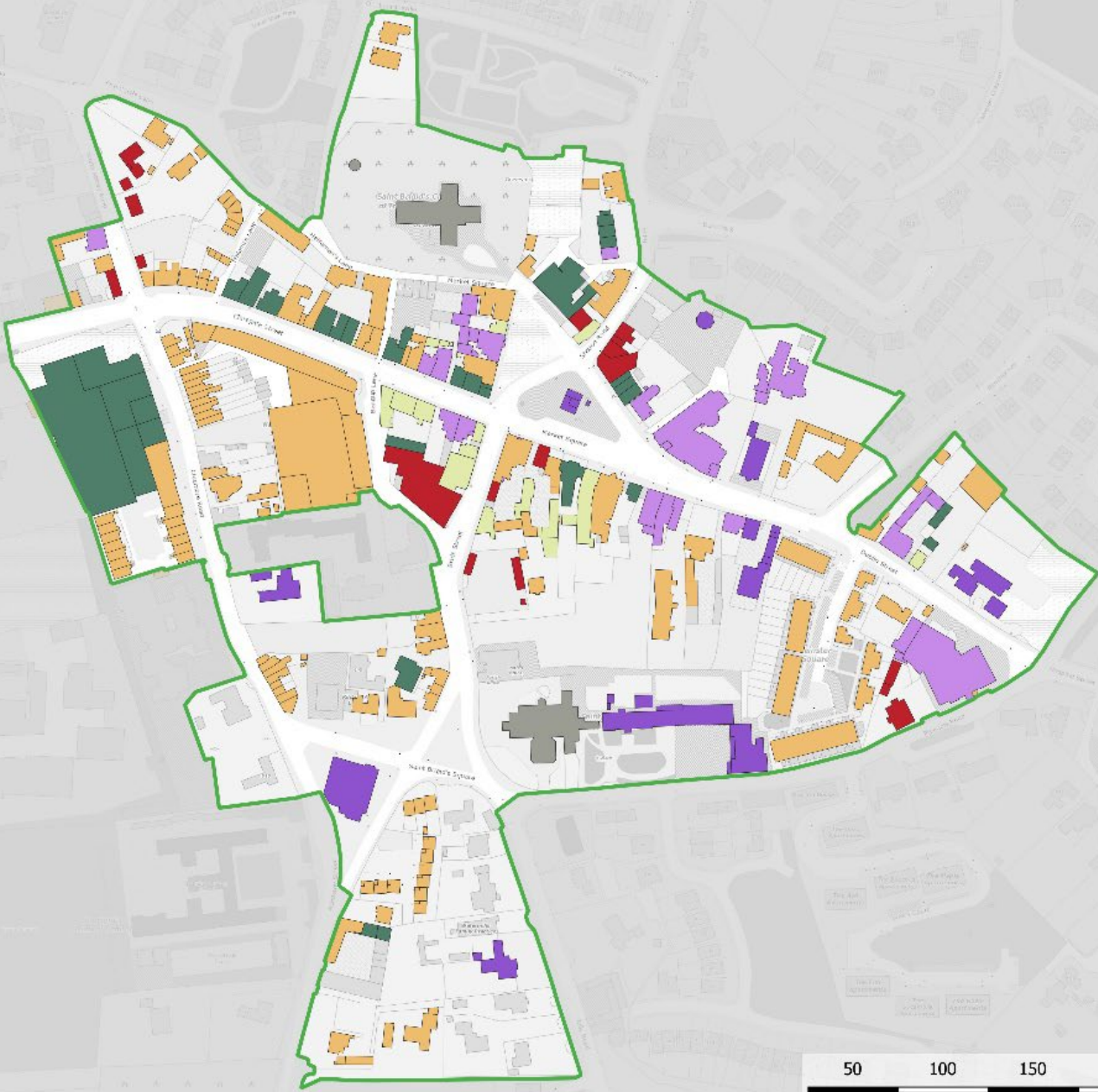


Stage	Date	Description

**Building Use - Town Centre  
First Floor**

Scale: N.T.S.	Map Ref: BU-002
Date: May 2023	Drawing No: 200/23/1376
Drawn By: M O'Loughlin Checked By: L Crawford Date: 15/05/2023	Approved By: J O'Reilly Date: 15/05/2023

This drawing is to be read in conjunction with the written statement





**Draft Kildare Town  
Local Area Plan 2023 - 2029**

**Legend:**

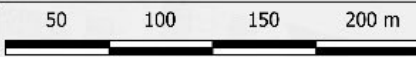
- Town Centre Zoning Boundary
- Vacant Units

Stage	Date	Description

**Building Use - Town Centre  
Vacancy Ground Floor**

Scale: <b>N.T.S.</b>	Map Ref: <b>BU-003</b>
Date: <b>May 2023</b>	Drawing No: <b>200/23/1376</b>

Prepared by: J.D. [Signature]    Drawn by: M.D. [Signature]    Checked by: L.C. [Signature]    Approved by: J.D. [Signature]  
 Date: 20/05/2023    Date: 20/05/2023    Date: 20/05/2023    Date: 20/05/2023  
 This drawing is to be read in conjunction with the written statement.





**Draft Kildare Town  
Local Area Plan 2023 - 2029**

**Legend:**

- Town Centre Zoning Boundary
- Vacant Units

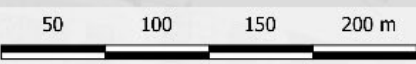
Stage	Date	Description

**Building Use - Town Centre  
Vacancy First Floor**

Scale: <b>N.T.S.</b>	Map Ref: <b>BU-004</b>
Date: <b>May 2023</b>	Drawing No: <b>200/23/1376</b>

Checked By: <b>M. O'Connell</b>	Drawn By: <b>M. O'Connell</b>	Checked By: <b>L. Crawford</b>	Approved By: <b>J. O'Reilly</b>
Date: <b>15/05/2023</b>	Date: <b>15/05/2023</b>	Date: <b>15/05/2023</b>	Date: <b>15/05/2023</b>

This drawing is to be read in conjunction with the written statement



## Chapter 2 Spatial Planning Context and Vision for Kildare Town

### Proposed Material Alteration

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

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

### Proposed Material Alteration

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

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

### Proposed Material Alteration

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



### Proposed Material Alteration

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

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

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

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

*Additionally, the Plan supports Kildare Town becoming an employment hub through increasing local employment opportunities not just in the important tourism and hospitality sector but also in other key areas such as bloodstock, enterprise and manufacturing. The Economic Development Strategy set out in the Plan seeks for Kildare to successfully fulfil its role as a 'Self-Sustaining Growth Town' through a range of measures including the targeting of an increased jobs ratio for the town and providing an adequate quantum of appropriately located zoned employment lands. Such an approach is also in keeping with the principles of compact growth and the 10-minute settlement by providing greater opportunities for people to both live and work in Kildare Town in order to enhance peoples' quality of life and to contribute to low carbon development.*

### **Proposed Material Alteration**

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

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

## **Chapter 4 Consolidation of the Town Centre**

### **Proposed Material Alteration**

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

#### **4. Consolidation *and Renewal* of the Town Centre**

### **Proposed Material Alteration**

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

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



### Proposed Material Alteration

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

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

### Proposed Material Alteration

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

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

### Proposed Material Alteration

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

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

### Proposed Material Alteration

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

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

### **Proposed Material Alteration**

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

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

## **Chapter 5 Economic Development**

### **Proposed Material Alteration**

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

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

### **Proposed Material Alteration**

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

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

### **Proposed Material Alteration**

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

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

### Proposed Material Alteration

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

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

### Proposed Material Alteration

Chapter 5: Economic Development, amend Objective EDO 1.5 as follows:

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

### Proposed Material Alterations

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

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

### Proposed Material Alteration

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

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

### Proposed Material Alteration

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

- EDO 2.7** *Facilitate the provision of a range of additional tourist accommodation types throughout Kildare Town to facilitate the expansion of the tourism product, taking cognisance of the primacy of the Core Retail Area.*

### Proposed Material Alterations

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

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

### Proposed Material Alteration

Chapter 5, Economic Development, amend objective EDO 3.6 and insert new Objective EDO 3.7, which will result in subsequent re-numbering of other objectives:

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

## Chapter 6 Homes and Communities

### Proposed Material Alteration

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

The population of Ireland is ageing. According to Census ~~2016~~ **2022** there are more than ~~637,000~~ **776,315** people aged 65 years or older in the country, an increase of more than ~~19%~~ **21.7%** over the last ~~five~~ **six** years, and now representing ~~13.4%~~ **15.1%** of the population.

### Proposed Material Alteration

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

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

### Proposed Material Alteration

Chapter 6 Homes and Communities, amend the second paragraph of Section 6.5.1.6 as follows:

The location of future community services should be provided relative to the location of target user groups and their level of accessibility insofar as practical. ~~Based on benchmarks used in Northern Ireland (Causeway Coast and Glens Borough Council, Strategic Framework for Community Centre Provision, 2016) there is no requirement for additional facilities in the town as the existing number will exceed the benchmark of 0.30 per 1,000 people in 2029 at 0.55 per 1,000 (based on existing facilities excluding the Garda Station. The Plan ensures that lands are appropriately zoned and located for community purposes throughout the plan area to support the provision of social and community services as the need and funding opportunities arise.~~

### Proposed Material Alteration

Chapter 6 Homes and Communities, amend Objective HCO 3.1 as follows:

**HCO 3.1** Support and facilitate new facilities and improvements / expansion of existing educational, *including third level and further educational opportunities which may arise*, early learning, childcare and healthcare facilities, at appropriate locations in Kildare Town.

### Proposed Material Alterations

Chapter 6 Homes and Communities, include a new objective as follows:

**HCO 4.10** *Support and facilitate the provision of a skatepark at an appropriate location within Kildare Town.*

## **Proposed Material Alterations**

Chapter 6 Homes and Communities, include a new objective as follows:

**HCO 4.11** *Promote community-managed gardens/allotments at appropriate locations in Kildare Town*

## **Proposed Material Alteration**

Chapter 6 Homes and Communities, include new objective as follows:

**HCO 4.12** *Support and facilitate the development of a multipurpose community centre on the Dunmurray Road opposite St. Conleth's Graveyard.*

## **Proposed Material Alteration**

Chapter 6 Homes and Communities, include new objective as follows:

**HCO 4.13** *Support the provision of community meeting rooms at appropriate locations throughout Kildare Town.*

## **Chapter 7 Movement and Transportation**

### **Proposed Material Alteration**

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

The measures proposed in this Plan (as detailed in the following Sections) in respect of improving infrastructure for active travel and public transport will endeavour to move towards achieving the targets set out in the County Plan to reduce car journey and increase trips by walking, cycling, bus and train. *It is considered that a -10% reduction in private motor vehicle use for work trips and a -5% reduction in private motor vehicle use for education trips by Census 2036<sup>24</sup>, would be challenging modal shift targets for Kildare Town. If these modal split targets are achieved, then car dependency for work trips would reduce to 64.1% and education trips car dependency would fall to less than half of trips at 49.4%.*

### **Proposed Material Alteration**

Chapter 7 Movement and Transportation, amend Section 7.2 Kildare Town Transport Strategy, paragraph two, to make reference to the Road Traffic Act 1994.

The progression of the measures in the future will be subject to a separate statutory procedure *either by Section 38 of the Road Traffic Act 1994 or as a* Part 8 process, in accordance with the Planning and Development Act 2000 (as amended) (or any subsequent Planning Act) which includes for detailed design and appraisal, consultation with the relevant statutory stakeholders and public consultation.

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<sup>24</sup> If the strategy is implemented as planned, most measures will be in place by Census 2036.

**Proposed Material Alteration**

Chapter 7 Movement and Transportation, Section 7.3 Active Travel - Walking and Cycling, amend the fourth sentence to provide up to date information as follows:

In relation to cycling, there are ~~no~~ *very limited* cycle *infrastructure paths* in the town such as the recently constructed link road between *Southgreen Road and the Dunmurray Road*. *In many instances*, with cyclists using footpaths instead ~~in some instances~~.

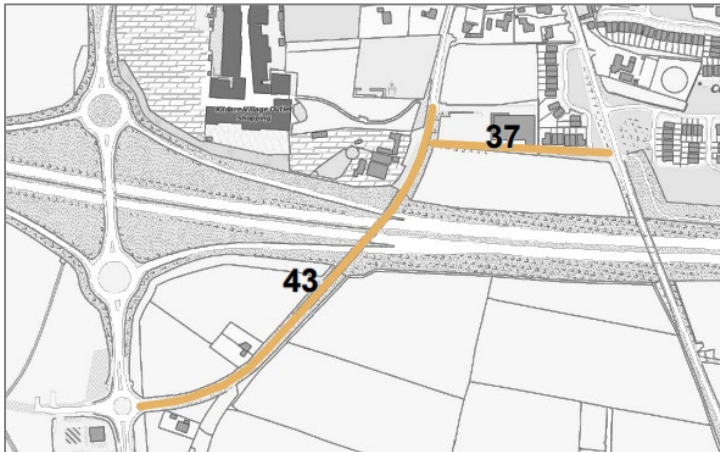
**Proposed Material Alteration**

Chapter 7 Movement and Transportation, insert new measure under Table 7-1 and on the corresponding Map 7.1, as follows:

Table 7-1 Permeability Measures

Ref. No.	Measure	Delivery Timeframe
<i>PERM 43</i>	<i>Create a new pedestrian / cyclist link along the Grey Abbey Road connecting from the R415.</i>	<i>Medium-term</i>

Map 7.1 Permeability Measures



**Proposed Material Alteration**

Chapter 7 Movement and Transportation, insert additional text (after Table7-1) under Section 7.3.1. Walking to provide further information, as follows:

The above referenced permeability measures will bring a 42.5% increase in the number of homes within the 1km catchment of the primary schools. However, there will only be a minor increase (2%) in the 1km catchment of the post-primary school. *However, there will be a substantial reduction of over 100m in school trips distances for 1,469 buildings, which represents a reduction in walking distance for 46% of buildings within Kildare Town for post-primary schools.* The measures will bring a 20.2% increase (237) in the number of residential addresses within 1km of the train station and 14.9% (227) increase in the number of homes within 500m of a bus stop.

**Proposed Material Alteration**

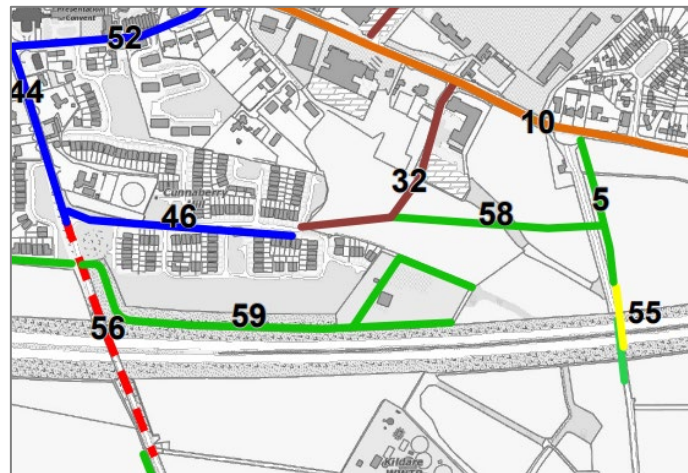
Chapter 7 Movement and Transportation, amend Table 7-2 in respect of Cycle 4 and Cycle 9 as follows:

<b>Cycle 4</b>	Tully Road ( <del>middle section</del> )
<b>Cycle 9</b>	R413 Melitta Road ( <del>middle section</del> )

**Proposed Material Alteration**

Chapter 7 Movement and Transportation, insert new cycling measure in Table 7-2 and on Map 7.2 as follows:

Ref. No.	Description	Proposed Link Type	Proposed Timeframe
<b>Cycle 59</b>	<i>Link between Tully Road and Cherry Avenue Park, south of Cunnaberry Hill and parallel to the motorway.</i>	<i>Greenway</i>	<i>Long-term</i>



**Proposed Material Alterations**

Chapter 7 Movement and Transportation, amend Objective MTO 1.1 as follows:

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



surface water management as a solution for surface water management.

**Proposed Material Alteration**

Chapter 7 Movement and Transportation, Walking and Cycling Objectives, amend Objective MTO 1.7, as follows:

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

**Proposed Material Alteration**

Chapter 7 Movement and Transportation, amend paragraph two of Section 7.4 as follows:

The train station that serves Kildare Town is located on the main southern rail line which connects Dublin with the regional cities of Cork, Galway, Limerick and Waterford. All inbound services that stop at Kildare terminate at Heuston Station and do not use the Phoenix Park Tunnel. ~~Potential changes to the train infrastructure that were highlighted across the survey analysis were improved facilities at the train station and an extension of the 'short hop' rail fare zone.~~

*In January 2023 the National Transport Authority (NTA) published its National Fares Strategy for commuter and inter-urban journeys on Public Service Obligation (PSO) bus and rail services. In Dublin a City Zone will be introduced and a new Outer Dublin Commuter Zone will be introduced which will include Kildare Town. Under the new strategy lower fares will be made available for passengers travelling from the Outer Dublin Commuter Zone into the Dublin City Zone (or vice-versa).*

**Proposed Material Alteration**

Chapter 7 Movement and Transportation, insert additional point on Map 7.3 in relation to Table 7-3 Public Transport Measures, PT 3 to improve quality and coverage of bus stops.



### Proposed Material Alteration

Chapter 7 Movement and Transportation, Section 7.4 amend the paragraph immediately below Table 7-3 Public Transport Measures, as follows:

A number of ancillary measures are also proposed to ensure the effective operation of public transport within Kildare Town. However, many of these are outside the remit of a local area plan but are important at a county strategic level which will in turn favourably impact Kildare Town. For example, working with the NTA ~~to achieve Leap Card Integration at Kildare Train Station will involve extending the 'short hop zone' to Kildare Town. Thereby, allowing local residents to avail of lower rail fares which would increase the appeal of the train for commuter and non-work trips to Dublin City. Currently the 'short hop zone' stops at the Sallins and Naas station. The other measures that would benefit Kildare Town are an extension to~~ *pursue the delivery of extending the rail services to Kildare Town* using the Phoenix Park Tunnel to further increase the appeal of rail travel for residents.

### Proposed Material Alteration

Chapter 7 Movement and Transportation, insert new objective MTO 2.2 (re-number subsequent objectives), as follows:

**MTO 2.2** *Liaise with the National Transport Authority (NTA), the owners of Kildare Tourist Outlet Village and bus operators to support and facilitate the improvement of bus services provision including the upgrading of existing infrastructure and the provision of the necessary supporting bus infrastructure (bus stops, lay over, turning areas) within the Kildare Tourist Outlet Village.*

### Proposed Material Alteration

Chapter 7 Movement and Transportation, amend Objective MTO 2.2, as follows:

**MTO 2.2** Support and facilitate the implementation of an extension of route 126 to the R415 to create a bus transfer point in the short term and in the longer term establish a transfer point within Kildare Tourist Outlet Village (*subject to consultation / engagement with landowners and bus operators*) after the connectivity route between Kildare Tourist Outlet Village with Academy Street and the Cleamore Road area has been secured.

### Proposed Material Alteration

Chapter 7 Movement and Transportation, amend Objective MTO 2.4, (and subsequent re-numbering) as follows:

**MTO 2.4** Work with the *National Transport Authority (NTA)* to *support and* pursue the delivery of the following:

- a) Improvements to the quality and coverage of the bus stops and achieve more frequent bus services in Kildare Town.

- b) *Rural Transport Services and associated bus stops within the town.*
- c) Achieve Leap Card integration at Kildare Train Station.
- d) Extension of the Phoenix Park tunnels rail services to Kildare Town.

**Proposed Material Alteration**

Chapter 7 Movement and Transportation, Public Transport Objectives, amend Objective MTO 2.4 as follows:

Work with the NTA to pursue the delivery of the following:

- a) Improvements to the quality and coverage of the bus stops and achieve more frequent bus services in Kildare Town.
- ~~b) Achieve Leap Card integration at Kildare Train Station.~~
- ~~e)b)~~ Extension of the Phoenix Park tunnels rail services to Kildare Town.

**Proposed Material Alteration**

Chapter 7 Movement and Transportation, Table 7-4 and from Map 7.4, remove PA 3 (Hospital Street to Tully Road link), insert a new road measure to Table 7-4 and Map 7.4 and amend RD 4 (one-way system on Meadow Road) in Table 7.4 as follows:

Ref. No.	Short Description	Delivery Timescale
<b>RD 4</b>	One-way system on Meadow Road running east to west <del>(to be delivered after the development of the Hospital Street Tully Road link road to ensure an alternative route is available).</del>	Short-term
<b>RD 6</b>	<i>Potential future link from Hospital Street to Tully Road south of Cunnaberry Hill and parallel to the motorway (to support the implementation of a one-way system on Meadow Road, if required)</i>	<i>To be determined</i>
<b>Previously Approved Measures</b>		
<del>PA 3</del>	<del>Hospital Street to Tully Road link</del>	<del>Developer led</del>



## Chapter 8 Built Heritage

### Proposed Material Alteration

Chapter 8 Built Heritage, amend chapter title to, Built Heritage and Archaeology and all consequential amendments throughout the Draft Plan, including titles of Map 8.1 and Map 8.2 as follows:

8. Built Heritage *and Archaeology*

Built Heritage *and Archaeology*

### Proposed Material Alteration

Chapter 8 Built Heritage, amend the second sentence of Section 8.5., as follows:

Archaeological heritage consists of such material remains (whether in the form of sites and monuments or artefacts in the sense of moveable objects) and environmental evidence ~~and are located to the south of the motorway within the Plan boundary.~~

### Proposed Material Alteration

Chapter 8 Built Heritage, Section 8.5.2. Zone of Archaeological Potential, amend the citations of the Department of Housing, Local Government and Heritage, as follows:

~~Department of Culture, Heritage and the Gaeltacht~~ *Department of Housing, Local Government and Heritage.*

### Proposed Material Alteration

Chapter 8 Built Heritage, Section 8.2. insert new objective after BHO 1.4:

*Support the sensitive incorporation of public amenity and open spaces around monuments, in a manner compatible with the protection and proper management and conservation of the monument, subject to an appropriate management and conservation plan to be prepared by the relevant landowner or stakeholder.*

### Proposed Material Alteration

Chapter 8 Built Heritage, Section 8.2. insert new objective after BHO 1.4:

*To support the delivery of a walking trail along the Town Walls within the curtilage of St. Brigid's Cathedral in an appropriate manner that is sympathetic to the historical context of the site.*

### **Proposed Material Alteration**

Chapter 8 Built Heritage, amend Objective BHO 4.2 of the Archaeological Heritage Objectives as follows:

- BHO 4.2** Prioritise the protection/preservation in situ (or upon agreement preservation by record) of items of archaeological interest as listed in Table 8-5 and shown on Map 8.1 and Map 8.2 Built Heritage *and Archaeology* from inappropriate development that would adversely affect and/or detract from the interpretation and setting of these sites.

### **Proposed Material Alteration**

Chapter 8 Built Heritage, include a new Objective as follows:

- BHO 4.6** *To support the repair and conservation of the Kildare Town Walls within the curtilage of St. Brigid's Cathedral.*

## **Chapter 9 Natural Heritage and Green Infrastructure**

### **Proposed Material Alteration**

Chapter 9 Natural Heritage and Green Infrastructure, insert a new objective after NHO 2.6 as follows:

- NHO 2.7** *Support the relocation of the Kildare Wild Animal Rescue Centre on appropriately zoned land.*

### **Proposed Material Alteration**

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

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

## **Chapter 10 Infrastructure and Environment**

### **Proposed Material Alterations**

Chapter 10 Infrastructure and Environment, insert new Objective IO 1.3 under Section 10.2 Water Supply and Wastewater as follows:

- IO 1.3** *Consult with Uisce Éireann prior to the implementation of any significant Public Realm Works or Transportation Measures contained in the Kildare Town Local Area Plan 2023-2029 to avoid and/or mitigate impacts on existing or planned water and wastewater infrastructure.*


**Proposed Material Alteration**

Chapter 10 Infrastructure and Environment, insert new objective under Section 10.5 Energy Supply and Communications as follows:

*IO 4.6 Consult with the Electricity Supply Board prior to any significant Public Realm Works to ensure opportunities to provide ducting/underground cabling in the most economically efficient way and limit disruption to local services.*

**Proposed Material Alteration**

Replace Map 10.2 with the following map based on recent pluvial flood modelling as recommended in the Surface Water Study.



Kildare County Council  
Planning & Strategic  
Development Department  
Aras Chill Dara,  
Devoy Park, Naas, Co Kildare.

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**Draft Kildare Town  
Local Area Plan 2023 - 2029**

**Legend :**

- Local Area Plan Boundary
- Pluvial Flood Risk Assessment Zone

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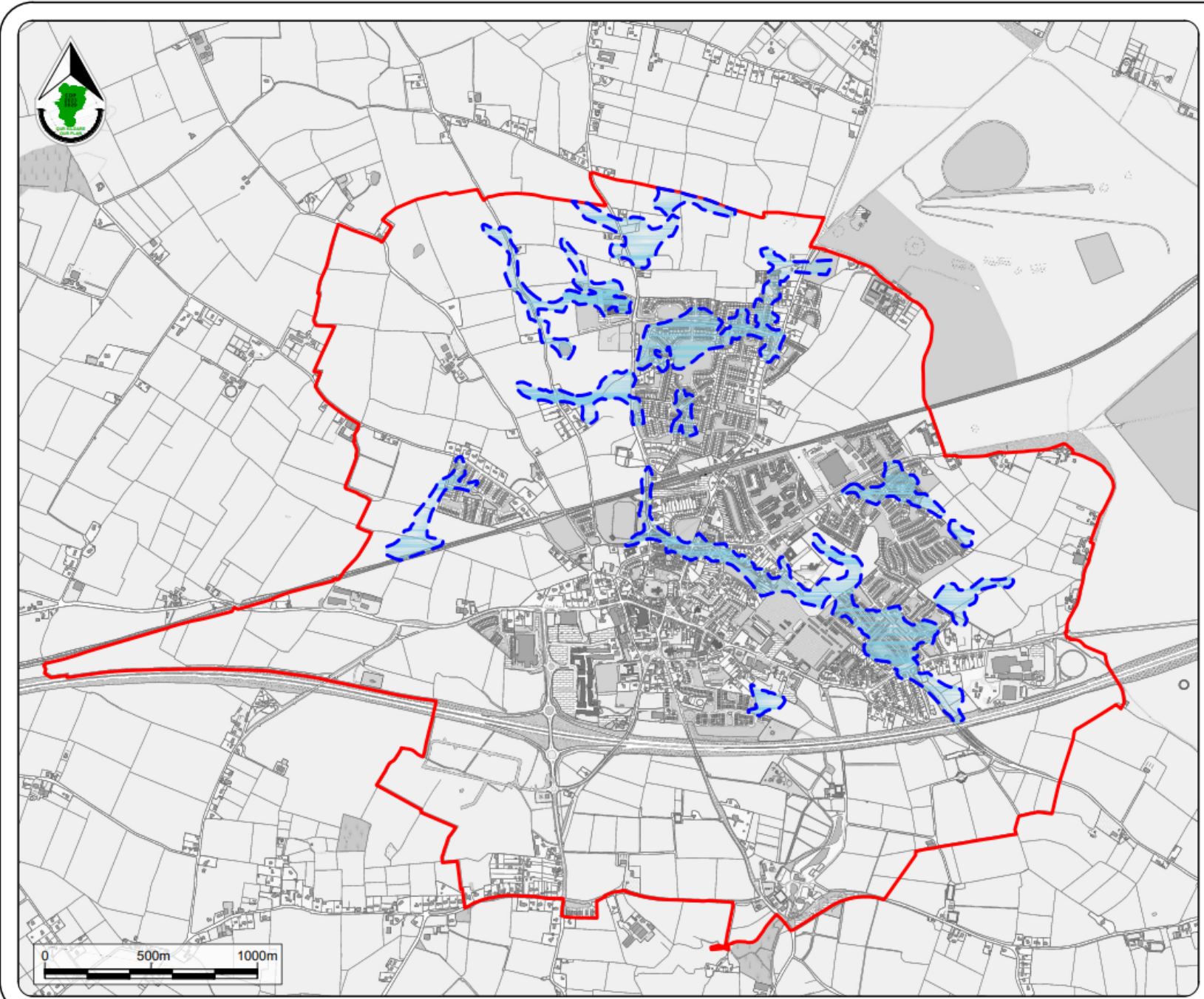
Stage	Date	Description
Draft	21/03/2023	Draft Plan Published
Material Alterations	01/06/2023	Material Alterations to the Draft Plan Published

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**Infrastructure and  
Environmental Services  
Strategic Flood Risk Assessment**

Scale: N.T.S.	Map Ref.: 10.2
Date: June 2023	Drawing No.: 200/23/1379
Drawn by: M O'Loughlin <small>(Signature)</small>	Checked by: L Crawford <small>(Signature)</small>
Approved by: J O'Reilly <small>(Signature)</small>	

This drawing is to be read in conjunction with the written statement



## Chapter 11 Implementation

### Proposed Material Alteration

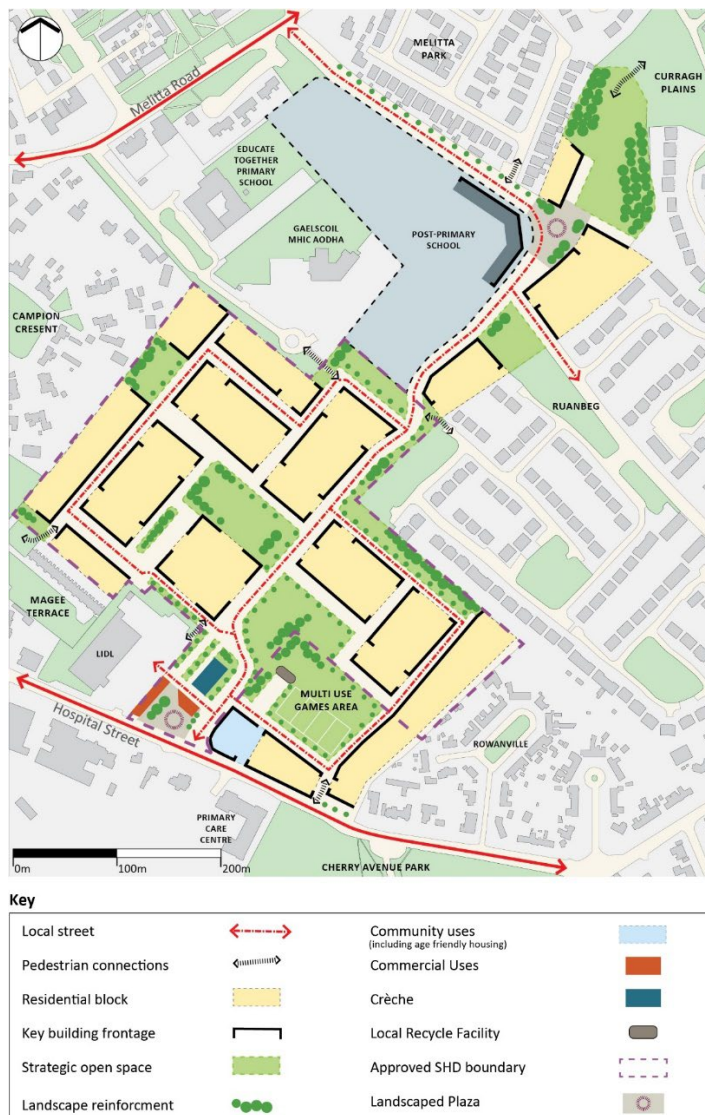
Chapter 11 Implementation, delete footnote 68 in its entirety as follows, and renumber all subsequent footnotes accordingly:

~~68- Planning permission has been granted for Phase 1 of the development which at the time of writing (February 2023) construction had not commenced and permission expires ca. December 2024. This framework provides guidance in the event that any subsequent applications are made on the site and for the remaining portions of the overall land bank to ensure a cohesive overall approach.~~

### Proposed Material Alteration

Chapter 11 Implementation, amend Figure 11-2 Former Magee Barracks Design Framework, to reduce the area specifically dedicated to community uses fronting on to Hospital Street and replace with an increase in the provision of residential uses, as follows:

**Figure 11-2 Former Magee Barracks Design Framework**





### Proposed Material Alterations

Chapter 11 Implementation, under Section 11.2. Infrastructure Delivery Schedule insert additional text with respect to water and wastewater and the re-ordering /re-numbering of the listings under Table 11-2, as follows:

Collaghknock – C (1)		
Infrastructure	Delivery Schedule	Funding Sources
Water and Wastewater		
Water supply – <i>There is a watermain immediately to the west of the site and in Melitta Rd to the north.</i> Improvements may be required, modelling for suitability required.	In tandem with new development	PPP
Wastewater - <i>A 225 uPCV runs through the southwest of the site and Collaghknock Glebe WWPS is on the site.</i> Collaghknock Glebe Pumping Station will need to be assessed. <i>Wayleaves will need to be maintained over sewers.</i>	In tandem with new development	PPP

Grey Abbey View – C (2)		
Infrastructure	Delivery Schedule	Funding Sources
Water and Wastewater		
Water supply – <i>There is a 150mm DI Watermain (&lt;20m) to east of site (R415).</i> Improvements may be required, modelling for suitability required.	In tandem with new development	Developer
Wastewater – <i>There is no Drainage Area Plan available for this area at present. Likely the site would have to provide its own sewer and connect to Armour Bridge Pumping Station @100m.</i> The pumping station and downstream sewers will need to be assessed. An upgraded or new pumping station will most likely be required.	In tandem with new development	Developer

<b>Rathbride Road – C (4) and C (5)</b>		
<b>Infrastructure</b>	<b>Delivery Schedule</b>	<b>Funding Sources</b>
<b>Water and Wastewater</b>		
<p>Water supply – <i>C (4) A 100mm uPVC runs into the site at the northwest side and on the Rathbride Road for second portion of the site improvements</i> may be required, modelling for suitability required.</p> <p><i>C (5) Approximately 200m to the closest 100 mm uPVC in the Rathbride Road through Site C (4). Water main may need upgrading.</i></p>	<i>In tandem with new development</i>	Developer
<p>Wastewater – <i>C (4) sewer in Dunmurray Drive may need upgrading, 35m to 225uPVC to the northwest of the site on Rathbride Rd / Curragh Finn.</i> Capacity of downstream sewers, pumping station, pumped main and railway crossing will need to be assessed.</p> <p><i>C (5) is 225m to the closest 225uPVC to the south of the site through Site C (4). Capacity of downstream sewers, pumping station, pumped main and railway crossing will need to be assessed.</i></p>	<i>In tandem with new development</i>	Developer

### **Proposed Material Alteration**

Chapter 11, Implementation, amend 'D: Retail Outlet Centre' zoning objective in Table 11-4 as follows:

*Consider the ~~Limited~~ provision of Café/Restaurant/Eateries and other food sales outlets uses shall be considered on a case-by-case basis, having regard to the principal function of the KTOV as a Retail Outlet Centre, the existing level of these uses currently in operation within the centre, in the context of enhancing the overall offer of Kildare Town as a visitor and tourist destination while protecting to the primacy of and enhancing Kildare Town Centre for town centre activities.*

### **Proposed Material Alteration**

In order to provide consistent references throughout the Draft Plan references to the Land Use 'B: Existing Residential' should be amended to 'B: Residential / Infill' as already stated on Map 11.1.

