

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

19th December 2025





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

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GLOSSARY OF ACRONYMS

AA	Appropriate Assessment
CDP	Kildare County Development Plan 2023 – 2029 (as varied)
CFRAM	Catchment-based Flood Risk Assessment and Management
CSO	Central Statistics Office
EMRA	Eastern and Midlands Regional Assembly
EPA	Environmental Protection Agency
GDA	Greater Dublin Area
KCC	Kildare County Council
LAP	Local Area Plan
MCC	Meath County Council
NCFHM	National Coastal Flood Hazard Mapping
NIFM	National Indicative Fluvial Mapping
NPF	National Planning Framework
NTA	National Transport Authority
NWQ	Northwest Quadrant
OPR	Office of the Planning Regulator
OPW	Office of Public Works
PFRA	Preliminary Flood Risk Assessment
RSES	Regional Spatial and Economic Strategy
SCA	Settlement Capacity Audit
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SIA	Social Infrastructure Audit
SuDS	Sustainable Drainage Systems
TII	Transport Infrastructure Ireland
RAG	Red Amber Green
UE	Uisce Éireann

1. Introduction

This report relates to the issues raised in submissions and observations received from members of the public, prescribed authorities and key stakeholders following the publication of the Proposed Variation No. 3 of the Kildare County Development Plan 2023 - 2029 (as varied) pursuant under Section 13(2) of the Planning and Development Act 2000 (as amended).

This report is furnished to the Elected Members of Kildare County Council for their consideration.

1.1. Background to Proposed Variation No. 3

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

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

Proposed Variation No. 3 seeks to amend Chapters 1 (Introduction & Strategic Context), 2 (Core Strategy & Settlement Strategy), 3 (Housing) and 15 (Development Management Standards) of the Plan. Proposed amendments to Chapter 1 primarily incorporate contextual changes in national policy, while Chapters 3 and 15 are updated to reflect the revised density provisions and residential design standards provided by the Compact Settlements Guidelines.

The Core Strategy (Chapter 2) has been revised to align the County Development Plan with the Housing Growth Requirements Guidelines, which translate the population and housing projections from the National Planning Framework – First Revision (2025) to annual housing requirements for each local authority. These housing requirements also incorporate assumptions on unmet housing demand. These Guidelines relate exclusively to the integration of these annual housing requirements into Development Plans and Local Area Plans.

Housing Growth: Numbers

Under the Housing Growth Requirement Guidelines, Kildare's new baseline annual housing requirement is 2,755 dwellings per year. The Core Strategy of the County Development Plan has a current annual housing supply requirement of 1,524 dwellings per year. Accordingly, Proposed Variation No. 3, as published, sought to provide for an additional 1,231 dwellings per year (the balance required to meet the new baseline annual housing requirement of 2,755) or 3,693 dwellings over the remaining 3 years of the County Development Plan (2026, 2027 and 2028).

The Housing Growth Requirement Guidelines also provide that an 'additional provision' (previously referred to as headroom) of **up to 50%** be incorporated over and above the baseline annual housing requirement. For Kildare, this 'additional provision' equates to 1,377.5 dwellings per year (representing 50% of the 2,755-

dwelling annual housing requirement) or 4,132.5 dwellings over the remaining three years of the County Development Plan.

Therefore, the combined additional housing growth for County Kildare for 2026-2028 (inclusive) to be integrated into the Core Strategy of the County Development Plan for the remainder of the Plan period is 7,826 additional residential units. This figure incorporates the full 50% 'additional provision' provided in the Housing Growth Requirement Guidelines and is incorporated into the Proposed Variation.

Land Use Zoning

In accordance with best planning practice and the Development Plans – Guidelines for Planning Authorities (2022), the zoning of lands should be undertaken through the plan making process, informed by evidence-based assessments and audits at both the site and settlement level. This approach is to enable the sustainable development of settlements, the integration of land use and transportation planning and the creation of communities that are supported by appropriate infrastructure. These audits and assessments include *inter alia* Settlement Capacity Audits, Social Infrastructure Assessments, Strategic Flood Risk Assessments, Area Based Transport Assessments / Transport Plans (where relevant) and environmental assessments.

In County Kildare, residential land use zonings apply to 35 settlements (from Key Towns to Villages) and the Blessington Environs. Land use zonings for the higher order settlements of Naas, Maynooth, Leixlip, Kildare Town, Athy, Celbridge, Kilcock, Monasterevin, Clane and Sallins are contained in Local Area Plans and are not contained in the Kildare County Development Plan 2023-2029. Proposed Variation No. 3 seeks to amend the Core Strategy of the County Development Plan in accordance with the provisions of Section 13 of the Planning and Development Act 2000 (as amended) – hereafter referred to as the 2000 Act, noting that the separate process for varying a Local Area Plan is set out under Sections 19 and 20 of the 2000 Act.

Delivery Mechanisms

Considering the above, Proposed Variation No. 3, as published, detailed a series of plan-led and evidence-based mechanisms which Kildare County Council intends to utilise in accommodating and facilitating the additional housing growth requirement provided in the Housing Growth Requirement Guidelines. These mechanisms include:

- The release of Phase 2 New Residential zoned lands in the comparatively recent and extant Local Area Plans (LAP) for Kildare Town and Naas, together with the Draft Settlement Plan for Newbridge (currently under consideration by Elected Members). These lands were previously assessed, or have been recently assessed, in the relevant Plans as appropriate areas for residential development and can be made available for immediate development.
- The provision of additional housing growth to the settlements of Kilcock, Sallins and Monasterevin. The preparation of new Settlement Plans to replace expired Local Area Plans for these settlements has commenced and Draft Plans are anticipated to be published in Q1/Q2 2026. These new Settlement Plans will incorporate and distribute the additional housing growth provided by

Variation No. 3 into residential zoned lands in a plan-led and sustainable manner, underpinned by evidence-based assessments.

- The provision of additional housing growth to two identified strategic development sites in Celbridge (known as Simmonstown and Ballyoulster). The Simmonstown and Ballyoulster lands represent the remaining residential zonings available in Celbridge. The sites in Celbridge are large, residential zoned sites that are situated in the Dublin Metropolitan Area and benefit from their proximity to comparatively frequent and accessible public transport options, including a rail service that will be further improved in the future in the form of DART+ Southwest.
- The allocation of housing growth to lands at Confey in Leixlip and the Northwest Quadrant in Naas, as part of the 50% 'additional provision' under the Housing Growth Requirement Guidelines, to ensure that initial phases of development can be delivered in the short term. These sites have been identified, through the Leixlip and Naas LAPs, as areas which can accommodate significant residential development and complementary uses to create sustainable communities. Regarding Confey, these lands are zoned and are subject to an existing masterplan (integrated into the Leixlip LAP in March 2024), to deliver approximately 1,765 homes and complementary land uses around the Leixlip-Confey Train Station. This rail service will be further improved in the future in the form of DART+ West. Regarding the Naas Northwest Quadrant, a masterplan is currently being prepared for this landbank which is expected to provide for the delivery of circa 4,000 homes and complementary land uses in an integrated manner. This masterplan is anticipated to be published in 2026.
- Given the significant scale and residential development potential of the lands at Confey and Naas Northwest Quadrant, it is prudent to assume that full housing delivery and requisite infrastructure provision will cover a timeframe that extends beyond the remaining lifetime of the Plan. Accordingly, these are considered to be long-term Strategic and Sustainable Development Sites, noting that the Housing Growth Requirement Guidelines provide that lands which offer the potential to meet the objectives of these Guidelines but are not serviced or serviceable during the lifetime of the current adopted development plan, may be identified as 'Long-Term Strategic and Sustainable Development Sites/Opportunity Areas', in order to give clear strategic direction to future development locations.
- Appropriate mechanisms are required to ensure that an uninterrupted planning policy framework is in place to facilitate ongoing development on the Confey and Northwest Quadrant lands in the longer term. Such mechanisms will include variations to integrate the masterplans, associated land use zonings and objectives into the County Development Plan and the commencement of the process to designate these sites as Urban Development Zones under the relevant provisions of the Planning and Development 2024 Act (as amended) – hereafter referred to as the 2024 Act.
- The provision of additional housing growth to an identified strategic development site in Athy (known as Chanterlands) to ensure distribution to the only remaining Self-Sustaining Growth Town not previously addressed and to the south of the county. The Chanterlands site in Athy is zoned Strategic Reserve in the Athy LAP and is recognised as an *'appropriate area to cater for*

future strategic requirements to accommodate the orderly and sequential expansion of the town'.

This was considered the most appropriate and balanced approach to integrating the Housing Growth Requirement Guidelines as quickly as possible for the remaining lifetime of the current County Development Plan, which is three years. The approach leverages the priority of the planning authority to update and replace expired Local Area Plans, the availability of existing Phase 2 zoned lands and the availability of other strategic landbanks in higher order settlements that are subject to (or will be subject to) plan-led development, most of which are proximate to existing and/or future high-capacity public transport options.

The Move to 10-Year County Development Plans

A key aspect to be noted is the upcoming formal commencement of the preparation of a new Kildare County Development Plan in August 2026, with planning legislation transitioning from the 2000 Act to the 2024 Act. The 2024 Act provides that zoning maps for all settlements are to be contained in the County Development Plan with a 10-year timeframe. The preparation of a new plan will include a review of the settlement hierarchy and housing growth allocation as part of an Integrated Overall Strategy for the proper planning and sustainable development of Kildare over a 10-year period.

1.2. Legislative Requirements

In accordance with Section 13(4) 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 Proposed Variation. This report is required to:

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

The report must be presented to the Elected Members no later than 8 weeks from the publication of the Proposed Variation, i.e. less than 4 weeks after the close of public consultation.

1.3. Public Consultation

Proposed Variation No. 3 of the Kildare County Development Plan 2023 - 2029 (as varied) (hereafter referred to as 'the Proposed Variation') was placed on public display from Wednesday 29th October 2025 to Thursday 27th of November 2025.

A public notice was published in the Irish Independent on Wednesday 29th October 2025 notifying members of the public that the Proposed Variation was on public display from the 29th October 2025 to the 27th November 2025. A copy of the statutory notice was also published in the Nationalist (4th November), the Leinster Leader (4th November) and the Liffey Champion (8th November).

The following documents were placed on display:

- Proposed Variation No. 3 – Amendments to Volume 1 of the Kildare County Development Plan 2023 - 2029 (as varied);
- A Settlement and Site Capacity Audit (SSCA).
- Screening for Appropriate Assessment (AA) Report pursuant to the EU Habitats Directive (92/43/EEC) and Determination; and
- Strategic Environmental Assessment Screening Report pursuant to the Planning and Development Strategic Environmental Assessment (SEA) Regulations 2004 – 2011 and Determination.

Documents for the proposed Variation were displayed at the following locations:

- Planning Office, Áras Chill Dara, Naas, County Kildare
- The County Council's dedicated online public consultation portal at:
<https://consult.kildarecoco.ie/en/browse>.

A total of 144 submissions/observations were received during the public consultation period, which can be viewed at:

<https://consult.kildarecoco.ie/en/node/10136/submissions>

1.4. Contents of the Chief Executive's Report

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

Section 1: Introduction to the Chief Executive's Report.

Section 2: List of persons or bodies who made submissions or observations.

Section 3: Submission from the Office of the Planning Regulator (OPR).

Section 4: Submissions from the Prescribed Authorities and public bodies.

Section 5: Submissions and observations relating to the zoning of land.

Section 6: Chief Executive's Proposed Recommended Alterations.

Section 7: Composite List of Proposed Chief Executive's Recommended Alterations to the proposed Variation.

Appendix A: Submission from the Office of the Planning Regulator

Chief Executive's Recommendations – How to Read

Proposed Variation No. 3 seeks to amend the Kildare County Development Plan 2023-2029 (the Plan), with the existing text of the Plan in black, proposed deletions in ~~striketrough-red~~ and proposed amendments or new text in *italics green*.

In response to submissions received, the Chief Executive may recommend changes to the text of the amendments in Variation No. 3, the provision of additional amendments to the County Development Plan or changes to the documents accompanying Variation No. 3.

The recommended deletions to the amendments in Variation No. 3, the Plan and the accompanying documents in this Chief Executive's Report are shown in ~~italics striketrough-blue~~. The recommended new text in Variation No. 3, the Plan and the accompanying documents in this Chief Executive's Report are shown in *italics purple*.

1.5. Next Steps

Within six weeks of receiving the Chief Executive's Report, the Elected Members of Kildare County Council must consider Proposed Variation No. 3 of the Kildare County Development Plan 2023 - 2029 (as varied) and the Chief Executive's Report (this report).

Following consideration of both, the Elected Members may, as they consider appropriate, by resolution, make the variation which would, if made, be a material alteration, with or without further modification or may refuse to make it.

If the Elected Members decide to materially alter the Proposed Variation, 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 for any Proposed Material Alteration is a minimum period of four weeks. Submissions and observations will be invited with respect to any Proposed Material Alterations and following the statutory public consultation period a Chief Executive's Report will also be prepared for consideration.