Chapter 11 Implementation, amend Table 11-6 Land Use Zoning Matrix, as follows:

**B: Existing Residential / Infill**

**Proposed Material Alteration**

Chapter 11 Implementation, Table 11-6 Land Use Zoning Matrix, amend as follows:  
Under the 'Town Centre' land use category amend 'Amusement Arcade' from 'O: Open for Consideration' to 'N: Not Normally Permitted'.

LAND USE	A: Town Centre	B: Existing Residential	C: New Residential	D: Retail Outlet Centre	E: Community and Education	F: Open Space and Amenity	G: National Stud and Green Belt	H: Industry and Warehousing	I: Agriculture	K: Commercial	N: Neighbourhood Centre	Q: Enterprise and Employment	R: Retail/Commercial	S: Equine Industry	T: Mixed Use	U: Utilities/Services
Amusement Arcade	⊖ N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N

**Proposed Material Alteration**

Chapter 11, Table 11-6 Land Use Zoning Matrix, amend as follows:  
Car Park (other than ancillary) / *Bus Parking*

**Proposed Material Alteration**

Chapter 11 Implementation, amend Table 11-6 Land Use Zoning Matrix, as follows:  
Under the 'N: Neighbourhood Centre' land use category amendment 'Crèches/Playschool' from 'O: Open to Consideration' to read 'Y: Permitted in Principle'.

LAND USE	A: Town Centre	B: Existing Residential	C: New Residential	D: Retail Outlet Centre	E: Community and Education	F: Open Space and Amenity	G: National Stud and Green Belt	H: Industry and Warehousing	I: Agriculture	K: Commercial	N: Neighbourhood Centre	Q: Enterprise and Employment	R: Retail/Commercial	S: Equine Industry	T: Mixed Use	U: Utilities/Services
Crèche/ Playschool	Y	O	Y	N	Y	N	N	N	N	O	⊖ Y	O	O	N	Y	N

**Proposed Material Alteration**

Chapter 11, Implementation, amend Table 11-6 Land Use Zoning Matrix, by inserting a new land use 'Conference / Exhibition Centre', as follows:

LAND USE	A: Town Centre	B: Existing Residential	C: New Residential	D: Retail Outlet Centre	E: Community and Education	F: Open Space and Amenity	G: National Stud and Green Belt	H: Industry and Warehousing	I: Agriculture	K: Commercial	N: Neighbourhood Centre	Q: Enterprise and Employment	R: Retail/Commercial	S: Equine Industry	T: Mixed Use	U: Utilities/Services
<i>Conference / Exhibition Centre</i>	Y	N	N	N	N	N	N	N	N	O	N	O <sup>25</sup>	N	N	O	N

**Proposed Material Alteration**

Chapter 11 Implementation, amend Table 11-6 Land Use Zoning Matrix in relation to land zoned D: Retail Outlet Centre, as follows:

LAND USE	A: Town Centre	B: Existing Residential	C: New Residential	D: Retail Outlet Centre	E: Community and Education	F: Open Space and Amenity	G: National Stud and Green Belt	H: Industry and Warehousing	I: Agriculture	K: Commercial	N: Neighbourhood Centre	Q: Enterprise and Employment	R: Retail/Commercial	S: Equine Industry	T: Mixed Use	U: Utilities/Services
Restaurant	Y	O	O	<del>Z</del> O <sup>26</sup>	N	N	N	O	N	O	O	O <sup>27</sup>	O	O <sup>28</sup>	O	N
Offices	Y	O <sup>29</sup>	O <sup>30</sup>	<del>Z</del> O <sup>31</sup>	N	N	N	O	N	O	O	O	O	N	O	N
Park/Playground	Y	Y	Y	<del>Z</del> O	Y	Y	N	N	O	O	O	N	N	N	Y	N

<sup>25</sup> A conference centre will be considered in the eastern section of lands zoned Q: Enterprise and Employment.

<sup>26</sup> Subject to compliance with zoning objective defined in Table 11-4.

<sup>27</sup> Ancillary to an enterprise and employment function or part of a mixed-use enterprise facility.

<sup>28</sup> Ancillary to the existing use on site.


<sup>29</sup> Proposals of this nature shall be restricted to a gross floor area of 100sqm.

<sup>30</sup> Proposals of this nature shall be restricted to a gross floor area of 100sqm.

<sup>31</sup> Ancillary only to supporting operations of KTOV.


**Proposed Material Alteration**

Chapter 11 Implementation, amend Table 11-6 Land Use Zoning Matrix in relation to land zoned E: Community and Education, as follows:

LAND USE	A: Town Centre	B: Existing Residential	C: New Residential	D: Retail Outlet Centre	E: Community and Education	F: Open Space and Amenity	G: National Stud and Green Belt	H: Industry and Warehousing	I: Agriculture	K: Commercial	N: Neighbourhood Centre	Q: Enterprise and Employment	R: Retail/Commercial	S: Equine Industry	T: Mixed Use	U: Utilities/Services
Restaurant	Y	O	O	N		N	N	O	N	O	O	O <sup>33</sup>	O	O <sup>34</sup>	O	N

**Proposed Material Alteration**

Chapter 11 Implementation, amend Table 11-6 Land Use Zoning Matrix in relation to lands zoned Q: Enterprise and Employment as follows:

LAND USE	A: Town Centre	B: Existing Residential	C: New Residential	D: Retail Outlet Centre	E: Community and Education	F: Open Space and Amenity	G: National Stud and Green Belt	H: Industry and Warehousing	I: Agriculture	K: Commercial	N: Neighbourhood Centre	Q: Enterprise and Employment	R: Retail/Commercial	S: Equine Industry	T: Mixed Use	U: Utilities/Services
Offices	Y	O <sup>35</sup>	O <sup>36</sup>	N	N	N	N	O	N	O	O		O	N	O	N

<sup>32</sup> *Only when ancillary to a community use.*

<sup>33</sup> Ancillary to an enterprise and employment function or part of a mixed-use enterprise facility.

<sup>34</sup> Ancillary to the existing use on site.

<sup>35</sup> Proposals of this nature shall be restricted to a gross floor area of 100sqm.

<sup>36</sup> Proposals of this nature shall be restricted to a gross floor area of 100sqm.

**Proposed Material Alteration**

Chapter 11 Implementation, amend Table 11-6 Land Use Zoning Matrix, as follows:  
Under the 'National Stud and Green Belt' land use category amend 'Restaurant' from 'N: Not Normally Permitted' to 'O: Open for Consideration'.

LAND USE	A: Town Centre	B: Existing Residential	C: New Residential	D: Retail Outlet Centre	E: Community and Education	F: Open Space and Amenity	G: National Stud and Green Belt	H: Industry and Warehousing	I: Agriculture	K: Commercial	N: Neighbourhood Centre	Q: Enterprise and Employment	R: Retail/Commercial	S: Equine Industry	T: Mixed Use	U: Utilities/Services
Restaurant	Y	O	O	N	N	N	<del>N</del> O	O	N	O	O	O <sup>85</sup>	O	O <sup>86</sup>	O	N

This amendment should be accompanied by the insertion of the following additional footnote:

*'To be provided within the established visitor amenities area of the Irish National Stud only.'*

**Proposed Material Alteration**

Chapter 11, Section 11.4, amend footnotes under Table 11-6 Land Use Zoning Matrix as follows:

LAND USE	A: Town Centre	B: Existing Residential	C: New Residential	D: Retail Outlet Centre	E: Community and Education	F: Open Space and Amenity	G: National Stud and Green Belt	H: Industry and Warehousing	I: Agriculture	K: Commercial	N: Neighbourhood Centre	Q: Enterprise and Employment	R: Retail/Commercial	S: Equine Industry	T: Mixed Use	U: Utilities/Services
Shop - Convenience	Y	O <sup>37</sup>	O <sup>38</sup>	N	N	N	N	N	N	O <sup>91</sup>	O <sup>92</sup>	O <sup>93</sup>	Y <sup>94</sup>	O <sup>95</sup>	O <sup>96</sup>	N

<sup>37</sup> No single unit shall exceed 100sqm. of net retail space, *except within the area north of the rail line between east of Green Road and west of Dunmurray Road which shall not exceed 150sqm of net retail space.*

<sup>38</sup> No single unit shall exceed 100sqm. of net retail space, *except within the area north of the rail line between east of Green Road and west of Dunmurray Road which shall not exceed 150sqm of net retail space.*

## Changes to Map 11.1 Land Use Zoning

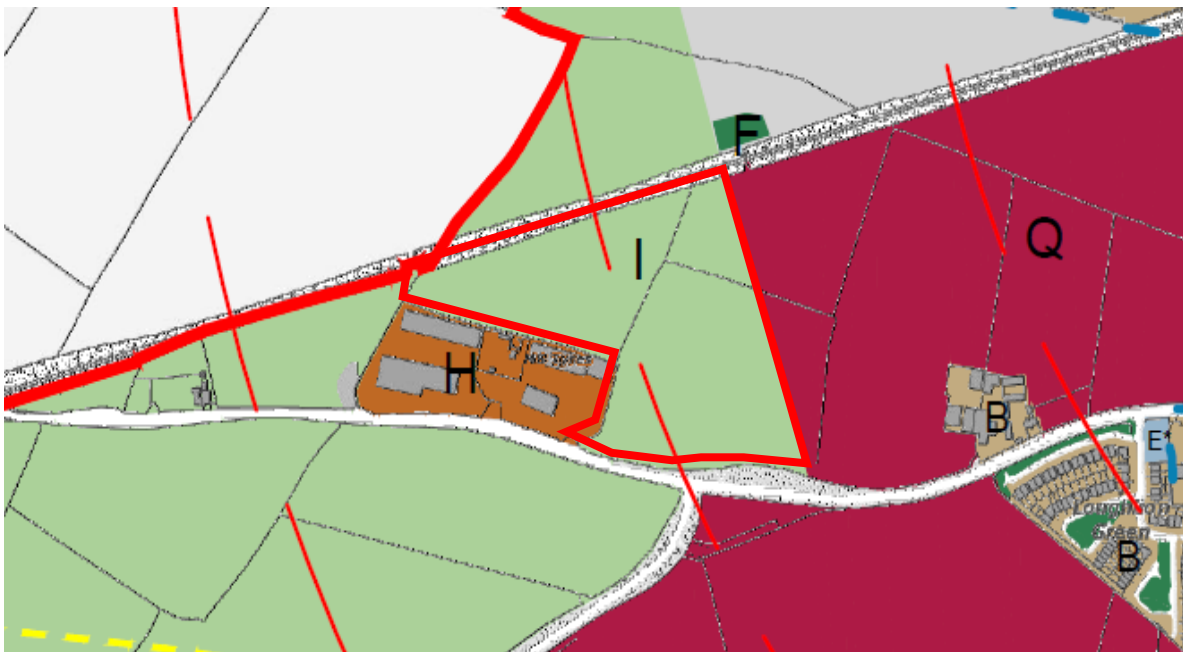
### Proposed Material Alteration

Map 11.1 Land Use Zoning, amend zoning of land outlined in red below (approx. 0.7 ha) from 'H: Industry and Warehousing' to 'E: Community and Education'.



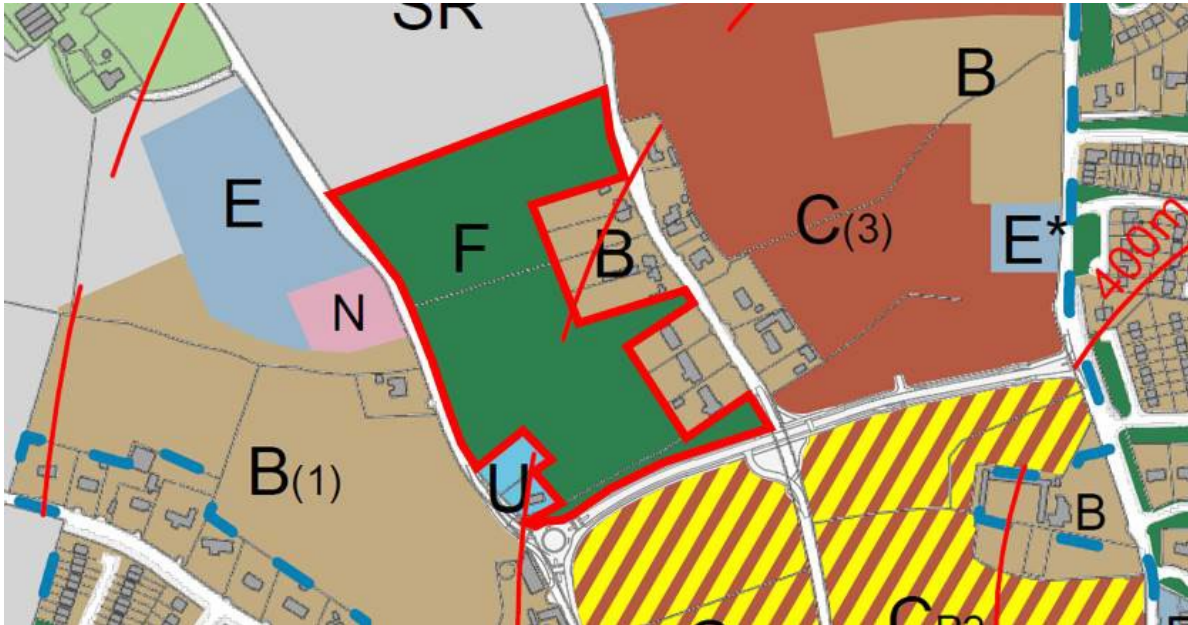
### Proposed Material Alteration

Map 11.1 Land Use Zoning, amend zoning of land outlined in red below (approx. 6.3 ha) from 'I Agriculture' to 'Q; Enterprise and Employment'.



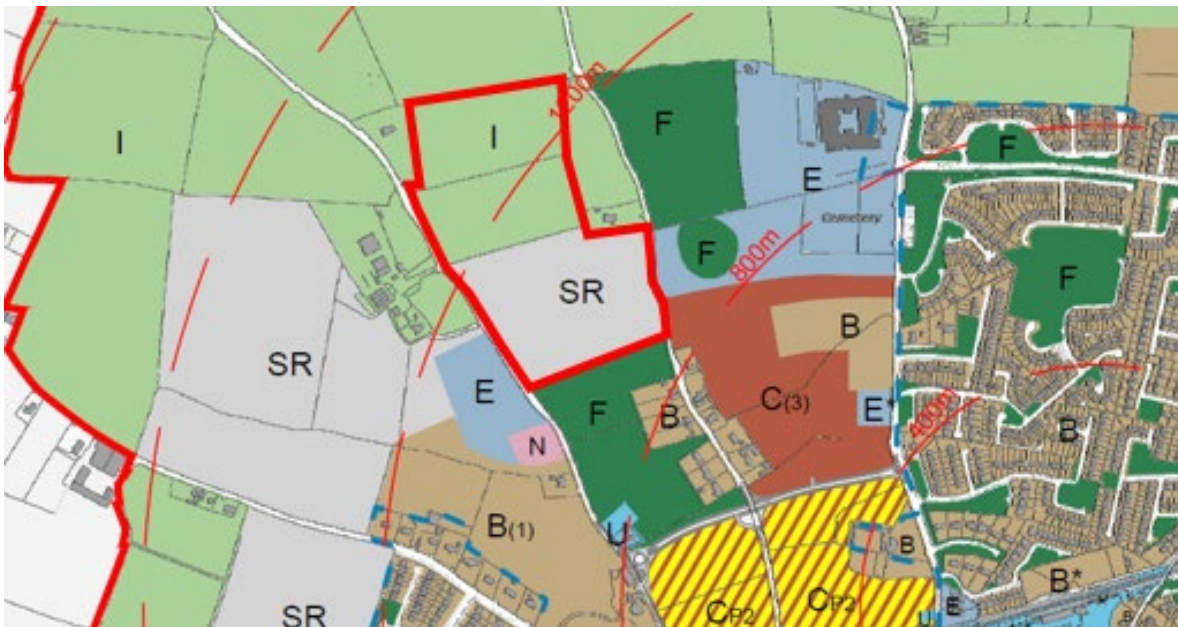
**Proposed Material Alteration**

Chapter 11, Map 11.1 Land Use Zoning Map, amend the zoning of lands outlined in red below (5.2 ha) from 'F: Open Space' to 'C: New Residential Phase 2'.



**Proposed Material Alterations**

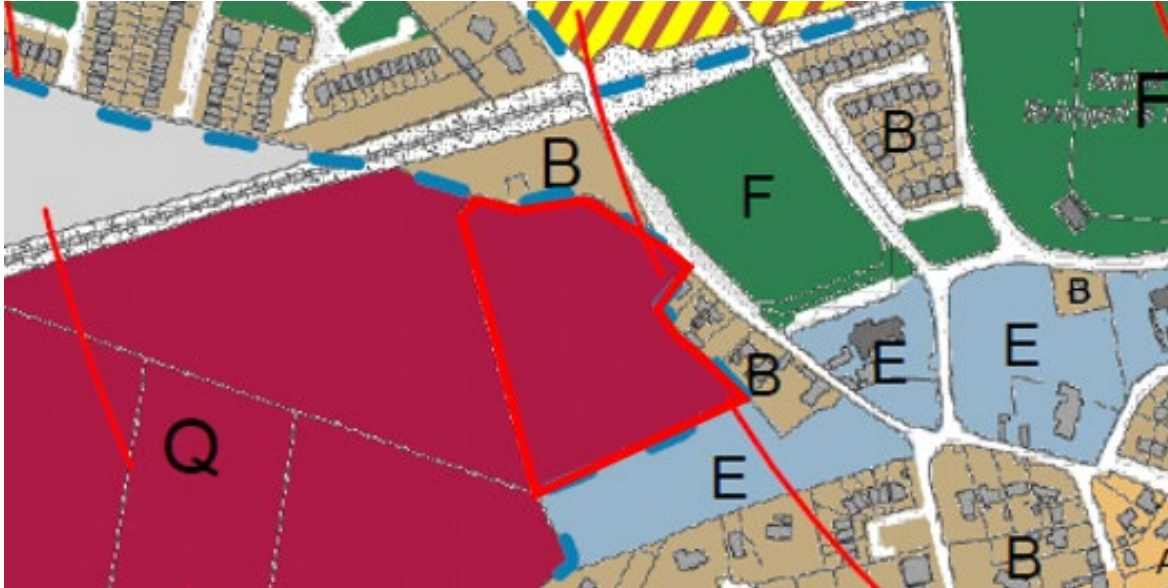
Map 11.1 Land Use Zoning, amend zoning objective of land outlined in red below (approx. 13 ha) from 'I: Agriculture' and 'SR: Strategic Reserve' to 'F: Open Space'.





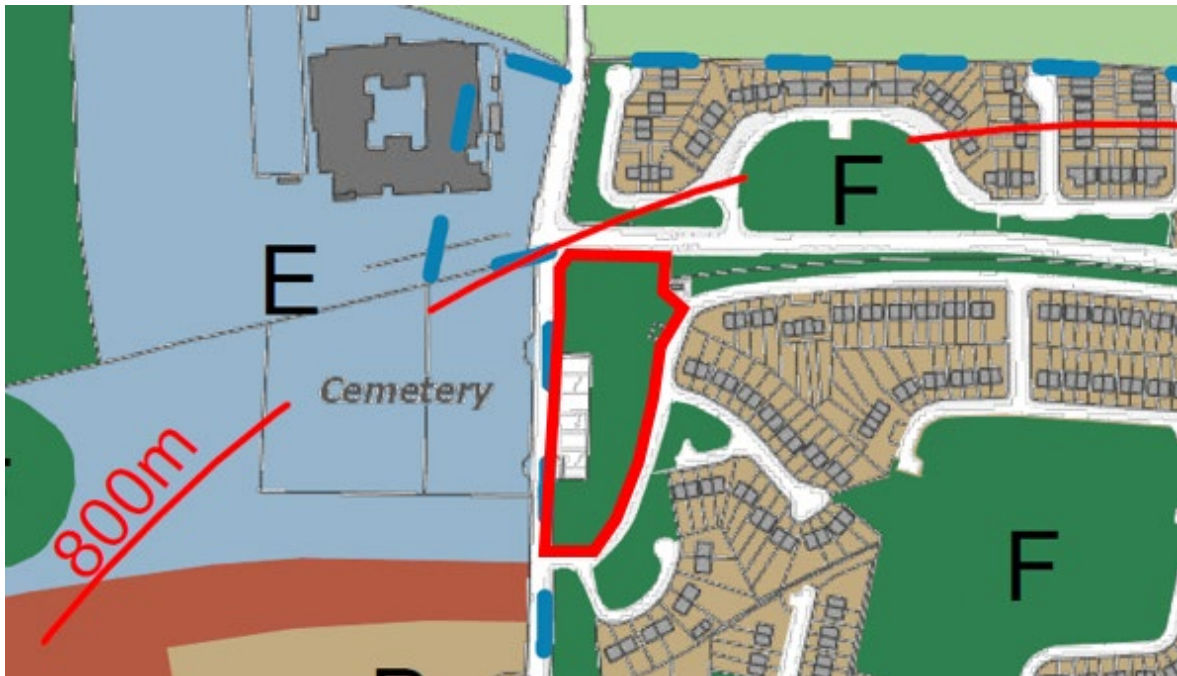
**Proposed Material Alterations**

Map 11.1 Land Use Zoning, amend zoning objective of land outlined in red below (approx. 2.5 ha) from 'Q: Enterprise and Employment to 'E: Community and Education'.



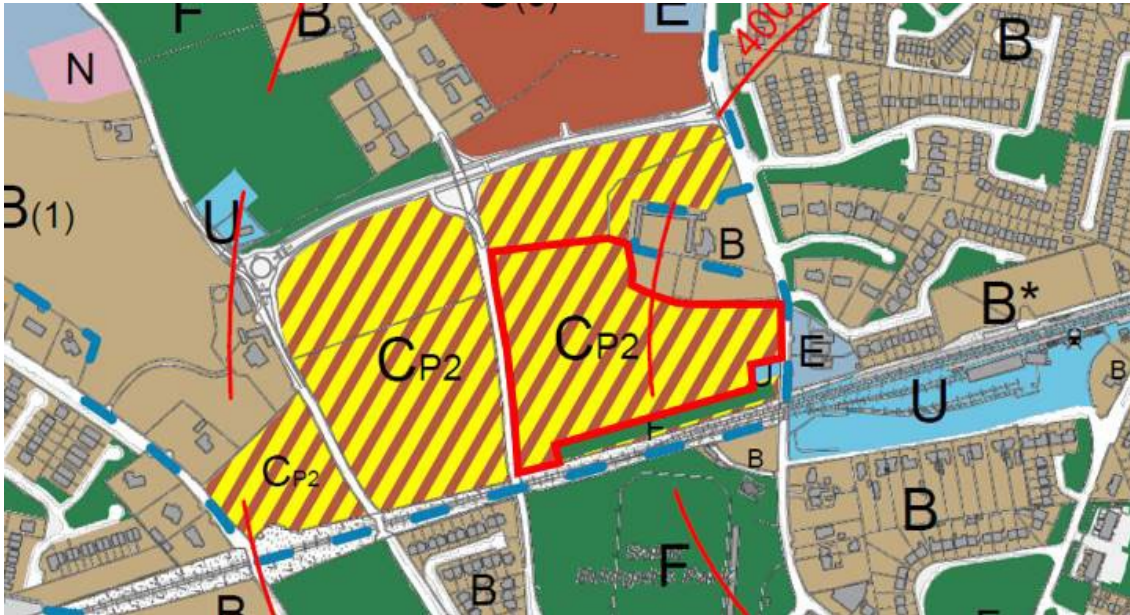
**Proposed Material Alteration**

Map 11.1 Land Use Zoning, amend zoning objective of land outlined in red below (approx. 0.9ha) from 'F: Open Space' to 'E: Community and Education'.



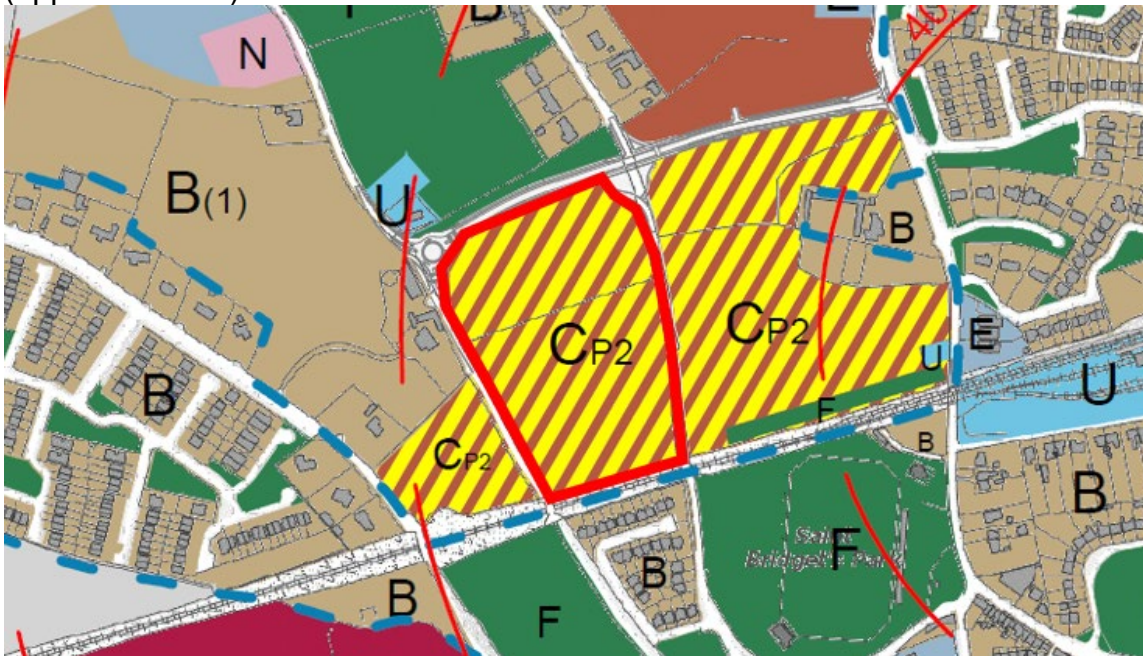
**Proposed Material Alteration**

Map 11.1 Land Use Zoning, amend zoning objective of land outlined in red below (approx. 3.6 ha) from 'C New Residential Phase 2' to 'Q: Enterprise and Employment'.



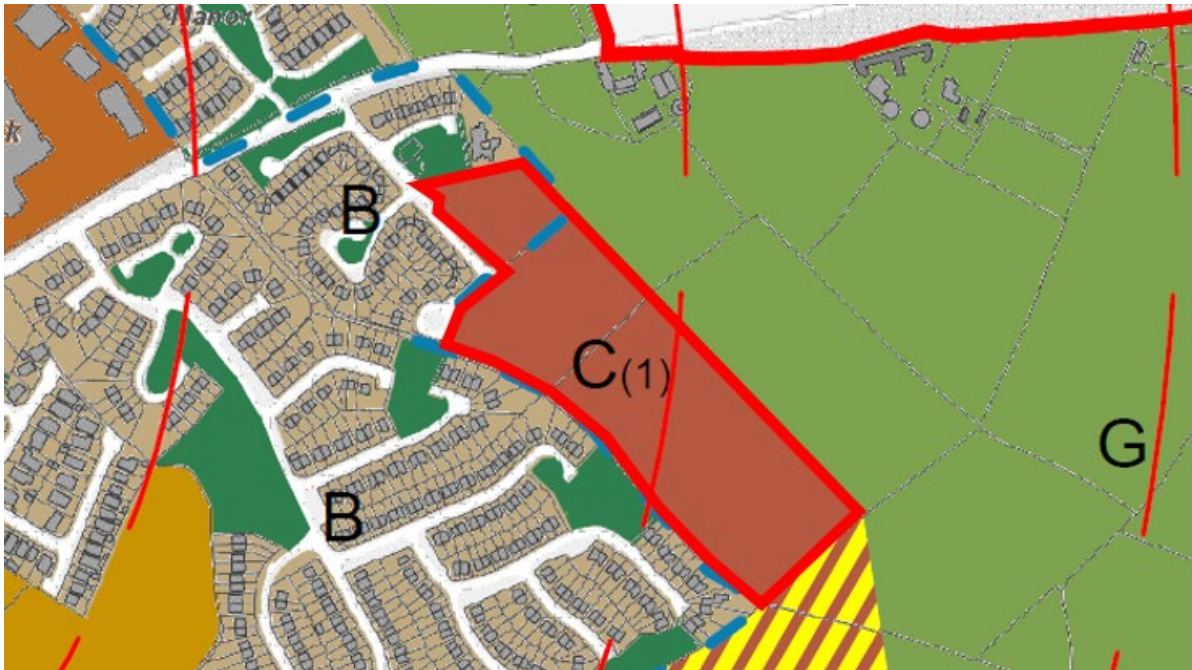
**Proposed Material Alteration**

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



**Proposed Material Alteration**

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



And Consequential Amendments to Table 3-7 Residential Development Capacity Audit as follows:

Table 3-7 Residential Development Capacity Audit

Site Ref.	Location	Site Area (Ha.)	Site in Built-up area	Residential Yield	Net Density
N/A	Infill Sites within CSO boundary	-	Yes	32 <sup>39</sup>	35-50
T	Former Magee Barracks	11.35	Yes	375 <sup>40</sup>	39*
<del>C (1)</del>	<del>Collaghknock</del>	<del>4.87</del>	<del>Partially within</del>	<del>85</del>	<del>80-85<sup>41</sup></del>
<b>C (1)</b>	<b>West of Old Road</b>	<b>4.53</b>	<b>No</b>	<b>158***</b>	<b>35-50</b>
C (2)	Greyabbey View	8.5	No	207	23*
B (1)	Walker's Gate	10.3	No	56	31*

<sup>39</sup> Allocation of 5% of the allocated units for Kildare Town for various sites within the Town Centre and Existing Residential / Infill lands land use zonings for potential yield from infill development.

<sup>40</sup> The residential yield of 375 units relates to the permitted development under Phase 1 only.

<sup>41</sup> Public Private Partnership to be subject of a Part 8 application.

Site Ref.	Location	Site Area (Ha.)	Site in Built-up area	Residential Yield	Net Density
C (3)	Oak Church	7.8	No	260	35*
C (4)	Rathbride Road	3.7	No	87	28**
<b>Total Area</b>		<del>47.88</del> ha <b>46.18</b>	<b>Total Units</b>	<del>4,102</del> <b>1175</b>	

\* Permitted Development.



\*\* Application at appeal with An Bord Pleanála.

\*\*\* Average density at 35 units per hectare.



**Draft Kildare Town  
Local Area Plan 2023 - 2029**

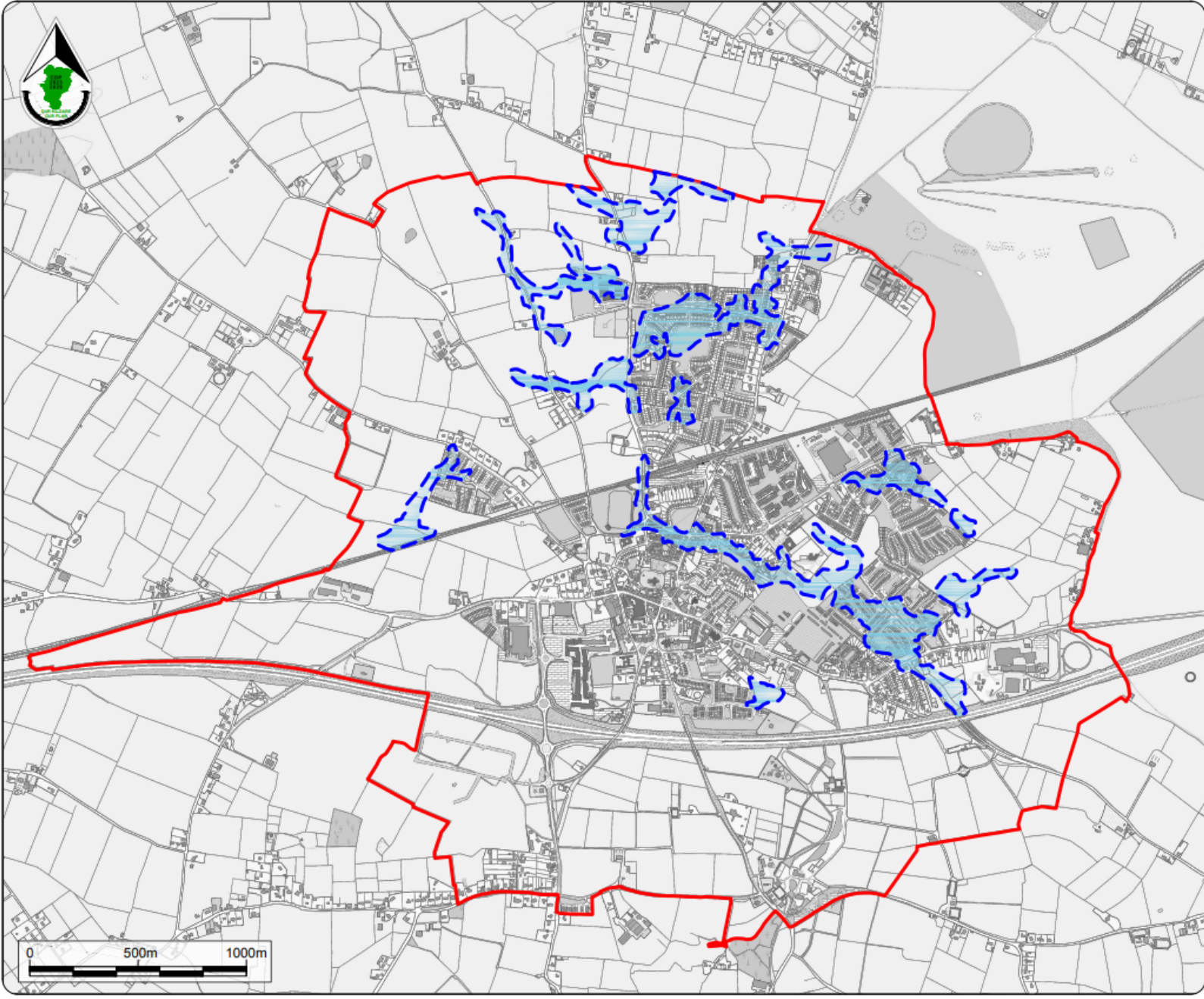
**Legend :**

-  Local Area Plan Boundary
-  Pluvial Flood Risk Assessment Zone

Stage	Date	Description
Draft	21/03/2023	Draft Plan Published
Material Alterations	01/06/2023	Material Alterations to the Draft Plan Published

**Infrastructure and  
Environmental Services  
Strategic Flood Risk Assessment**

Scale: N.T.S.	Map Ref.: 10.2
Date: June 2023	Drawing No.: 2020/23/1379
<small>Prepared by:</small> M O'Loughlin <small>Date:</small> 06/06/2023	<small>Checked by:</small> L Crawford <small>Date:</small> 06/06/2023
<small>Approved by:</small> J O'Reilly <small>Date:</small> 06/06/2023	
This drawing is to be read in conjunction with the written statement	



## Strategic Flood Risk Assessment (SFRA)

### Proposed Material Alteration

Amend the Strategic Flood Risk Assessment (SFRA), Section 2.2 as follows:

*Within the Kildare Town LAP area, there are no watercourses identified within the EPA Flow Network dataset (<https://gis.epa/EPAMaps/>) within the Kildare Town LAP area, with.* The closest identified watercourse to Kildare Town being the Tully Stream, which originates on the southern boundary of the LAP area and flows in a southerly direction away from Kildare Town. Other watercourses around Kildare Town include:

- River Liffey 8.5km to the east, flowing northward;
- Cloncumber Stream 5km to the northeast, flowing northward;
- Slate River 11km to the north, flowing west; and,
- River Barrow 9.5km to the west, flowing south.

*A former tributary of the Tully Stream, commonly referred to as the Armour Stream previously drained a catchment area to the west of Kildare Town. Further information was drawn from the Hydrogeological Assessment of Saint Brigid's Well (Aqua Geoservices Ltd, 2021)<sup>42</sup>.*

*The assessment states that the Kildare Town By-Pass (M7 Motorway) altered the natural flow of a former Tully Stream tributary (Armour Stream), as the feeding springs/wells in its upper catchment area were located to the North of the motorway. Figure 3-1 shows an extract map from the report showing the assumed former catchment feeding the tributary. The map shows the M7 motorway has altered the Tully Stream catchment, with the upper portion of the catchment now diverted westward towards the River Barrow.*

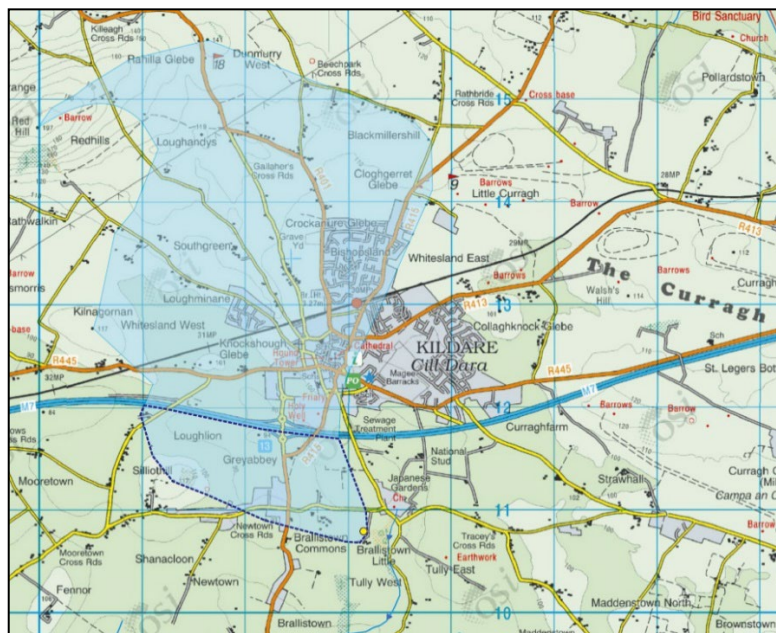


Figure 0-1 Extract from Hydrogeological Assessment of Saint Brigid's Well showing M7 motorway has altered the Tully Stream catchment

<sup>42</sup> Hydrogeological Assessment (Phase 1) At Saint Brigid's Well, Aqua Geoservices Ltd, 2021

*South of the M7, recent developments in the Greyabbey area have altered the nature and form of the watercourse channel through conversion into land drains overlain by infill or culverted to form part of the local stormwater drainage design. As such, it is understood that the former Armour Stream is no longer an active fluvial watercourse and currently functions as a local field drainage and stormwater drainage network conduit.*

*Approximately 800m of the former watercourse is culverted with a 450mm diameter concrete pipe downstream of Armour bridge through the Irish National Stud lands and outfalls to open channel adjacent to St. Brigid's Well.*

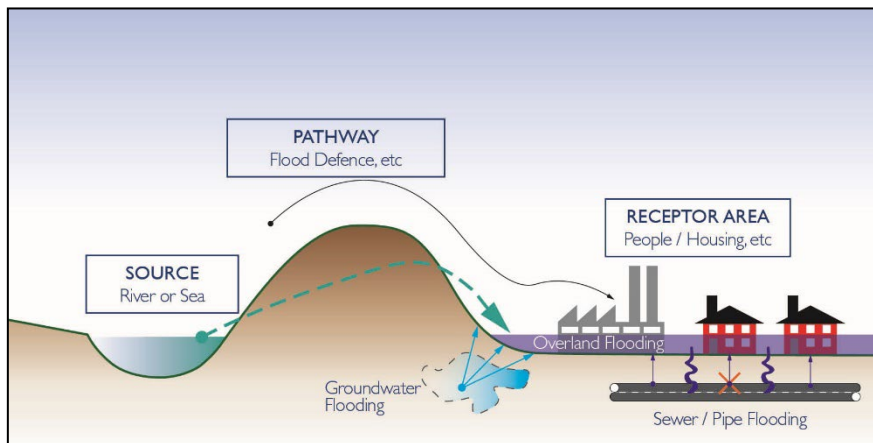
### **Proposed Material Alteration**

Amend Section 3.1 of SFRA as follows:

This section presents a brief summary of The Guidelines, for more detail refer to The Guidelines and the accompanying Technical Appendices at [\(https://www.gov.ie/en/publication/7db50-the-planning-system-and-flood-risk-management-guidelines-for-planning-authorities-nov-09/\)](https://www.gov.ie/en/publication/7db50-the-planning-system-and-flood-risk-management-guidelines-for-planning-authorities-nov-09/).

### **Proposed Material Alteration**

Amend Figure 3.1 of SFRA as follows:



*Figure 0-2 Flood Risk Assessment Source – Pathway – Receptor Model*

### **Proposed Material Alteration**

Amend Section 3.7 of the SFRA, Table 3-4, Line 1 as follows:

The *urban settlement is targeted for growth as it is identified as a Self-Sustaining Growth Town in the Core Strategy of the Kildare County Development Plan 2023-2029, aligning with the ~~Regional Planning Guidelines for the Greater Dublin Area 2010-2022 (now superseded by the Regional Spatial Economic Strategy for the Eastern Midlands Region 2019- 2031 ) set out the planned direction for growth within the Greater Dublin Area up to 2022 (2031)~~ by giving regional effect to national planning policy under ~~the National Spatial Strategy (NSS) (now superseded by Project Ireland 2040; the National Planning Framework & its Implementation Roadmap)~~ County Development Plan or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.*

### **Proposed Material Alteration**

Amend Section 4.4.2, point vi, of SFRA as follows:

As well as reducing and treating runoff in accordance with GDSDS, NBS and NWRM also promote biodiversity and provide important amenity value to residents and visitors alike. Therefore, KCC require that SuDS features *may should* contribute towards a *maximum minimum* of ~~15~~ 10% of the open space requirement *where it contributes in a significant and positive way to the design and quality of open space.*

### **Proposed Material Alteration**

Amend Section 5.5.1 of the SFRA as follows:

The CFRAM Studies have developed FRMPs to manage flood risk within the relevant catchment. Flood maps were one of the main outputs of the studies and indicate modelled flood extents for flood events of a range of annual exceedance probability (AEP) for catchments greater than ~~5~~ 1 km<sup>2</sup>.

### **Proposed Material Alteration**

Amend Section 5.5.2 of the SFRA as follows:

Subsequent to the completion of CFRAM, the NIFM study was undertaken to assess fluvial flood risk for catchments greater than ~~4~~ 5 km<sup>2</sup> not included within CFRAM studies.

### **Proposed Material Alteration**

Amend the SFRA, Section 6.6 with a new final paragraph as follows:

*All development proposals should incorporate surface water management in compliance with the Greater Dublin Drainage Strategy (GDSDS), in particular Volume 2 Chapter 6 Stormwater Drainage Design Criteria, and CIRIA SuDS Manual (C753) and with Nature-Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Best Practice Interim Guidance Document (2021, DHLGH).*

### **Proposed Material Alterations**

Updated Section 6.5.4 to reflect results Pluvial Flood Modelling (see Map 10.2 of Draft Plan).



## **Appendix 1**

**Submission from the Office of the Planning Regulator**



Oifig an  
Rialaitheora Pleanála  
Office of the  
Planning Regulator

**OPR Ref: DP-013-23**

3 May 2023

Senior Executive Officer  
Planning Department  
Kildare County Council  
Naas  
Co. Kildare

**Re: Draft Kildare Town Local Area Plan 2023-2029**

A chara,

Thank you for your authority's work on preparing the draft Kildare Town Local Area Plan 2023-2029 (the draft LAP).

The Office of the Planning Regulator (the Office) wishes to acknowledge the considerable and evident work your authority has put into the preparation of the draft LAP against the backdrop of an evolving national and regional planning policy and regulatory context and the need to balance competing pressures within an increasingly complex system.

As your authority is aware, a key function of the Office is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning.

The Office has evaluated and assessed the draft LAP under the provisions of sections 31AO(1) and 31AO(2) of the *Planning and Development Act 2000*, as amended (the Act) and this submission has been prepared accordingly.

The Office's evaluation and assessment has had regard to the Kildare County Development Plan 2023 – 2029 (the Development Plan), the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region, and relevant section 28 guidelines. This submission makes one recommendation and one observation.

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

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. The planning authority is requested by the Office to action an observation.

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

The Office commends the planning authority for the robust evidence based approach to inform the draft LAP which includes the Kildare Town Transport Strategy, a Settlement Capacity Audit and a Social Infrastructure Audit.

The Office also commends the planning authority for including clear strategic principles (section 2.2.1) to achieve the LAP's vision, which in turn are related to specific National Strategic Outcomes of the NPF. This provides a clear line of sight between national planning policies and the key principles emanating from the LAP's vision and is particularly noteworthy aspect of the draft LAP.

The Office welcomes the focus in the draft LAP on town centre renewal and brownfield / infill development which is supported by clear policy objectives and initiatives. In this regard, Chapter 4 illustrates appropriate infill and opportunity sites for the town centre and identifies public realm improvements from the Kildare Town Renewal Masterplan.

## **Overview**

On the whole, the Office considers that the draft LAP is generally consistent with the objectives of the recently adopted the Development Plan.

The Office also considers that the draft LAP is broadly consistent with the RSES, in particular its overall strategy to promote compact growth, target town centre renewal and

promote more sustainable travel patterns which demonstrates consistency with Regional Policy Objective (RPO) 3.3 (Compact Growth), RPO 6.12 (Town Centre Renewal) and RPO 8.6 (Local Transport Plans) respectively.

The draft LAP aims to direct the majority of future growth to zoned lands inside the CSO Settlement Boundary, which are in turn supported by sustainable transport measures. The Office has, however, a number of concerns and queries regarding the ability to service the more peripheral zoned lands adjoining the motorway interchange.

The Office also notes that there is an existing watercourse traversing the lands zoned for H: Industry and Warehousing and C: New Residential south of the motorway which may not have been adequately assessed as part of the Strategic Flood Risk Assessment accompanying the draft LAP.

It is within this context the submission below sets out (1) recommendation and (1) observation under the following seven themes:

<b>Key theme</b>	<b>Recommendation</b>	<b>Observation</b>
<a href="#">Consistency with Regional, Spatial and Economic Strategy</a>	-	-
<a href="#">Consistency with Development Plan and Core Strategy</a>	-	-
<a href="#">Compact Growth</a>	-	-
<a href="#">Transport and Accessibility</a>	-	<a href="#">Observation 1</a>
<a href="#">Floodrisk Management</a>	<a href="#">Recommendation 1</a>	-
<a href="#">Infrastructure Capacity</a>	-	-
<a href="#">Economy and Employment</a>	-	-

## **1. Consistency with the Regional, Spatial and Economic Strategy**

As the planning authority is aware, Kildare Town is located in the Core Region of the RSES for the EMRA and has been designated as a Self-Sustaining Growth Town, which the RSES describes as ‘...*Towns with a moderate level of jobs and services – includes*

*sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining’.*

In this regard, the Office welcomes the LAP’s vision ‘*To promote the social, economic and physical development of Kildare Town as a self-sustaining growth town in a compact, permeable and sequential manner...*’ and the specific measures to promote economic development contained in the LAP to reach a job ratio target of 0.70.

The LAP also promotes modal shift and more sustainable travel and the protection and enhancement of key green infrastructure such as the Curragh Plains which demonstrates consistency with the guiding principles in the RSES for integration of land use and transport (page 187) and green infrastructure (page 166). In this regard, the Office commends the planning authority for including targets for modal shift and increases in tree canopy coverage which is supported by specific objectives such MTO 2.1 and NHO 4.2.

Overall, the Office is satisfied that the provisions of the draft LAP are broadly consistent with the RSES for the EMRA.

## **2. Consistency with Development Plan and Core Strategy**

Section 19(2) of the Act also requires the LAP to be consistent with the objectives of the development plan and its core strategy. Section 3 of the draft LAP sets out how the LAP is compliant with the core strategy of the Development Plan.

The core strategy in the Development Plan has allocated a projected population increase of 1,182 with a corresponding housing supply target of 430 units to Kildare Town over the development plan period. Core Strategy Table 2.8 indicates a residential zoned land requirement of 14 ha based on a density of 35-40 units per hectare to provide for this growth.

Since the LAP will not commence until the end of 2023, the planning authority has allocated an additional 12 months population growth and housing allocation, which results in a projected population increase of 1,380 and housing supply target 502 units.

The draft LAP includes a rationale for availing of 25% additional provision as provided for in Section 4.4.3 of the *Development Plans, Guidelines for Planning Authorities (2022)*. This increases the housing unit allocation to 628 units. It is noted that the additional

provision refers to an existing unmet social housing demand within the town and will be provided for through the oversupply of units on sites with existing planning permissions.

## **2.1 Housing yield from lands zoned for residential**

The Residential Development Capacity Audit (Table 3-7) estimates that the available lands zoned B: Existing Residential / Infill, C: New Residential and T: Mixed Use (Magee Barracks) in the Draft LAP provide for a total housing yield of 1,102 units<sup>1</sup>.

The Office accepts that these lands have been subject to a Settlement Capacity Audit and have been categorised as either Tier 1 or Tier 2 consistent with the tiered approach to zoning in the NPF.

While the Office acknowledges the potential of Kildare Town exceeding its core strategy housing target over the life of the Development Plan due to historical legacy zonings and extant permissions for residential development, the Office considers, on balance, that the draft LAP includes a reasonable and pragmatic approach to address the surplus of residential zoned lands. In this regard, the Office welcomes the decisions to zone lands C: Phase 2 New Residential and SR: Strategic Reserve in particular the lands on the eastern and western periphery of the town and the Objective CSO 1.10 to preserve these lands from inappropriate forms of development and to safeguard their strategic value.

Further, the Office also welcomes the commitment in the draft LAP and Objective CSO 1.4 to:

*Monitor the scale, type, tenure and location of constructed and permitted developments in Kildare Town during the lifetime of the Plan and apply appropriate development management standards to ensure compliance with the Core Strategy to achieve the delivery of strategic plan-led and coordinated balanced development within the town.*

---

<sup>1</sup> Figure of 1,102 includes 32 housing units from infill sites within the CSO boundary.

The above is critical to ensure that the growth facilitated on residential and mixed use zoned lands is commensurate with Kildare Town's position in the county settlement hierarchy and the definition of a Self-Sustaining Growth Town in Table 4.2 of the RSES.

### **3. Compact Growth**

The Office acknowledges that consolidation and infill development underpin the development strategy in the draft LAP and that the LAP provides for circa 65% of all new homes to be developed within the defined settlement boundary.

While this approach is welcomed and supported in Objective CSO 1.3, the draft LAP zones significant lands for residential and employment development outside of the CSO Settlement Boundary and adjoining the junction 13 of the M7 motorway.

Since the lands south of the M7 are removed from the train station, there is a greater likelihood that they will give rise to a car-borne form of development. This matter is addressed further in section 4 below.

### **4. Transport and Accessibility**

The Office commends the planning authority for the LAP's focus on reducing the demand for travel by car and promoting more sustainable travel, which is supported by a transport strategy which has been incorporated into Chapter 7 of the draft LAP. In this regard, the Office welcomes the range of implementation measures to support permeability, walking and cycling and use of public transport which are clearly set out on maps in Appendix A and supported by the objectives.

Notwithstanding, the Office notes that the draft LAP does not include any public transport measures to support the future development of the substantial area of Q: Enterprise and Employment zoned lands to the west of the Kildare Village Outlet Centre and only includes a proposed cycle track / lane as part of the future Modus Link Road (Maps 7.2 and 7.4 refer).

In respect of the lands zoned for H: Industry and Warehousing and C: New Residential south of the M7, the draft LAP does not include any permeability or cycling measures to serve this area and it is unclear if bus measure PT 4 is intended to serve these lands (Maps 7.1, 7.2 and 7.3 refer).

Having regard to the location of the above lands adjoining a busy intersection of the M7 motorway, the Office considers that there is scope to better integrate these lands into the overall proposed transport network from the outset and reduce the reliance on private transport as the lands develop.

#### Observation 1 – Sustainable transport measures

Having regard to:

- (a) section 10 (2)(n) of the *Planning and Development Act 2000*, as amended;
- (b) the vision and strategic principles of the Local Area Plan including *Creating Compact and Connected Communities*, the measures and objectives promoting modal shift and more sustainable transport in Chapter 7; and
- (c) the location of the Q: Enterprise and Employment zoned lands west of the Kildare Village Outlet Centre and the H: Industry and Warehousing and C: New Residential zoned lands south of the M7,

the Office advises the planning authority to investigate measures to promote use of public transport and active travel for the aforementioned undeveloped lands in consultation with the National Transport Authority and Transport Infrastructure Ireland.

## 5. Flood risk management

The Office welcomes the preparation of a Strategic Flood Risk Assessment (SFRA) to inform the draft LAP, which identifies that there is a low risk of fluvial and groundwater flooding in Kildare Town, whereas there is a medium risk of pluvial flooding.

The Office notes, and welcomes the requirement for a site-specific flood risk assessment to be undertaken at development management stage for developments within the noted area at risk of pluvial flooding (Objective IO 3.1 and Map 10.2 refer).

The Office notes that the 'Kildare Town Surface Water Study' indicates the location of a watercourse (Armour Stream), which travels to the south of the settlement from the M7 and runs adjoining areas zoned highly vulnerable C: New Residential and less



vulnerable. The SFRA includes no assessment to indicate whether there is any flood risk associated with this watercourse. Notwithstanding the absence of a flood risk assessment for the Armour Stream, the SFRA concludes that the entire lands within the LAP boundary are located within Flood Zone C.

The Office is concerned, therefore, that the draft LAP includes lands zoned for highly vulnerable development to the south of the M7 and adjoining an existing watercourse, which have not been informed by a suitable level of flood risk assessment, and if necessary a Justification Test in accordance with the Flood Guidelines.

### **Recommendation 1 –Strategic Flood Risk Assessment - Armour Stream**

Having regard to:

- (a) National Policy Objective 57 of the *National Planning Framework Project Ireland 2040*; and
- (b) the *Flood Risk Management Guidelines (2009)*, as revised, and *Circular PL 2/2014 Flooding Guidelines*,

the planning authority is required to review the Strategic Flood Risk Assessment for the draft Local Area Plan to include a flood risk assessment of the Armour Stream, in particular having regard to adjoining vulnerable land uses, to ensure that any land use zonings, and flood risk associated with this watercourse, are assessed in accordance with the application of the sequential approach, and the Justification Test where appropriate, and having regard to potential climate change effects.

This review may entail the review of land use zonings where they fail to satisfy the plan-making Justification Test to ensure consistency with the guidelines.

The Office requires the planning authority to consult with the Office of Public Works regarding this Recommendation.

In respect of Sustainable Urban Drainage Systems (SuDS) and Nature Based Solutions, it is considered that the LAP would benefit from referencing 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)*.

The Office also notes that the SFRA appears to contain inconsistencies with respect to catchment sizes for CFRAM mapping and NIFM mapping in sections 5.5.1 and 5.5.2. The planning authority is advised to consult with the Office of Public Works to clarify this matter.

## **6. Infrastructure capacity**

The Office notes that the wastewater treatment plant has sufficient capacity to cater for the growth planned to occur during the life of the LAP and welcomes Objective IO 1.1, which will ensure that development land is appropriately serviced by adequate water and wastewater infrastructure.

In respect of surface water management, the Office welcomes the inclusion of Objective IO 2.3 to incorporate nature-based solutions as part of all plans and projects, and Objective IO 2.4 to require all new development proposed to integrate SuDS and ensure that areas indicated as Nature-Based Management Areas are reserved free from development in accordance with NPO 57 and RPO 10.15.

## **7. Economy and Employment**

The employment profile and economic development strategy for Kildare Town are set out in sections 5.2 and 5.4 respectively.

The Office notes that the LAP aims to protect existing employment in the town and to create new employment opportunities to ensure long-term and sustainable growth with the aim increasing the town's job ratio to 0.70 and becoming more self-sustaining.

The Office welcomes the inclusion of a range of specific measures in section 5.4 to achieve the economic development strategy such as '*Develop a pedestrian link connecting the town centre to the Kildare Tourist Outlet Village to capitalise on the potential synergies*' which are supported by economic development objectives in section 5.5.

## **7.1 Town centre and retailing**

The Office welcomes the comprehensive strategy and objectives to address current issues in the town centre and protect its role while allowing for a wider range of uses to support its overall vitality and address vacancy.

The Office commends the planning authority's focus on town centre renewal in the LAP and the incorporation of projects from the Kildare Town Renewal Masterplan into Chapter 4. This is a particularly noteworthy aspect of the Draft LAP and demonstrates consistency with RPO 6.12 (Town Centre Renewal).

The planning authority is commended for the overall clarity and direction provided for economic development and employment in the draft Plan.

### **Summary**

Arising from the foregoing evaluation and assessment of the draft Kildare Town Local Area Plan 2023 - 2029, the Office concludes that the draft LAP is generally consistent with the objectives of the Kildare County Development Plan 2023 – 2029 and the regional policy objectives contained in the Regional Spatial and Economic Strategy for the Eastern and Midland Region.

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

The Office requests that your authority addresses the recommendation and observation outlined above. As you are aware, the report of the chief executive of your authority prepared for the elected members under section 20 of the Act must summarise these recommendations and the manner in which they will be addressed. Where your authority decides not to comply with the recommendations of the Office, made in the draft LAP and report, please outline the reasons for the decision in the chief executive's report.

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

Is mise le meas,

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A handwritten signature in black ink that reads "AM O'Connor". The signature is written in a cursive style with a diagonal slash at the end.

**Anne Marie O'Connor**

Deputy Regulator and Director of Plans Evaluations


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## Appendix 2 – Summary of Submissions Received

The submissions summarised in Appendix 2 **exclude** the following:

- The submission from the Office of the Planning Regulator (Sub No. 123, see Section 3 of the Chief Executive’s report).
- Submissions from Prescribed and Public Bodies (see Section 4 of the Chief Executives report).
- Submissions that relate to requests for the zoning of land (see Section 6 of the Chief Executive’s report).