Section 13(7) 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 (such as Section 28 Guidelines).

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. List of Persons/Bodies who made Submissions

During the public consultation period a total of 144 valid submissions or observations were received. The list of persons, prescribed bodies, groups, and stakeholders who made valid submissions are listed in Table 2.1.¹

Kildare County Council would like to take the opportunity to thank those who made written submissions on the Proposed Variation.

Table 2.1: Persons/Organisations Who Made Submissions or Observations

Sub.	Author	Sub.	Author
001	Fergus Mahon	029	Gareth and Austin McHale
002	Kehoe Family	030	Gareth and Austin McHale
003	Orchard County Residential Estates Ltd	031	Frank Needham
004	Comer Group	032	Vaughan Whelan
005	Ken and Kim Davis	033	Frank Reynolds
006	John Kehoe	034	David Barton
007	JP and M Doyle	035	Peter and Aisling Connolly
008	JP and M Doyle	036	Peter and Aisling Connolly
009	Environmental Protection Agency	037	Peter and Aisling Connolly
010	Office of Public Works	038	Carmel Hughes
011	Molozza Ltd	039	Victor Burrell, Gerard Conway, James Fagan, Pierce Fagan, Joe Flanagan, Thomas Heffernan and Paddy White
012	Patrick J Tansey	040	Joe and Ann Headon
013	Aidan Kelly	041	Patrick Boyd
014	Keshmore Construction Ltd	042	Kildare Green Party
015	John McDonnell	043	Oakway Homes
016	David Owens	044	Denis Holligan
017	Sheila Doyle	045	Smullen Transport
018	Patrick Tierney and Patrick O'Reilly	046	Nolan Family
019	John O'Reilly	047	PJ Burke
020	Ciaran Smith, Donal Kearney and Gerry Cosgrove	048	PJ Burke
021	Vincent Casey	049	Millennium Falcon Holdings Ltd
022	Cormac Cogan	050	Playacting Youth Theatre
023	Fifi Smith	051	David, Joe and Robert Osborne
024	June Fitzgibbon	052	David Dowling
025	Lodgepark Developments Ltd	053	Jennifer Doyle
026	Clare Cleary	054	Kelland Homes Ltd
027	Cllr. Claire O'Rourke	055	Masonbrook Holdings Ltd
028	Barina Property Group	056	Voussoir Developments Ltd
		057	Transport Infrastructure Ireland

¹ Each reference number associated with a submission or observation starts with KCC – C418 and the unique reference number is the last digits which are reflected in Table 2.1.

Chief Executive's Report on Proposed Variation No. 3
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Sub.	Author
058	Graeme and Margaret Beere
059	Celine Hanratty
060	Andrews Construction Ltd
061	Helen Comerford
062	Andrews Construction Ltd
063	James Kelly
064	Acorn Connect Ltd
065	Aravonian Ltd
066	Brereton Building Services Ltd
067	Louie and Babette Harris
068	National Transport Authority
069	Pat Toolan
070	Elstown Ltd
071	Neville Homes Ltd
072	Uisce Éireann
073	Ballymore Group
074	JP and Michael Holligan
075	Ena Fitzpatrick
076	IRBOA Irish Residential Boat Owners Association
077	Brian Connolly Associates
078	JP Quinn and Sons Ltd
079	Karen and Maurice Meaney
080	Cappagh GAA and Newtown Community Group
081	Castledermot GAA
082	Nyle Rafferty
083	David Walsh Homes Ltd
084	Kathleen Gill
085	St. Patrick's College, Maynooth
086	Patrick J Lawler
087	Karl Colton
088	Glenveagh Homes Ltd
089	The Arrow Group Ltd and Liam Queally
090	Westar Investments Limited
091	County Kildare Orchestra
092	Celbridge Community Council
093	Patrick Murphy
094	Deoval Ltd
095	Land Development Agency
096	Lydon
097	Martin Flinter
098	Summix NKK Developments Ltd.

Sub.	Author
099	Midhaven Limited
100	Petrogas Group Ltd
101	Ad Meliora Management Ltd
102	Cavan Developments
103	Mountkerry Ventures
104	Millennium Falcon Holdings Ltd
105	Keogh Family
106	Feldway Ltd
107	Meath County Council
108	T.D Housing Limited
109	Pousterle Ltd
110	Andrew Bergin
111	Montane Developments
112	Celbridge Estates Ltd
113	KDM Construction
114	MRP Oakland and Jim Meehan
115	Brook Advantage Ltd
116	Office of the Planning Regulator
117	Vaughan Whelan
118	Ballymore Beef Ltd
119	Roger Satchwell
120	McGreevy Construction/Enterprises
121	Green Project Management
122	Pierce Greaney and Sallyann Freyne
123	Cormac Hickey
124	Clane Community Council
125	Cairn Homes Properties Ltd.
126	Montane Developments
127	Robert O'Brien
128	David Bean
129	O'Brien, Donovan and Donovan
130	The Green Road Partnership
131	Department of Education and Youth
132	Vanessa Liston
133	Noel Dowling
134	Montane Developments
135	Green Project Management
136	Dunne Family
137	William and Liz Purcell
138	Ger Kavanagh
139	Naas Town Strategy Group

Sub.	Author
140	Lawlor Family
141	Joe Kelly
142	Michael P. Kelly

Sub.	Author
143	James Kelly
144	John Lynch

3. Submission 116 - Office of the Planning Regulator (OPR)

Issues Raised

The Office commends the planning authority on the clarity and quality of information provided as part of the Variation process, and that a transparent and evidence-based approach has been followed.

The Office notes that the housing growth requirement of 12,398 units to the end of the plan period, including 50% additional provision, is consistent with the Housing Growth Requirement Guidelines. However, the Office has concerns regarding the delivery of units in the short term. The OPR has 1 no. recommendation in this regard.

Recommendation No. 1

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

- NPO 42 of the NPF to target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2042;
- NPO 43 of the NPF to prioritise the provision of new homes at locations that can support sustainable development; and
- the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Requirement Guidelines), including policy and objective 3 to incorporate the objectives of the Housing Growth Requirement Guidelines within development plans,

the Planning Authority is recommended to:

- revise tables 2.8A and 2.8B to omit or clarify the inclusion of lands at Celbridge (Simmonstown and Ballyoulster) and Leixlip (Confey) in the calculation of the capacity of residential zoned lands;
- taking account of the likelihood that the lands identified for residential development in Celbridge and Leixlip/Confey will not come forward for development for the remaining period of the Kildare County Development Plan 2023-2029, consider zoning additional residential lands that are not so constrained, or specifying opportunities for parts of these landbanks to be brought forward earlier;
- revise objective CS O29 to release Phase 2 Residential lands in all settlements viable for development; and
- revise objective CS O30 and CS O31 to include a timeframe for the timely review of the settlement plans for Athy, Monasterevin, Kilcock and Sallins

to ensure residential delivery within the remaining development plan period.

Chief Executive's Response

Part (i) of the OPR's Recommendation refers specifically to the inclusion of the Confey Masterplan lands and the Ballyoulster and Simmonstown lands at Celbridge in Table 2.8A and Table 2.8B. These are large scale and strategically located sites with substantial residential development potential, that benefit from existing and future higher capacity rail services in the form of DART+ West and DART+ Southwest respectively. The Chief Executive's Report on the above Guidelines, prepared and circulated to the Elected Members prior to publication of the proposed Variation, indicates that Leixlip has approximately 49 hectares and Celbridge approximately 75 hectares of undeveloped land zoned for new residential development, as of August 2025. The majority of these undeveloped zoned lands are within the Confey Masterplan lands and the Ballyoulster/Simmonstown lands respectively. For continuity between land use plans (i.e. the transition between expired Local Area Plans and new Settlement Plans) and to allow for developments to be brought forward on these lands, it was considered prudent to provide support in the form of site-specific core strategy allocation to secure the development of these strategic sites.

In relation to Confey, 450 units will be delivered in the short term as Phase 1a, provided for in the Confey Masterplan which forms part of the Leixlip Local Area Plan 2020-2023 (as extended). Submission Ref. No. 073 confirms that Ballymore, as the majority landowner of the Confey Masterplan lands, intends to submit a planning application for Phase 1A in Q1 2026 with remaining phases to follow. It is therefore considered appropriate to amend Table 2.8A to include 450 units in Confey, with a resulting change in Table 2.8B to reflect Phase 1b and 2 of the Masterplan.

In relation to Celbridge, including Simmonstown and Ballyoulster, it is noted that An Coimisiún Pleanála is currently considering a Strategic Housing Development application for 344 residential units at the lands identified in Table 2.8A at Ballyoulster. The subject site is referred to in the submission received from the Land Development Agency (LDA) also. It is also noted that Kildare County Council has recently submitted planning and CPO documentation to An Coimisiún Pleanála for the transport infrastructure required to access and develop the Simmonstown lands. For clarity, it is proposed to include additional text in the Variation (Chapter 2 of the Plan) noting that regard will be had to Local Area Plans that have expired, which includes the Celbridge Local Area Plan 2017-2023, when considering proposals for development until such time as said plans are replaced, revoked or integrated into the County Development Plan, thus allowing consideration of proposals for the Simmonstown and Ballyoulster lands.

Having considered the overall requirement of the Recommendation from the OPR to deliver more housing units in the short term, it is considered appropriate to make the following additional changes to housing growth allocations in Table 2.8, 2.8A and 2.8B to Core Strategy objectives of the County Development Plan:

1. Considering future DART+ provision announced to Kilcock and with long term provision likely to Sallins in line with the Greater Dublin Area Transport

Strategy, it is considered reasonable and appropriate to increase the allocation of residential units to both settlements in Table 2.8A from 250 unit to 500 units. The combined increase in units to Kilcock and Sallins (500 units) are proposed to be deducted from the Naas Northwest Quadrant allocation in Table 2.8B.

2. In relation to Clane, and based on the content of Submission Ref. No. 090, it is considered reasonable and appropriate to allocate 251 additional units to the settlement to facilitate residential development, together with the phased delivery of the town park (Zoning Map 13.1 of the Clane LAP identifies circa 21.25 hectares of parkland to the east of Clane on lands between the River Liffey and the Dublin Road), in tandem with the development of the lands currently zoned New Residential within a Key Development Area identified in the Clane Local Area Plan 2017-2023.
3. In relation to the Blessington Environs, and given the capacity of the lands zoned New Residential to accommodate development over and above the Core Strategy allocation of the Kildare CDP 2023-2029, it is considered appropriate to provide an additional housing growth requirement of 100 units to the Blessington Environs in Table 2.8A which will assist in the delivery of much needed critical servicing infrastructure and new amenity lands, as required under Objective BEO 1 of Volume 2 (Small Towns and Environs) of the CDP.
4. In order to provide for and drive equitable, balanced and proportionate delivery and growth across the county, and given the extent of undeveloped zoned lands in the Villages of approximately 35 ha and Settlement Expansion areas in Rural Settlements it is proposed to amend Table 2.8 to remove the 2023-2028 housing target of 366 and 137 units respectively. This mechanism will release capacity for over 1,000 units (estimated delivery capacity) on undeveloped lands in Villages and Rural Settlement and will assist in revitalising and reenergising rural communities across County Kildare.

The development of these lands will be subject to the objectives of the County Development Plan (SC O16, SC O17 and SC O18) as they relate to the delivery of commensurate social infrastructure and design and density parameters as outlined in Table 3.1.

Given Kildare County Councils continued focus on balanced housing delivery across the entire county of Kildare, activity and delivery across residential lands in all settlements will be actively monitored over the remaining period of this County Development Plan. Where equitable housing delivery is not realised in these Village and Rural Settlements, alternative lands will be identified and considered in the forthcoming County Development Plan review.

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

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

In response to part (iii) of the Recommendation, the only town in which land is zoned Phase 2 Residential that is not referred to in Objective CSO 29 is Maynooth. The Maynooth and Environs Joint Local Area Plan 2025-2031 (MEJLAP) provides for the delivery of 3,370 houses over the lifetime of that plan, some of which are currently in the planning system. This growth is carefully provided for on lands zoned ‘New Residential’ through the development of Key Development Areas across the plan area. The Phase 2 lands in Maynooth are zoned ‘Phase 2 New Residential (Transport-Oriented Development)’ and are located within the Maynooth West Long Term Strategic and Sustainable Development Site. The progression of these Phase 2 lands is subject to the preparation of a Masterplan, which is contingent on the delivery of DART+ West and the Maynooth West Train Station. As planning permission has not been secured to date for the second train station, it is considered premature to bring forward these lands now for housing as that would prejudice the proper planning and sustainable development of the Maynooth West TOD. Furthermore, it is not considered reasonable or appropriate to increase the level of growth planned for Maynooth in the MEJLAP to 2031 as the maximum level of growth is already provided for.

In response to part (iv) of the Recommendation, the preparation of settlement plans for Sallins, Kilcock and Monasterevin is already underway and the anticipated publication date for these plans as Variations to the County Development Plan is Q1/Q2 2026. Objective CS O31 is proposed to be updated accordingly. In relation to Athy, it is stated in Section 2.11 that the review of this settlement plan will take place in 2026/2027. This objective will also be expanded to include reference to Clane and Celbridge. Furthermore, it is noted that the Newbridge Settlement Plan is nearing adoption, and this settlement will deliver circa 2,362 units over the coming three-year period.

Chief Executive's Recommendation

Update Amendment No. 12 [Preferred Development Strategy] as follows:

Kildare County Council's Approach to New Housing Growth Requirements (2025)

It is proposed to accommodate the Government's revised housing targets for County Kildare in a targeted, plan-led approach so that additional housing may be delivered in the short, medium and long term in accordance with the provisions of the Ministerial Guidelines.

The updated housing growth requirements for County Kildare are presented in two tables, which are separate and in addition to Table 2.8 Core Strategy Table, as follows:

- (i) Table 2.8A Core Strategy Supplementary Table for revised National Housing Growth Requirements 2025: Short and Medium Term*

(ii) Table 2.8B Core Strategy Supplementary Table for revised National Housing Growth Requirements 2025: Long term Strategic Development Sites.

Where specific sites are identified in Tables 2.8A and 2.8B, accompanying maps are provided for reference purposes (see Maps Vol 1-2-3 V3 2.1 to 2-9 V3 2.6 inclusive). The delivery mechanisms by which additional housing growth will be facilitated are as follows:

- 1. The release of lands zoned Phase 2 in Local Area Plans (LAP) / Settlement Plans for Naas (New Residential Phase 2), Newbridge (New Residential – Phase 2) and Kildare Town (Phase 2 New Residential) by way of a Core Strategy objective to allow planning applications to be considered in the short term.*
- 2. The allocation of additional housing growth to the settlements of Monasterevin, Kilcock and Sallins to inform the preparation of new Settlement Plans in 2026 for inclusion in Volume 2 of the County Development Plan.*
- 3. The identification of strategic sites in Athy and Celbridge for future housing delivery to be integrated into new settlement plans in 2026/2027, the zoning for which will be determined during the plan making process having regard to strategic flood risk assessment and other environmental assessments.*
- 4. The progression of long-term Urban Development Zones, as provided for in the Planning and Development Act 2024, at two locations as follows:*
 - Northwest Quadrant, Naas.*
 - Confey, Leixlip.*
- 5. To provide for and drive equitable, balanced and proportionate delivery and growth across the county, and given the extent of undeveloped zoned lands in the Villages of approximately 35 ha and Settlement Expansion areas in Rural Settlements it is proposed to amend Table 2.8 to remove the 2023-2028 housing target of 366 and 137 units respectively. This mechanism will release capacity for over 1,000 units (estimated delivery capacity) on undeveloped lands in Villages and Rural Settlement and will assist in revitalising and reenergising rural communities across County Kildare. The development of these lands will be subject to the objectives of the County Development Plan (SC O16, SC O17 and SC O18) as they relate to the delivery of commensurate social infrastructure and design and density parameters as outlined in Table 3.1.*
- 6. Include additional Core Strategy objectives in Chapter 2 to address continuity in housing supply across all settlements. In this regard, the objectives will, notwithstanding the housing growth allocated to that settlement, make provision for the release of any lands which have the benefit of a residential zoning ("B" or "C" in relevant land use zoning maps), where it can be demonstrated to the satisfaction of the Planning Authority that the lands are readily serviced or serviceable through upgrades to infrastructure as part of any application on the lands and where the proposal addresses any identified social infrastructure deficit in the respective settlement.*

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

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

Chief Executive's Report on Proposed Variation No. 3
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Update Amendment No. 13 [Chapter 2, Table 2.8 – Core Strategy Table] to remove the Housing Target for Villages (366) and Rural Settlements (137) as follows:

Villages ¹²	Athgarvan (1176 1,193), Allenwood (981 1,685), Ballitore (793 667), Ballymore Eustace (873 689), Caragh (966 1,006), Coill Dubh (746), and Coolearagh (377 1,476), Crookstown (105 122), Johnstown (1,005 1,320), Johnstownbridge (683 677), Kildangan (317 546), Kilmeague (1082 1054), Moone (127 137), Narraghmore (378 375), Robertstown (707 771), Straffan (853 1,158), Suncroft (746 491),								
		9,984 13,521	4.80% 5.46%	10562	4.70%	1006	366		

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	Timolin (136 154)									
Rural Settlement ¹²	Allen (94 149), Ardclough (220 285), Ballyshannon (111 107), Brannockstown (217 235), Broadford (50), Brownstown (883 817), Calverstown (699 652), Clogherinkoe (196 214), Cutbush (278 297), Kilberry (400 361), Kilkea (105 122), Kilmead (309 372), Kilteel (214 262), Lackagh/ Mountrice (99 98), Maganey/ Levitstown (88 95), Milltown (344 372), Nurney (497 497), Rathcoffey (274 371),	3,310 5,958		1.40% 2.40%	3502	1.50%	377	137		

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	Staplestown (116 128), Two Mile House (460 474)									
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Update Amendment No. 13 [Chapter 2, Table 2.8 – Core Strategy Table] to amend footnote 10 as follows:

~~Objective V GO 4 (Volume 2) is to generally control the scale of individual development proposals to 10–15% of the existing housing stock of any village or rural settlement over the lifetime of the Plan in accordance with the Sustainable Residential Development in Urban Areas Guidelines (2009). Furthermore, Objective V GO 9 (Volume 2) is to restrict growth in a village/rural settlement where necessary physical and social infrastructure cannot be delivered. In the absence of the necessary physical or social infrastructure, the projected growth for that development centre may be allocated to other serviced settlements within the same Municipal District or adjoining Municipal District or to serviced towns within the upper range of the settlement hierarchy. Kildare County Council's delivery mechanisms to facilitate additional housing growth in Section 2.11 regarding Villages and Rural Settlements, together with the Core Strategy Objectives in this Chapter, supersede Objectives V GO 1, V GO 4 and VG O 9 of Volume 2 of the Kildare County Development Plan 2023-2029. Regard shall be given to the density guidance contained in Section 3.7 of this Plan. Given Kildare County Councils continued focus on balanced housing delivery across the entire county of Kildare, activity and delivery across residential lands in all settlements will be actively monitored over the remaining period of this County Development Plan. Where equitable housing delivery is not realised in these Village and Rural Settlements, alternative lands will be identified and considered in the forthcoming County Development Plan review.~~

Update Amendment No. 14 [Table 2.8A and Table 2.8B] as follows:

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

Settlement Type	Settlement Name	Location / Site Name	Within Built Up Area (BUA)	Zoning Status	Tier 1 / 2	Approx. Gross Residential Area in hectares	Potential Additional Dwellings	Approx. Net Dwelling Density per Hectare	Delivery Mechanism

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Key Town	Naas Map V3-2.1	Kilcullen Road.	No	'New Residential Phase 2' in Naas LAP 2021-2027	Tier 1	5.2 ha	Total 16.0 ha	455	35	Objective CS O29
		Blessington / Tipper Road	Yes		Tier 2	10.8 ha				
Self-Sustaining Growth Town	Newbridge	TBD*	TBD*	'New Residential – Phase 2' in Newbridge Settlement Plan	Tier 1 / 2*	TBD*		850	TBD*	Objective CS O29 ¹⁴
	Kildare Town Map V3-2.2	Ruanbeg	No	'Phase 2 New Residential' in Kildare Town LAP 2023-2029	Tier 2 ¹⁵	16.9 ha	Total 26.5 ha	886	37	Objective CS O29
		Southgreen	Partial		Tier 2	5.16 ha				
		Dunmurry Road	No		Tier 2	1.8 ha				
		Green Road South	No		Tier 2	1.14 ha				
		An Talamh Bán	No		Tier 2	1.5 ha				
	Leixlip Map V3-2.6	Phase 1a as per Confey Masterplan - Leixlip LAP 2020-2023 (as extended)	No	'New Residential' and 'Mixed Use' in Leixlip LAP 2020-2023 (as extended)	Tier 2	46.5 ha		450	As per the Confey Masterplan - Leixlip LAP 2020-2023 (as extended)	Leixlip LAP, County Development Plan Variation and Urban Development Zone

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	Athy Map V3-2.3	Chanterlands	Partial	'Strategic Reserve' in Athy LAP 2021-2027	Tier 2 ¹⁵	18.25 ha	480	31	Objective CS O30
Self-Sustaining Town	Celbridge Map V3-2.4	Celbridge including Simmonstown and Ballyoulster	No	'New Residential' in Celbridge LAP 2017-2023	Tier 2 ¹⁵	73 ha approx. – to be confirmed at Settlement Plan level.	2,000	37	Objective CS O30
	Kilcock	TBD*	TBD*	TBD*	Tier 1 / 2*	TBD*	250 500	As per Compact Settlement Guidelines (2024)	Objective CS O31
	Monasterevin	TBD*	TBD*	TBD*	Tier 1 / 2*	TBD*	250	As per Compact Settlement Guidelines (2024)	Objective CS O31
	Clane	Lands zoned 'C: New Residential / Infill' in the Clane LAP 2017 – 2023.	Varies	'New Residential / Infill' in the Clane LAP 2017 – 2023.	Tier1 / Tier 2	As per the Clane LAP 2017 – 2023.	251 (to be delivered in tandem with the phased development of the town park (Zoning Map 13.1 and footnote 2	As per Compact Settlement Guidelines (2024)	Allocation to be read in conjunction with Table 2.8

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							page 73 of the Clane LAP refers).		
Towns	Sallins	TBD*	TBD*	TBD*	Tier 1 / 2*	TBD*	250-500	As per Compact Settlement Guidelines (2024)	Objective CS O31
	Bless- ington Environs	Lands zoned 'C: New Residential	No	'C: New Residential'	Tier1 / Tier 2	As per Volume 2 of County Development Plan.	100	As per Compact Settlement Guidelines (2024)	Allocation to be read in conjunction with Table 2.8
Total							5,421 6,722		

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

Table 2.8B: Core Strategy Supplementary Table for revised National Housing Growth Requirements (2025) Long term Strategic and Sustainable Development Sites Additional Provision [to be read in conjunction with Table 2.8 and Table 2.8BA]

Settlement Type	Settlement Name	Location	Zoning Status	Tier 1 / Tier 2	Gross Residential Area in hectares	Potential Additional Dwelling	Net Density Dwellings per Hectare	Delivery Mechanism
Key Town	Naas Map V3-2.5	Northwest Quadrant	'Strategic Reserve' in Naas LAP 2021-2027 ¹⁶	Tier 2	112 ha (not yet zoned)	1,294 543 ¹⁷	Approx. 40 – to be confirmed at Masterplan level	Northwest Quadrant Masterplan / County Development Plan Variation and Urban Development Zone
Self-Sustaining Growth Town	Leixlip Map V3-2.6	Confey	'New Residential' and 'Mixed Use' in Leixlip LAP 2020-2023 (as extended) ¹⁶	Tier 2	46.5 ha	1,111 661 ¹⁸	As per the Confey Masterplan - Leixlip LAP 2020-2023 (as extended)	County Development Plan Variation and Urban Development Zone
Total						2,405 1,204		

Amend footnote nos. 17 and 18 for Table 2.8B in Amendment No. 14 to state, as follows:

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

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

Update Amendment No. 16 [Chapter 2, Core Strategy Objectives] by amending CS O31, as follows:

Prepare settlement plans for Monasterevin, Kilcock and Sallins to include the additional housing growth requirement included in Table 2.8 and Table 2.8A on serviced lands to be informed by infrastructural and environmental assessments and publish Draft Settlement Plans for these towns as Variations to the County Development Plan in Q1/Q2 2026. Settlement Plans for Celbridge and Clane will also be prepared and integrated into the County Development Plan by way of a statutory variation.

Update Amendment No. 16 [Chapter 2, Core Strategy Objectives] by including the following objectives:

CS O33: Ensure continuity and facilitate housing delivery across all settlements through the favourable consideration of proposals for housing on lands which have the benefit of a residential zoning ("B" or "C" in relevant land use zoning maps and Settlement Expansion lands), where it can be demonstrated to the satisfaction of the Planning Authority that the lands are readily serviced or serviceable through existing infrastructure or upgrades to infrastructure as part of any application on the lands and where the proposal addresses any identified social infrastructure deficit in the respective settlement in accordance with Objectives SC O15, SC O16 and SC O17 of this Plan.

CS O34: Where planning applications are received for housing developments on appropriately zoned lands and where the development would result in an exceedance of core strategy allocation for that settlement, the Planning Authority may consider granting permission for such developments having regard to the provisions of Section 86(7) of the Planning and Development Act, 2024, and where commensurate social infrastructure is delivered as part of the development scheme, in accordance with Objectives SC O15, SC O16 and SC O17 of this Plan.