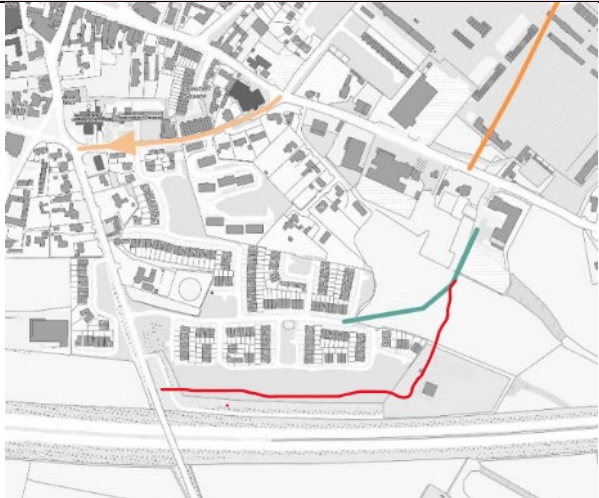
Sub. No.	Name	Summary of Submission
001	Hugh McCarthy	The plan should state what junctions and links are outlined for improvement, in respect of cycling and pedestrian infrastructure mapping. Improving junctions and giving more signal time to crossing stages would help achieve mode shift.
002	Thomas Dunne	This submission relates to land in Castledermot. It is a re-zoning request for 5.8 acres with the potential for 54 houses. A 33-page attachment accompanies the submission along with letters of support. The submission states 30 units/ha would allow more housing. No properties on Daft in Castledermot. Four houses for sale the lowest priced at €320,000. The solution is to allow additional houses to be built at this location. Reference is made to national, regional and local policy in respect of prioritising houses to be built in existing settlements, re-zoning of lands which are contiguous to the existing residential lands, the site is ready to go compared to other lands zoned for development across the County Kildare, the subject lands could provide modern housing including social and affordable housing.
003	Tony Bonnie	<p>This submission relates to Perm 2 and four photos have been submitted.</p> <ul style="list-style-type: none"> <li>• The access will be created through the end of a Cul-de-sac through a wall outside the submitter’s home.</li> <li>• Very annoyed at creating a walkway at this location where they have lived for 25 years.</li> <li>• Already excellent pedestrian and cycle access at the entrance to our estate which connects directly to the new distributor road and to Rathbride Demesne.</li> <li>• Alter the environment of the estate.</li> </ul>

Sub. No.	Name	Summary of Submission
		
004	Silviu Munteanu	<ul style="list-style-type: none"> <li>• Object to opening up Hospital Street to Tully Road via Oaktree Road.</li> <li>• Well populated by small kids, playground on Oaktree Road, increase risk of accidents.</li> </ul>
005	Anil Vetsa	<ul style="list-style-type: none"> <li>• Road through Oaktree estate risks, wildlife, safety and privacy.</li> <li>• Playground in the estate and the planned road goes right beside it.</li> <li>• Avoid this proposal of the road.</li> </ul>
006	Elaine Keating	<p>Objects to public road going through Oaktree Road for the following safety issues:</p> <ul style="list-style-type: none"> <li>• Dangerous to the children playing in the playground located on the route.</li> <li>• Green areas where children play would be dangerous and children should be allowed the freedom to play in their own housing area.</li> <li>• Open plan driveways.</li> <li>• Environmental and noise pollution.</li> <li>• Already speeding on Tully Road.</li> <li>• Nesting birds and hares in the undeveloped field.</li> <li>• Potential for build-up of water from the proposed roadway and splashing onto properties.</li> </ul>
007	Lalit Suryawanshi	<p>Concerned on environmental and safety grounds of making Meadow Road one way and opening up Hospital Street to Tully Road via Oaktree Road.</p> <ul style="list-style-type: none"> <li>• Floodplain, threat the nesting birds and wildlife, may cause floods in nearby areas, safety concerns for children, estate road too narrow.</li> <li>• Estate gate is extremely unsafe for the ongoing and incoming vehicles.</li> </ul>

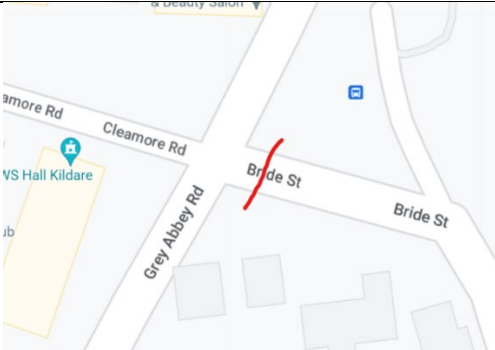
Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>School children usually walk from the estate on the road, proposed estate road will cause inconvenience.</li> </ul>
008	Zuhair Ahmed	<p>Concerned and disapproves of the Oaktree Road.</p> <ul style="list-style-type: none"> <li>Dangerous for children as passing by the playground.</li> <li>House value could be impacted.</li> <li>Impact on wildlife like hares.</li> <li>Turn a peaceful estate into noise polluting with constant traffic.</li> </ul>
009	Peter Daniel	<p>Objection to opening Hospital Street to Tully Road via Oaktree Road as it would create health and safety issues in the Oaktree estate. The road is short sighted and ill-informed There are c. 160 houses within the estate with young children who play freely the submission highlights the following grave concerns:</p> <ul style="list-style-type: none"> <li>Proposed route is dangerous as there is a playground located at the location with children running on both direction in and out of the playground.</li> <li>There is a green area located adjacent where sports ball already encroaches onto to the roadway, increasing traffic would be disastrous.</li> <li>No hard border to the majority of houses great risk to children.</li> <li>Speeding could become and issue in the estate.</li> <li>Not aware of any other estates with public roads running through them.</li> </ul>
010	Aoife Hand	<p>Objection to link Hospital Road to Tully Road by connecting them via Oaktree Road for the following reasons:</p> <ul style="list-style-type: none"> <li>Unsafe and irresponsible as it's an estate with young families and children which play on the greens and the playground located along Oaktree Road.</li> <li>Road is not wide enough, and pathways are flush with the road.</li> <li>Increase in traffic would be an increased risk to children being involved in an accident with a car.</li> <li>Children walk and cycle to local schools through the estate.</li> <li>Risk to wildlife in the field such as foxes and rabbits.</li> <li>Look at improving Meadow Road and access to the town.</li> </ul>

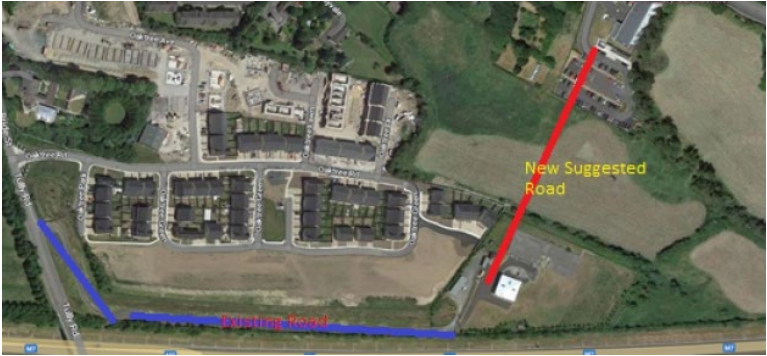
Sub. No.	Name	Summary of Submission
011	Tikkina Ananda Bai	<p>Concerned and totally disagree with opening a public road through Oaktree Rad which is part of a private estate.</p> <ul style="list-style-type: none"> <li>• The estate contains about 160 houses and is occupied by mostly young families with kids.</li> <li>• Playground and two green areas are right beside the proposed road and will be unsafe for children.</li> <li>• The road is not wide enough to accommodate 2-way traffic – cause dangerous driving conditions.</li> <li>• Risk for school children and pedestrians, risk for wildlife, safety concerns over no harm borders.</li> </ul>
012	John Nicol	<p>Objection to making Oaktree Road an access to the Primary Care Centre for the following reasons:</p> <ul style="list-style-type: none"> <li>• Road not conducive or designed for traffic other than that of residents of the estate.</li> <li>• Hedges planted would restrict line of sight.</li> <li>• Entrance would not permit two lorries to pass.</li> <li>• Minimal visitor parking which results in vehicles parked on the road further reducing two-way traffic.</li> <li>• Three parkland areas where children play.</li> <li>• Blind spot to the west of Oaktree Road, bounded by Oaktree Road and Oaktree Ave which could cause accidents when children run onto the road and vehicles have limited sight.</li> <li>• Impact on wildlife habitat on undeveloped flood plain.</li> <li>• The estate has not been taken in charge and therefore no right to establish a public roadway through the estate.</li> <li>• Reference is made to a Senior Executive Engineer's report (Item 27 19/01/2012) that the long straight sections of roadway (being Oaktree Road) would encourage higher vehicle speeds, requiring the applicant to submit revised layouts that incorporate more restrictive road layouts in order to provide passive traffic calming measures. The submission states that This detail was not incorporated in the final development layout, however those issues noted by the Senior Executive Engineer are precisely what is now of serious concern with this proposal.</li> <li>• The submission proposes an alternative road as per image below (marked in red).</li> </ul>



Sub. No.	Name	Summary of Submission
		
013	Rositsa Pavlova	<p>Objection to extend Oaktree Road to the Medical Centre, allowing traffic through housing estate.</p> <ul style="list-style-type: none"> <li>• The existing road was not constructed for that purpose.</li> <li>• Not enough alternative parking in the estate so people park on the footpaths and street and is not wide enough for this and traffic.</li> <li>• Bigger traffic more dangerous for children using the playground next to road.</li> <li>• Request has already been made for ramps to protect the children.</li> </ul>
014	Slavi Pavlov	<p>Objection to making Oaktree Road a public road due to the impact on safety and well-being of the community.</p> <ul style="list-style-type: none"> <li>• Increasing traffic will result in access for residents to be limited which will impact quality of life.</li> <li>• Emergency service access will be impacted.</li> <li>• The playground and green areas are located on Oaktree Road which put the health and safety of the children at risk.</li> <li>• Increase in crime in the area.</li> <li>• Impact on wildlife in the area and the ecosystem from increased traffic and air pollution.</li> </ul>

Sub. No.	Name	Summary of Submission
015	Olga Postolachi	<p>Disapprove and object to the road going through Oaktree Road to Tully Road on health and safety issues as follows:</p> <ul style="list-style-type: none"> <li>• Playground on the road and a public road going through the area will be highly dangerous to children.</li> <li>• There is a green area where children play football/sports, and a road would be dangerous.</li> <li>• Open plan driveways have no protection or safety from the road.</li> <li>• Pollution from cars and already have the motorway to contend with.</li> <li>• Cars speeding would be a safety concern.</li> <li>• Impact on the wildlife nesting bords and hares.</li> <li>• Build-up of water and water could be sprayed on the houses.</li> <li>• Don't know any other estate in the town that has a public road going through it.</li> </ul>
016	Hazel Nolan	<p>Objection to open Hospital Street to Tully Road via Oaktree on major health and safety concerns.</p> <ul style="list-style-type: none"> <li>• Dangerous location given the playground situated on the road where the concentration of children is the highest.</li> <li>• The green area used for play with children and balls encroaching in the roadway is already a regular occurrence increasing traffic level would be disastrous with an increased risk of injuries or death for children and motorists.</li> <li>• Houses have no hard borders and children impinging on Oakreee Road is commonplace and the creation of a public thoroughfare would create and extremely perilous situation.</li> <li>• If the road was to become a public road it is likely that speeding would occur similar to behaviour shown on other public roads and would increase the danger level.</li> <li>• Not aware of other estates that have public road running through then and assume this is by design due to the concerns listed in this submission.</li> <li>• The road is short signed and ill-informed.</li> </ul>
017	EPA	Please see Section of the Chief Executive's Report.
018	Connell O'Donnell	The submission makes reference to two aspects of the Plan regarding making Market Square more friendly to pedestrians and the objective of reducing the flow of vehicular traffic through the town

Sub. No.	Name	Summary of Submission
		<p>centre. In this regard the submission suggests a number of speed bumps and pedestrian crossing locations.</p> <ul style="list-style-type: none"> <li>• Pedestrian crossings flanked by speedbumps to the western and northern corners of Market Square.</li> <li>• A pedestrian crossing between the Silken Thomas and Cunningham’s bar would make the town pedestrian friendly and directly link two popular bars/restaurants.</li> <li>• Speedbumps would improve noise and also reduce traffic noise.</li> <li>• Pedestrian crossing at the northern corner between the ice cream shop and McHugh’s chemist, flanked by speedbumps as poor visibility on the northern approach.</li> <li>• Crossings at all three sides of the Square.</li> <li>• The closing of Bride Street is a medium to long terms objective and these measures would be a welcomed stopgap.</li> </ul>
019	Connell O’Donnell	The submission suggests placing a speedbump on Dublin Street in front of the Leinster Square housing estate. It would reduce night-time noise and in keeping with the general objective to make the town centre more friendly to pedestrians.
020	Connell O’Donnell	<p>The submission suggests adding a pedestrian crossing on Bride Street at the junction where it meets Grey Abbey Road in line with Objective MTO 1.2 (Walking and Cycling Objectives) which refers to developing a pedestrian link from Kildare Village to the Market Square. The submission provides the following image:</p> 
021	Kaushal Adarsh	The submission relates to the connecting road from the Primary Care Centre to Tully Road via Oaktree Road and the issues have been raised by two children aged 8 and 6 years.

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• We play football in the park and the ball goes onto the road and if the traffic increases this would become more dangerous.</li> <li>• Residents drive slowly and know when weather is good children will be outside and we ride our scooters and bikes.</li> <li>• There are blind roads in the estate.</li> <li>• No space for guest parking so people park on the roads and adding more traffic will make it difficult for a driver to pass through.</li> <li>• There is no space to widen this road.</li> <li>• There is a lot of water on the roads.</li> <li>• Residents would have to reverse onto the road from their driveway.</li> <li>• Children play areas like the green and playground would be in jeopardy if traffic increases.</li> <li>• KCC should think of an alternative route. And an image has been provided illustrating same.</li> <li>• This alternative option would keep traffic outside the estate.</li> <li>• Wildlife will be impacts by the road.</li> <li>• The road would be a first of its kind experiment.</li> </ul> 
022	Nigel Curran	<ul style="list-style-type: none"> <li>• Upgrade Cycle 13 to Short Term in line with the Perm 1 Path from Rathbride Road to Chill Dara Golf Club. The path is used by pedestrians and e-scooters, upgrading would make it</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>impossible for pedestrians with buggies to use given the sheer volume of e-scooters heading towards the soccer club.</p> <ul style="list-style-type: none"> <li>• Use speed bumps on the Rathbride Road from the railway station to the cattle grate, cars do not obey the speed limit and there are a lot of cyclists and e-scooters using it.</li> </ul>
023	DAA	See Section 4 of the Chief Executive's Report.
024	Sean Donegan	<p>Objects to the planned new road from Tully road through Oaktree Residential Estate to join up with the health centre for the following reasons:</p> <ul style="list-style-type: none"> <li>• Increased traffic passing through the housing estate.</li> <li>• The playground and green areas are located near and adjacent to this road which put the health and safety of the children at risk.</li> <li>• The actual width of the road is not suitable.</li> <li>• Guests of residents in Oaktree park their cars outside properties.</li> <li>• Emergency service access will be impacted.</li> <li>• The footpaths in the estate are flush with the current road, which will be a safety hazard if a busier road was put in place.</li> <li>• Property devaluation in the housing estate.</li> <li>• Impact on the environment and wildlife habitat of animals like red squirrels and hares. Video evidence can be provided.</li> <li>• Higher levels of crime.</li> <li>• Toxic fumes will damage the health of all residents in the area.</li> </ul>
025	Caroline Christie	<p>Objects to the proposal to route a main thoroughfare from Tully Road to Hospital Street on the following grounds:</p> <ul style="list-style-type: none"> <li>• The large green area is blind to traffic coming in from the main entrance.</li> <li>• Oak Tree road is home to many young families.</li> <li>• An increased traffic flow would represent an overwhelming danger for the safety of children and other users of the green.</li> <li>• Danger posed by speeding traffic and the playground along the proposed connecting road.</li> <li>• Road width of Oaktree Road is not very wide.</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Cars reverse directly onto this road.</li> <li>• Guest parking is limited with most guest cars parking directly on the road.</li> <li>• No hard borders around the driveways and gardens of houses.</li> <li>• Young children run out on to the road after balls.</li> <li>• Noise and environmental pollution.</li> <li>• Road being used as a ring road by high levels of trucks, vans and cars.</li> <li>• Traffic build-up in a small estate with a road surface and layout that is not fit for purpose.</li> <li>• Water drainage issues of the estate roads.</li> <li>• Property value of the homes in our estate will be affected.</li> <li>• This road and connection to hospital street was not on the plans from which I bought my home.</li> </ul>
<b>026</b>	<b>Cathal Mahon</b>	<ul style="list-style-type: none"> <li>• The submission questions if the new road through Oaktree park was part of the original plan and states that many young kids play out in the estate.</li> <li>• Concerns are raised about increased traffic, noise pollution, and the impact on the safety of pedestrians and cyclists in the area.</li> </ul>
<b>027</b>	<b>Victoria Vaughan</b>	<p>Objects to the plans of a road going into oak tree park on the following grounds:</p> <ul style="list-style-type: none"> <li>• More cars and heavy vehicles through the estate, which could cause congestion, delays, and safety risks for residents and children playing in the area.</li> <li>• Increased risk of accidents, particularly for pedestrians, cyclists, and children.</li> <li>• Air pollution, noise pollution, and damage to local ecosystems.</li> <li>• Could result in the loss of green spaces and trees.</li> <li>• Negative impact on the aesthetic value of the area.</li> <li>• Negative impact on property values in the area.</li> </ul> <p>The submission suggests considering alternative routes or solutions, such as improving existing roads or promoting public transport or cycling.</p>

Sub. No.	Name	Summary of Submission
028	Mihaita Stoinoiu	Objects to the proposal to open Hospital Street to Tully Road via Oaktree Road. It is a major risk for kids playing in the estate. Instead, it is suggested that ramps should be installed in Tully Rd for the speeding cars.
029	Gaurav Verma	<p>Objects to the proposal to route a main thoroughfare from Tully Road to Hospital Street on the following grounds:</p> <ul style="list-style-type: none"> <li>• The large green area is blind to traffic coming in from the main entrance.</li> <li>• Oak Tree road is home to many young families.</li> <li>• An increased traffic flow would represent an overwhelming danger for the health and safety of children and other within the borders of the estate.</li> <li>• Danger posed by speeding traffic and the playground along the proposed connecting road.</li> <li>• Road width of Oaktree Road is not very wide.</li> <li>• Cars reverse directly onto this road.</li> <li>• Guest parking is limited with most guest cars parking directly on the road.</li> <li>• No hard borders around the driveways and gardens of houses.</li> <li>• Young children run out on to the road after balls.</li> <li>• Noise and environmental pollution.</li> <li>• Road being used as a ring road by high levels of trucks, vans and cars.</li> <li>• Traffic build-up in a small estate with a road surface and layout that is not fit for purpose.</li> <li>• Water drainage issues of the estate roads.</li> <li>• Property value of the homes in our estate will be affected.</li> </ul>
030	Daniel Meaney	<ul style="list-style-type: none"> <li>• The submission commends the Plan, the SCA and the conclusion that enough land is zoned for housing and employment.</li> <li>• The National Stud/Green Belt (Zoned G) is commended and the importance of protecting the Curragh is highlighted.</li> <li>• The importance of preserving the hedgerows in undeveloped fields and lands zoned for development is also highlighted.</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• The submission commends the Curragh Buffer zone and recommends that native semi-mature trees be used. It is submitted that the former Magee Barracks Phase 1 and Phase 2 roads should be completed simultaneously in order to:               <ul style="list-style-type: none"> <li>○ Facilitate a safer entrance/exit to Lidl.</li> <li>○ Reduce traffic into the town by creating an alternative route for all estates feeding into Melita road (R413).</li> </ul> </li> </ul>
031	<b>Keshmore Construction Ltd.</b>	See Section 6 of Chief Executive's Report.
032	<b>Adele Woods</b>	<p>The submission commends the plan and proposals such as cycle and pedestrian tracks in Cherry Avenue. As a resident of Cunnaberry Hill estate the proposal to open Hospital Street to Tully Road via Oaktree Road appears short sighted and ill-informed for the following reasons:</p> <ul style="list-style-type: none"> <li>• Impact on public safety, traffic hazards and additional air pollution.</li> <li>• Oaktree Road is not suitable as it is lined with houses on both sides that front directly onto the road with no barriers or walls and there is no space to add barriers.</li> <li>• No visitor parking in the estate and as a direct result these cars park along both sides of the road.</li> <li>• Not enough space to provide segregated cycle lanes which should be mandatory on any new road.</li> <li>• The footpaths in the estate are unsuitable in width and height.</li> <li>• The estate is primarily inhabited by young and growing families.</li> <li>• Parallel to Oaktree Road is a playground and green area which represents an immediate and severe safety risk.</li> <li>• In this climate emergency we should be prioritising walking, cycling, and public transport and not additional vehicular traffic.</li> <li>• Cunnaberry Hill is already impacted by significant noise from the adjacent M7 motorway.</li> <li>• Cycle/pedestrian access is sufficient and if vehicle access is deemed essential the use of the county council owned road/lane to the waterworks should be evaluated as an option.</li> </ul>



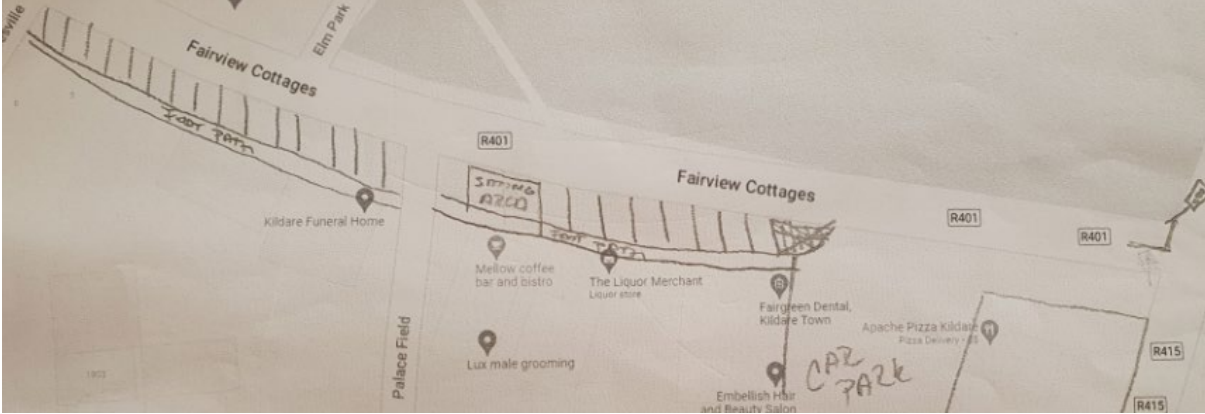
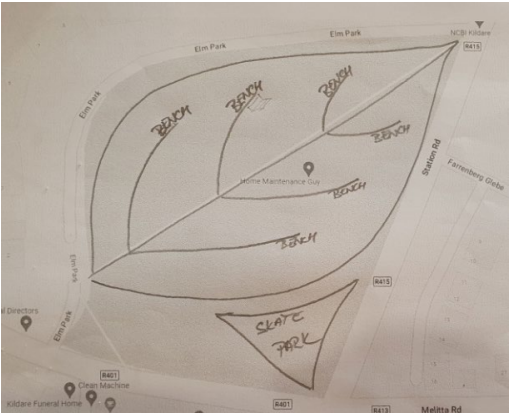
Sub. No.	Name	Summary of Submission
		<p>The writer was unaware of the fact that the road proposal was part of the 2012 Kildare development plan when buying a house in the estate in 2017.</p> <p>It is submitted that walking along some roadways in the area is unsafe due to inadequate footpaths and highlights the footpath that abruptly stops at the front of Cunnaberry Hill along Bride Street.</p>
033	<b>James Johnston</b>	<p>The submission by the owner of the lands surrounding Cherryville junction supports the development of an inland port at this location for the following reasons:</p> <ul style="list-style-type: none"> <li>• It's an Ideal location between Junction 13 and 14.</li> <li>• The general area has minimal residential dwellings.</li> <li>• Would lead to extra jobs in Kildare Town.</li> </ul>
034	<b>Maurice and Karen Meaney</b>	See Section 6 of Chief Executive's Report.
035	<b>Dylan Byrne</b>	<p>Oppose to the plan to open Oaktree Road to the health centre for the following reasons:</p> <ul style="list-style-type: none"> <li>• Risk involved for children in the estate playing on the green and in the playground.</li> <li>• Commuter traffic through the estate.</li> </ul>
036	<b>Simon Holohan</b>	It is submitted that Kildare town has a large catchment area with a considerable population living outside the town boundary, when considered, it will likely show the reality that there are not enough schools, doctors, etc. to serve the existing population in 2023.
037	<b>Richard Bannister</b>	<p>Support the proposed pedestrian and cycle route between the far side of Cunnaberry Hill and the medical centre.</p> <p>Opposed to building a road as this would lead to commuter traffic through a residential area where children regularly play.</p> <p>Submits that the footpath at the entrance to Cunnaberry Hill remains a hazard six years after the estate opened and should be completed.</p>

Sub. No.	Name	Summary of Submission
038	<b>Select Vestry of St. Brigid's Cathedral</b>	<p>This submission relates to St. Brigid's Cathedral and access problems following the realignment of the Kildare Town square.</p> <ul style="list-style-type: none"> <li>• General access is impeded by parking of cars, vans, etc.</li> <li>• Particular problems arise with: <ul style="list-style-type: none"> <li>○ Weekly Sunday services</li> <li>○ Special services such as confirmation, harvest, christmas, etc.</li> <li>○ Funerals</li> <li>○ Concerts and events.</li> </ul> </li> <li>• Access for Emergency Services.</li> <li>• When the Cathedral grounds are full, there is nowhere to divert the cars to as Southwells has been blocked off. Could lead to health and safety problems.</li> <li>• Access for tourists especially during the summer months.</li> <li>• Lack of parking in the town.</li> <li>• Lack of public toilets in the town for tourists.</li> </ul> <p>Above points have been notified to KCC over the past 2-3 years, but no remedial action has been taken.</p>
039	<b>Rory de Bruir</b>	<p><b>Height of proposed structures/developments</b></p> <p>Developments over three storey should have their height designated by flags on poles /scaffolding as part of the planning application process (as required for certain developments in Kilkenny) which would put interested parties 'on notice' as to the ultimate height of a building. Kildare Town is one of the oldest in Ireland and the skyline features a number of significant features. An apartment development now obscures the town and cathedral from many viewpoints as there was no indicator of the eventual height. This would also enhance and protect the town as a tourist attraction.</p> <p>The submission makes reference to a recent refusal of a six-storey hotel and the site notice did not outline the indicative height scale or mass and there was no requirement for a photomontage.</p>

Sub. No.	Name	Summary of Submission
		<p>It is suggested that three storeys should be the criteria as this is the greatest building height on the Square.</p> <p>The submission suggests that a comprehensive review of the nature and extent of the requirement to put all interested parties and those who are likely to be become interested parties on full notice of major developments in the town.</p> <p><b>Planting of Oak Trees</b></p> <p>All developments should make provision for the planting of Oak Trees at a scale and ratio to be determined in 2023 by planners, county counsellors and tidy towns. The submission noted that in Stellenbosch, South Africa there is a requirement for ongoing planting of the Oak Forest /Wood which gave rise to the name Stellen (Oak) Bosch (wood). There is limited oak tree planning or provision in Kildare Town which owes its name to the Oak Tree.</p> <p><b>Provision of Playgrounds</b></p> <p>All developments should make provision for children’s playgrounds at a scale and ratio to be determined in 2023 by planners, county counsellors and tidy towns. There is only one building development where the developer provided a children’s playground. The cost to the developer is moderate but with huge social benefit.</p>
040	<b>Kildare Tourism Enterprise Centre Limited</b>	See Section 6 of the Chief Executive’s Report.
041	<b>RSR Kildare (Ireland) Ltd.</b>	See Section 6 of the Chief Executive’s Report.
042	<b>Uisce Éireann</b>	See Section 4 of the Chief Executive’s Report.

Sub. No.	Name	Summary of Submission
043	Mairead Cooney	<p data-bbox="618 280 1816 312"><b>Hospital St to Tully Road Link Road' via Cunnaberry Hill Estate (Oaktree Road)</b></p> <p data-bbox="618 320 1917 440">The submission highlighted key points of significance in relation to Planning Application Ref 11/1153 and the concerns raised by the Senior Executive Engineer of the Transportation department, regarding the proposed layout.</p> <p data-bbox="618 472 2018 552">It states that an Internal compliance letter dated 7th July 2017 refers to the ABP condition No 3 but in no way addresses the concerns raised internally by the roads engineering staff.</p> <p data-bbox="618 584 2018 663">The submission raised the following concerns in relation to the proposed 'Hospital St to Tully Road Link Road' via Cunnaberry Hill Estate (Oaktree Road):</p> <ul data-bbox="663 695 2029 1342" style="list-style-type: none"> <li data-bbox="663 695 1290 727">• There is a playground on Oaktree Road.</li> <li data-bbox="663 735 1525 767">• There are children cycling and playing on the green area.</li> <li data-bbox="663 775 1491 807">• Serious safety risk to all the children of Oaktree Estate.</li> <li data-bbox="663 815 1917 887">• The booklet provided by the estate agent &amp; developer in Sept 2017 did not show that Oaktree Road may be opened up to the public as an access route.</li> <li data-bbox="663 895 2029 999">• An Bord Pleanala/ Kildare County Council aided in this by granting an entrance which is much more akin to a housing estate than a through road and therefore raised no red flags for potential purchasers.</li> <li data-bbox="663 1007 1491 1038">• Negative impact on the market value of our properties.</li> <li data-bbox="663 1046 1951 1118">• The estate entrance has blind spots for traffic coming from both left and right, with extra traffic it will only be a matter of time before there is an accident.</li> <li data-bbox="663 1126 1962 1190">• Making Meadow Rd one-way would be at the expense of the safety and wellbeing of the Oaktree Residents.</li> <li data-bbox="663 1198 1816 1230">• Oaktree Road has a narrow carriage width with just room for two cars to pass.</li> <li data-bbox="663 1238 1783 1270">• Residents park in their driveways and on the roadway outside their houses.</li> <li data-bbox="663 1278 2029 1342">• Questions which data have been used to estimate the volume of traffic that will pass through the estate.</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• The greener, active travel type approach adopted by the Plan are completely at odds with proposing a rat run through a housing estate.</li> </ul> <p><b>Social Infrastructure Audit</b></p> <ul style="list-style-type: none"> <li>• Given the scale of the increase to the population of Kildare Town there is an existing and future requirement to provide amenities.</li> <li>• It is important to not just focus on statistics, but to consider what would best serve a community.</li> <li>• A public gym, a swimming pool and tennis courts can be used by residents of all ages.</li> <li>• Residents drive to Monasterevin, Newbridge or Naas to access facilities.</li> <li>• Access to amenities may assist in the demand on GP and hospital services, both of which are under severe pressure in Kildare.</li> <li>• Considering climate, it is not acceptable that residents (in greater numbers) continue to drive to avail of these leisure facilities.</li> <li>• Playgrounds in Kildare Town should be inclusive for all children.</li> <li>• Residents of all ages and abilities should be considered in the development of future amenities and leisure facilities.</li> </ul>
044	Anna Hrdlickova	The lack of parking along Fairview road is identified as an big issue for the businesses and residents of the street with people leaving their cars there for the day. The following ideas for improvement was attached to the submission.