4. Submissions in Respect of the Prescribed Authorities and Public Bodies

During the public consultation period the following submissions/observations were received from the Prescribed Authorities and public bodies (in addition to the OPR):

Submission 009	Environment Protection Agency (EPA)
Submission 010	Office of Public Works (OPW)
Submission 057	Transport Infrastructure Ireland (TII)
Submission 068	National Transport Authority (NTA)
Submission 072	Uisce Éireann (UE)
Submission 107	Meath County Council
Submission 131	Department of Education and Youth

Submission 009 – Environmental Protection Agency (EPA)

Issues Raised

The submission gives advice to the Planning Authority on carrying out Strategic Environmental Assessment for the Proposed Variation including the requirement for an SEA Determination and consultation with neighbouring authorities. The submission refers to the available guidance for planning authorities in this regard, including the EPA SEA Screening Guidance, SEA Guidelines for Planning Authorities (2022), Flood Risk Management Guidelines (2009), the principles of sustainable development and plan hierarchy, other EPA publications including Ireland's State of the Environment Report (2024) and online resources such as EPA SEA WebGIS Tool and websites.

In relation to Appropriate Assessment, it is stated that the Plan should comply with the Habitats Directive where relevant and incorporated into the SEA and the Plan.

Chief Executive's Response

The issues raised in the EPA submission are noted. An SEA Determination and SEA Screening Report were placed on public display as part of Proposed Variation No.3 and referred to environmental authorities and neighbouring planning authorities. An Appropriate Assessment (AA) and associated AA Determination were also published. Any future material alteration will be screened for likely significant effects on the environment. On adoption, a SEA Statement will be prepared.

Chief Executive's Recommendation

No change recommended.

Submission 010 – Office of Public Works (OPW)

Issues Raised:

The OPW submission refers specifically to flooding and flood risk management. It notes that Section 5.1 of the Settlement and Site Capacity Audit states: *“In addition, both pluvial and groundwater flood risks to individual sites were considered under the surface water drainage assessment criteria, through a review of CFRAM and PFRA flood maps”*. It is suggested that this text should be updated, as the indicative PFRA maps have been superseded by the national indicative fluvial (NIFM), coastal (NCFHM) and groundwater flood mapping (2016 – 2019 GWFlood Project by Geological Survey Ireland). It is not intended to update the PFRA pluvial maps, and they are not considered to be reliable for the purposes of zoning or decision making.

Should there be any changes to zoning designations in areas of flood risk, it is important that flood risk assessment(s) to an appropriate level of detail are carried out and that there is appropriate justification of decisions as set out in the Guidelines.

Chief Executive' Response

The comments are noted. It is considered appropriate to update the references in Section 5.1 of the Settlement and Site Capacity Audit as suggested.

Any proposed changes to zoning designations will be subject to the appropriate strategic flood risk assessment, carried out in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009).

Chief Executive's Recommendation

Update Section 5.1 of the Settlement and Site Capacity Audit that accompanied Proposed Variation No. 3 as follows:

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

Submission 057 – Transport Infrastructure Ireland (TII)

Issues Raised

The submission notes that the Proposed Variation does not include alterations to Development Plan policies and objectives in respect of the maintenance of the safe and efficient operation of the national road network in accordance with Section 28 Guidelines *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012). The Authority looks forward to working on the future progression of planning authority development objectives, such as Naas North-West Quadrant.

Chief Executive' Response

The contents of the submission are noted.

Chief Executive's Recommendation

No change recommended.

Submission 068 – National Transport Authority (NTA)

Issues Raised

The Proposed Variation does not include proposed changes to existing objectives or measures in the Development Plan and/or Local Area Plans and accompanying Local Transport Plans in relation to the requirement to develop sustainable communities that can be served by sustainable modes of transport, including towns in the Greater Dublin Area and access to appropriate public transport networks.

It is recommended that the Variation should provide that 'the future development of the residentially zoned land will proceed in accordance with the principles of sustainable development and will be developed to coincide with the delivery of sustainable transport provision, such as appropriate walking and cycling infrastructure as well as public transport infrastructure and services'.

Chief Executive's Response

It is an objective of the Plan, as expressed in CS O13, to 'require that the design of future development complies with the 10-minute settlement principle through the creation of a safe, attractive, permeable, and universally accessible environment for all, including permeability to existing estates to require public consultation, which maximises the potential for active modes of travel along with accessibility to both present and planned public transport options and to advocate for increased public transport options to meet this goal where now are in place'

Through the preparation of Settlement Plans, the phasing and implementation of housing developments with active travel measures will be secured, as can be seen through recent plans for Newbridge and Maynooth, for example.

Chief Executive's Recommendation

No change recommended.

Submission 072 – Uisce Éireann (UE)

Issues Raised

Uisce Éireann has no objections to the Proposed Variation and notes the following:

1. The GDA water supply zone RAG* status remains Amber.
2. Watermain upgrades will be required in some areas. If there is no UE project in the area, upgrades shall be developer funded.
3. Sewer and/or pumping station upgrades may be required in some areas. Where there is no UE project, these upgrades shall be developer funded.

*RAG refers to Red Amber Green; a status system used for performance and project management.

Chief Executive's Response

The contents of the submission are noted, in particular the requirement for developer funded upgrades to the water and wastewater network to facilitate additional housing growth where there are no Uisce Éireann projects in the area. The requirement for

local upgrades will be dealt with through the development management and Uisce Éireann connection agreement processes.

Chief Executive's Recommendation

No change recommended.

Submission 107 – Meath County Council (MCC)

Issues Raised

Meath County Council has no comment.

Chief Executive's Response

Noted.

Chief Executive's Recommendation

No change recommended.

Submission 131 – Department of Education and Youth

Issues Raised

The submission estimates that the population of County Kildare at Q3 2025 is approximately 270,000 people. The Department queries the use of 2.75 people as the average housing occupancy in the Variation, when the average household size in County Kildare was 2.97 persons in 2022. Using the higher occupancy number, the proposed new housing allocation could result in the population of County Kildare reaching 298,000 by the end of 2028. If this occurs, it will result in substantial additional requirements for school place provision in County Kildare.

Naas

New primary, post primary and special schools will be required in the Northwest Quadrant Strategic Reserve lands to cater to the school place demand associated with the new housing developments and increased population.

Maynooth

No change required to the Maynooth and Environs Joint Local Area Plan.

Newbridge

The projected growth figures could see an increase in primary school place demand which could be met by expansion of the existing facilities or through the utilization of the sites identified in the Draft Newbridge Settlement Plan. The projected growth figures could see an increase in post-primary school place demand, that could be accommodated by the planned expansion of existing facilities.

Confey

New primary and/or post primary schools may be required in Confey on lands identified in the current LAP.

Kildare Town

The projected growth figures could see a significant increase in primary school place demand and an additional primary school may be required. The projected growth

figures could see an increase in post-primary school place demand, but it is currently expected that this could be met by expansion of the existing facilities, including the new Curragh post primary school, which is to be constructed on the land of the former Magee Barracks.

Athy, Kilcock and Monasterevin

The projected growth figures could see an increase in primary and post-primary school place demand which could be met by expansion of the existing facilities, if required.

Celbridge

The projected growth figures could see a significant increase in primary school place demand and an additional primary school may be required, in the Simmonstown area. The projected growth figures could see an increase in post-primary school place demand, but it is currently expected that this extra requirement could be met by expansion of the existing facilities, if required. Core Strategy Objective CS O27 which supports the Triple School Campus is noted.

Sallins

The projected growth figures could see a significant increase in primary school place demand and an additional primary school may be required. The requirement for a new post-primary school should be looked at in conjunction with the requirements in the Naas Northwest Quadrant Strategic Reserve lands.

Conclusion

The Department's preference is to expand existing facilities (if possible) to cater for additional school places and requests that the Planning Authority examine the potential of protecting a land buffer around each school to enable expansion.

Schools should be positioned in the heart of new and expanding sustainable communities, allowing for the maximum benefit to the community inside and outside school hours. Other community facilities and amenities should also be positioned close to school facilities to allow for all community facilities to be complimentary to each other for the benefit of the whole community.

The Department notes that it is not within their remit to develop or fund enabling infrastructure including roads, electricity, water infrastructure, sustainable transport links, active travel networks, road safety measures and safe routes to school facilities.

The department anticipates that additional Special Education Needs (SEN) provision at both Primary and Post Primary level will be required in the future throughout the country, and this may result in schools requiring additional accommodation or space to meet this growing need. The Department would welcome explicit support within the Plan in this regard.

Chief Executive's Response

The issue regarding the use of the national household size (2.75 people) rather than the county household size (2.97 people) to estimate potential population increase is noted. It is considered reasonable to indicate the potential population increase as a

population band, using both figures to define the range, noting however that the NPF acknowledges household sizes will continue to decrease in Ireland.

The Department's advice that the planned housing increase will result in additional school requirements is noted. The potential need for an additional primary school in Kildare Town and in Celbridge is acknowledged in the relevant local area plans, in which sites are zoned 'E: Community and Education' to accommodate a primary school. The requirement for additional primary and post primary schools in Naas NWQ will be addressed in the Masterplan, as is already the case in the Confey Masterplan. In relation to Sallins, the primary school requirement will be addressed at settlement plan level through the preparation of a Social Infrastructure Audit. An appropriate quantum of land will be zoned for educational purposes, proximate to residential and neighbourhood centres, and clustered with other community uses where feasible for the benefit of the whole community.

It is agreed that the Plan should include specific reference to supporting additional Special Education Needs (SEN) provision at both primary and post primary levels.

Chief Executive's Recommendation

Update Amendment No. 2 [Aim of Chapter 2 – Core Strategy & Settlement Strategy] as follows:

Aim: To provide for the delivery of an additional ~~9,144~~ **16,970** housing units to accommodate an additional ~~25,146~~ **46,498** – **50,400** ^[insert footnote] people ~~by the end of the Plan period~~, and to continue to create the environment to retain existing and attract new employers to locate in County Kildare through the delivery of sustainable, compact settlements supported by a commensurate level of physical, social and green infrastructure to mitigate against climate change and enhance the quality of life for residents.

New footnote: Calculated using household sizes of 2.75 people (national average) and 2.97 people (county average)

Update Objective CS O27, as follows:

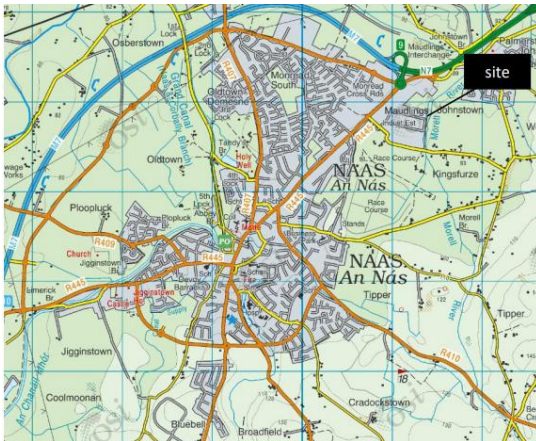

Work in close partnership with the Department of Education to support the timely planning and delivery of new schools including Special Education Needs (SEN) provision where additional accommodation is required across the county, so that educational infrastructure meets the needs of a growing population and contributes to the long term social and economic wellbeing of the community. It is a priority of the Council that the triple school campus at Ballyoulster, Celbridge is delivered during the life of this Plan.

5.0 Submissions and Observations relating to the zoning and designation of land uses in Settlements

For clarity, submissions received requesting the zoning of land, the designation of particular land uses or raising issues in relation to a particular settlement are grouped together and responded to by settlement and in the order that they appear in the Settlement Hierarchy set out in the Kildare County Development Plan 2023-2029. For example, all submissions received in relation to Naas are considered and responded to together, and so on and so forth.

Issues Raised: Naas

(22 Submissions) Submissions 012, 026, 045, 049, 051, 058, 063, 064, 065, 088, 089, 096, 099, 104, 106, 121, 122, 125, 135, 137, 138 and 139

Sub Ref No:	012
Name:	Patrick J Tansey
<p>Issues Raised:</p> <p>This submission has been prepared by David Mulcahy Planning Consultants Ltd. on behalf of Patrick J Tansey seeking the rezoning of 0.914 ha of lands at the Naas Industrial Estate, Maudlins, Fishery Lane, Naas from F: Open Space and Amenity to H: Industrial and Warehousing.</p>	
<div style="display: flex; justify-content: space-around;">   </div>	
<p>The submission raises the following points for consideration in relation to the rezoning request:</p> <ul style="list-style-type: none"> • The lands are located within an industrial estate and accommodates an existing business (Tansey Transport). The lands are ideal for the current industrial / logistics use and the proposed zoning based on access to existing road networks and a lack of other suitable sites in Naas to accommodate such businesses. • The lands are brownfield in nature, having been previously utilised as a compound for Kildare County Council. It has no biodiversity value. • A <i>de facto</i> NE 1: Industry / Warehousing zoning in the Naas Environs Plan, contained in the County Development Plan 2011 – 2017, was in place when the lands were purchased. 	

- The planning history of the site includes previously permitted industrial uses / units. Permission has been refused for the retention of the current business operation partly based on the current site zoning.
- The current zoning for open space and amenity is an anomaly at the edge of an industrial estate. It is assumed that the zoning reflects the potential flood risk of the River Morrell.
- There is no potential for a riverside linear park along this part of the Morrell, or the provision of an indicatively planned roadway in the Naas LAP based on public access constraints, existing developments and the planning history of the surrounding area.
- Documentation from the Naas Flood Relief Scheme notes that Naas has a limited amount of flooding and that modelling indicates a low risk of flooding.
- An SSFRA submitted with a retention application on the subject lands concluded that the existing commercial development is appropriate in terms of flood risk, however, permission was also refused partly due to conflicting detail in the application regarding a potential riparian corridor.
- The submission outlines the support for infill/brownfield development, economic development/growth, local job opportunities, reversing outbound commuting patterns and the zoning of sufficient lands in national, regional and local plans.
- Draft Variation No. 3 seeks primarily to substantially increase housing supply. It is submitted that this can only be achieved in tandem with increased job opportunities, noting that the jobs ratio of Naas needs to be improved to avoid continued long distance commuting patterns. The proposed rezoning would help improve the workforce ratio for Naas in light of increased housing supply.
- The submission also references the new Core Strategy Objective CS O28 in Variation No. 3 which seeks to promote and facilitate the expansion and the development of Foreign Direct investment sites and industries. In this regard, it is stated that Tansey Transport is a local enterprise business that needs to expand to sustain jobs in the Naas Industrial Estate.

Sub Ref No: 026

Name: Clare Cleary

Issues Raised:

This submission has been prepared by Foundation Management Consultants Ltd. on behalf of Clare Cleary, seeking the rezoning of circa 1.5 ha of land at Rathasker Road, Naas from I: Agricultural to New Residential.



The submission raises the following in relation to the rezoning request:

- The subject lands are suitable and available for residential zoning that can be delivered within the timeframe of the Development Plan, with potential to provide circa 53 units at a density of 35 per hectare.
- The lands are within the defined settlement / CSO settlement boundary of Naas, adjoining the Broadfield View housing estate and near the recently developed Rathasker Lane housing estate.
- The lands are an 8-minute cycle or 5-minute drive from the Naas town centre, noting that development on the lands and surrounding area will catalyse cycle/pedestrian infrastructure upgrades in the area. Development of the Rathasker Lane housing estate to the north demonstrates that services are available for the subject lands.
- The submission summarises national policy/objectives and guidance documents in relation to zoning for residential development in the NPF – First Revision and the Development Plan Guidelines for Planning Authorities.
- The submission notes that Naas is a key town which has been allocated a growth of 3,747 persons/1,362 housing units in the Core Strategy of the County Plan. The Core Strategy also shows that 40 ha of land are zoned for residential development in Naas.
- The submission summarises the context and intent of Proposed Variation No. 3, noting that it includes rezoning designations, with Strategic Reserve or Phase 2 lands prioritised.
- It is noted that consultants have been appointed to prepare the masterplan for the Strategic Reserve lands of the Northwest Quadrant (NWQ). However, other road and potential water/wastewater capacity constraints to the NWQ, acknowledged in the Naas LAP 2021-2027 may take significant time to resolve. In addition, proposed Objective CS O32 provides that the NWQ masterplan may be integrated into the County Plan prior to the commencement of the candidate Urban Development Zone Udz process. Accordingly, these lands are unlikely to facilitate residential development during the Plan period.
- Regarding the release of Phase 2 lands in the Naas LAP 2021-2027, the variation documentation does not demonstrate that an objective, plan wide comparison of all potential residential lands was undertaken. The approach to appears to have been selective, with certain sites considered for zoning without due regard to the relative infrastructure capacity, accessibility or serviceability of other lands in the settlement boundary. It cannot be assumed that the infrastructural and development context of Naas has not evolved since the adoption of the Naas LAP in 2021.
- A Settlement Capacity Audit, being an evidence-based assessment of all lands identified for development potential to inform zoning, has not been undertaken for Variation No. 3 in accordance with the Development Plan Guidelines for Planning Authorities.
- It is considered that the subject lands are a Tier 1 site, while a significant portion of the lands proposed to be rezoned in Naas through Variation No. 3 are Tier 2, as per the previous Sustainable Planning and Infrastructure Assessment for the Naas LAP. Rezoning should be on a sequential basis in

areas that are serviceable and accessible, rather than lands that have infrastructural constraints as identified in the previous audit for the Naas LAP.

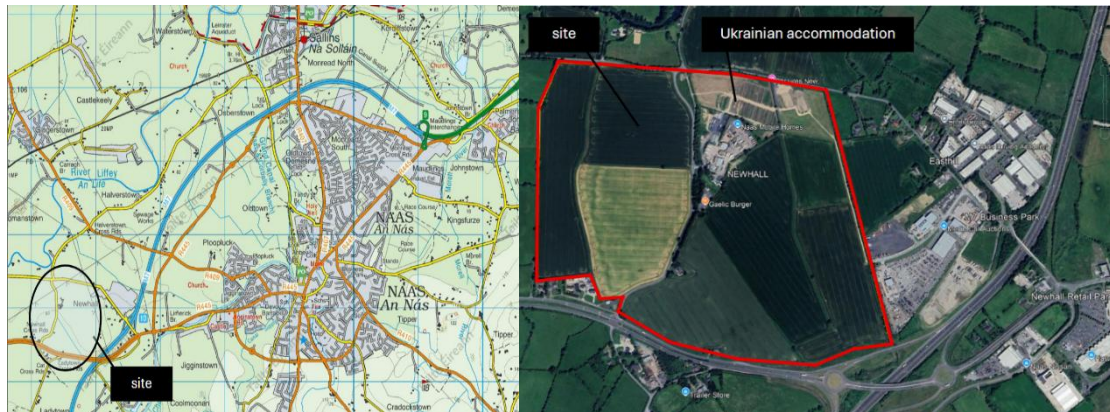
- There are numerous geographic constraints to the development of other lands in Naas, with the Craddockstown Demesne / rural area to the southeast, the M7 to the north and development beyond the Racecourse to the east encroaching on rural areas. New residential development to the southwest has been restricted, with the exception of some limited zonings along the Rathasker Road.

Sub Ref No: 045

Name: Smullen Transport

Issues Raised:

This submission has been prepared by David Mulcahy Planning Consultants Ltd. on behalf of Fintan Flood and Smullen Transport seeking the rezoning of lands (circa 100 ha) from greenfield to 'H': Industry and Warehousing.



The subject site is located to the south-west of Naas in the townland of Newhall close to the Junction 10 interchange on the M7 Motorway and west of the M7 Business Park. The northern portion of the site (circa 13 ha) provides temporary accommodation for people fleeing the war in Ukraine and another part of the site is used as an HGV parking area.

The submission raises the following points for consideration in relation to the request:

- States that the rationale for the rezoning request is the need to create a strategic employment hub in Naas to provide jobs for the increased housing supply attributed to Naas under the Variation and the new Objective CS O28 as set out in Amendment No. 16 of the Variation to avoid long distance commuting.
- States that the zoning sought is complementary to the focus of Millennium Park which is a business park but needs to be coupled with an industrial/logistics park to capture the wider range of employment opportunities and states that the development of the lands would be subject to the preparation of a masterplan which would include a phasing plan.

- Contends that Smullen Transport are a long-established local business servicing local industry with 250 staff and zoning the subject lands as employment provides them with the ability to expand and stay in the Naas/Newbridge area.
- States that zoning the adjoining lands directly supports the continued operation, competitiveness and future expansion of a major local employer already integrated into the Junction 10 logistics ecosystem.
- States that the Ukrainian refugee accommodation on part of the subject lands has ensured that drainage services are available, as the Ukrainian accommodation on the northern portion of the site brought services to the site including foul and water supply and there is an onus on the local authority to ensure that this infrastructure is now capitalised on.
- States that the subject site is strategically located relative to the motorway, ports, the airport and the site is served by public transport providing frequent services to Naas, Newbridge, Kildare and Dublin and landowners are open to providing dedicated bus stops as part of any future development on the site.
- States that the site has established road connections back into Naas town via the L2030 and the L2031/R445 and an additional access route to the site is available via the M7 Motor Park Industrial Estate, where Smullen Transport currently operates, which provides an established, functioning industrial access point already used daily by a major logistics operator.
- Refers to an established pedestrian route back to the Naas Town Centre for the emergency accommodation at the north end of the site and this route can be upgraded and used to facilitate future pedestrian connections.
- Refers to the Part 8 consultation in respect of the L2031 on the R445 from Newbridge (see image below) and states that the landowners would be happy to contribute toward a roundabout junction as part of any future development of the lands.



- States that the Historic Environment Viewer provided by the DHLGH shows a single enclosure to the south-west of the subject site and this can be accommodated as part of any future development of the site. Also, the NPWS Designations Viewer shows that the Grand Canal pNHA is located on the opposite side of the M7 Motorway.
- States that a review of floodinfo.ie did not reveal any flood risk issues associated with the subject lands.

- States that the general area is characterised by agricultural and industrial land uses, which are located east of the site, M7 Business Park and M7 Motorpark which it contends is approximately 90% occupied and the industrial lands to the south are almost fully complete and occupied.
- States that a previous grant of planning permission (06/707) comprising a business park/industrial estate was not acted on due to the economic climate at that time and lapsed.
- Refers to the provisions of the Revised NPF, RSES, Kildare 2025 – Economic Development Strategy, Kildare CDP 2023-2029, the Naas LAP 2021-2027 to support the rezoning.
- States that there is an insufficient supply of zoned/serviced land in the vicinity of Junction 10 in Naas, and this is resulting in a loss of business and jobs to other counties.
- Refers to the City Edge Project where the South County Dublin and Dublin City Councils have come together in a joint regeneration effort on 700 ha., and quotes from a Sunday Business Post article from 2022 which it states, *inter alia*, referred to the almost full Citywest, Baldonnell and Greenogue Business Parks and that in the absence of newly zoned and serviced industrial lands, there would be nowhere for Ireland's primary distribution hub to expand to or industrial users to decant as the Dublin City Edge project takes hold.
- States that there is an opportunity in County Kildare to take advantage of the migration of distribution/warehouse/logistics land uses out of Dublin City/South Dublin as these lands become more valuable for higher order uses such as residential, mixed use, etc associated with the City Edge Project.
- States that County Kildare is competing with County Meath, Fingal and Co. Wicklow for these employment uses and that County Kildare has a particular advantage being on the route from Rosslare to Belfast via the M9 and M7, along with its close proximity to Dublin.
- States that Junction 10 is a particularly attractive location for industrial and warehousing land uses due to its close proximity to the M7 Motorway network and its strategic proximity to Dublin City (and Dublin Port), Belfast, Rosslare and Dublin Airport and that much of the lands zoned for industrial/warehousing in the vicinity of Junction 10 (M7 Business Park) are already fully occupied or nearing full occupation and there is no remaining zoned 'H' lands in Naas LAP area.
- States that Kildare County Council needs to act to ensure that all efforts are made to avoid business and jobs being lost to other counties.
- States that the developable area is circa 60-70 ha, plot ratio: 40-50%, job density is 70-90sqm per employee, total employment capacity is c.2,000-3,000+ jobs.
- States that the site offers potential for PV, micro-grids and renewable energy, opportunity for EV fleet hubs and future potential for rail freight integration and full SuDS compliance across the site, immediate deliverability and incorporation of green corridors and biodiversity area, construction and long-term employment, major uplift in commercial rates for KCC.

Sub Ref No:	049
Name:	Millennium Falcon Holdings Ltd.
<p>Issues Raised:</p> <p>This submission has been prepared by Coady Architects, David Mulcahy Planning Consultants Ltd., and Donnachadh O'Brien and Associates Consulting Engineers Ltd on behalf of the landowner, Millennium Falcon Holdings Ltd, seeking to rezone lands (circa 5.08 ha) at the junction of Millennium Park Ring Road and the Sallins Road in Naas that is primarily zoned 'Q1: Enterprise and Employment', but also includes the site of a dwelling zoned 'B: Existing Residential/Infill: and 'F: Open Space and Amenity'.</p> <div data-bbox="253 631 1329 1048" data-label="Image"> </div> <p>The submission seeks to have the subject site rezoned in its entirety to 'C: New Residential' under Proposed Variation No. 3 in order that housing can be quickly delivered on the ground within the lifetime of the current CDP as per Housing Growth Requirement Guidelines (July 2025).</p> <p>The subject site consists of two land holdings: Site A: circa 4.06 ha and Site B: circa 1.02 ha. Site A is primarily brownfield in nature and contains remnants of the old Sallins Road, and a single storey, detached dwelling that is vacant and of no architectural merit (White Cottage). Site B is greenfield in nature and has a row of mature trees to the north and access to the site is off an internal road in Millennium Park.</p> <p>The submission raises the following points for consideration in relation to the request:</p> <ul style="list-style-type: none"> • Refers to the provisions of the Action Plan on Housing Supply and Targeting Homelessness (Nov 2025), the Revised NPF, the Sustainable and Compact Settlements Guidelines for Planning Authorities (2024), s.28 Guidelines – NPF Implementation: Housing Growth Requirements (July 2025), RSES, the Core Strategy of Kildare CDP 2023-2029, Naas LAP 2023-2029 and Variation No. 3. • Contends that the delivery mechanisms outlined in the Variation No. 3 will not deliver housing on the ground to meet the increased housing targets as per the s.28 Guidelines. • Refers to the Delivery Mechanism by which additional housing growth will be facilitated in County Kildare as set out in Amendment No. 12 of the Variation 	

and states that apart from mechanism No. 1, which will allow planning applications to be lodged as soon as they can be prepared after adoption of the Variation, the majority of the mechanisms involved pushing decisions on zoning down the track via new Settlement Plans and future Urban Development Zones (UDZ), which will not achieve the targets set out as per the guidelines.