Sub. No.	Name	Summary of Submission
		 <p>The submission states that Elm Park has potential and includes a sketch with ideas for improvements:</p> 
045	Owen Kennedy	<p>The submission objects to PERM 4 for the following reasons:</p> <ul style="list-style-type: none"> <li>• Anti-social behaviour, littering, lack of privacy, noise, destruction of existing green areas, felling of mature trees, vandalism.</li> </ul>


Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Bought house because it's in a quiet cul-de-sac.</li> <li>• Drumcree Court have many elderly residents.</li> <li>• It will destroy the peacefulness, safety and ambience of the estate.</li> </ul>
046	<b>MRP Oakland Ltd.</b>	See Section 6 of Chief Executive's Report.
047	<b>Deborah Bonnie</b>	<p>Objects to the proposed walkway between Rathbride Abbey and Rathbride Demense for the following reasons:</p> <ul style="list-style-type: none"> <li>• Bought house because it's in a cul-de-sac.</li> <li>• Walkway will affect the privacy of residents.</li> <li>• The space is currently used for parking.</li> <li>• Risk of mature trees being vandalised.</li> </ul>
048	<b>Han Wang</b>	<p>Objects to the proposal to open Hospital Street to Tully Road via Oaktree Road for the following reasons:</p> <ul style="list-style-type: none"> <li>• Many families with young children who play freely in Oaktree estate.</li> <li>• Massive health and safety risk.</li> <li>• Playground situated on Oaktree Road.</li> <li>• A big risk of injuries and/or deaths to both children and motorists to increasing the traffic levels on this road.</li> <li>• The majority of houses in the estate have no hard borders around their driveways and gardens.</li> </ul>
049	<b>Eimear O'Brien</b>	<p>Objects to the proposed link road from Hospital Street to Tully Road via Oaktree Road on the following grounds:</p> <ul style="list-style-type: none"> <li>• The road will divide an established estate in half.</li> <li>• Huge health and safety concerns for children and residents in Oaktree.</li> <li>• Children play freely in the playground, on the greens, footpaths, and roads around the estate.</li> </ul>


Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• A public road will take away from that independence and safety of the children living in Oaktree.</li> <li>• Heavy traffic volumes passing through the estate.</li> <li>• Noise pollution from HGV's travelling through the estate.</li> <li>• This road will be used to access the Kildare Chilling Company and the R445.</li> <li>• The majority of houses in Oaktree have no hard borders around their driveways and garden.</li> <li>• Entering and exiting driveways will be very dangerous for residents.</li> </ul> <p>It is proposed that the link road should be constructed via the already constructed water treatment facility road. The author is not opposed to a cycle/pedestrian path via Oaktree Road.</p>
050	Benson Ecology	<ul style="list-style-type: none"> <li>• Welcome and agree with the objective to create a people centred, walkable and cycle friendly town. (2.2.1)</li> <li>• Agree with the challenges as described in 1.5.</li> <li>• Not convinced that the Plan addresses the significant identified challenges.</li> </ul> <p><b>Housing, Creating Compact and Connected Communities</b></p> <ul style="list-style-type: none"> <li>• The plan proposes that 65% of all new homes will be within the settlement boundary which suggest that 35% of new homes will continue to follow the “dispersed pattern”.</li> <li>• Questions if the number of new homes within the settlement boundary could be increased to 85%.</li> <li>• Notes that the proposed development of the former Magee Barracks will already account for 60% of all new housing units.</li> <li>• Questions if vacant, unused or derelict properties and sites could be converted for housing.</li> <li>• Welcome the objective to create an intergenerational settlement in the former Magee barracks.</li> <li>• Notes that there were 637 social housing applicants in October 2022 and that Table 3-5 includes a total of 118 Part V Units. The submission questions how the shortfall will be met.</li> <li>• No mention in the plan of the role of Cost Rental accommodation or Housing Associations.</li> </ul>



Sub. No.	Name	Summary of Submission
		<p><b>Public Realm</b></p> <ul style="list-style-type: none"> <li>• Welcomes and acknowledges the success of the re-design of Market Square and support the move towards a pedestrian friendly public realm in the quarter.</li> <li>• Supports the proposed pedestrian connection to Kildare Village.</li> </ul> <p><b>Tourism – Sustainable EcoTourism</b></p> <ul style="list-style-type: none"> <li>• While Natural Heritage is covered in Chapter 9 there is no mention of EcoTourism in Chapter 5.</li> <li>• Chapter 5 should acknowledge that Kildare Town is surrounded by areas of major ecological interest and in some cases international significance. The Curragh Plains, Pollardstown Fen and the Bogs and the water courses of south and west Kildare are of significant ecological and scientific interest.</li> <li>• There is growing international and domestic public appreciation of the importance of nature, natural heritage and nature-based solutions in meeting our climate and biodiversity challenges.</li> <li>• The proposed National Peatlands Park as mentioned in the County Development Plan should be referred to.</li> </ul> <p><b>Kildare Town and the Curragh Plains</b></p> <ul style="list-style-type: none"> <li>• Agree that “An important part of this Plan is ensuring that the development of Kildare Town does not impinge upon this special character of the Curragh Plains”.</li> <li>• Support the proposed “Curragh buffer zone” with appropriate native tree and native understory planting.</li> <li>• Oak trees should have priority given the association with Cill Dara.</li> <li>• The draft Conservation Management Plan for the Curragh Plains and Wayfinding Strategy is likely to be completed during the lifetime of the Kildare LAP. This will further underpin the important linkage between the Curragh and the town of Kildare.</li> <li>• Consideration should be given to a safe pathway or greenway linking the town to the Curragh. (See NHO 1.3).</li> </ul>

Sub. No.	Name	Summary of Submission
051	Pamela Fletcher	<p>Objection to opening Hospital Street to Tully Road via Oaktree Road as it would create health and safety issues in the Oaktree estate. The road is short sighted and ill-informed There are c. 160 houses within the estate with young children who play freely the submission highlights the following grave concerns:</p> <ul style="list-style-type: none"> <li>• Proposed route is dangerous as there is a playground located at the location with children running on both direction in and out of the playground.</li> <li>• There is a green area located adjacent where sports ball already encroaches onto to the roadway, increasing traffic would be disastrous.</li> <li>• No hard border to the majority of houses great risk to children.</li> <li>• Speeding could become an issue in the estate.</li> <li>• Not aware of any other estates with public roads running through them.</li> </ul>
052	Livia Maria Bida	<p>Objection to opening Hospital Street to Tully Road via Oaktree Road as it would create health and safety issues in the Oaktree estate. The road is short sighted and ill-informed There are c. 160 houses within the estate with young children who play freely the submission highlights the following grave concerns:</p> <ul style="list-style-type: none"> <li>• Proposed route is dangerous as there is a playground located at the location with children running on both direction in and out of the playground.</li> <li>• There is a green area located adjacent where sports ball already encroaches onto to the roadway, increasing traffic would be disastrous.</li> <li>• No hard border to the majority of houses great risk to children.</li> <li>• Speeding could become an issue in the estate.</li> <li>• Not aware of any other estates with public roads running through them.</li> </ul>
053	Adam Doyle	<p>Objects to the proposal of joining the HSE Primary Care Clinic and Tully Road via Oaktree Road for the following reasons:</p>
054	Aoife O'Connor	

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• The proposed route is unfeasible for a public road due to its potential hindrance to the safety and wellbeing of the families and young children.</li> <li>• The children in the area are constantly crossing the roads and playing games near the green area and playground that straddles the 'T' junction between Oaktree Road and Oaktree Green.</li> <li>• Community spirit and sense of meitheal in Cunnaberry Hill would be lost.</li> <li>• The treelines in the greenfield area between Cunnaberry Hill and the Primary Care Clinic are home to a number of endangered species such as the Leisler Bat as per Irish and EU Law. Link provided to the Biodiversity Maps of Ireland.</li> </ul> <p>Suggests alternative actions that may be considered for the road network:</p> <ul style="list-style-type: none"> <li>• Instead of limiting the Meadow Way to a one-way system, consider proper enforcement of parking restrictions at the junction of Meadow Way and Dublin Street, thus allowing it to remain two-way. See figure below.</li> </ul>  <p>Fig 1.</p>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Use the pre-existing road to the south of Cunnaberry Hill. See figure below.</li> </ul>  <p>Fig 2.</p>
055	Frances van Oirschot	<p>Strongly objects to the proposal to connect Tully Rd to Hospital St via Oaktree Rd for the following reasons:</p> <ul style="list-style-type: none"> <li>• The writer bought their house in Oaktree Green partly because of the quiet and safe roads, the playground and green areas for kids to play.</li> <li>• Making Meadow Rd one-way would be at the expense of children’s safety in Oaktree Estate.</li> <li>• There is limited parking in the estate, so visitors park on the road, narrowing the roads to slow single lane traffic.</li> </ul>
056	Edel McGovern	<p>The submission recognises the housing crisis and the need for additional housing in Kildare Town, but raises concerns about the lack of amenities, infrastructure and ancillary services to support the residents of Kildare Town.</p> <p>Schools:</p> <ul style="list-style-type: none"> <li>• Not enough capacity at primary or post-primary level, particularly for children with additional needs.</li> <li>• The LAP should include an objective to support the delivery of facilities and services to support children with additional needs.</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• The introduction of the post-primary school at the Magee Barracks site is welcomed, but it is stated that one additional school might not be enough to meet growing needs.</li> </ul> <p>Amenities:</p> <ul style="list-style-type: none"> <li>• Very few services cater to the growing number of teenagers within the town.</li> <li>• The Hive Youth Hub is small and only serves a small proportion of the youth.</li> <li>• Requests the inclusion of a number of objectives in the LAP that would provide a safe space for the teens and youths to meet up that would benefit their mental health and well-being.</li> <li>• A leisure centre, basketball court, public football pitch and a skate park would all be very welcome in Kildare Town.</li> <li>• The existing sports clubs are currently almost at full capacity and will struggle to cater for the growing population.</li> </ul>
057	OPW	See Section 4 of Chief Executive's Report.
058	TII	See Section 4 of Chief Executive's Report.
059	Mary Munnely	<p><b>PERM 4 and PERM 8</b></p> <p>The submission objects to the proposed links for a range of reasons including that they will not achieve the desired aims and objectives of the Plan, that it will lead to a proliferation of crime and that it will have a negative effect on the health and safety, amenities and quality life of residents, particularly their privacy rights. Contends that the proposal will not provide a proportional benefit to Drumcree Court and will not enhance spatial justice to the residents of Drumcree Court which is a legal requirement in formulating and adopting the county and town development plan. Further contends that the proposal will reduce property prices.</p> <p>Outlines concerns that the proposal will create a new "parking hub" within Drumcree Court for unauthorised parking. Contends that the Council has failed to take into account past history of crime when access was previously permitted through Drumcree Court. Also notes that the age profile of the estate has not been taken into account which it is stated is contrary to objective SC 21 Kildare County Development Plan (CDP) 2023 – 2029. Further notes that the proposal is contrary to the CDP provision to '<i>provide a framework for the identification, assessment, protection,</i></p>

Sub. No.	Name	Summary of Submission
		<p><i>management and planning of landscapes'</i> and states that it will detract substantially from the landscape, common area and amenities of the estate. Submits that the draft Plan must be read in conjunction and in accordance the CDP and refers to paragraph 1.1 which states that all development must '<i>in terms of supporting structured new development, protecting the environment, enhancing valued assets and amenities.</i>'</p> <p>Further submits that the draft Plan has failed to comply with Strategic Environmental Assessment (SEA) requirements under EU SEA Directive (2001/42/EC) and the Planning and Development (SEA) Regulations 2004 (as amended). In this regard, it is stated that the draft Plan has failed to properly assess the proposal from a planning, social, economic and environmental perspective in a range of ways, including the deleterious social impact of the walkway, and that it will not strengthen the settlement, contrary to the aim of the RSES. Submission refers to a range of core strategy objectives and states that there is no evidence that council took into account objective 13 which requires that the design of future development complies with the 10- minute settlement or objective 20 as it is premature without a full Settlement Capacity Audit and Social Infrastructure Audit for each local area plan.</p> <p>Submission concludes with a further series of points stating that the proposal has neglected or failed to place sufficient weight on the negative effects on the health, safety and quality of life of residents in Drumcree Court.</p>
060	IOMST	<p><b>Proposed Re-development of Market Square</b></p> <p>Submission asks a number of questions concerning the proposed redevelopment of Market Square, as follows:</p> <ul style="list-style-type: none"> <li>• How long any redevelopment works on and around Market Square will take?</li> <li>• When is it proposed that these works occur?</li> <li>• What effect will this have on street traders using the square and their normal operating routine?</li> <li>• How is it proposed to accommodate them during the works?</li> <li>• How will the redeveloped Square facilitate street traders operating in their usual manner?</li> </ul>

Sub. No.	Name	Summary of Submission
		Submits that the traders using Market Square operate under a historical 'market right' gives a legal right to the use of the area and cannot be unilaterally altered or extinguished.
061	George Ryan	See Section 6 of Chief Executive's Report.
062	Department of Transport	See Section 4 of Chief Executive's Report.
063	Department of Education	See Section 4 of Chief Executive's Report.
064	Niamh Keogh	<p>This submission relates to Perm 2.</p> <ul style="list-style-type: none"> <li>• The access will be created through the end of a Cul-de-sac through a wall close to the submitter's home.</li> <li>• Very annoyed at creating a walkway at this location where they have lived for over 21 years.</li> <li>• Already excellent pedestrian and cycle access at the entrance to our estate which connects directly to the new distributor road and to Rathbride Demesne.</li> <li>• Alter the environment of the estate.</li> <li>• Increases the risk of both anti-social behaviour and crime.</li> <li>• The risk to the young children in the estate increases significantly.</li> <li>• Provides access and egress for those who prey on elderly in their homes.</li> </ul>
065	Malcolm Haig	<p>Objects to Perm 4 and Perm 8 for the following reasons:</p> <ul style="list-style-type: none"> <li>• Potential for 100s(1000s?) of pedestrians and bikes/scooters accessing the streets on a 24-hour basis.</li> <li>• Benefits of our quiet, tidy, clear, relatively secure environments, with play areas will be wiped out overnight.</li> <li>• These multiple exits/entrances/throughways throughout the town, will promote the opportunity for miscreants to engage in anti-social activity, criminal or otherwise.</li> </ul>

Sub. No.	Name	Summary of Submission
066	Rebecca Jones	<p>Strongly objects to the proposal to route a main thoroughfare from Tully Road to Hospital Street, via Oak Tree Road on the following grounds:</p> <ul style="list-style-type: none"> <li>• Health and Safety: The Oak Tree estate includes a playground and the proposed route runs straight past a green large area.</li> <li>• Oak Tree estate is home to many young families. A greatly increased traffic flow would represent an overwhelming danger.</li> <li>• Property Design: The Oak Tree Estate homes are built with paved forecourt areas which do not allow for the construction of walls or gates at the front of the homes. The proposal would therefore constitute an infringement of residents' privacy by limiting their use of the frontages.</li> <li>• Division of the Estate: The potentially heavy levels of traffic will create an unattractive dividing line within the estate.</li> <li>• Parking Concerns: Non-residents will use the side of the roadway for temporary parking which would violate safety provisions, residents' rights, and privacy entitlement.</li> <li>• Property Valuation: Having a roadway within the estate will have a significant impact on house prices in the area.</li> </ul>
067	John Conway	<ul style="list-style-type: none"> <li>• Land is being de-zoned where there is an obvious need for housing.</li> <li>• In a town with higher than national unemployment, it is not appropriate to de-zone land for industry or other employment uses.</li> <li>• Questions where the locals will go who cannot buy houses in Kildare.</li> <li>• There is no strategy to provide for services in the town, particularly sports facilities for children or adults.</li> <li>• Questions why the draft LAP is not postponed to take into account the imminent Census 2022 results.</li> </ul>
068	Bill McDonald	<p>Objects to Perm 4 and Perm 8 for the following reasons:</p> <ul style="list-style-type: none"> <li>• Does not represent the interests of the resident and children of Drumcree Court, Curragh Finn and Rathbride as the current green areas are enclosed, safe and secure.</li> </ul>



Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• This potential footfall will lead to issues with security, litter, vandalism and anti-social behaviour.</li> <li>• Will facilitate increased parking of non-residents who use the train service and do not wish to pay for Irish Rail car park charges.</li> <li>• Volume of traffic will increase as Kildare station now falls under the new outer Dublin Commuter Zone attracting greater numbers of vehicle traffic from other towns to avail of cheaper rail fares.</li> </ul>
<b>069</b>	<b>Lidon Ltd.</b>	See Section 6 of Chief Executive's Report.
<b>070</b>	<b>Elstown Limited</b>	See Section 6 of Chief Executive's Report.
<b>071</b>	<b>Sara Byrne</b>	<p>This submission relates to the proposed walkway through an existing cul-de-sac at the back of Rathbride Abbey. It objects to this proposed walkway stating existing entrance serves all the residents and an additional walkway does not add any value. The current footpaths along the outside of the estate are in perfect condition. Bringing additional footfall through the proposed gap does not add any value, purpose or shorten any distance. It also states the value of a cul-de-sac is safety and security for children and pets and there is no desire to have a walkway from Rathbride Abbey to Rathbride Demesne when the current link at the main entrance, with existing traffic lights for safe crossing, exists already.</p>
<b>072</b>	<b>Frank McMahon</b>	<p>This submission outlines that there is an inadequate provision of public open space and sports facilities in Kildare Town and the Social Infrastructure Audit (SIA) is flawed.</p> <p>Public open space and sports facilities are confused throughout the SIA as sports pitches, private lands and school facilities are included in the calculation of public open space provision. Private facilities including the National Stud, rugby, GAA and soccer clubs are all incorrectly considered in calculations of public open space. It should also be noted the GAA current land are being used on an ad-hoc short-term basis.</p>

Sub. No.	Name	Summary of Submission
		<p>Furthermore, while the SIA confirms that Kildare Town has a young population, with lower than national average educational attainment and higher than national average unemployment. The subsequent analysis however does not take any of these factors into account in assessing the need for public open spaces or for sports facilities.</p> <p>It also considers that the provision of the Cherry Avenue Park will not address both the lack of sports facilities and public open space.</p> <p>This submission requests that the lands zoned “E” in the previous LAP 2012 – 2018 on Old Road be retained for the future development of a community sports campus, for the benefit of the whole town.</p> <p>This submission requests that the lands to the north, comprising 18 acres, currently occupied by the round Towers GAA Club be zoned as “E” in the current plan.</p>
<b>073</b>	<b>Joan Conlan</b>	<p>This submission relates to the proposed closing of Old Road Bridge to through vehicular traffic. The submission supports Cycle 33. It outlines this will benefit school children cycling to Kildare Community College thus avoiding the ever-congested railway bridge on the Dunmurray Road which has no cycle lane under it.</p> <p>It also outlines KCC should resurface this existing roadway and include proper road markings and states it is essential that KCC ensure that cyclists have safe access onto the new Oak Church Road without being impeded by parked/stationary vehicles and temporary dwellings. Furthermore, it states access to the field, alongside the railway track, between Old Road and Dunmurray Road, where the local sewage pumping station is located needs to be maintained as it is checked on a daily basis.</p>
<b>074</b>	<b>Anastassia Pinzariu</b>	<p>Objects to the proposed road to link Hospital Street to Tully Road from Oaktree Road, PA3 due to health and safety concerns. It outlines the proposed route is in the most dangerous location for a public roadway as it would adjoin a playground and green area where the concentration of young</p>

Sub. No.	Name	Summary of Submission
		children in the estate is at its highest. It outlines there would be a high potential for accidents and speeding if this road were to be constructed. It also states they are not aware of any other housing estates with through roads for these health and safety reasons.
075	<b>Tom Blennerhassett</b>	<p>The submission objects to Perms 4, 8, 9 and 10 as these openings would be detrimental to mature and established residential estates, while also introducing unnecessary traffic and anti-social behaviour to these areas. It states the optimum solution is redevelop the main road with bicycle lanes, footpaths and better traffic management. Mature estates should not be opened up, destroying the community therein.</p> <p>This submission outlines issues with Kildare County Council's upkeep of footpaths particularly in the winter months. Four photos have been attached to this submission depicting unclean paths coated with mushed up leaves which the submission indicates is a dangerous slip hazard.</p>
076	<b>Barry Waters</b>	<p><b>Tourism</b></p> <p>The submission states that there is a myth/belief that there is a tunnel that stretches from the cathedral in Kildare town to Grey Abbey beside the Kildare Village (outlet centre) that was used for escape from the town when under attack. Now is the time to investigate if this could be a unique tourism opportunity for Kildare town prior to any more investment put into St Bridget's Square. The town should also be connected to Kildare Village.</p>
077	<b>Mark Murphy</b>	This submission objects to the proposed pedestrian access through Curragh Finn, Perms 4, 8,9 and 13 as opening up their estate would expose children who are playing to potential dangers and increase the number of people using the Curragh Finn estate to park their cars and avoid parking at the train station. This added congestion in the estate would impact health and safety.
078	<b>Gayle Doyle</b>	This submission objects to the proposed pedestrian access through Curragh Finn and Drumcree Court, Perms 5, 7, 8, 9 and 13, as opening up their estate would expose children who are playing to potential dangers and increase the number of people using the Curragh Finn estate to park their cars and avoid parking at the train station. This added congestion in the estate would impact health and safety, increase the risk of anti-social behaviour and decrease the value of housing as it will no longer be a secure estate.
079	<b>Cunnaberry Hill, Oaktree</b>	This submission objects to the proposed link road Oaktree Road to Hospital Street through the Cunnaberry Hill estate. It includes Annex A which is an extract from Map Ref: 7.4 in Appendix A of

Sub. No.	Name	Summary of Submission
	<b>Residents Association</b>	<p>the Draft Plan and Annex B which is an extract of the playground approved by the parent permission for this development. It outlines the playground in Cunnaberry Hill is particularly well used by young residents and these children could be harmed by additional non-local traffic driving through the area.</p> <p>It also outlines the Cunnaberry Hill, Oaktree development has not been taken in charge by Kildare County Council (KCC) and all upkeep has been coordinated by the Residents Association.</p> <p>It notes in section 6.5.1.5. Sports and Recreation the playground is part of the town's social infrastructure, but it has not yet been taken in charge by KCC and is in a poor level of disrepair.</p> <p>Cunnaberry Hill already suffers from noise and environmental pollution from the M7 motorway and existing measures to combat noise have not addressed this issue and issues have been communicated several times through official channels. If the link road where to be developed this would be increased.</p> <p>Furthermore, parking on Oaktree Road is currently uncontrolled and for a through road to work in this location a number of measures are required which are not supported.</p> <p>The developing of a road in this location would be contrary to statement made in the plan relating to lowering carbon emissions in sections 2.1.1, 2.2 MTO 3.3, 7.1, MTO 1.5, MTO 1.3.</p> <p>Boundary areas of households, although as per part of the planning permission granted by KCC required the developer to construct screen walls with brick plinth finish and rendered blockwork capped, facing public areas to private gardens of residents were not to date constructed.</p> <p>The locations in which have been deemed pedestrian priority zones and associated finishing's were not constructed as per the planning application received by KCC.</p>

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		When the town centre is closed for cultural activities the proposed link road may be used as a rat run. The proposal would also have a significant impact flora and fauna especially in thriving hedgerows / shrubbery and trees which are protected in sections 9.3, NHO 2.4 and NHO 2.2.
080	<b>Ailish Murphy</b>	This submission objects to the proposed pedestrian access through Curragh Finn, Perms 4, 8, 9 and 13, as opening up their estate would expose children who are playing to potential dangers and increase the number of people using the Curragh Finn estate to park their cars and avoid parking at the train station. This added congestion in the estate would also impact health and safety.
081	<b>Marie-Anne Ponsard</b>	This submission objects to the proposed pedestrian access through Curragh Finn, Perms 4, 8, 9 and 13, as they state the additional footfall from outside of the estate would compromise safety, children playing and their peaceful neighbourhood.
082	<b>Louise Rollo</b>	This submission objects to the proposed pedestrian linking Curragh Finn and Drumcree Court, as it would increase footfall and car traffic in both estates. Which would create a safety issue for children and may lead to an increase house and car break in. Parking would also be a nuisance for residents.
083	<b>Patrick Kearney</b>	<b>PERM 8, PERM 9 and PERM 13</b> Submission objects to the proposed permeability measures in the Curragh Finn estate. States that the walking and cycle route will lead to problems including anti-social behaviour, the compromising of children's safety and an increased number of cars coming through the estate. Submits that many estates which allowed this to happen in Naas have a problem with cars using the estate as a carpark. Also outlines fears for property values in the estate.
084	<b>Ricardo Olguin</b>	<b>Tully Road to Hospital Street Link</b> Submission by Ricardo Olguin on behalf of the Cunnaberry Hill, Oaktree Residents Association is a duplicate of submission No. 79. submitted under the name of Cunnaberry Hill, Oaktree Residents Association.
085	<b>Elaine McCormack</b>	<b>Link Road through Curragh Finn – PERM 4, PERM 8, PERM 9, PERM 13</b> Submission strongly objects to introducing a link road through Curragh Finn. States that aside from the increase in traffic, it would not be safe for children playing with having extra footfall and strangers walking through. Submits that people will leave cars parked in the estate to avoid paying

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		for car parking at the train station. Contends that the estate already has issues with speeding cars and that they have requested speed ramps to be installed.
086	Jiyoun Kim	<b>PERM 8, PERM 9 and PERM 13</b> Objects to creation of pedestrian/cyclist link through the estate due to child safety, increases in traffic, and anti-social behaviour.
087	John Spencer	<b>PERM 4 and PERM 8</b> Submission completely objects to proposed routes through Drumcree Court. States that cul-de-sac nature of estate gives children freedom without having parents worrying that they will go wider afield. Notes that residents of the estate have had to deal with acts of vandalism in the past with youths jumping the wall between Drumcree Court and Rathbride Close and that this has been stopped due to a barrier being erected. Submits that recreating this link may lead to this occurring again.  Submits that all residents of the estate and neighbouring estates have already voiced objections as part of the public consultation for the Kildare Transport Strategy all of which were completely overlooked with a standard response that concerns can be mitigated through good design. States that the draft Plan shows a complete disregard for the residents of these estates and the actual needs of the town when there is a complete lack of both educational and medical facilities to support the number of new builds in the town.
088	Drumcree Residents Association	<b>PERM 4 and PERM 8</b> Submission from the residents of Drumcree Court outlines objections to the proposed permeability routes and states it already has adequate access to the Rathbride Road and considers that the scale of the various estates proposed would create a serious imbalance in the footfall through the estate.  Outlines a range of additional concerns including, issues relating to the safety of children who play on the green, additional parking of cars in the estate by people using the train station to avoid paying for car parking, and the risk of increased anti-social behaviour. Notes that the estate previously experienced vandalism and extreme anti-social behaviour. Refers to Garda numbers in

Sub. No.	Name	Summary of Submission
		<p>the town and asks that the current Garda ratio to the population is in Kildare and if it meets international standards.</p> <p>Outlines concerns regarding the unfair impact on property values because of these proposals. Requests that residents are engaged with by Kildare County Council before any statutory process takes place and before any decision is taken that affects Drumcree Court.</p>
089	Lynda and Shane Geraghty	<p><b>PERM 2</b></p> <p>Submission refers to section 7.3.1 and specifically PERM 2 in Table 7-1. States that on Map 7.1 it appears that this proposed permeability measure would involve the demolition of part of the existing boundary wall and removal of trees. Submits that this proposal is nonsensical and has the potential to create serious safety issues in a small estate, home to many families with young children who play in this part of the housing estate. Further submits that the proposal to create an exit onto a very busy link road constitutes very bad planning in terms of health and safety, particularly for young children. States that the current entrance to Rathbride Abbey is more than adequate for existing pedestrian and cycle paths and that creating a further entrance circa 150m away from the existing entrance is a waste of taxpayers' money. Strongly urges the council to omit this proposal from the Plan.</p>
090	Chris Geoghegan	<p><b>PERM 8</b></p> <p>Strongly objects to the proposed pedestrian path to link Curraghfinn and Drumcree Court. States that the proposed location of the path would remove green space that children play on and would also have a negative effect on much needed street parking used by houses at that location. Further states it would increase pedestrian/cycle traffic and could contribute to more anti-social behaviour.</p>
091	Shane Byrne	<p><b>PERM 8</b></p> <p>Submission strongly objects to the proposal to connect Curraghfinn and Drumcree Court. States that both estates would lose green space for children to play on. Submits that it would increase foot traffic and the potential of anti-social behaviour. States that as a shift worker more noise in the estate could affect his sleep.</p>
092	Janet Doyle	<p><b>PERM 8, PERM 9 and PERM 13</b></p> <p>Opposes the walkway through Curragh Finn. States that the proposal will increase traffic through the estate, increase the risk of children being knocked down and will also create problems with parking and security for residents. Also outlines concerns about child safety for children playing in</p>

Sub. No.	Name	Summary of Submission
		the estate and states that the proposal will create additional high volumes of pedestrian, cyclist and motorists in the estate that will significantly impact the quality of life of residents.
093	Kieran Conboy	<p><b>Hospital Street to Tully Road Link</b></p> <p>Submission states that this would create major health and safety issues in Oaktree estate which is home to many families with young children who play freely within the estate. Submits that the proposal appears short-sighted and ill-informed and is the most dangerous location for a public roadway, given there is a playground situated on Oaktree Road where the concentration of young children is at its highest. Notes that the houses along this road have no boundary walls and that this introduces further risk of children accidentally running onto a busy road. Also notes the location of a green area at the Tully Road end of the estate is heavily used by children. Submits that the inevitable rise in traffic levels that would occur would be disastrous to both children and motorists and the council would be ultimately responsible for any injuries/ deaths that would happen.</p>
094	Aoife Hegarty	<p><b>PERM 8, PERM 9 and PERM 13</b></p> <p>Objects to proposals which will impact Curragh Finn. States that the proposed walkways from Drumcree Court and North Glebe are of great concern and that they are of no benefit to residents in Curragh Finn. States that the proposed link between North Glebe and Curragh Finn will negatively impact on a green area which is used by many children to play. Submits that the resulting increase in footfall will heighten security and child safety concerns. Outlines concerns that the estate will be used for free parking for the train station and will result in increased vehicular traffic. Outlines further concerns about anti-social behaviour occurring along with noise and light pollution. States that residents have not asked for this and the estate has already easy access via public pathways to amenities and services.</p>
095	Department of Housing, Local Government and Heritage	See Section 4 of CE Report
096	Round Towers GAA Club and Kildare Town AFC	See Section 6 of Chief Executive's Report



Sub. No.	Name	Summary of Submission
097	Meath County Council	See Section 4 of Chief Executive's Report
098	Pousterle Limited	See Section 6 of Chief Executive's Report
099	Ronan Maher	<p><u>Vision for Kildare Town</u>  Supports the vision for Kildare Town and specifically supports:</p> <ul style="list-style-type: none"> <li>• The creation of compact and connected communities and the implementation of 10-minute settlement principals.</li> <li>• The delivery of catch-up infrastructure.</li> <li>• The use of the Former Magee Barracks as a settlement consolidation site.</li> </ul> <p><u>Function, Scale and Population of Kildare Town</u></p> <ul style="list-style-type: none"> <li>• Notes the Kildare town boundary is much larger than the current urban footprint and warns against building outwards without first filling in sites within the town. Reiterates the development of Magee Barracks must come first before Kildare town expands beyond its current footprint.</li> </ul> <p><u>Future Population and Housing Targets</u></p> <ul style="list-style-type: none"> <li>• Notes there were 637 social housing applicants in October 2022 and states that it's not clear that Part V social housing will be sufficient to meet these needs.</li> <li>• Highlights that Table 3-5 suggests a total of 118 Part V Units and recommends that the housing targets be adjusted upwards to address this shortfall.</li> <li>• Submits that the role of Cost Rental accommodation and Housing Associations needs to be addressed and included in the plan.</li> </ul> <p><u>Economic, Retail, Social Infrastructure and Environmental and Heritage Protection</u></p> <ul style="list-style-type: none"> <li>• Notes the site at Grey Abbey Road has no active travel access and recommends that any development of the site must come with associated works on Grey Abbey Road in conjunction with those on Bride Street to link the site to the town centre.</li> </ul> <p><u>Cycling</u></p>