Reference is made to the Blessington/Tipper Road site (identified in Table 2.8A), which it states already has the benefit of planning permission and is in the process of being built out and will therefore not deliver the new housing targets being sought.

- Refers to the other delivery mechanism in Naas, the Northwest Quadrant lands, which along with Confey in Leixlip, is described as being for future long term Urban Development Zones, which are described in Table 2.8B as “Long term Strategic and Sustainable Development Sites.”
- States that the entire purpose of the Guidelines is to increase housing targets under the Variation so that lands which are ready to go can come on stream in terms of lodging planning applications that will allow housing to be delivered on the ground during the lifetime of the current CDP, which it states will not happen under the Variation as currently drafted.
- Contends that the emphasis should be on identifying lands which are serviced or serviceable and are free from constraints to development, which should include smaller settlements in the county and not just the larger towns.
- States that the subject site presents as an ideal candidate for New Residential zoning if zoned in this manner, and that the lands are serviceable and ‘ready to go’ as confirmed by the Consulting Engineers and will be quickly acted on by the landowners who have in-house experience as a housebuilder in Naas.
- States that the key features of the subject site are as follows:
 - National and regional planning strategies promote compact urban settlements with an emphasis on compact growth.
 - Reference is made to population increase in County Kildare and the recent reduction in commencement notices for new homes lodged for the entire county.
 - The site is within a 10-minute walk of Sallins Train Station, and it is Government policy to promote the location of higher density housing in close proximity to public transport (particularly train stations).
 - The site is zoned for Enterprise and Employment and has not attracted any employment-based interest over the course of two CDPs to date.
 - States that a New Residential zoning objective would provide for much needed housing and contribute toward attaining the increased housing target for Naas.
 - There are no known built or natural heritage constraints associated with the land or flood risk.
 - There are established road connections back into Naas.
 - The site is within the 50kph posted speed limit.
 - The site is fully served and can be quickly activated to deliver over 230 new homes and live work units.

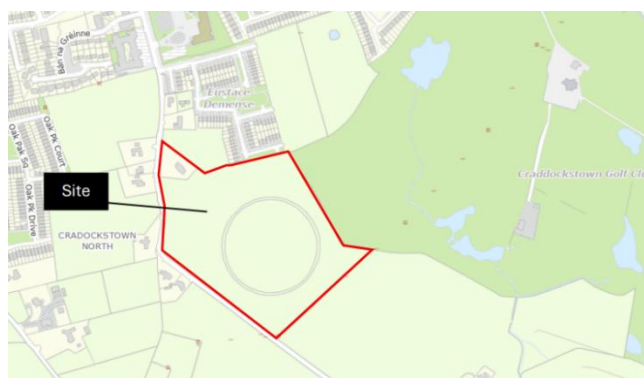
- The development of the site offers an opportunity to complete the local greenway and connect to bus stops, creche and workplaces with the existing residential neighbourhood.
- States that the Development Proposal prepared by Coady Architects enclosed with the submission demonstrates how the overall site can be developed for a housing scheme and the delivery of circa 231 residential units based on a residential density of 57uph, the delivery of high quality urban design and architecture at a gateway entry point to Naas town including a positive frontage to both Sallins Road and Millennium Road, and the creation of a public open space to the south of Site A which will serve the wider area and facilitate a connection with the Grand Canal.
- Refers to the Engineering Constraints and Feasibility Report prepared by Donnachadh O'Brien Associates, Consulting Engineers enclosed in the submission which demonstrates, *inter alia*, that the site is serviceable in terms of foul, water supply, surface water, road infrastructure and utilities (subject to confirmation by Uisce Éireann).
- States that there is a large swathe of Enterprise and Employment lands in Naas town and 5.08 hectares is only a minor element of this overall total, but the landowner would be open to a Mixed-use zoning that allows for residential development and would facilitate commercial development at ground floor level.

Sub Ref No: 051

Name: David, Joe and Robert Osborne

Issues Raised:

Submission by David Mulcahy Planning Consultants Ltd. on behalf of David, Joe and Robert Osborne concerns unzoned lands extending to approximately 9.3 ha at Craddockstown Demesne, Naas for which it is requested to be zoned New Residential.



The submission outlines the rationale for this request, as follows:

- Notes that the site adjoins lands zoned B: Existing Residential/Infill in the Naas Local Area Plan 2021-2027 (LAP).
- Submits that the variation allocates only limited land for new housing in the county and its mechanisms are unlikely to deliver homes within the Plan's timeframe. Contends that zoning the subject site would enable a planning application in 2026 and ensure housing delivery under the current CDP.

- Notes the site's generally flat greenfield context (aside from a detached dwelling in the northwest of the site) located to the approximately 1.7 km southeast of the town centre – with footpath connections to the town centre.
- Notes the location and proximity of cycle paths and bus stops to the site.
- Notes that the site is sequentially appropriate for development, adjacent to Eustace Demesne residential estate with potential for access routes and that it also has established vehicular access off and extensive frontage along Craddockstown Road.
- Notes the population growth of the town and the associated increased demand for housing. Refers to Naas's designation as a Key Town.
- States that there is no known flood risk, archaeologic heritage or natural heritage designations affecting the site.
- States that there is no planning history recorded for the site but notes a Part 8 planning application for residential development for lands to the northwest.
- Refers to various provisions of the Revised NPF, the RSES, the Kildare County Development Plan, the Naas Local Area Plan 2021-2027, recently published Section 28 Guidelines and the housing action plan (November 2025). States that the vast majority of lands zoned for new residential development in Naas have either been built out or are under construction.
- Refers to the evolving national and regional planning policy context. Notes the implications for County Kildare in terms of delivering more housing at increased densities and the provisions of Proposed Variation No. 3 in this regard. Submits that the delivery mechanisms outlined in the Proposed Variation will not deliver housing to meet the increased housing targets outlined in the Housing Growth Requirements Guidelines. Notes that the guidelines place emphasis on bringing forward 'ready to go' lands. States that the landowners have a housing scheme ready to go if the subject lands are zoned.
- States that the site is serviceable and can provide for approximately 330-340 housing units (with social and affordable units) developed at approximately 35.5 units per hectare. Submits that the planning gain from this development would potentially include additional community infrastructure in the form of a childcare facility and multi-use games area.
- Submission report includes a map outlining the site in red.

Engineering Constraints and Feasibility Report

The submission includes an accompanying report by Donnachadh O'Brien and Associates Consulting Engineers which examines the feasibility of the site for residential development. The findings of this report are referred to in the main submission document. The report examines the existing roads infrastructure, sight lines, water supply, wastewater, flood risk and surface water and finds the site to be serviceable, subject to certain upgrades and interventions. It notes that the Craddockstown Road will need to be widened to provide the necessary access and sightlines to the proposed development and this intervention will affect third party lands (see below).

The submission also contains the following:

- A draft masterplan illustrating a residential development scheme on the site.

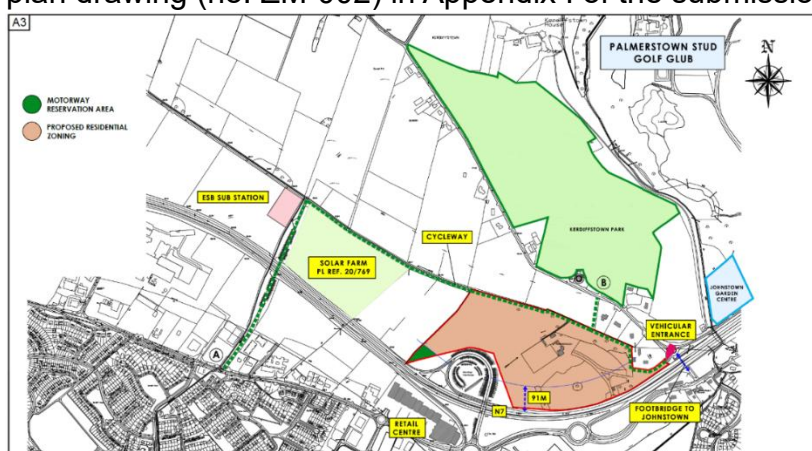
- A letter of consent from Gerard and Helen Kavanagh agreeing to the requisite road realignment on Craddockstown Road which will affect their landholding. This letter also includes maps illustrating the extent of the proposed realignment
- A Tailte Éireann map showing the extent of the lands under the ownership of Ger Kavanagh

Sub Ref No: 058

Name: Graeme Beere and Margaret Beere

Issues Raised:

This submission has been prepared by O'Flynn Architects on behalf of Graeme Beere and Margaret Beere for the rezoning of 16.759 ha of lands at Maudlins, Naas from agricultural to low density residential. The subject landholding is on a site location plan drawing (no. ZM-002) in Appendix I of the submission.



The submission raises the following for consideration in relation to the request:

- There is a need for additional accommodation at local and national levels. While some of the need housing in the region can be accommodated on brownfield lands and occasional windfall sites, it is apparent that most will be provided on agricultural lands and with a notable increase in residential zoned lands.
- The submission provides an overview of national, regional and local planning policy, together with relevant planning guidelines in relation to housing need and the zoning of residential lands. The submission opines that additional residential zoned lands are required in Kildare to satisfy the recent increase in headroom for zoning from 25% to 50%, as provided for by the Housing Growth Requirements Guidelines.
- The submission provides an overview of the current Core Strategy housing / population allocation for Naas and Johnstown, and a summary of Proposed Variation No. 3 in terms of integrating the Housing Growth Requirement Guidelines, particularly in relation to Naas. It is noted that the Northwest Quadrant (NWQ) is anticipated to accommodate most of the additional housing for Naas under Proposed Variation No. 3.
- Planning permission for development on the NWQ can only be lodged and granted following the preparation of a masterplan and its integration into the

<p>County Development Plan by variation. Any such plan will require various assessments, public consultations and resources to finalise. It is improbable that any physical homes will be produced during the lifetime of the County Development Plan, contrary to the Housing Growth Requirement Guidelines.</p> <ul style="list-style-type: none"> • The submission gives an overview of the location of the subject lands, with the Johnstown Garden Centre to the east, Kerdiffstown Park to the north, Sallins to the northwest, and Naas to the south (2km from the town centre). The subject lands are of a similar distance from the Naas town centre as the NWQ. • The lands have a level topography, are currently zoned agricultural in the Naas LAP 2021-2027 and accommodate a bloodstock enterprise. • Nearby land uses include retail, recreational, social, community, cultural and educational facilities. The proposed rezoning would complement surrounding land uses, provide needed housing in a well-positioned location, be a logical extension of existing land use policy for Naas and accord with the sequential approach to zoning. • The lands are accessible to Junction 8 of the M4/N4 and are connected to Johnstown Village via the M4/N4 footbridge. The lands are within 400m of the Johnstown village centre (including its associated services / facilities and transport links) and are also proximate to major public transport links, such as the Sallins train station (2.5km). • The subject lands could accommodate a minimum of 40 units, as shown in the indicative site layout drawing in Appendix II of the submission. The proposed low-density residential zoning would assist in providing individual sites to reduce long distance travel patterns to the workplace, considering the number of major, multi-national and indigenous employers in the area. • The zoning would reduce the unsustainable demand for one off dwellings around Naas, allow for the completion of the Monread Road – Kerdiffstown Park Cycleway, and provide activity and security to the nearby Kerdiffstown Park. • The subject lands are Tier 1, with foul and surface water drainage, water supply and road / pedestrian /cycle infrastructure immediately available. It is noted that the NWQ lands are identified as Tier 2 in Variation No. 3. • Development on the subject lands will incorporate landscape features and have limited tree removals, subject to appropriate surveys. There are no known impediments to development in terms of archaeology, ecology or flood risk. The site does not accommodate any monuments or protected structures. • Renewable power will be available from the nearby solar farm. 	
Sub Ref No:	063
Name:	Jimmy Kelly
<p>Issues Raised: This submission has been prepared by Brian Connolly Associates Consulting Engineers on behalf of Mr Jimmy Kelly. The submission seeks the rezoning of 26.9 ha of land at Tipper West, Blessington Road, Naas from agricultural to new residential.</p>	



The submission summarises the content and intent of Variation No. 3, particularly the incorporation of the NPF Implementation: Housing Growth Requirements - Guidelines for Planning Authorities (2025) and its associated additional housing growth requirements into the Core Strategy of the County Development Plan. Regarding the Key Town of Naas, the submission notes the allocation of an additional:

- 445 units to 2 no. sites – one on the Kilcullen Road and one on the Blessington Road.
- 1,294 units are allocated to the Northwest Quadrant on lands zoned Strategic Reserve that require a masterplan. This could delay the delivery of dwellings.

The submission raises the following in relation to the proposed rezoning:

- Government policy requires the provision of additional zoned lands to deliver additional housing in the immediate future. Residential development on the lands complies with Government policy in the County Development Plan.
- The subject lands are accessible from and have significant frontage onto both the Tipper and Blessington Roads.
- The lands are approximately 1.5km from the Naas town centre.
- The lands are adjacent to the Stonehaven residential development and its permitted neighbourhood centre. It is noted that this development is under construction.
- Development on the subject lands would continue the character of the Stonehaven site, representing the sequential expansion of residential lands. Appendix B of the submission provides an indicative site layout plan for the subject lands.
- Future development on the lands will comply with the design standards of the County Development Plan and relevant guidelines.
- Future development on the lands would allow for the provision of an outer orbital link between the Tipper and Blessington Roads.
- Future development would provide planning gain in the form of 20% Part V social and affordable housing.

- Water supply, wastewater and stormwater services are available and adjacent to the subject lands.
- It is noted that the southern portion of the subject lands are identified as being subject to a Specific Flood Risk Assessment in the Naas LAP 2021-2027. Appendix C of the submission includes an extract from the Flood Risk Assessment by RPS Consultants for the Naas LAP 2021-2027. This extract relates to the adjoining Stonehaven site and provides a justification and recommendations for development in this area. Accordingly, potential flood risk can be eliminated in a similar manner for similar developments in the immediate vicinity of the lands.

Sub Ref No: 064

Name: Acorn Connect Limited

Issues Raised:

The submission includes an attachment document prepared by John Spain Associates, on behalf of Acorn Connect Limited., in relation to lands located at Oldtown House, Oldtown, Naas.

It submits under the current Naas LAP the site is zoned F2: Strategic Open Space. The submission requests subject site be identified for housing delivery in short-term in the variation and its zoning be redesignated to C: New Residential and proposes that an updated version of the zoning map for Naas be incorporated into the Proposed Variation.



- States that the remaining plan period is only three years and additional sites suitable for short term delivery of housing should be given greater consideration in the proposed variation.
- Notes the NPF First Revision (April 2025), informed by research by the ESRI and Housing Commission, and lists two key points - national population growth target from 5.8 million to 6.1-6.3 million by 2040 and a revised national housing target for an additional 50,000 houses per year.
- Notes the Ministerial Guidelines published in accordance with Section 28 of the Planning and Development Act 2000 (as amended), NPF Implementation:

Housing Growth Requirements Guidelines for Planning Authorities (2025) – as means to implement NPF First Revision at local level allowing for zoning to be updated and an additional provision of 50% over and above.

- States the Guidelines and Proposed Variation No. 3 has a revised housing delivery target of 4,133 dwellings per annum to 2034 for County Kildare (including the 50% additional provision) – an increase of 2,609 per annum and equates to a housing growth requirement of an additional 7,826 dwellings over the remaining lifetime of the Plan.
- Some sites in Kildare identified for the delivery of housing in the short and medium-term have potential units of 5,421. Sites identified for the delivery of housing in the long-term have potential units of 2,405. All sites developed would equate to 7,826 dwellings.
- Asserts that in the context of short-term housing growth requirement the lands identified in the proposed variation to meet requirement by 2029 might not come forward for development.
- Contends that should it not be considered possible to rezone the site in variation the submission requests that a commitment is given by KCC that the site will be considered in the Settlement and Site Capacity Audit of the Variation.
- States two sites identified for delivery of additional dwellings in short and medium term in Naas, at Kilcullen Road and Blessington Tipper Road, which have combined potential for an additional 455 dwellings.
- Asserts for many other areas in Table 2.8A the exact locations where these could be delivered is still 'to be determined through Settlement Plans' planned to occur in 2026, there is no definitive timeframe for delivery of these plans.
- States two areas for delivery of additional dwellings in long-term in Northwest Quadrant in Naas and one in Confey Leixlip, which have combined potential for 2,405 additional dwellings.
- Asserts target of 7,826 dwellings would only be met if short-medium- and long-term sites are all delivered but some are dependent on Settlement Plans, Masterplans and Urban Development Zones which are yet to be prepared.
- Asserts that in the case of recently rezoned lands at Maria Villa in Maynooth, it is possible to provide C (New Residential) zoned lands in proximity to protected structures with carefully considered site layouts. The land was zoned I: Agriculture in the Maynooth LAP 2013-2019 and were rezoned C: New Residential in the Maynooth LAP 2025-2031.
- The submission provides an indicative site layout (as shown below) and demonstrates how residential development could be provided on the subject site, respecting the existing woodland and Oldtown House and the approach is similar to that in the Maynooth LAP for Maria Villa.



Site and Context:

- The subject lands are in private ownership and the adjacent lands to the west have recently been acquired by the County Council to facilitate the delivery of the de Burgh Woodland Gardens.
- Submits the site is serviced and suitable for residential development as it is in an extremely accessible location allowing for housing development which supports compact growth and integration with the existing built-up area of Naas.
- Located on Oldtown Demesne, less than 1km north of Naas town centre and part of the wider lands of Oldtown House, a protected structure. States the site is bound by Boreen Lusk, the access road from Sallins Road to Oldtown House, Oldtown House and woodland.
- Asserts that residential development on the site would have limited impacts on the existing woodland on the site as there is an existing access and service road through the site from the south, which could be used for future development on the site. This does not traverse any water courses.
- Notes a number of “water-filled ditches” described in the Naas LAP run through the woodland area outside the site boundary and feed into an old lake north-west of Oldtown house that has now been infilled and has become a reed swamp.
- Submits that this submission relates only to the lands within red line boundary in excerpt shown above, but the immediate adjacent woodland areas are also in the client’s ownership and potential for these woodlands outside the site boundary to be incorporated into the publicly accessible De Burgh Woodland Garden as part of future planning gain.
- Outlines the immediate area surrounding the site is characterised predominantly by residential development (the Orchard, Millbridge) and older detached housing along Sallins road which is the arterial north-south route through Naas and provides access to M7.
- States bus stops are located on Sallins road and childcare, primary and secondary schools are within 1.5km of site. Naas GAA is north of site.

- Notes Policy Context – Kildare County Development Plan 2023-2029, Core Strategy and Settlement Strategy with policies and objectives for whole county and classifies Naas as a Key Town.
- Notes Naas LAP 2021-2029 contains detailed policy and objectives for Naas specifically and relevant for subject site:
- Movement and Transport – cycling routes on Sallins Road and Mill Lane are identified. Sallins Road is identified as the 'Central Spine' route which is intended as primary route connecting school to south of Naas with town centre and Sallins Railway station to the north. Notes these measures will further enhance connectivity to site.
- Green Infrastructure – LAP emphasises the importance of this area of woodland on subject site.
- Protected structures – two protected structures on and near site. (Oldtown House and St. Patrick's Well).

Sub Ref No: 065

Name: Aravonian Ltd.

Issues Raised:

This submission has been prepared by John Spain Associates on behalf of landowner Aravonian Ltd. The submission seeks the rezoning of 17.92 ha of land at Oldtown (Northwest Quadrant), Naas from 'SR: Strategic Reserve' and 'I: Agricultural' to 'C: New Residential'.



The submission raises the following points for consideration in relation to the rezoning request:

- The subject lands are irregular in shape and are bound by existing dwellings and farmhouses to the north and south, with the canal bank road running along the eastern boundary of the lands.
- A small portion of the lands currently bound a hardstanding parking area of Millenium Park to the northwest, located off the R455 which can provide a sufficient access point to the lands.
- The lands are currently greenfield/agricultural in nature which includes an existing pressured sewer line that traverses the site in an east to west direction discharging at the Osberstown WWTP.

- Refers to national and local policy context with reference to existing land use zonings and associated movement and transport objectives relevant to the subject lands and their connectivity to the town centre and surrounding amenities.
- Refers to Policy NWQ1 of the Naas LAP and pending masterplan framework for the Northwest Quadrant lands which states no development shall take place on lands identified 'SR: Strategic Reserve' until such time as a masterplan is prepared and integrated by statutory amendment to the local area plan.
- The submission notes the subject lands are in an area identified for the delivery of housing in the long term, contingent upon the publication of a pending masterplan variation, including a proposed Urban Development Zone (UDZ) designation which is an even longer-term objective.
- Refers to the remaining three years of the current development plan and states the subject lands can contribute to the short-term housing targets set out for Kildare.
- The submission generally supports Objective CS O32 of Draft Variation No.3. Recommends the pending masterplan framework for the Northwest Quadrant is brought forward as a variation and adopted as soon as practicable.
- The submission proposes the change of 'SR: Strategic Reserve' zoning to 'C: New Residential' to allow planning applications to be considered on these strategic lands in the short term, increasing housing delivery during the lifetime of the development plan.
- The submission also proposes the rezoning of lands zoned 'I – Agricultural' to 'C: New Residential' to align with the aims and objectives of Draft Variation No.3 to provide housing in the Northwest Quadrant. This includes both the northern portion of the site and portion of the site adjacent Keredern House where existing farm buildings are not protected structures.
- The submission generally welcomes the future UDZ designation as this can promote the delivery of critical infrastructure in the new urban quarter. However, it states the adoption of the masterplan framework for the area or the rezoning of the lands is considered crucial for housing delivery on these lands in the short term.
- The submission states the subject lands are considered 'Tier 1 – Serviced Zoned Land' with appropriate access points and excellent connectivity to the town centre and wider area.
- States the lands benefit from its proximity to the canal with the potential for future residential development to connect to the canal bank road and potential future active travel links that can enhance the sites connectivity with the town centre.
- States the northwestern portion of the lands have access to mains water, gas and electricity connections, including sufficient sewerage capacity due to the completion of the Osberstown sewer line running through the site.
- Refers to existing pedestrian and cycle link objectives identified under the Naas LAP which are relevant to the subject lands. States the landowner is happy to facilitate these important links including a proposed active travel bridge which can facilitate and enhance access to the rezoned lands.

- Refers to an identified greenway objective in the Naas LAP which runs along the eastern site boundary adjacent the canal and which is currently zoned 'F – Open Space and Amenity'. States the existing zoning provides a 40m set back approximately from the canal edge which is more than sufficient for the development of a potential greenway route and subsequent future building lines.
- Refers to recent residential developments at Finlay Park and Sarto Park which have adopted similar if not lesser setbacks from the canal edge as outlined in map exert below.



- The submission requests an updated zoning map for Naas to be incorporated into the CDP via the proposed variation which includes the rezoning of the 'SR: Strategic Reserve' and 'I: Agricultural' zoned lands to 'C: New Residential' to align with the aim of delivering housing on these strategic lands in the short term.
- States the above requests are considered appropriate due to the lands Tier 1 designation and ability to support the sequential development and compact growth of the town.

Sub Ref No: 088

Name: Glenveagh Homes Ltd.

Issues Raised:

The submission includes an attachment document by John Spain Associates, on behalf of Glenveagh Homes Ltd., and seeks to demonstrate the suitability of the sites identified in this submission for residential development, particularly in the short-term and to propose changes to the Proposed Variation No. 3, to ensure housing can be delivered on the site in the short-term to contribute to the increased housing target for the County within the lifetime of the Development Plan.