Sub. No.	Name	Summary of Submission
		<p>States that any cycle path/track mentioned in the plan must be separate and segregated cycling infrastructure. Submits that the plan lacks the provision for bike parking and recommends the following:</p> <ul style="list-style-type: none"> <li>• The inclusion of Sheffield stands at all major destinations.</li> <li>• The construction of a secure bike garage at Kildare Train Station</li> <li>• The inclusion of secure bike lockers in Market Square.</li> </ul> <p><u>Tree Coverage</u></p> <ul style="list-style-type: none"> <li>• Submits that any additional tree coverage should come in the form of native trees.</li> </ul>
100	<b>Michael Hegarty</b>	<p>Objects to Perm 8,9,13 for the following reasons:</p> <ul style="list-style-type: none"> <li>• Traffic increase in Curragh Finn.</li> <li>• Car's parking for free in Curragh Finn to use the train station.</li> <li>• Security concerns related to increased footfall in Curragh Finn where young children play.</li> </ul>
101	<b>Shirley Flanagan</b>	<p>Objects to Perm 8 and 4 for the following reasons:</p> <ul style="list-style-type: none"> <li>• Does not represent the interests of the resident and children of Drumcree Court, Curragh Finn and Rathbride. Currently the green areas are enclosed, safe and secure and maintained by the resident's associations.</li> <li>• Potential footfall leading to issues with security, litter, vandalism and anti-social behaviour.</li> <li>• Drumcree Court has in the past been subject to vandalism and the submission questions what the proposal will do to add security for houses.</li> <li>• Increased parking of non-residents who use the train service. The volume is also going to increase with the new outer Dublin Commuter Zone attracting greater numbers of vehicles from towns further south.</li> </ul> <p>Questions if bike/scooter lanes and more lighting along the main roads would not be more beneficial.</p>
102	<b>Kildare Sports Partnership</b>	<p>This submission reiterates the Local Area Plan guidelines outlining what should contain be consideration in any Local Area Plan. It also reiterates findings identified in the Kildare Town Local</p>

Sub. No.	Name	Summary of Submission
		<p>Area Plan 2019-2025 'Report on submissions and observations received during pre-draft consultation stage'.</p> <p>Kildare Sports Partnership is tasked by Sport Ireland and the National Sports Policy with;</p> <ul style="list-style-type: none"> <li>• Increasing participation levels in sport and physical activity (especially among sectors that are under-represented).</li> <li>• Supporting the sustainable development of sport and physical activity in the county by removing barriers and ensuring that opportunities for participation are progressive, innovative and fully inclusive at a local level.</li> </ul> <p>The outcomes that are sought from Kildare Sports Partnership include:</p> <ul style="list-style-type: none"> <li>• Improved planning for the development of sport and physical activity at local level</li> <li>• Increased levels of local participation, especially amongst specific target groups</li> <li>• Enhanced coach education, volunteer training and club development</li> <li>• Better use of existing facilities and priorities for local facility provision and improvement.</li> </ul> <p>The submission also contains population analyses using 2016 census statistics and the Kildare Census 2016 Profile Demographics by AIRO and the County Development Plan.</p> <p>It outlines a consultative workshop it had with a number of sporting stakeholders on 27<sup>th</sup> Feb 2023. Key issues from this meeting related to:</p> <ul style="list-style-type: none"> <li>• While participation in sport and physical activity is relatively even between boys and girls at Primary School level, participation in organised sport is lower amongst the girls.</li> <li>• Participation in sport and physical activity remains high (or increases) for boys in the transition to 1st yr at post-primary - but there is considerable dropout already amongst girls.</li> <li>• Non-participation in sport and physical activity increases steadily throughout the secondary school period - this is more pronounced amongst girls.</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• The need for an expansive campus incorporating outdoor amenities and indoor facilities to facilitate a wide range of competitive sports and physical recreation.</li> <li>• Funding / financing of running costs.</li> <li>• The need for additional pitches.</li> <li>• The current lack of (and decreasing number of) volunteer leaders and coaches.</li> <li>• The ongoing effect of Covid-19 on participation and membership.</li> <li>• The rising costs of facility rental.</li> </ul> <p>The unavailability of indoor sports facilities - the challenges faced by clubs and organisations to cater for ever-increasing numbers (especially those of children and young people). In this regard, a number of clubs reported on the need to cap numbers.</p> <p>This submission contains a ‘Strengths, Opportunities, Challenges and Threats Analysis’ relating to the future provision of sports and physical activity in Kildare Town.</p> <p><u>Strengths</u> - The town has a long history of sport and physical activity provision and the town is well located with proximity to a major motorway and rail line.</p> <p><u>Opportunities</u> – The population is growing and diverse. There is good collaboration between groups and organisations. Kildare Sports Partnerships can provide support and expertise.</p> <p><u>Challenges</u> – The former Army Barracks had provided access to sporting facilities for a number of sports (including GAA, Soccer and Pitch &amp; Putt). Its development as a Strategic Housing Development has had a huge negative impact on opportunities for participation in sport and physical activity. The population has doubled between 1981 and 2016 yet the last major community infrastructure development in the town was CYMS Hall, constructed in 1938. The current population in Kildare Town is one of the youngest towns in Ireland.</p> <p><u>Threats</u> – many sports clubs are facing closure, such as St Brigid’s Boxing Club attributable to a lack of facilities. Kildare has become a dormitory town.</p> <p>The submission reiterates the following walking and cycling facilities are required, including:</p> <ul style="list-style-type: none"> <li>• Dedicated cycle lanes throughout the town</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Cycle lanes and footpaths continued to the Curragh on the Melitta and Rathbride roads.</li> <li>• Cycling links to the Grand Canal cycleway.</li> <li>• Creation of the town as a national cycle hub</li> </ul> <p>Further development of the Slí na Sláinte walking route and proposed park including lighting.</p> <p>The submission indicates there is insufficient provision of amenity facilities for the current and future population growth and there is urgent need to identify and develop a large site to accommodate a wide range of modern outdoor and indoor facilities and amenities.</p> <p>The submission outlines the Kildare Sports Partnership could provide support in terms of education and training of voluntary leaders, young people. Furthermore, it states it could provide advice in terms of capital funding and establish a forum.</p>
103	Seán O'Fearghail	<p><u>General</u></p> <p>Submits that the draft plan is seriously flawed and factually incorrect, containing data that is out of date and/or at variance with the salient facts as they exist in Kildare at present time. Therefore, unless corrected, or radically altered, it is highly probable that this LAP will be the subject to an External Review. States that it's essential to recognise the importance of the ancient town centre and its international heritage and standing and that it must be protected at all costs, and development peripheral to the centre should, where practicable, contain some reflection of the area's history and heritage i.e., Naming of streets, schools', estates, developments etc.</p> <p><u>Transport</u></p> <ul style="list-style-type: none"> <li>• States that the local authority should ensure new residential development provides for direct access to the town centre as a priority, together with access to the Railway Station and the M7 motorway.</li> <li>• Submits that removing the orbital route is a retrograde step and will lead to massive congestion at critical junctions. States the orbital route in Naas and Athy has proved to be essential.</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Consideration should be given to continuing the existing footpath which ends at Newtown Cross onto the Mooretown Road.</li> <li>• Traffic lights or a roundabout should be provided at Newtown Cross.</li> <li>• The Rathbride Road footpath should be continued towards the Kildare Town Soccer Club grounds and Cill Dara Golf Club.</li> <li>• The local access road to the soccer grounds requires substantial upgrading and restoration.</li> </ul> <p><u>Retail</u></p> <p>The submission states the following in relation to Kildare Village:</p> <ul style="list-style-type: none"> <li>• Value Retail/Kildare Village must be recognised as the most significant development in Kildare in modern times, attracting huge visitor numbers, providing valuable employment for people locally and from nearby towns and counties.</li> <li>• Regarding land zoning, lands should be identified and preserved to accommodate the future development of The Village.</li> <li>• Future development at Kildare Village should be contingent upon strengthening existing and providing new linkages to the town centre.</li> <li>• Future expansion of Kildare Village must avoid replication of the existing retail/hospitality offer available at the town centre.</li> <li>• Development of out-of-town retail facilities should be prohibited to avoid the doughnut affect.</li> <li>• Estate-based retailing should be avoided.</li> </ul> <p><u>Tourism and Heritage</u></p> <ul style="list-style-type: none"> <li>• The protection of the ancient St. Brigid's Cathedral and Round Tower site requires priority as does access to the site itself. Means need to be found to restore, to an appropriate level, the collapsed boundary wall, while the remainder of the structure requires continuous management.</li> <li>• Needs to be guaranteed protection of the Abbey sites i.e., White Abbey, Grey Abbey and Black Abbey.</li> <li>• Attention needs to be given by the Local Authority to the graveyards at Grey Abbey and Dunmurry.</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Connectivity between The Village, Kildare town and the National Stud needs to be regularised and maintained.</li> <li>• Any works of an environmental nature around the Market Square should ensure that a particular focus remains on the St. Brigid's Cathedral complex.</li> <li>• The Courthouse needs to be brought into productive public use.</li> </ul> <p><u>Residential</u></p> <ul style="list-style-type: none"> <li>• States that social and affordable housing should be prioritised and trading up and trading down opportunities must be facilitated as a matter of equal importance. The current plan fails to address the needs of those who want to move to a bungalow or supported living facilities.</li> <li>• Also states that no provision is made for larger detached or semi-detached houses to attract buyers with the potential to invest and generate employment in the area.</li> <li>• Objects to the down zone/de-zone of the South Green lands to defer or delay the development of the land for the following reasons: <ul style="list-style-type: none"> <li>○ The land has been zoned for housing since the 1997 Development Plan and continued to be included in all subsequent LAP's.</li> <li>○ The upgrading of services i.e., water, sewage, roads etc have been substantial at considerable expense including to the taxpayer.</li> <li>○ To alter this long-standing proposal after heavy investment would be erroneous in the extreme.</li> <li>○ Undermines the very concept of medium/long-term planning and will shatter the Council's credibility.</li> </ul> </li> <li>• Notes the inappropriate zoning of the Carmelite Fathers land adjacent to White Abbey and propose that these lands i.e., the two fields in the ownership of the Carmelite Order, be zoned residential and be targeted for low density, high quality and/or purpose-built accommodation for older people.</li> </ul> <p><u>Services</u></p> <ul style="list-style-type: none"> <li>• Highlights that the provision of GP services and school places are as important as the provision of water, sewage, and roads.</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• States that large scale residential development are taking place without provision for additional GP service's and scant regard for primary and post primary school admissions.</li> <li>• Submits that the Plan envisages a foolish and unsustainable level of pre-school provision and fails to authentically address Primary and Secondary School places and the provision of Medical Services.</li> <li>• States that a method needs to be found to integrate the Local Authority Planning function and the HSE and Department of Education.</li> <li>• Kildare county council must strive to ensure that bus and rail services, are used to the maximum through the provision of frequent, regular, and affordable services.</li> </ul> <p><u>Recreation and Amenity</u></p> <p>The submission states the following with regards to recreation and amenity:</p> <ul style="list-style-type: none"> <li>• The draft plan identifies open spaces in several estates for public amenity purposes, but these green areas, for example Elm Park and Campion Crescent, are exclusively used by local residents.</li> <li>• It's essential that the park at Cherry Avenue be delivered to meet local amenity needs and to enhance the tourist experience of Kildare town.</li> <li>• Public open space in housing developments should be better developed to include where possible, children's play facilities, and adult exercise areas.</li> <li>• Provision should be made for the development of "Pocket Parks" which could meet the needs of apartment dwellers and those with very limited garden spaces.</li> <li>• Attention should be given to the possibility of developing allotments/community gardens.</li> <li>• Sporting enthusiasts are well serviced by all the Kildare Town Sports Clubs. The Plan should ensure the provision of space/accommodation for the ongoing development and growth of these facilities, having regard to overall population targets.</li> <li>• The Hub and the CWMS Hall should be assessed for their potential to develop to meet growing demands.</li> <li>• Means must be found to develop the Community Centre on Dunmurry Road (planning permission was previously granted), proposed by Cill Dara Housing Association.</li> </ul>



Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>The Council Sport and Recreation Department should investigate the possibility of developing a local tennis club following consultation with the town community.</li> </ul> <p><u>Parking</u></p> <p>The submission states the following with regards to parking:</p> <ul style="list-style-type: none"> <li>Off street, town centre, accessible car parking must be provided in the immediate future.</li> <li>Advises KCC to examine what has been done by the Manx authorities in Douglas where several low rise (2 storey) parking areas have been built on back land and along side streets. In this regard the vast back land area stretching from behind Cunningham's Gastro Pub on Dublin Street to Boland's along Bride Street could be considered. Additionally, the Chilling Factory site could be considered for this or other beneficial development.</li> </ul> <p><u>Dereliction</u></p> <p>Kildare County Council should make active use of the Derelict Site Act to address problematic sites such as:</p> <ul style="list-style-type: none"> <li>The terrace of red brick cottages on Fair Green and Sraíd.</li> <li>O'Mahony House and land at Station Road.</li> <li>Tadhg Hayden's house at White Abbey Road.</li> <li>Cill Dara Housing Associations 2 vacant properties and land at Cleamore Terrace Academy Street, Kildare.</li> <li>The former Water Systems site on Melitta Road could also be included.</li> </ul> <p><u>Market Square</u></p> <p>The submission states the following regarding the Market Square:</p> <ul style="list-style-type: none"> <li>Efforts should continue to develop regular artisan markets on the Square.</li> <li>Additional planning and promotion of the markets should take place.</li> <li>An annual plan for the promotion of the Kildare Town Market Square as an events venue should be agreed.</li> </ul> <p><u>Permeability</u></p> <ul style="list-style-type: none"> <li>Objects to the walkways/links through established estates to the Railway Station for the following reasons:</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>○ Will damage the residential amenity of the estates involved.</li> <li>○ Strong propensity to become locations for antisocial behaviour.</li> <li>○ Many such walkways have been closed and the Council has incurred the wrath of local communities and significant legal expense.</li> <li>● Objects to the link road through Cunnaberry Hill to the Kildare Primary Care Centre. States that it would seriously endanger public safety in a residential area and would limit the operational capacity of the Primary Care Centre.</li> </ul>
104	Irish Home Builders Association (IHBA)	<p><b>Population and Housing Allocation (Quantum of Land Use Zoning)</b></p> <p>Submission from the Irish Home Builders Association (a constituent association of the Construction Industry Federation) strongly refutes land being re-zoned where it had previously been zoned for development purposes. States that as a Self-Sustaining Growth Town and core region within the core strategy it will be unlikely to meet the increased population needs if land is not adequately zoned or removed from the original zoning plans.</p> <p>Refers to draft Plan objective HCO1.3 (relating to encouraging development within the built-up area) and the provision that ‘65% of all new homes to be developed within the defined settlement boundary of the town’ will be ‘consolidation and infill development’. States that while it notes this is a requirement under the NPF, solely focusing on these brownfield/infill sites will not deliver the housing needed as these sites are timely and costly to develop and will not address urgent housing needs. Ultimately these increased costs are passed on to the end purchaser. Contends that it is vital that reference is made to alternative development locations to ensure a range of housing needs can be met and that future needs are taken into consideration.</p> <p>Notes the estimated 2022 population and the projected population for the town in 2029 as outlined in Table 3.3 and states that the draft plan does not account for adequate headroom for the increase in population in its zoned land. Submits that without additional headroom the Plan will fail to meet the increased population’s housing needs. Refers to IHBA’s 2022 review of the NPF and notes that the Census 2022 population for County Kildare represents a +2.1% divergence when compared with the ESRI baseline projection for 2022. States that if this is sustained the divergence would</p>

Sub. No.	Name	Summary of Submission
		<p>grow to 7.2% and that such an increase is not budgeted for in the draft Plan. Contends that these figures would result in an additional housing requirement of approximately 7,100–7,400 homes across the county by 2028.</p> <p>Notes Map Ref. 11.1 which outlines land within the ‘Strategic Reserve’ (SR) and states that they do not consider this to be enough of a buffer for future development. The definition for Strategic Reserve does not go into detail as to how the SR designation would be reviewed over time, which essentially means these lands would not be considered for development within the lifetime of the plan. Submits that if this is the case then the land zoned will not adequately deliver housing needs, resulting in a deficit. Refers to Table 3.1 which states that the Target Residential Density (UPH) is 35-40. Whilst acknowledging the need to have a range of densities, the submission states that they should be considered on a site-by-site basis. Submits that the strategy should consider the soon to be released Sustainable and Compact Settlement Guidelines which will provide further information on density achievements whilst recognising the viability concerns over apartments.</p> <p><b>6.3 Residential Development: Capacity and Delivery</b>  Submits that the residential development objectives (page 62) do not comment on changing household sizes occurring nationally and should be specifically recognised so that housing meets future population needs. Refers again to its review of the NPF stating that that average household size will be 2.2 in 2040 and states that the draft Plan should reference this.</p> <p><b>Sustainable Development (Car parking provisions for new homes)</b>  Notes that the Plan references a <i>‘range of measures to encourage active travel, reduce car dependency...’</i>. States that whilst this is a key component of sustainability in the long term, appropriate infrastructure must be in place for reduced car dependency to be introduced and that this must be factored in if development decisions are made requiring reduced car parking provisions for new homes.</p>
105	NTA	See Section 4 of Chief Executive’s Report

Sub. No.	Name	Summary of Submission
106	Department of the Environment, Climate and Communications	See Section 4 of Chief Executive's Report
107	Mark Stafford	<p>Submission broadly welcomes the draft Plan's publication notwithstanding the fact that the pre-draft issues paper was published in 2018. States that the provision of the statutorily required Transport Strategy, Social Infrastructure Audit and Settlement Capacity Audit is to be welcomed and is useful in informing the draft Plan.</p> <p><b>Vision for Kildare Town</b>  Outlines the purpose of a vision and how it should describe what or where the town needs to be and that should connect with the hopes and dreams of all the stakeholders. A more ambitious vision could be prescribed from the strategic development principles at Figure 2.2 in the Plan. States that aside from Magee Barracks there are no substantial brownfield sites or backland areas within the Town Centre to be developed. The acknowledgment of the requirement to deliver key infrastructure is welcomed. Requests the vision include the provision of new tourist offerings as well as the enhancement of the existing heritage and cultural features mentioned. Submits that the strategic goal of ensuring a vibrant town centre should include a specific emphasis on the regeneration of Fairgreen/Shraud.</p> <p><b>Population Growth</b>  States that population growth is based on the 2016 Census and that an updated population estimate be prepared. It is requested that same would be furnished and revised as necessary prior to the final adoption of the Plan.</p> <p><b>3.5 Delivering Compact Growth</b>  Requests that Magee Barracks should not be classified as a brownfield site or underutilised town centre. A more appropriate designation for Magee Barracks would be as a former institutional site as designated in the County Development Plan, as lands with low development density which</p>

Sub. No.	Name	Summary of Submission
		<p>provided an important service and had a strong cultural connection with the town and with development of the site reflecting its former nature.</p> <p><b>4. Consolidation of the Town Centre</b>  With regard to objective TCO 1.3 (iv), the submission asks if it is intended to band these proposed uses or are they equally all permissible. Also asks if residential uses be listed as the least preferred option for town centre (ground floor) units.</p> <p><b>Kildare Town Renewal Masterplan</b>  Requests that the adoption of sections the Kildare Town Renewal Masterplan should be reviewed prior to adoption as it is submitted that priorities have shifted. States that the Masterplan was indicative of certain projects that could be achieved, and concerns remain regarding certain aspects of same. Specifically refers to the following aspects:</p> <ul style="list-style-type: none"> <li>• Nugent Street Car Park - questions if consideration has been given to the possibility of extending this car park. Other measures are welcomed.</li> <li>• Streetscape regeneration include Fairgreen Street and Jackie's Lane in addition to Shraud Street. Include general enhancement of the area not just the shopfronts.</li> <li>• Submits that the proposed laneway strategy is welcomed particularly those adjacent to the Cathedral. Suggests removal of signs at upper levels indicating that is a residential area as not in keeping with historic area. Submits that the laneway strategy should include all laneways in the Town.</li> <li>• States that the Section 4.3.5 proposal for additional car parking at this location is welcomed. It is submitted no residential development will be permitted at this location or limited to certain number of apartments.</li> <li>• States that proposals to the Old Town Courthouse (section 4.3.6) is welcomed notes its potential to be developed as a tourist attraction similar to Wicklow Gaol or Lifford Old Courthouse.</li> <li>• Re-use of the Water Tower Site is welcomed. Suggests that it should be a destination in its own right and not as sub office of the heritage centre. States that this is a possible location for the Kildare Craft, Creativity and Design Hub.</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>Submits that all of the town renewal projects outlined in Table 4.1 are important and sees no need to rank them in terms of importance.</p> <p><b>Section 5.5 Locations for Economic Development</b>  States that sufficient lands need to be zoned for economic development. Submits that a number of commercial units and businesses at White Abbey Road and Academy Street should be included as part of the Core Retail Area. Submits that the need for office space should be addressed by the Plan in section 5.5.1.</p> <p>Submits that the Enterprise and Employment zoning referred to in objective EDO 1.5 and Industry and Warehousing zoning in objective EDO 1.6 are substantial tranches of land where the cost of development may be prohibitive, and that phasing may be required. States that smaller more manageable sites particularly those to be zoned Q Enterprise and Employment should be provided in the Plan. Notes that the objective in the previous plan to promote Magee barracks as an appropriate site to develop enterprise and employment (7.3.3, EDO1) has been removed and alternative lands should therefore be identified.</p> <p><b>Social Infrastructure</b>  Noting the growth of further educational and the educational opportunities, it is requested that a specific objective be included to support and enhance further education in Kildare Town and that specific support should be given to provide for third level and further education in the draft plan.</p> <p>Notes that Section 6.5 of the draft Plan refers to community facilities as forming part of the social infrastructure of the town and being vital to residents but that no further reference is made to community halls and centres. States that the existing plan refers to the role of the CMWS Hall being used by a number of social sporting groups and acknowledges that it is at capacity and also refers to the provision of a new community hall on the South Green which would alleviate pressure at the CMWS. States that to-date this hall has not been delivered. Refers to objective HC0 4.1 is noted and states that it should be clear in the Plan that the intention is to deliver additional community hall type facilities in addition to the all-weather multi games area (MUGA).</p>

Sub. No.	Name	Summary of Submission
		<p>States that specific reference to the Arts in the draft plan is welcomed and that Kildare Town has a long tradition in the arts, specifically the performing arts with the town boasting an array of drama and musical societies. Notes that objective CUO 2 of the current Plan sought to '<i>support the development of performing arts centre/theatres in the town</i>' and that there has long been a clear case for the provision of a performance/theatre space in Kildare Town. States that this can be achieved as a standalone project or as part of multi-purpose facility and requests that objective HCO 4.3 be bolstered to include a more specific objective. Also requests that similar provision for the same should be included in Table 6.3.</p> <p><b>Permeability</b> Submits that any permeability measures through existing established residential areas should be considered carefully in light of residents' concerns regarding safety and security and that measures should only be conducted after full consultation and having addressed such concerns.</p> <p><b>Public Transport</b> Submits that draft Plan should refer to the objective in the County Development Plan for the reopening of the Curragh Train Station and potential benefits for Kildare Town residents.</p> <p><b>Table 7-4 Roads Measures</b> Refers to measure RD 1 and states that given the number of existing dwellings on the Old Road it is submitted that the closure of the Old Road Bridge to vehicular traffic would not serve any useful purpose. Suggests that a one-way system be introduced instead which would provide room for safe cycle and pedestrian routes. Notes that the direction would need to be determined. Submits that measure RD2 should include one way system on section of White Abbey Road at the Education Centre. Further notes that consideration should be given to one-way system at Chapel Lane and Priests Lane. With regard to measure RD 4 the submission states that this street is sufficiently wide to take existing two vehicle traffic and is not particularly heavy trafficked. Submission concludes by recommending amendment to objective MTO 3.2 following further investigation and consideration.</p>

<b>Sub. No.</b>	<b>Name</b>	<b>Summary of Submission</b>
<b>108</b>	<b>Cristina Conchi</b>	<p>This submission objects to the proposed link road Oaktree Road to Hospital Street through the Cunnaberry Hill estate.</p> <p>The submission questions how the Plan will address current acute shortage of leisure facilities, medical facilities, educational facilities and overpriced shopping options especially in the light of an increasing population.</p>
<b>109</b>	<b>ESB</b>	See Section 4 of Chief Executive's Report
<b>110</b>	<b>Curragh Finn Residents Association</b>	<p>This submission relates to the proposed pedestrian access through Curragh Finn Estate.</p> <p>The submission objects to Perms 4, 8, 9 and 13 as they state these pedestrian openings would impacts children playing safely and could lead to unsocial behaviour.</p>
<b>111</b>	<b>Value Retail Dublin Ltd.</b>	See Section 6 of the Chief Executive's Report
<b>112</b>	<b>Olive Watkins</b>	This submission objects to the proposed pedestrian access through Curragh Finn Estate, Perms 4, 8, 9 and 13 as they state these pedestrian openings would impact children playing safely, increase the likelihood of burglaries. Furthermore, they state existing access route to the train station and environs provide adequate pavements and the proposed opening could provide little benefits.
<b>113</b>	<b>The Irish Province of Carmelites</b>	See Section 6 of Chief Executive's Report
<b>114</b>	<b>Jorge Rodrigues</b>	<p>This submission outlines concerns relating to safety and noise regarding drivers speeding through Kildare Town, especially on Dublin Street in front of the Leinster Square estate. It proposes implementing traffic calming on this section of Dublin Street to address this concern.</p> <p>The Draft Plan should have greater emphasis managing pedestrian, cyclists and parking. It states heritage is an important aspect of Kildare and must be preserved by prioritizing residents and its people as opposed to investing resources to build more roads and increase traffic problems.</p>



Sub. No.	Name	Summary of Submission
115	<b>Teresa Harrington</b>	<ul style="list-style-type: none"> <li>• This submission outlines concerns that the figures for current and future population do not make sense when the amount of new housing developments completed and not completed are taken into account.</li> <li>• There are currently no vacancies at creches, doctors or dentists. The new Curragh secondary school being built in Magee Barracks is only bringing in an extra 400 places as it already has approximately 600 students. Outlining it is simply not good enough for builders to have creches in on the plans of new housing estates as these often do not go ahead and are converted into houses/apartments and the site earmarked on Green/South Green Road for education purposes is not adequate.</li> <li>• The town needs a sports centre, swimming pool, playing fields, parks and another playground. It notes Cherry Avenue park is still lying idle while anti-social behaviour is increasing.</li> <li>• The Plan does not do enough to increase local employment and decrease commuting.</li> <li>• More parking is required to allow people to park and walk to the centre of town. The parking situation on the Square needs to be addressed as it is very dangerous and taking away a much needed civic and social amenity.</li> <li>• No new residential units should be granted until the lack of amenities and facilities in the town is addressed.</li> </ul>
116	<b>Annette Irwin</b>	This submission objects to the proposed walkway from Curragh Finn through to North Glebe.
117	<b>Ciaran Brannock</b>	This submission requests Kildare County Council add an objective to ensure Kildare Chilling is fully compliant with its EPA licences and to ensure it has an appropriate Environmental Odour Management Plan.
118	<b>Senator Mark Wall</b>	<p>The submission is based on issues brought to his attention through conversations with local people, by local members of the Kildare Town Labour Party and through his own observations.</p> <p><b>Social infrastructure</b></p>

Sub. No.	Name	Summary of Submission
		<p>States there is a lack of necessary social infrastructure to support the large number of homes built over the past number of years. Requests that consideration must be given in this Plan to identify areas suitable for such infrastructure across the town. Contends that every town over 5,000 population should have a community playing field/fields and that sports clubs in the town are under pressure with their current facilities. Submits that 12-15 acres of land should be identified for a suitable sports centre that can be run by council but provide the additional playing fields. Requests that the provision of a swimming pool should also be investigated. Further notes that young families are looking for a skate park and suitable locations should be investigated. States that, if possible, a social infrastructure audit should be carried out as part of the final plan.</p> <p><b>GP services</b> Submits that the plan must address the problems so many people and in particular those that have come to live in the town are having in accessing GP services.</p> <p><b>School places</b> States the importance of the plan addressing the current issues with secondary school places and notes that this issue will hopefully be addressed with the development of the new secondary school. Submits that the plan needs to reflect how this school will operate within the current traffic issues of the town, while developing solutions to alleviate any future problems.</p> <p><b>Tourism Potential</b> States that the Plan must concentrate on developing the massive potential of tourism that exists and can develop within the town and on its doorstep which can assist job creation and the wonderful groups in the town currently working in this area.</p> <p><b>Parking</b> States that people have identified the lack of public parking facilities within and near the town and the Plan should address this by mapping current carparks and identify suitable locations where additional parking can be accommodated.</p>

Sub. No.	Name	Summary of Submission
		<p><b>Rail fares and commuting</b> States that the Plan should welcome the proposed new Dublin Commuter Zone ticket arrangements, given as commentary has indicated that Kildare Train Station will be included in the zone. Further submits that given this prospect the train station should be given priority in the development of transport infrastructure. States that parking should be controlled and only allocated where it will not affect current local residents and current problems with such parking must be investigated within the development of this Plan.</p> <p><b>Existing infrastructure</b> States that there is a need for a comprehensive audit of existing footpaths, roads and accessibility currently within the town.</p>
119	Thomas Simpson	See Section 6 of Chief Executive's Report
120	Darren Christie	<p><b>Tully Road to the R445 Link</b> Objects in the strongest possible terms to the Plan to link Tully Road to the R445 via Oaktree Road for vehicular traffic. Outlines concerns about this route becoming a '<i>rat run</i>' by people using the street street to bypass town lights and traffic. Also notes the potential consequences of people using the people the estate as a car park to avoid paying the parking fees at Kildare Medical centre.</p> <p>Notes the dangers posed by increased traffic to children in the estate who are not used to such traffic. Refers to locations and green spaces in which children play where you cannot see traffic coming from the Tully Road direction due to the presence of a wall and submits that increased traffic will pose an inherent danger to children playing at this location. States that given the plans for Meadow Road traffic the proposal will result in traffic levels skyrocketing. Outlines concerns about HGVs, and questions if the route is suitable for heavy traffic. States that at the very least there should be an HGV ban similar to that enforced in Dublin City Centre.</p> <p>Notes that the Oaktree estate is currently not taken in charge by the council and questions if the council will be making these works if they are not actually in charge of the estate. Outlines concerns about the roads width and issues related to cars parked in the estate which will mean two cars will</p>

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		not be able to pass in such instances. Notes that there is currently no effective height difference between the road surface and the footpath. Further notes that the fact that no houses in Oaktree have any form of hard perimeter wall so there is no protection/safeguard from vehicles if they were to mount the footpath in event of accident.
121	Deborah Quigley Daly	<p><b>Hospital Street to Tully Road Link</b></p> <p>Strongly objects to the proposal and outlines a number of areas of concern, relating to health and safety, hazardous driving conditions and increased traffic volumes on Tully Road. Notes that the width of the roads and the entrance in the estate was never planned for a public through road. Notes the presence of the playground along the route and the other green areas which are heavily used by children also border the route. States that these will become unsafe areas for such activities.</p> <p>Submission also notes that there is a lack in parking spots within the estate and a lot of on street parking which would create issues. The design of the estate incorporates no front boundary walls or hedging which will increase the risk of children running onto the road and also the potential of damage to properties in the event of a traffic accident. Refers to use of estate by local primary schools as a cycling training route due to its cul de sac design.</p> <p>States that proposal will increase car use and carbon footprint as residents will be more inclined to drive rather than walk alongside a busy road. Further contends that it will increase volumes of traffic around the school at peak periods should Meadow Road be limited to one way system. Outlines concerns of a 'rat run' being created. Notes the potential impacts on nature, given the rich biodiversity of the treelines in the greenfield area between Cunnaberry Hill and the primary care centre. Contends that the proposal would lead to the devaluation of properties along Oaktree Road as people purchased in the belief that they were buying into a safe enclosed housing estate. Also refers to potential for increased potential for pollution and adverse health impacts on residents.</p> <p>Outlines various development considerations which would be required the council's cost should the road go through. These include the building of brick wall boundaries around all green areas, the cost of building permanent wall boundaries on all properties facing onto Oaktree Road and compensation paid to residents in terms of car insurance. Also refers to other associated building</p>

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		<p>costs such as lighting, widening the entrance to the estate, pedestrian crossings and dealing with the 'blind spot' along the route.</p> <p>Submission concludes by suggesting two alternative options which could be proposed, as follows:</p> <ol style="list-style-type: none"> <li>1. Not limiting the Meadow Way to a one-way system. Look at widening the road in parts and enforcing parking restrictions.</li> <li>2. Development of the pre-existing road south of Cunnaberry Hill which runs parallel to the Motorway and services the Irish Water Treatment building.</li> </ol> <p>Submission attaches a number of photos showing the proposed route through the estate.</p>
122	Gillian Smyth	<p><b>PERM 8, PERM 9 and PERM 13</b></p> <p>Submission objects to the proposed links between Curragh Finn, Drumcree Court and Rathbride Abbey. States they add no value to either estate and the current ring-road pathway is more than sufficient to accommodate children walking to school. Further states that the proposed walkway will impact valuable green space in Curragh Finn which is maintained by residents. Notes that the estate already has issues with parked cars of non-residents and that the addition of pedestrian access will add to this problem. States that such walkways linking estates have been known to increase anti-social behaviour.</p>
123	OPR	See Section 4 of Chief Executive's Report
124	Harry Seymour	<p><b>PERM 4 and PERM 8</b></p> <p>Outlines concerns about proposal for creating these routes. States outrage for proposals and contends that the implementation of such routes will increase the potential for anti-social behaviour and criminal damage. Notes previous incidences of theft and damage to property due to individuals climbing over walls but the activity stopped when the wall was heightened. Submits that the residents of the estate have invested resources in creating a space that is safe, secure and well-maintained and that increased footfall through area will result in greater littering and loitering.</p>
125	Eoin Leavy	See Section 6 of Chief Executive's Report
126	Des Scahill	See Section 6 of Chief Executive's Report

Sub. No.	Name	Summary of Submission
127	Kildare Green Party	<p><b>Vision for Kildare Town</b>  The submission outlines support for the ambitious vision set out for Kildare Town, as well as support for the creation of compact and connected communities, the implementation of the 10-minute settlement, and the delivery of catch-up infrastructure. States that for the town to thrive, residents must have the infrastructure to support themselves. Agrees with the challenges for the town as described in Section 1.5, including its car-orientated urban form, the lack of social infrastructure along with poor public and active transport infrastructure. Also agrees with the objective to create a people-centred, walkable and cycle friendly town. However, the submission states that it is not convinced that the Plan as drafted addresses the very significant identified challenges.</p> <p><b>Housing, Creating Compact and Connected Communities</b>  Notes that 65% of all new homes will be within the settlement boundary and states that this means 35% will continue to follow the '<i>dispersed pattern</i>' identified as a challenge in section 1.5. Asks if the number of new homes within the settlement boundary be increased to 85%? In this context, the submission notes that the proposed development of the former Magee Barracks will already account for 60% of all new housing units. Welcomes objective 3.5 to create an intergenerational settlement in the former Magee Barracks.</p> <p>Notes that there were 637 social housing applicants in October 2022 and states that it is not clear from the Plan that Part V social housing will be sufficient to meet these needs. Notes that Table 3-5 suggest a total of 118 Part V units and questions how the shortfall will be met? Submission also notes that there is no mention in the Plan of the role of Cost Rental Accommodation or Housing Associations and states that perhaps this might be addressed.</p> <p><b>Public Realm</b>  Submission welcomes and acknowledges the success of the re-design of Market Square with the resulting vibrancy and support the move towards a pedestrian friendly public realm. Also supports the proposed pedestrian connection to Kildare Village.</p>

Sub. No.	Name	Summary of Submission
		<p><b>Tourism - EcoTourism</b>  Submits that in section 5.6.1 there is no mention of EcoTourism and states that the Plan should acknowledge that Kildare Town is surrounded by areas of ecological interest including the Curragh, Pollardstown Fen and the bogs of south and west Kildare. While noting that this is considered “niche” tourism the submission states that there is a growing appreciation of the importance of nature and nature-based solutions in meeting our climate and biodiversity challenges.</p> <p><b>Economic, Retail, Social Infrastructure and Environmental and Heritage Protection</b>  Notes that the site at Grey Abbey Road currently has no active travel access and recommends that any development of this site must come with associated works on Grey Abbey Road in conjunction with those on Bride Street so that active travel infrastructure can link the site to the town centre.</p> <p><b>Cycling</b>  Submits that that any cycle path/track mentioned in the plan must be separate and segregated cycling infrastructure as line of paint on a road does not constitute adequate cycling infrastructure. States that the plan lacks any provision for bike parking and recommends the inclusion of the following:</p> <ol style="list-style-type: none"> <li>1. Sheffield stands at all major destinations in the town such as all grocery shops, public buildings and Market Square.</li> <li>2. The construction of a secure bike garage at Kildare Train Station</li> <li>3. The inclusion of secure bike lockers in Market Square.</li> </ol> <p><b>Tree Coverage</b>  Submits that any additional tree coverage should come in the form of native trees.</p>
128	Glenveagh Homes Ltd.	<p><b>Quantum/Phasing of Lands Zoned for New Residential Development</b>  Submission by McCutcheon Halley Planning (MHP) Consultants on behalf of Glenveagh Homes Ltd. states that the company is uniquely placed to help address the housing shortage. Submits that for this to happen the Plan, must be based on Census 2022 to ensure that the forecasts for housing need are accurate so that there is sufficient zoned and serviced land available. States that by not</p>

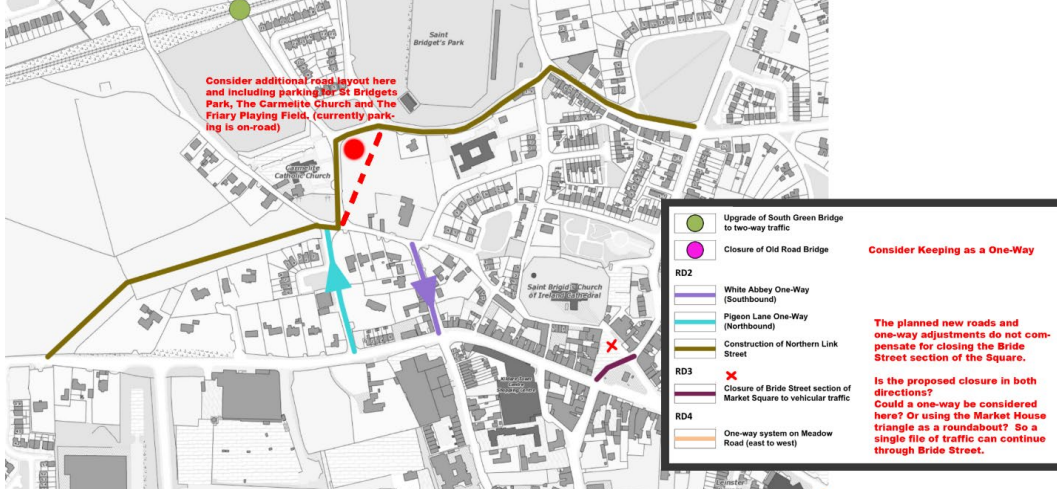
Sub. No.	Name	Summary of Submission
		<p>doing so risks the planning authority failing to discharge its duties established under Section 95 of the Planning and Development Act 2000, as amended. Submits that the population targets in the Draft Plan are outdated and based on proven underestimated population projections and the resulting de-zoning and reallocation of zoned land to Phase 2 will create a shortage of zoned land.</p> <p><b>Evidence-based Planning</b></p> <p>Notes the importance of have an accurate evidence based to inform NPF as this is critical to the success of the entire planning system. Refers to the population projections set out in the NPF which has affect the Draft Plan noted an envisaged 2040 national population of 5.7 million. Submits that the population projections in the NPF are derived from an ESRI report which underestimated long term growth due to severe economic conditions at the time. Submits that the NPF baseline is technically flawed as it does not account for a sufficiently wide set of growth and contraction differentials. States that this flawed analysis has had a cascading effect on regional population projections and plans such as the Draft Plan. Notes more recent CSO statistic and states that aside from factors relating to the war in Ukraine, net migration is considerably higher than estimated in the NPF/RSES.</p> <p>Submits that using the current inaccurate NPF/RSES based population projections to formulate an ‘evidence-based’ core strategy for the Draft Plan is contrary to the purpose of a core strategy which is to facilitate an acceptable equilibrium between the supply of zoned, serviced land for the projected demand for new housing, over the lifetime of the Plan. State that the result of this is that the Draft Plan does not reserve an appropriate amount of land to meet the pent-up demand and population growth. Notes the provisions to review the NPF which will incorporate the results of Census 2022 and states that it will directly impact on the population targets and the quantum of land required to meet housing need, which will result in all development plans being reviewed.</p>



Sub. No.	Name	Summary of Submission
		<p>Accordingly, it is it is strongly recommended that the current LAP is extended until such time as all higher order plans are reviewed and aligned.</p> <p><b>Kildare County Development Plan 2022-2028</b>  Notes the preliminary Census 2022 population for Kildare which it states represents a +2.1% divergence when compared with the ESRI baseline projection for 2022. Submits that if this level of growth continues to 2028 then there would be a divergence of 7.2%, or an additional 18,574 people. States that assuming an Average Household Size (AHS) of 2.5 persons, this additional population would generate a requirement for 7,430 homes or circa 45% more than is currently provided for in the Development Plan.</p> <p><b>Draft Plan - Population Targets</b>  Notes that the preliminary census results identify an increase of 1,747 people within the Kildare ED over the period 2016-2022, with a total estimated population of 11,621 which it states is relevant for demonstrating the rate of growth (averaging 2.5% per annum) that is occurring within and around the Kildare Town area. Submits that based on these figures, a reasonable if conservative estimate is that population of Kildare Town is 10,160. Notes that the Draft Plan targets population growth of 1,182 across the 6-year plan period, this equates to 197 people per annum. Submits that by applying the Census 2022 data this increases to 216 people per annum and the target should therefore be at least 1,296 persons. Notes that Census 2022 results will be available on 29 June 2023 and recommends that these be fully accounted for in the Plan.</p> <p><b>Household Size</b>  Notes that the housing target in draft plan of 430 units equates to a 2.74 household size. States that the NPF acknowledges that the average household size is likely to reduce to 2.5 by 2040 and notes that this is not accounted for in the Draft Plan. Submits that applying the average household size in</p>

Sub. No.	Name	Summary of Submission
		<p>the United Kingdom which in 2021 was 2.3, the housing target in the draft LAP should be revised upwards to 514 units. Further states that applying a population growth target of 1,296 as set out in the preceding section, the housing allocation should be increased to at least 563 units i.e., 133 more units than provided for. Accordingly, the submission recommends that an average household sized at least 2.3 persons per household be applied in the Plan.</p> <p><b>Zoning</b> Notes that the proposed annualised 72 units per annum represents a dramatic reduction when compared to recent housing output in the town, the quantum of land zoning in the previous LAP and the ongoing housing crisis. States that the Section 28 Guidelines for Development Plans provide clear advice to enable the zoning land in excess of that required to meet identified six-year targeted housing need and that land that is zoned and serviced should not be de-zoned, to ensure that there is an adequate supply of zoned housing land. Submission recommends that the zoning of land in the Plan should align with Census 2022 and there should be no de-zoning or reallocation of zoned land until this information is incorporated into higher order plans.</p>
129	Brian Murphy	<p>Submission outlines thanks for the courtesy extended to the public by the council staff at the recent public consultation session for the draft Plan, and also acknowledges the work and research gone into making it.</p> <p><b>Roads and Transportation (Traffic and Cycling Measures)</b> Submission notes that the town is a very attractive place for people to live but this has drawbacks. Notes that the railway line has created a division within the town with 4 of the 5 bridges crossing it restricted to one-way traffic and the fifth limited to pedestrian traffic. States that a lot of heavy vehicles will be transferred to different parts of the town using northern link road but that this has several 90 degree turns to be negotiated. In this regard, the submission notes proposals to add cycle lanes to these routes which would mix with the heavy goods traffic will create difficulties.</p> <p><b>Access to the Cathedral and Market Square</b></p>

Sub. No.	Name	Summary of Submission
		<p>Submits that access around the town is becoming increasingly difficult and needs to be constantly monitored for assessment before major changes are made. States that Kildare is an important '<i>historic town</i>' which needs to facilitate tourist traffic also. Also states that the cathedral is a working cathedral, that hosts services and concerts, in addition to tourists. Contends that parking restrictions on Market Square seriously affected both visitors to the cathedral and businesses in the area. Submits that more thought is needed on this as the draft Plan does not resolve the issue. Recommends further discussion with interested parties before the Plan is agreed.</p> <p><b>Old Tunnels</b> Refers to a system of old tunnels and cellars and evidence of below surface living quarters in some buildings around Market Square and adjacent areas. Submits that these should be considered or explored if only to research and record and add to the overall '<i>mystique</i>' of the town.</p>
130	Garvan de Bruir	<p><b>Roads Measures</b> A number of observations are set out in the annotated map (see below). These observations include the following:</p> <ul style="list-style-type: none"> <li>• RD1 – Closure of Old Bridge Road: Requests that consideration be given to keep it one-way.</li> <li>• RD2 – Construction of Northern Link Street: States that the planned new roads and one-way adjustments do not compensate for closing the Bride Street section of the Square. Also states that consideration should be given for altered road layout within a portion of the route which would also provide for parking for St. Bridget's Park, the Carmelite Church and the Friary playing field.</li> <li>• RD3 – Closure of Bride Street section of Market Square: Asks if this proposed closure is for both directions and whether a one-way closure could be considered, using the Market House as a roundabout?</li> </ul>

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131	Columbia Estates Management (IE) Ltd.	<p><b>Former Magee Barracks Settlement Consolidation Site</b></p> <p>Submission by John Spain Associates on behalf of Columbia Estates Management (IE) Ltd. relates to lands at the former Magee Barracks. Refers to the planning permission granted for a Strategic Housing Development (SHD) 375 no. residential units (Phase 1) by An Bord Pleanála on part of the subject lands and that construction has recently commenced on this. States that the northern portion of the lands have been identified for a new secondary school campus, and it is the intention of the owners to make an application for the remainder of the landholding based on an update of the previously proposed masterplan for Magee Barracks. Submission seeks minor amendments in the proposed framework which it states are intended to provide for maximum <i>'flexibility and viability'</i> regarding the development of the remainder of the of the lands.</p> <p>The submission requests that Figure 11-2 be amended (see Map below) to provide for a realignment and an increase in the extent of the community and residential uses (both in the southeast and northern portions of the site), and reinstatement of the open space as per the permitted SHD (Phase 1) and the previously prepared masterplan for the overall lands, which includes for Phase 2 residential development (now partially superseded by the new secondary</p>

Sub. No.	Name	Summary of Submission
		<p>school campus designation), and provides for public open space at a rate in excess of 15% of the total site. Also seeks amendment of relevant text in Section 11 to reflect these amendments. States that the changes will ensure that the LAP is more closely aligned with the permitted SHD and overall masterplan for the lands. Contends that the new school campus has sufficient land designated to provide a new multi-use games area (MUGA) within the school campus, and this can then be made available to the public outside school hours, which aligns with current best practice, as reflected in Chapter 10 of the County Development Plan (CDP) and the 2008 Guidelines on the Provision of Schools and the Planning System.</p> <p>Notes the provisions of the draft Plan including the zoning objectives for the site (<i>T: Mixed Use</i>), its designation as a Settlement Consolidation Site and the provisions of the Design Framework. Also notes the strategic location of the site within the town. Further notes the Design Framework which incorporates provision for specific uses including housing for older people, supported by additional community infrastructure, including childcare and recreational facilities. Refers to various relevant objectives and provisions such as, permeability measures which provide for new routes to be created through the site. The identification of the need for a MUGA in the town and its proposed location on the former Magee Barracks is also noted.</p> <p>The submission concludes by reiterating its justification for the amendments it is seeking to make noting that its proposals will maximise the potential of these brownfield lands for residential and community uses. Also states that with regard to objectives HCO 2.1 and HCO 3.3, the requested amendments will still ensure that housing for older people and additional community infrastructure, including childcare/recreational facilities, can be brought forward on the lands. Submits that the requested amendments would not impact on the objective to increase the urban canopy coverage by 30% in accordance with the CDP.</p>
132	Maria Barry	<p><b>PERM 8, PERM 9 and PERM 13</b></p> <p>States that as a new resident to the areas she feels that that proposed permeability links PERM 8, PERM 9 and PERM 13 will result in excessive cumulative impact on residents.</p>
133	Michael Lawlor on behalf of	<p>The Curragh Finn Residents Association strongly oppose Perm 4,8,9, and 13 for the following reasons:</p>


Sub. No.	Name	Summary of Submission
	<b>Curragh Finn Residents Association</b>	<ul style="list-style-type: none"> <li>• The estate has many young children playing safely in an enclosed environment which would be exposing to potential dangers.</li> <li>• It will significantly increase the people traffic through the estate which could lead to unsocial behaviour.</li> </ul>
134	<b>Cill Dara le Gaeilge</b>	<p><i>Summary of translation of Irish introductory portion of the submission</i></p> <p>Submission notes that on 28 February 2019 Minister Seán Kyne launched the Kildare Language Plan - the first ever language plan for any county. States that this gave courage to the Irish-speaking community that the council was willing to support the promotion of the Irish language. Notes that the goals are stated on L19 of the language plan: <a href="https://cildaralegaelge.ie/pleanail-teanga/">https://cildaralegaelge.ie/pleanail-teanga/</a> Submits that Irish should be given proper recognition and appropriate status in the LAP and it should be clear in the document that the council not only understands its duties in terms of language under the Official Languages (Amendment) Act 2021 but that the status and use of Irish is important to it. States that it must be recognised that the Irish-speaking community is growing in the county and notes the number of pupils attending all-Irish schools in Kildare Town and in Naas.</p> <p><i>English language section of submission</i></p> <p><b>2.2 Vision for Kildare Town</b></p> <p>States that making the Irish language more accessible to the community should be centric to the proposed vision ensuring, for example, that Irish is visible on public signage and afforded equal status to English, as well as developing more Irish language opportunities in areas such as learning, economy or culture.</p> <p><b>5.4 Kildare Town’s Economic Development Strategy</b></p> <p>States that Cill Dara le Gaeilge provides support to local businesses that wish to leverage the Irish language to promote their business through signage, marketing or through the provision of services. Refers to the Gnó Chill Dara programme offered by Cill Dara le Gaeilge which is open to any business in the county and should be mentioned in the Economic Development Strategy. Submits that the table listing how the Economic Development Strategy will be achieved should include the following bullet points:</p>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• <i>Through providing grants to businesses that wish to erect permanent Irish language or bilingual signage on their premises.</i></li> <li>• <i>By allocating funding to leisure/recreation/environmental/heritage projects only if Irish language or bilingual signage is erected for those projects.</i></li> <li>• <i>Through Encouraging the use of the Irish language at all levels of business by funding an award scheme for businesses that use Irish.</i></li> <li>• <i>By establishing a ‘Is le gach duine an Ghaeilge’ initiative to encourage everyone to use whatever Irish they have and to promote businesses and organisations that provide services through Irish.</i></li> </ul> <p><b>5.6.1 Tourism Development Spatial Strategy</b>  Submits that Irish language should be considered an additional asset to Kildare Town’s unique religious heritage and equine, retailing and recreational assets and included as a heading in this section as a unique selling point for tourism in the area.</p> <p>With regard to objectives EDO 2.2 the submission states that any standardised signage and interpretation for tourism facilities and attractions in the town should be bilingual and that the council should be aware of all its obligations under Acht na dTeangacha Oifigiúla (Leasú), 2021, in this regard. Proposes the following modified wording: <i>‘Facilitate the provision of standardised Irish language / bilingual signage and interpretation for tourism facilities and tourist attractions throughout the town.’</i></p> <p>With regard to Objective EDO 2.3 (b) – creation of a walking trail/greenway, the submission states that any signage on trails of this kind should be bilingual and would add value to such important facilities. Recommends the addition of a bullet point to objective EDO 2.7, as follows <i>‘Engage with Cill Dara le Gaeilge in seeking to ascertain how best to promote Irish language and cultural tourism to the area’</i></p> <p><b>5.7 Retailing</b>  Under Retailing Objectives, the submission recommends that the following provision be included:</p>

Sub. No.	Name	Summary of Submission
		<p><i>'Engage with Cill Dara le Gaeilge in seeking to ascertain how best to promote local businesses that use Irish'</i></p> <p><b>6. Homes and Communities</b> Notes the projections for considerable housing growth in the town over the life of the Plan and that according to the 2016 Census County Kildare bucked the national trend regarding the number of weekly Irish speakers by recording a significant 7.3% increase (outside the education system). Submits that giving new developments an Irish-language name, not only acknowledges this growth, but sends a message that the Irish language is valued in County Kildare in terms of local heritage and history.</p> <p><b>7. Movement and Transportation - Table 7.1</b> Suggests provision to encourage walking, nature walks and info graphs along trails to enhance the experience and encourage people to return. Bilingual signage and trails would be a fantastic addition to such trails and would encourage school groups as well as many others to use such amenities.</p>
135	<b>Kildare Town Chamber of Commerce</b>	<p><b>Zoning of Residential Lands</b> Questions the de-zoning of land when there is an obvious need for housing and asks where will the locals go who cannot buy houses in Kildare? Asks if the draft LAP should follow the instruction of the Minister for Housing in relation to de-zoning? Also questions why the creation of a new LAP can cannot wait until the census is published in the summer?</p> <p><b>Zoning of Employment Lands</b> Notes that the town's unemployment rate that is higher than the national rate and questions if it appropriate to de-zone land for industry or other employment uses.</p> <p><b>Policies to Address Unemployment and Deprivation</b> Asks what specific policies are there in the Plan to address the higher unemployment and higher deprivation levels in Kildare?</p>



Sub. No.	Name	Summary of Submission
		<p><b>Social Infrastructure</b>            Contends that there is no strategy to provide for services in the town, particularly sports facilities for children or adults.</p>
136	4th Kildare Town Scout Group	<p>The following observations are made:</p> <ul style="list-style-type: none"> <li>• The draft Plan needs to provide Kildare Town with a large community centre or facility for use by a number of groups within the town and surrounding areas. Currently there is no community centre in Kildare Town.</li> <li>• The 4th Kildare Town Scout Group are currently searching for a premise to hold their weekly meetings on Monday to Thursday evenings 6.30 to 9pm.</li> <li>• Many community organisations have been struggling to find a permanent location.</li> <li>• The group have been providing a recreational, educational and community facility to the local children for nearly 40 years and provides more information.</li> <li>• Currently 200+ children on the 4th Kildare Town Scout Group waiting list.</li> <li>• This year the group will only admit 20 children due to the restricted space in the rented location.</li> <li>• Many scout groups have closed (Suncroft, Monasterevin, and Portarlington) whose members wants to join other groups.</li> </ul> <p>Highlights the number of times the Scout Den moved in recent years and that the group is currently renting a temporary hall in the De La Salle Building, St. Brigid's Primary School. The long-term future is uncertain which affects the group receiving national and county funding and grants.</p>
137	Sinéad Mahon	<p>Welcomes the overall plan to increase pedestrian and cycleway accessibility but states that the proposed new road infrastructure is not in keeping with the Green agenda.</p> <p>The following issues were raised:</p> <ul style="list-style-type: none"> <li>• Kildare Town should have an overall objective to move parking to the town periphery, specifically town square parking with exception for wheelchair &amp; accessibility parking.</li> <li>• Pedestrian permeability included in planning approvals must be enforced and included in the town plan.</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>The Hospital Road to Tully Road proposal is unacceptable on both safety and environmental grounds. A cycle and pedestrian way only should be included.</li> </ul>
138	BDP Assets Ltd.	<p><b>Section 4.3.1 (Provisions of the TRMP) and Permeability / Car Parking Measures</b></p> <p>The submission refers to Section 4.3.1 of the draft Plan on the issue of '<i>Burgage Plots Development</i>' and a proposed pedestrian and cycle link between Bride Street and Market Square which would pass through the subject site (see lands outlined in red below). It is further noted that the draft Plan makes reference to the site being used for car parking with Figure 4-3 depicting an access way. Also notes proposed permeability measure PERM 29 and Car-parking Measure PK3 both of which affect the subject site. Submits that the provision of a pedestrian/cycle access route would devalue the lands and constrain potential future uses. States that they wish to retain the option of developing the lands in the future and not to restrict the lands to just supplementing parking requirements due to the removal of car parking from the Market Square area.</p> 
139	Cllr. Suzanne Doyle	<p>Submission from Cllr. Doyle provides a background briefing note to the submission which outlines her role as a public representative, both as a councillor and as chair of the Local Community Development Committee. Outlines external issues that have affected the strategic development of the town, including the Strategic Housing Development legislation, and notes that plans should be</p>

Sub. No.	Name	Summary of Submission
		<p>specific and unambiguous in their objectives. Refers to a range of key issues of concern which are dealt with at length in the body of the submission. Contends that the Draft Plan is based on out-of-date data and requests that the plan-making process be deferred until it was better informed by current and relevant data.</p> <p><b>Chapter 2 Vision</b>  Vision should address deprivation factors within town. Suggests replacing '<i>Creating Compact Connected Communities</i>' with '<i>Creating Healthy integrated Communities</i>', in Figure 2-2 Strategic Principles to Achieve the Vision.  The strategic development principle '<i>Enhancing Kildare Town as a Tourist Destination</i>' needs to support bed night spaces through supporting town centre redevelopment opportunities. Requests that reference is made to supporting development of quality over the shop residential opportunities and redevelopment of brownfield sites within town centre in the strategic development principle Ensuring a Vibrant Town Centre.  Requests that the Plan include a further Strategic Development Principle as follows: '<i>Enhancing the living and working ratio Kildare Town</i>' Submits that this part of the vision needs to support quality employment opportunities and the reserving of sufficient lands, including close to the train station and the Cherryville Rail Junction in order to attract key employers. Also, submits that reducing the overall carbon footprint through strong working and living ratios is a valuable opportunity that should be seriously explored in Plan.</p> <p><b>Chapter 3</b>  Struggles with how the Draft Plan complies with the Core Strategy of the CDP as the majority of the units under construction many occupied. That Kildare is exceeding its CDP target.  The submission states the Draft Plan is overshooting by 672 units / 2.5 times prescribed growth rate. The submission states that applying the 4.7% growth allocation based on the known delivery within Kildare town and not accounting for one extra planning permission until 2029, implies a projected housing unit target for County of 23,446 when the current CDP identifies less than 10,000. The submission states that the data sets are not consistent especially when LAPs are statutorily required to be consistent with the core strategy and it places elected representatives into</p>

Sub. No.	Name	Summary of Submission
		<p>an invidious position and undermines the veracity of the planning system. There is no accounting for developments after Census 2022. Developments such as Black Miller Hill and the proposed social development on Station Road have not been accounted for.</p> <p><b>Chapter 4</b>  Include the following in objective TCO 1.3:  (v) <i>Support Kildare town as a tourism destination town through the delivery of adequate convenient town centre parking for both coach visitors and free independent travellers. This objective needs to be supported by research on what levels of parking are provided in other successful tourism destinations with similar profile e.g. Westport.</i>  (vi) <i>Re-establish the primacy of town centre, through the development of public realm activation programmes delivered through a multi-disciplinary stakeholder team, supporting Festivals, events and regular organised street entertainment etc.</i>  (vii) <i>Building on the work of recently established market bye laws, actively support and promote town centre as a venue for contemporary attractive markets that will generate visitor numbers to town.</i>  (viii) <i>Support and protect the independent retail sector, particularly outlets that improve the attractiveness of town as a tourism destination centre.</i></p> <p>Requests the removal of objective TCO 1.6 as there is no town regeneration officer or town team and any decisions regarding the direction of the town should be made through the mandated offices of the MD in consultation with the public.</p> <p>Questions if the delivery of the six masterplan projects outlined under figure 4.1 are listed in accordance of priority. If so, submission requests that they should be reordered, as follows:  Market Sq. and environs  KROV links to town  Cycle and pedestrian improvements  Public realm and enhancements  Town Courthouse improvements  Train station improvements.</p>

Sub. No.	Name	Summary of Submission
		<p>Requests the inclusion of a further project which would see the development of a walled walk around Cathedral in town centre, including the restoration of part of wall, and a lit walkway around Cathedral.</p> <p>With regard to the Market Square and Environs project, it is submitted that the following wording be included 'This plan will encompass an extension to the current Heritage offices that will facilitate necessary extended office space, public space and potential franchise hospitality/ performance space)</p> <p>Also requests that instead of the Water Tower site the Plan should identify the land bank with high levels of vacancy and backland potential that sits between Claregate St, Bride St and Bangup Lane. Section 4.3.1 of the Plan, the Burgage plots identified should also have as many pedestrian links as possible, a number of linkages exist and re-opening them should be included as an objective through future backland development from Boland's Corner to Cunningham's Pub. States that to successfully deliver the Markets Square Project will require and objective for additional car parking spaces which is not outlined in this masterplan. Further states that the development of the Square will also need to be accompanied by an activation plan to ensure that the space is optimised. Submission does not support proposals for Water Tower as the access and egress is too limited given the potential car parking spaces that might be achieved. Outlines other concerns relating to the steep gradient and states that its potential development might better be delivered by the private sector.</p> <p>Submits that reference to Market Square should refer to 'Market Square/Cathedral.</p> <p>Section 4.3.3 - include Irish National Stud and Kildare Retail Outlet Village (KROV) in the bike hire scheme project. Note this such a provision will make it more likely that the scheme would be successful.</p> <p>Section 4.3.4 - include a public realm activation programme that will resource and support development of activities that enhances the attractiveness of town centre. Requests that this section includes an extension to Market House, which is limited by space. States that such a provision should be instead of the water tower project.</p> <p>Welcomes the inclusion of section 4.3.5 but requests that reference be included to enhance the interior platform of train station including the placing of public art or effective promotional artwork on</p>

Sub. No.	Name	Summary of Submission
		<p>approach from both sides of track to enhance the town's important tourist identity and promote the station as a station major stop-off destination.</p> <p>Section 4.3.6 - the redevelopment of the Courthouse is timely but notes the strong appetite for the space to be developed as an interpretative centre that recognises the significance of the equine industry. Refers to the example of the equine museum in Newmarket, England which started on a small scale and are now on their third extended iteration due to the success of the venture.</p> <p>States that the vision for water tower while very attractive is overly ambitious, until the public realm of the town square is completed. Submits that it would be more practical to support the consolidation of town square with an extension of Market House building. States that another alternate project would be to support the continued development of Cathedral Grounds with perhaps an interpretative centre on the site.</p> <p>Requests the following adjustments to Table 4-1:</p> <p>Include additional parking as a priority in conjunction with Market Square public realm.</p> <p>Link to KROV Short Term 5  Courthouse Medium Term 4  Water Tower Long Term 1</p> <p>Requests that additional objectives be included after TCO 2.4, as follows:</p> <p><i>TCO2.5: To select a palate of materials that will give an attractive consistent treatment for public open space throughout the town and be used through conditions of planning to ensure a consistent approach for town aesthetics.</i></p> <p><i>TCO2.6: To require all development within town centre to achieve high standards of design, working within guidelines that aim to achieve a consistent complimentary aesthetic within the urban footprint.</i></p> <p><i>TCO2.7: That any development seeking to deliver a multistorey building (above 2 floors) must use appropriately qualified design teams with experience in delivering quality buildings within heritage towns and similar environs. (This objective can be placed elsewhere and worded more appropriately if required.)</i></p> <p><b>Chapter 5</b></p>

Sub. No.	Name	Summary of Submission
		<p>The submissions states that the Census 2016 data is not reliable enough to base any conclusions on.</p> <p>The submission states there is a need to review location of zoned land in the context of the Economic Development Strategy (pg43).</p> <p>The Economic Development Strategy should mention Building the Brigid Brand as an International USP for town.</p> <p>The submission requests that the Modus Link site has the appropriate for a hotel.</p> <p>The submission refers to the Equine Innovation Hub under Section 5.5.4 of the Draft Plan and requests numbers on what level of activity is in this centre and how many jobs it supports.</p> <p>Cherryville – The submission welcomes reference to the inland port but suggest that this should be reflected in the land use zoning map.</p> <p>The submission states that in respect of the Economic Development objectives they should include reference to; prioritising town centre regeneration, through support of independent retail and tourism activities that enhance the tourism package of town and importantly offer opportunities to extend stay of visitors to close by attractions, such as KTOV, INS &amp; Curragh Racecourse. It is stated that this objective should be first in list.</p> <p>In the context of Table 5-2 the submission states that bed-space ratios of tourism towns of which Kildare should emulate should be included in the Plan.</p> <p>The new welcome standard should be supported.</p> <p>The submission states that undoubtedly the town will be enhanced by the arrival of a large hotel but we should have policies that support the continued supply through this organic approach already been provided in the town.</p> <p>The submission requests for the Draft Plan to identify on a map a core town centre footprint within which we would encourage property owners to explore the development of tourism bed spaces. Perhaps through LEO a pilot of running the spaces through a town co-op (potentially managed through tourism office) could be explored, where consistency of standards are achieved, economies in management where the property owners are simply responsible for investing in high quality spaces that would yield a monthly income.</p>

Sub. No.	Name	Summary of Submission
		<p>The heritage of the town should be supported through naming policies on all new developments and the Plan should put forward a range of suggestions for developments that can build on heritage, ecclesiastical and equine tourism brands.</p> <p>In relation to Section 5.6.1.3 the submitter supports the vision but states the Plan needs policies to protect and nurture independent retail. The submission also in the context to objective TCO 1.3 that the following should be included, 'support and protect the independent retail sector, particularly outlets that improve the attractiveness of town as a tourism destination centre'.</p> <p>In relation to Section 5.6.1.4 (Food Tourism) it states that it is very good but that it needs to reflect the range of offerings.</p> <p>It is recommended that an additional Tourism Objective is inserted to 'support St Brigid's Cathedral in the preservation and development of this historic site as a visitor attraction in Kildare Town.</p> <p>EDO 2.6 what is the vision for the lands at the RACE. Will it not require a change in zoning. It is stated that the site is a location that community groups and recreation and amenity forums have expressed an interest in as a potential shared recreation amenity centre. The submission provides a report commissioned by Kildare Sports Partnership in relation to same.</p> <p>The submission recommends an additional objective to 'deliver appropriately located and sufficient parking spaces both coach parking and Free Independent travellers. The submission states that it is essential to encourage visitors to extend their stay and other tourist destinations all offer ample car parking.</p> <p>The submission recommends that Map 5.1 should be extended to include all of the identified masterplan area between Bride Street and Bang-Up Lane.</p> <p>The submission states that a map identifying the KTOV link for public realm enhancement should be included. Also, that Academy Street will require commercial activation and enhancement and a policy that manages this in a complimentary fashion would help optimise the success of linkages.</p> <p>The submission questions the rationale behind the location of the neighbourhood centre on Map 11.1 and questions whether it is possible to support one neighbourhood centre in Southgreen but identify a number of sites. The submitter is concerned that one location creates a ransom strip and increased site acquisition costs.</p>



Sub. No.	Name	Summary of Submission
		<p>In relation to EDO 3.1 it is submitted that the objective should be strengthened and acknowledge the particular challenges that developing a traditional retail offering in the town centre that Kildare Town has.</p> <p>The submission queries whether it would be possible to have an objective to examine the potential for working with LEO to develop a pilot of creating a co-operative of independent retailer / shop owners to work in tandem in attracting a nice independent retail centre.</p> <p>The submission would like policies that prevented the proliferation of franchise retail in preference for independent retail. It is suggested a restriction on the ratio of retail space that can be devoted to franchise activity or that perhaps 70% of retail space in core centre be dedicated to independent retail. It is stated that this is in the interest of supporting a strong tourism attraction and an identity for the town.</p> <p><b>Chapter 6</b></p> <p>6.2.1 and Table 6.2 - Up to date socio-economic information need to be examined to establish an economic profile of the town and any issues of deprivation, such as educational attainment. Without proper analysis of up to date data a diagnosis cannot be made to address issues appropriately. Using such out of date data is negligent.</p> <p>6.2.1 - Engagement with schools is required to determine mechanisms to address worrying trends from school populations.</p> <p>6.2.3 - A clear profile and graph of housing stock in Kildare Town is required. 62% of the housing stock is labelled as having 5 plus bedrooms, is this correct and can the boundary used to calculate this statistic be defined.</p> <p>HCO1.5 - Should include an objective seeking to achieve a balanced mix of housing typologies across the comprehensive town (within settlement boundary) housing stock.</p> <p>HCO1.6 - Should include an objective to deliver housing stock that is suitable for the right sizing policy.</p> <p>HCO1.7 - Should include an objective to encourage the development of a high quality multi storey (not specified but recognise the need for height to achieve delivery) unit that is attractive to right sizing members of community. Such a development will not be constrained in unit size, should offer concierge facilities and recreation within the building (possibly basement swimming pool), be in</p>

Sub. No.	Name	Summary of Submission
		<p>appropriate convenient town centre location (possible brownfield site) and ideally deliver a courtyard garden. The inclusion of a design framework to illustrate the concept within plan, would be helpful. A potential site to consider for this design framework is the current site of KWETB, with the exception of limited existing residential, this is a very well-located land bank within the town centre.</p> <p>6.4 - CDP density targets are very difficult to achieve without embracing height ambitiously at the cost of personal private space and public open space, each very important factors for personal wellbeing.</p> <p>Policies are required to ensure historic views are not obscured by tall developments and all multi-unit applications for development should use professionally qualified architects and ideally RIAI members, having regard to the importance the heritage status of town.</p> <p>To redress deprivation in the town an objective should be added to provide housing that would attract ABC socio economic demographics with strict adherence to Part V and protection of the existing social housing stock. This ratio of housing stock should be monitored to ensure deprivation is being addressed while not creating an elite enclave.</p> <p>6.4.2 - There should be reference to right sizing legislation that offers option for people whose home no longer meets their needs in the last paragraph of 6.4.2 and HCO 2.5.</p> <p>The site identified in Magee Barracks identified for age friendly housing is welcomed, but another two should be identified. One on Station Road and another on the block of land where KWETB site is currently located.</p> <p>These three sites should also have a creche co-located on them. This should be supported by objective HCO 2.1.</p> <p>6.5 - More detail is required in section 6.5 and the use of non-Irish benchmarks for standards of required social infrastructure is unambitious and does not reflect the lived experience of the community.</p> <p>6.5.1.1 - The new proposed secondary school site appears very small, it is important that we set a high standard for delivery of recreational and amenity lands on sites of any new schools and expansion of existing schools should not be at cost of existing recreation and amenity lands associated with schools.</p>

Sub. No.	Name	Summary of Submission
		<p>6.5.1.2, HCO 3.2, HCO 3.3 and HCO 3.8 - This plan needs to honestly acknowledge the challenges around delivery of quality childcare facilities. The 7 extant permissions for childcare facilities are unlikely to supply the places outlined.</p> <p>Creches should be co-located with existing/new schools, transportation hubs and elderly housing. Statements to encourage developers to act cooperatively in the delivery of large quality childcare facilities (off site) should be included as a means of directing developers to an effective solution to this problem. An objective that requires large employers to include (on site or off site) provision or contribution to same (community creche) for the provision of childcare facilities should also be included in plan.</p> <p>6.5.1.3 - It is not clear if the 3 nursing homes reference are within the settlement boundary. The benchmark used to investigate whether the number of GPs does not reflect the reality of no GPs taking on new patients. This should be addressed.</p> <p>6.5.1.3 and HCO 3.7 - The plan should support the reintroduction of the public dental service on Tully Road.</p> <p>6.5.1.4 - It is not clear if the 1.8ha referenced to the rear of Carmelite Church is St Brigid's Park football field. The plan needs to distinguish between public open space, accessible to all and private open space within housing estates as all are zoned F (Open space and Amenity). Also, a map is required of outdoor facilities.</p> <p>6.5.1.5 and HCO4.1 - All clubs in Kildare Town are currently oversubscribed (club membership data attached with copy of Kildare Sports Partnership submission also). Outlines the potential for a cooperative of voluntary recreation and amenity providers to support delivery of a multi-disciplinary centre to meet needs of town. More land zoned for recreation is therefore required in the following locations.</p> <p>Larger zoned sites include:</p> <ul style="list-style-type: none"> <li>25/30 acres within the South Green development lands, possibly adjacent to secondary school site.</li> <li>25/30 acres within the Green Belt INS lands bounding both Tully Road and Grey Abbey.</li> <li>25/30 acres within the lands beyond RACE on Maddenstown Road.</li> </ul> <p>Smaller potential sites for recreation and amenity include:</p> <ul style="list-style-type: none"> <li>Lands adjacent to graveyard car park that have an existing planning permission for community centre.</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>Portion of the site identified CP2 on Dublin Road, edge of town across from Chilling factory, a site to the North West of these lands could provide a well located sports facility that could achieve linkages to Melitta Road and Ruanbeg.</p> <p>6.5.1.6 - There is a lack of meeting rooms in the town.</p> <p>6.5.1.7 and HCO 4.3 - There is need for a theatre and multimedia facility in the town.</p> <p>6.5.1.8 and HCO 4.9 - Community space is required to accommodate worship of diverse faiths. Further cemetery space and a crematorium close to the motorway are also required.</p> <p>6.5.1.9 - Neighbourhood centres should not undermine the primacy of the town centre, should have limited opening hours and should not sell alcohol and fast food.</p> <p>Table 6.3 - The area proposed for the post primary school in the Former Magee Barracks site should be increased to ensure larger proportion of amenity space.</p> <p>Table 6.3 and HCO 3.5 - Two locations should be identified for new primary schools and a further location to relocate St Brigid's School.</p> <p>HCO 4.2 - Remove pump track, replace with destination attraction such as largest tree house in Europe in order to create destination attraction on this site.</p> <p>Add HCO 4.10: Support the delivery of 2 further public playgrounds within Kildare town and the comprehensive refurbishment of current playground on Station Road.</p> <p>Add HCO 4.11: Support the delivery of an ECO park within or on boundary of settlement.</p> <p>Add HCO 4.12: Develop the lands adjacent to Towers football club known as Weigh bridge for delivery of a Skateboard park.</p> <p>Add HCO 4.13: Continue to develop Sli Na Slainte routes throughout the town, including link from KROV and Tully Sli through to Cherry Ave via road to WWTP parallel to motorway.</p> <p>Add HCO 4.14: Support the delivery of a Community Centre on Dunmurray Road in lands adjacent to cemetery car park.</p> <p><b>Chapter 7</b></p> <p>Encourages the use of one-way systems to facilitate footpaths and cycle lanes.</p> <p>Proposes the following new road measures for inclusion in the Draft Plan:</p>

Sub. No.	Name	Summary of Submission
		<p><i>'To create a series of one-way systems throughout the town that will facilitate DMURS footpaths and cycle lanes throughout town and create a ready flow of traffic designed to remove congestion and unnecessary traffic from town centre.'</i></p> <p>Suggests including graphs outlining the necessary road widths of key routes (Melitta Rd, Tully Rd, Rathride Rd, Dublin Rd, etc.) to demonstrate their capacity to support pedestrian, cycle, and motor movements.</p> <p>Suggests including a set of guidelines for permeability routes including standards of delivery with regards to:</p> <ul style="list-style-type: none"> <li>• Safety, the scale and design of the housing estates that proposed routes cross through; and the cumulative impact on estates close to key destination points.</li> </ul> <p>Submits that PERM 4 channels a much larger estate through a much smaller one.</p> <p>Submits that PERM 7 achieves little increased accessibility.</p> <p>Submits that PERM 11 will result in an over burden of footfall through Dunmurray View and it will require the train station to orient public access on both sides of the platform.</p> <p>Submits that PERM 15 should preferably be located to access through or on the boundary of the Local Industrial estate.</p> <p>Submits that PERM 16 will be difficult to achieve due to the significant difference in ground level.</p> <p>Submits that PERM 18 needs to be progressed in the short term.</p> <p>It is submitted that a condition needs to be attached to the delivery of the new post primary school to deliver PERM 19 in a similar time frame.</p> <p>Submits that PERM 26 should be supported with more extensive cycle links through KROV.</p> <p>Submits that PERM 27 should be mapped, notes very limited permeability through this site and states that this site has the capacity to deliver in reducing car journeys to work in KROV and in encouraging walking from the bus terminal at KROV.</p> <p>The submission states that the very low levels of cycling within Kildare Town might be explained by the many narrow carriageways and poor public lighting.</p> <p>States that the identified cycle routes outlined in blue seems to indicate a degree of difficulty in accommodating these routes.</p> <p>Question what is meant by 'middle section' in the description of Cycle 4 and Cycle 9.</p>

Sub. No.	Name	Summary of Submission
		<p>Regarding Cycle 4, it is submitted that the width of the carriageway often struggles to support buses and cars and questions it's capacity to support a dedicated cycle lane.</p> <p>Submits that route Cycle 5 would need dedicated safe passage for cyclists, and motorised scooters. Expressed concern about pedestrians and vulnerable road users on a shared cycle lane.</p> <p>Submits that route Cycle 6 would need dedicated safe passage for cyclists, and motorised scooters. Expressed concern about pedestrians and vulnerable road users on a shared cycle lane.</p> <p>Submits that this route should be prioritised for pedestrian users and should be located within the lands marked F.</p> <p>Questions why Cycle 14 and Cycle 15 isn't continuous.</p> <p>Concern raised with regards to the capacity of Cycle 17 to safely support a cycle route.</p> <p>Questions what the distinction is between Cycle 4 (blue) and Cycle 21 (red).</p> <p>Submits that Cycle 42 and 43 will be very difficult to deliver due to the carriage width and footpath width and poor site lines.</p> <p>Submits that Cycle 34 should be delivered as part of the imminent development of Fairview cottages and states that the route is currently the subject of ASB.</p> <p>Highlights that the removal of vehicle access to Palace Field Cottages will be problematic.</p> <p>Submits that Cycle 32 should drop south and link with an extended cycle 6 to be delivered as a safe and separate route from pedestrian link on same path.</p> <p>Also submits that Cycle 46 should be relocated to use the route to the WWTP.</p> <p>Submits that Cycle 35 may not be compatible with the plans to pedestrianise town Sq and create vehicle access to service local business.</p> <p>Submits that Cycle 53 should be moved to the boundary of Woodside Park and the Industrial estate.</p> <p>The following comment is made in relation to Cycle 56: <i>'Not wide enough.'</i></p> <p>Submits that Cycle 58 would not be necessary if Cycle 46 is dropped to connect with Cycle 6.</p> <p>Submits that the identified routes on Maps 7.1 &amp; 7.2 in the area between Dunmurray rd and Rathbride rd only achieve a short reduction on maximum times to the train station.</p> <p>States that data on stats outlining the merit of including these routes would be helpful to support the merit for inclusion of these routes.</p> <p>Issue raised during a meeting held to discuss vulnerable road users in town:</p>

Sub. No.	Name	Summary of Submission
		<p>Narrow, uneven and in poor repair paths in town with specific mention of the:  Town Centre footpaths/particularly from HIVE to BOI.  Station road, entire path from Sq to turn for Melitta rd.  Tully Sli Na Slainte, particularly from Newtown Cross to Bull testing Station.  Need to use non-slip/trip materials for paths.  Car chargers blocking pedestrians outside the Kildare House Hotel.  The high kerb heights are problematic in places.  All new kerbs should have a dished access point at regular convenient intervals.  Requirement for new footpath to connect the estate on Monasterevin rd.  Prioritise path delivery to Golf Club on Rathbride rd.  Traffic calming measures on Rathbride Rd.  Safety concerns regarding the right of way at the top of Priests lane meeting Green rd &amp; Firecastle.  Sight lines at Cross Quays  Supports the introduction of roundabouts including pedestrian crossings in certain locations to relieve congestion.  The junctions at Cross Quays and CWMS were highlighted for difficulty to achieve pedestrian crossing.  Re-examine light sequences particularly at Connollys Chemist and Tesco to introduce filter turns.  Need to review timelines on TL for pedestrians crossing.  Locations requiring dedicated pedestrian crossings:  Between ice cream parlour and Silken Thomas.  Ball Alley Hill between Sq and Playground.  From Garda Station to Kildare House Hotel.  Require clear road markings throughout town for people with vision problems.  Inadequate school parking at St Brigid's Primary School.  Loading bay on Market Sq close to ice cream parlour, too close to junction.  Support for limited stay use of disabled bays and age friendly spots.  Poor lighting and safety concerns expressed around Top Nolan's carpark.  Bicycle lanes that stop without notice.  Use of scooters and bicycles on footpaths with no lights.</p>

Sub. No.	Name	Summary of Submission
		<p>Drainage problems at entrance to Campion Crescent.  The corner at the ice cream parlour is too tight, need to remove a car space.  All day parking at Fairview restricts access and business activity.  Extend regulation to include Fairgreen in Kildare.  Proposes the following new public transport measure: 'PT 8 Reinstate the town link bus service required as a condition of KROV planning. This bus link looped between Train station, town centre, INS, KROV, town Centre and train station. It is an important service in supporting tourism objectives and reducing traffic to each of these locations.'  To add a further objective to MTO2.4:  To get the third rail route, reaching Hazelhatch at present, to be extended to Kildare train station.  The submission questions how MTO 2.7 could be achieved.  Proposes the following new public transport objective for inclusion in the Draft Plan:  '<i>To provide dedicated coach parking in appropriate location in Kildare town to facilitate tourist coach travel passengers complemented by a convenient set down area in the town centre.</i>'  Raised the following concerns regarding the intentionally restrained roads strategy of the Draft Plan:  Opportunity for the delivery of road infrastructure to support the medium to long-term growth of the town will be lost.  While the modal shift to active travel is meritorious, the elimination of the motor vehicle is not foreseen.  With the ability of the current WWTP to be upgraded to 45,000 PE, routes need to be secured to service a town that may potentially grow to this size.  Submits that Cycle 7 and PERM 5 should be upgraded into an orbital route and needs to be connected to Monasterevin Rd at appropriate locations, shifted north to run adjacent to the post primary school linking to cycle 16, plotted further to cycle 54 (upgraded to bridge for pedestrians, cyclists and motorists) and further plotted to meet Dublin rd.  Proposes the following new road measures for inclusion in the Draft Plan: '<i>Identify an outer orbital vehicle route to be protected for future delivery.</i>'  Road Measure PA 4 needs to be fast tracked through the delivery of the new post primary school.  PA 3 needs to incorporate a link with route from KROV through Cycle 6 using route to WWTP and link to Cherry Ave.</p>



Sub. No.	Name	Summary of Submission
		<p>Proposes the following new road and street network objective for inclusion in the Draft Plan:  MTO 3.7 - <i>‘Working with the NTA, Irish Rail and TII, examine the feasibility of delivering an inland port at Cherryville junction just beyond settlement boundary.’</i></p> <p>The submission highlights the following issues with regards to the <u>proposed car parks</u>:  Car park 1 is already in use and does not represent additional parking.  Car park 2 will be difficult to deliver with limited access and space.  Car park 3 is not conveniently located.</p> <p>The submission refers to objective MTO 4.4 and states that the town centre needs to offer parking equally convenient to that at edge of town centre sites, albeit this parking will be charged.</p> <p><u>Tourism towns</u>  The provision of adequate appropriately located car parking is essential to developing a key tourism hub within Kildare Town.  Needs to set out what the parking quantum is, need to be above the guidelines for non-tourist towns.  Need to research successful tourism towns such as Westport.</p> <p><u>Suggested alternatives for car parking to be considered:</u>  May be delivered in multi storey development or through the re location of existing uses within the town.  An extension of the current Nugent street car park through the relocation and upgrade of the playground.  Lands at Tower View.  Derelict site across from HARP bar.  Extension into rear of Old Convent site.  Link a number of brownfield sites to the rear of properties in town centre with linkages through old burgage plot access routes.  The relocation of school sites close to KROV could potentially services visitors to KROV while affording them convenient access to town.</p> <p><u>Train station car park</u>  Appears as though the upgrade of the train station car park does not deliver more space.  Need to set adequate targets for parking.</p>

Sub. No.	Name	Summary of Submission
		<p>Both a north and south side car park will be required.  Previous plans conditioned developers to acquire lands for a northside car park, these need to be re-investigated.  The submission is accompanied by a map which highlights the site marked in black for the extension of train station parking.  <u>The following issues are raised in relation to street parking:</u>  A one-way system should afford more on street parking which will provide for the elderly and disabled.  Supporting the town centre first principles is not sustainable without adequate car parking.  <u>Issue raised during a meeting held to discuss vulnerable road users in town:</u>  Insufficient car parking in town, very limited convenience for disabled or elderly drivers.</p> <p><b>Chapter 9</b>  Add NHO2.7 -To designate an appropriate site in Kildare that will secure the service delivered by Kildare Wild Animal Rescue Centre. This service plays an important role in the local biodiversity. Last year they treated and released over 400 animals into the wild. The service is currently operated on a short term lease in buildings and lands within the Grey Abbey Veterinary practice in Kildare town. While they have a very generous list of patrons they are prohibited from applying for many capital grants as they do not have a permanent location with secure lease or ownership. The delivery of this service relies heavily on funding and puts the service under threat into the future.  Add NHO2.8 - To designate lands for the development of a Natural Eco Park within Kildare town to be delivered and managed by KCC.  Add NO4.4 - As a legacy project for Brigid 1500 require all developments in excess of 50 units to plant at least one well established mature tree in prominent appropriate location (determined in consultation with Parks Dept) either on or off site. Given the heritage of Kildare town 'Church of the Oak', if possible, these should be Oak Trees.  Add NO4.5 - Prepare and plant a tree planting landscape plan to establish an avenue of mature trees from Roundabout at KROV up to Monasterevin Road Junction on both sides of road.  Adequate ducting should also be provided to support lighting trees for Christmas season.</p>

Sub. No.	Name	Summary of Submission
		<p><b>Chapter 10</b>  The shared waste and surface water drainage system of the old historic town is causing regular occurrences of a malodourous environment. The town centre buildings used for accommodation, the area along Academy Street around to the junction where CWMS meets Parish Sq. is specifically highlighted.  Submits that the high levels of lime in water should be acknowledged, and an objective should be included to have a polishing filtration system put back into operation.  Highlights that certain areas within town frequently experience flooding including areas with a shared surface and wastewater drainage system. Areas such as Campion Crescent, Chapmans Garage and occasionally at CWMS.</p> <p><b>Chapter 11</b>  Section 11.1 Former Magee Barracks/ Section 6.3 Residential Development, Capacity and Delivery Welcomes the detail of this chapter and its focus on delivery. Outlines the history of the site from its use as an army barracks, its closure in the 1990s, its use as a refugee centre and traveller accommodation site and its subsequent sale to a private developer. The submission welcomes the inclusion of a parkland within site.  Further states that despite the clear objectives in current (2012-2018) LAP that site should primarily deliver job creation opportunities, an application for substantial housing has been granted permission.  Stresses the importance of Magee Barracks being developed in a manner that deliver a for the future development of Kildare town. Submits that reference to Magee Barracks as a designated Settlement Consolidated Site is at complete variance with vision for site within the 2012-2018 LAP as primarily a employment generating location due to its highly attractive for potential employment generating investment. States that the displacement of this very important objective needs to be re-designated to alternate optimum site within settlement boundary, ideally on lands close to train station, potentially some of the 'CP2' lands. Notes that in previous plan a portion of this land had an enterprise and employment zoning.  States that the Plan as outlined in 11.1 has some merit, however, submits that given the western direction in which town development has already begun, it is going to create an east and west side</p>

Sub. No.	Name	Summary of Submission
		<p>of town. Submits that in previous plans we were advised that the westerly direction of growth of the town was preferable for the following reasons:</p> <p>There was natural boundary constraining town on the Curragh side.</p> <p>There was natural boundary on the southern side with the Irish national Stud and it was also considered inappropriate to go beyond the motorway.</p> <p>Notes that an IFPLUT study was presented that advised against development on the Southwest Quadrant on Monasterevin Road, for various reasons and that the planning advice informed our decision to develop lands in the Southgreen area.</p> <p>11-2 Magee Barracks Design Framework</p> <p>States that the framework map does deliver important and valuable linkages from hospital Street to Melitta Road but submits that it needs stronger linkages to the existing town centre or otherwise it may run risk of competing with town centre. Perhaps to identify both a pedestrian and vehicle link through Magee Terrace. Requests more detail to design objectives, for example in creating a strong streetscape with the potential to develop 3/4 storey executive style on street housing, indicated within this framework.</p> <p>Further submits that the land identified for multi-games area is welcome but needs to be considered in terms of a detailed accurate needs analysis for town. Submission refers to an attached report from Kildare Sports Partnership outlining a need for a 20/30-acre site to adequately meet growing recreational needs.</p> <p>Welcomes location of the crèche but wonders if would be better to place both the green space and crèche possibly beside schools where the co-location might be more advantageous. Notes that the development of Cherry Avenue close by will result in two parks in proximity. Suggests that the location of landscaped plaza might be replaced and extended to deliver identify an objective of Performance and Arts Centre over at least 3 floors (see model of theatre in Waterford). Notes the potential shared use of Lidl car park for evening performance could be efficient use of surface car parking.</p> <p>Understands that plans are in place to relocate Fitzpatrick's Garage site opposite to Magee Barracks on Hospital Street. States that it would be important to determine what might go on that site that could potentially run the risk of sandwiching historic town centre between two behemoths or indeed require an AAP for any future development of such a large site.</p>

Sub. No.	Name	Summary of Submission
		<p>11-4 Land-Use Zoning Objectives</p> <p>Suggests that F: Open Space &amp; Amenity needs to be broken up into sub-categories:</p> <p>F/O: Open space, identifying passive green space within town that is developed and easily accessible to all.</p> <p>F/OV: Open space, identifying passive green space within town that is private open space delivered as part of a residential development.</p> <p>F/R: Identifying appropriate green space that is suitable for the development of active recreation.</p> <p>11.4 Land Use Zoning Matrix</p> <p>Requests the following changes:</p> <p>Amusement Arcade: remove optional in town centre and have consistency in all categories.</p> <p>Betting Office: Replace 'O' with 'N' under Neighbourhood centre.</p> <p>Hot Food Takeaway: replace 'Y' with 'N' under neighbourhood centre.</p> <p>Pub: Other than town centre with 'Y' all other categories should be 'N'.</p> <p>Emergency residential accommodation: replace 'Y' with 'N' under town centre.</p> <p>Restaurant: Replace 'N' with 'Y' under National Stud.</p> <p>Map Ref: 11.1 Land Use Zoning</p> <p>Submission includes a copy of the Draft Land Use Zoning Map (Map Ref: 11.1) containing handwritten annotations for the following requests:</p> <p>'Y': which relates to a number of sites in the town for which it is requested that there should be a zoning objective for shared use facilities for both childcare and elderly stepdown facilities.</p> <p>'Y': Requests zoning for crèche facility on Southgreen Road beside site zoned for neighbourhood centre.</p> <p>'2': Community centre to be located on a site on the Dunmurray Road in the north of the town, opposite the cemetery zoned 'F' in Draft Plan.</p> <p>'2': Lands located to the east of the town on proposed to be zoned 'Cp2' in Draft Plan, requested to be zoned community centre / 5 acres.</p> <p>'K': An area extending to c. 25 acres located to the south of the Motorway on the Irish National Stud lands requested to be zoned for open space and amenity.</p> <p>'K': An area extending to c. 25 acres located on RACE lands and to the south of the M7 Motorway.</p>

Sub. No.	Name	Summary of Submission
		<p>'K': Requests 'Open Space and Amenity to be located on lands located between the Southgreen and Old Roads beside the secondary school.</p> <p>'I': Requests enterprise and employment uses on an area of land located on lands proposed to be zoned 'Cp2' in Draft Plan, immediately to the north of the of rail line on Dunmurray Road.</p> <p>'A7': Requests wildlife sanctuary at a location outside the proposed LAP boundary to the west of the town on the Monasterevin Road.</p> <p>'C-P': Requests car park extension to train station.</p> <p>'S': Requests serviced sites to be located on a site on the Newton/Nurney Roads.</p> <p>'S': Requests serviced sites /executive homes to be located on lands accessed through the Grey Abbey Glenveagh site.</p> <p>Further requests the designation of lands in appropriate locations for the delivery of serviced sites accompanied by a design framework demonstrating required plot ratio, public open space and levels of required service to sites with specific timelines for the build out period of complete site.</p> <p>Requests extension to LAP boundary on Nurney Road to reflect existing settlement boundary with associated current land use zonings.</p>
140	<b>Catherine Gannon</b>	The submission reference Table 7.1, Perm 4,8,9 and 13. It strongly objects to Curragh Finn becoming a roadway/pathway as it will devalue the writer's home and states that the writer will need to be compensated for loss of privacy and parking.
141	<b>Fine Gael – Kildare Town Branch</b>	<p><b>Height of Proposed Structures</b></p> <p>The height of proposed structures should be designated by flag poles/scaffolding which should be erected on the same date as the site notice. The standard size of site notices should be reviewed.</p> <p><b>Tree planning</b></p> <p>All new development should make provision for planting oak trees to enhance the environment and special character of Kildare. The scale of planting should be determined by planners, county councillors and Tidy Towns.</p> <p><b>Playgrounds</b></p> <p>All new developments should provide children's playgrounds, the scale to be determined by planners and county councillors. Costs to a developer are moderate but the benefits for children are great.</p>

Sub. No.	Name	Summary of Submission
142	David Hanley	<p>Objects to the downgrading of the writers zoned land at Green Road adjacent to Loughminane Green. In addition, the submission objects to:</p> <ul style="list-style-type: none"> <li>• Pigeon Lane and Road up by the HARP bar made one-way. States that both roads are wide enough for two way and will lead to more congestion at busy school times.</li> <li>• Closing off the square to traffic as turning at Silken Thomas is too severe.</li> </ul> <p>(Note the zoning request is dealt with in Section 6 of the Chief Executive's report.)</p>