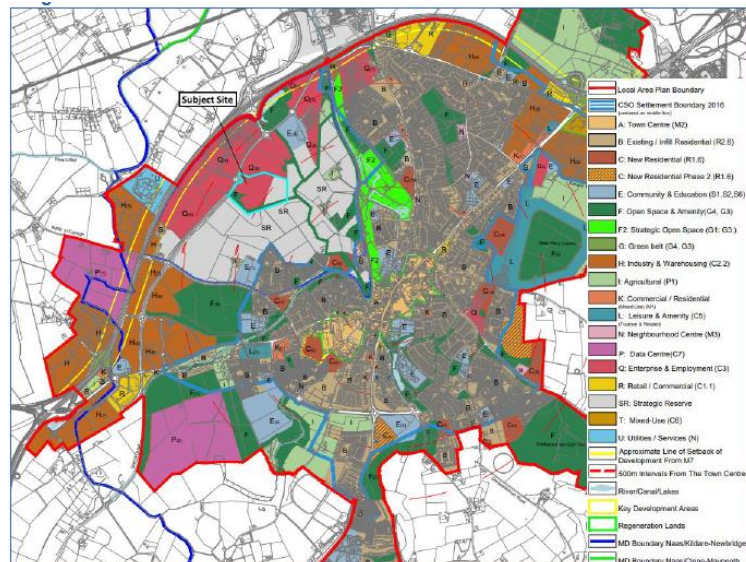
The submission seeks the following subject site zoned 'C: New Residential':

- Millennium Park, Naas (c. 14.3 hectares)



Millenium Park, Naas

- Circa 14.3 hectares (450-500 dwellings based on density of c.35 dph)
- Currently zoned 'Q: Enterprise and Employment', 'F: Open Space' and 'SR: Strategic Reserve', as shown in excerpt below with light-blue outline:



- Notes substantial part of subject lands are zoned Strategic Reserve and that there is recognition that the lands are suitable for residential development by the planning authority.
- States Table 2.8B identifies two areas for the delivery of additional dwellings in the long-term. (one is Northwest Quadrant of Naas - NWQ)
- Submits that the entirety of the NWQ (1,294 units) is brought forward for short term development and Table 2.8A is revised.
- Contends subject lands are accessed via the adjacent roundabout along the R445 Millenium Link Road, located proximate to Naas and Sallins Train Station, at a strategic location along R445 road with direct connections to M7 Motorway.
- Outlines site would act as gateway to the remainder of the landbank at the Northwest quadrant and can be connected to existing services.
- Notes:
 - Road access – direct via R445

- Pedestrian and cycle access – opportunities on R445
- Foul sewerage – can be serviced and connected to existing infrastructure.
- Water supply - can be serviced and connected to existing infrastructure.
- Surface Water – several watercourses/ditches in vicinity of site.
- Community Facilities – close proximity to retail district of Monread and Naas town centre
- Educational Facilities- exceptionally well served by post-primary Naas Community College and primary Scoil Bhríde.
- Asserts release of lands which are Tier 1, without flood risk and serviceable before the NWQ Masterplan and update on local plan to ensure delivery of the core strategy numbers by 2028.
- Requests the lands should be zoned for residential rather than classed as Tier 2 and it meets the suitability criteria of the 2022 Guidelines.
- Asserts the provisions of the variation with regard to the Masterplan for the NWQ, and the Urban Development Zone (UDZ) for Naas mean there are additional significant unnecessary obstacles to the delivery of housing in the short term.
- Recommends the following objective is included in the Development Plan:
“In order to facilitate the development of 1,294 dwellings within the NWQ in the lifetime of the current County Development Plan the Naas Local Area Plan 2021 – 2027 should be amended immediately following the passing of the Proposed Variation to designate lands Tier 1 and zone ‘New Residential’ lands within the NWQ.”
- Submits the proposed variation fails to support the zoning of lands which are serviced to enable development to proceed now, also noting the lands were originally identified for development 20 years ago as part of the IFPLUT 2024.
- Asserts a masterplan was completed in 2007, preparation of a recent masterplan commenced in 2024 (as per the objective of the Naas LAP adopted 4 years ago) and there has been minimal engagement in progressing these strategic lands.
- Understands the other landowners within the NWQ close to the Glenveagh landholding, have the ability and wish to deliver new housing withing the lifetime of the plan.
- Raises concern regarding uncertainty when legislation is in place to allow for the initiation of a UDZ and when it will be prepared and adopted – and there is a risk that the inclusion of this objective as currently phrased will delay and hinder the provision of housing on lands which are Tier 1 and can accommodate housing now.
- Recommends the following text be added at the end of CS O32:
“Prior to the completion of the Northwest Quadrant Masterplan and its integration into Volume 2 the County Development Plan the Naas Local Area Plan 2021 – 2027 should be amended to allow for the immediate zoning of additional lands within the NWQ for residential development.”

Sub Ref No:	089
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Name: The Arrow Group Ltd. and Liam Queally

Issues Raised:

The submission includes an attachment document prepared by Brock McClure Planning and Development Consultants, on behalf of The Arrow Group Ltd and Liam Queally, in relation to lands comprising circa 47 hectares located at Bluebell Farm, Naas and shown in the map excerpt below:



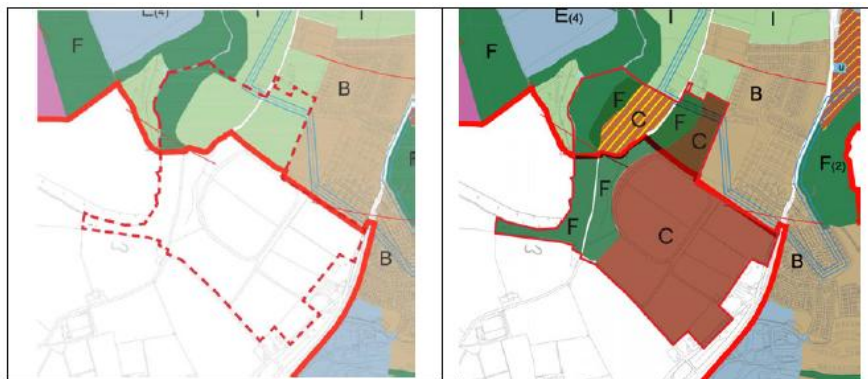
The current zoning of the site is as follows:

- A portion of the overall site (13.30 ha) is currently within the development boundary and is zoned F - Open Space and Amenity (3.34 ha) and I-Agricultural (9.96 ha).
- The Submission requests 2.768 ha to be re-zoned Objective C: New Residential, for 3.486 ha to be re-zoned C: New Residential Phase 2 and for 3.706 ha to be re-zoned F: Open Space and Amenity.

The submission further proposes the following zoning:

- Rezoning and extension of the development boundary of Naas to include for 33.835 ha of currently unzoned land:
- 25.59 ha to be zoned C: New Residential and for 8.245 ha to be zoned F: Open Space and Amenity.

An excerpt is shown below with the current and proposed zoning:



The submission outlines the rationale for this request, as follows:

- Asserts that the variation does not fully realise the potential required to meaningfully address the scale of housing demand in the County, but specifically within Naas as the County's 'Key Town'.
- Notes the 4 no. delivery mechanisms intended to facilitate housing growth and contends that the current extent of zoning proposed falls short of what is needed to support timely and effective housing delivery.
- Submits the variation is extremely limited in its scope for Naas by solely focusing on Phase 2 zoned lands and that the Northwest Quadrant cannot be considered to meet housing targets over the short to medium term as occupation of these lands is many years in the future.
- Asserts it is fundamental that all sites equipped with the necessary infrastructure and services for residential development be released as part of variation process.
- States that unless the proposed variation is strengthened to include appropriate residential zoning, an opportunity to advance housing delivery in Naas will be missed and this is counter to the intent of the Ministerial Guidelines and urgent increased housing provision.

Land Nomination

- Submits the high-level approach taken by the Council in respect of site nomination means some lands may not be realised for housing provision in time required.
- Asserts the blanket release of Phase 2 lands in Naas is an overly simplistic approach and questions if the approach is the most viable.
- States it is apparent from evaluating the variation that assumptions made that all zoned Tier 1 and Tier 2 lands are deliverable but questions this methodology in terms of its comprehensiveness and asserts it is not a robust methodology and suitable additional sites should be considered.
- Contends the reliance on future Urban Development Zones, Local Area Plan updates and design frameworks for key sites means planning questions are not being answered now.
- Asserts concern that the variation assumes full utilisation of land identified within it and development of lands are often delayed due to legal issues, economic reasons, permissions sites not commencing, and longer lead times for strategic development sites.

Revisions to the Plan for Naas

- States Tier 1 settlement towns such as Naas, should remain focus for delivering on new population targets and KCC has not gone far enough in respect of the zoning of a myriad of land options for residential growth.
- Contends there must be meaningful action by Planning Authority and radical change is required to no longer rely on legacy zonings with release of lands at marginal scale.
- The NPF revision provides for population projections well in excess of figures published in 2018 – the miscalculation reinforces the need to better accommodate the demand for housing and increasing population pressures.
- Notes the variation does not provide enough zoned land that is risk-free.
- Subject lands should be released for immediate residential development.

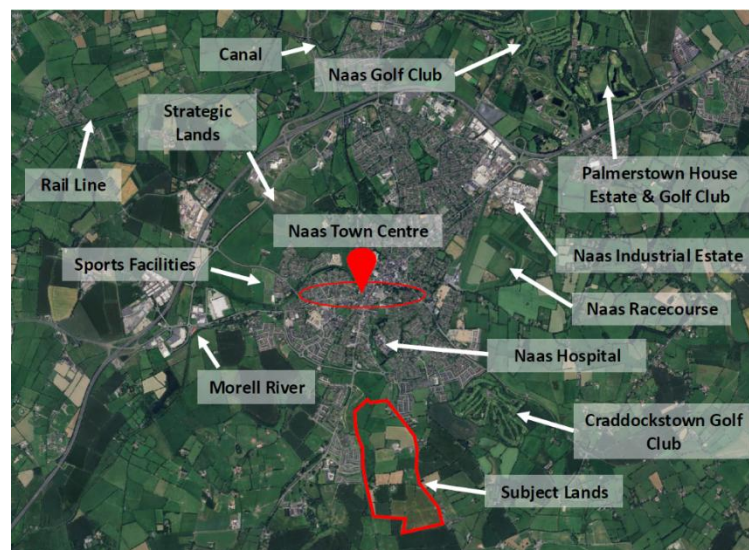
- States land has potential to deliver 980 homes and are serviced.
- Strong regional and local connectivity, town centre is easily accessible, existing waste water and watermain infrastructure, and the site has not flooded and is classified as Flood Zone C.
- States the subject lands at Bluebell Farm, represent a coherent extension to the emerging residential context of Naas and a fully serviceable opportunity to deliver a significant number of dwellings in short-medium term.
- Also states the subject lands are adjacent to services and transport infrastructure with access to public services including water supply and public drainage.
- Outlines the development of subject lands in the context of newly established Whites Well and Piper's Hill would maximise existing infrastructure provided for those schemes.

Sub Ref No: 096

Name: Lydon

Issues Raised:

This submission has been prepared by Stephen Little and Associates on behalf of Lydon in relation to a large tract of land to the south of Naas. The submission seeks the inclusion of these lands in proposed Objective CS 032 of Variation No. 3, in addition to the Northwest Quadrant and Confey Leixlip. The submission also proposes that the lands be zoned to facilitate the creation of a sustainable community.



The submission states that the lands owned by a limited number of parties. Lydons, an established homebuilder, has secured permission from the majority of landowners to pursue the rezoning of lands.

The submission notes that the NPF Implementation: Housing Growth Requirements Guidelines provide for a particular focus on the likelihood that lands identified for residential development will come forward. In this regard, the submission examines the current Core Strategy housing allocation for the County, the revised housing growth requirement for Kildare in the Guidelines and the level

of housing activity since the adoption of the County Development Plan. It concludes that there is a clear demand for additional housing in Kildare, with 4,958 units delivered as of mid-2025 and 7,826 to be accounted for between 2026-2028.

The submission details that the lands are outside the town boundary and are currently unzoned, with lands immediately to the north zoned for New Residential Phase 2; Community and Education; and Open Space and Amenity. It is submitted that the surrounding zonings provide a foundation to support the creation of a community focused development in the area which provides a mix of residential, educational, green spaces / amenity and community uses.

It is asserted that the lands are serviceable in terms of roads with strong vehicular connectivity and access, water supply, foul drainage, electricity and broadband. Some areas will be susceptible to occasional flooding with a stream through part of the lands. Future development will need to be supported by flood risk mitigation measures, guided by a site-specific flood risk assessment.

It is considered that the logical future growth of Naas will be in the Northwest Quadrant and southwards towards the subject lands, as both are large landbanks within 2km of the town centre.

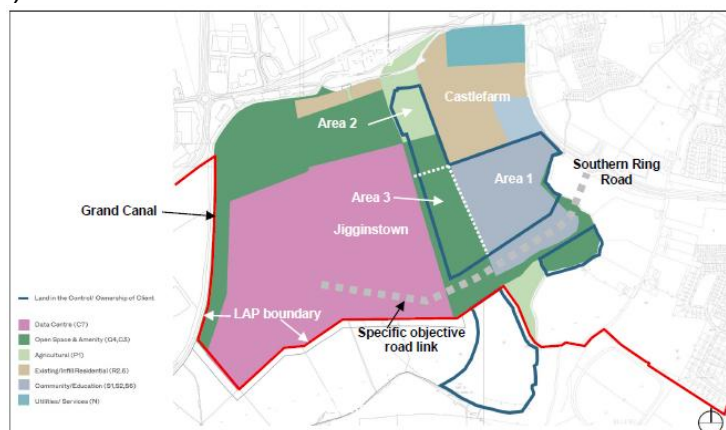
Accordingly, it is stated that the lands will contribute to compact growth, are proximate to public transport routes / stops, are fully serviceable, benefit from access to existing / planned social infrastructure and do not have any significant constraints.

Sub Ref No: 099

Name: Midhaven Limited

Issues Raised:

The submission includes an attachment document prepared by Marston Planning Consultancy, on behalf of Midhaven Limited, in relation to lands comprising 20.26 ha hectares located at Jigginstown, Naas and shown in the map excerpt below (outlined in blue):



The submission states that currently the lands are zoned:

- Education (Area A/1 - immediately south of Castlefarm Estate) at 12.27 ha
- Agriculture and Amenity (Area B/2 - west of Castlefarm Estate) at 4.19 ha

- Amenity (Area C/3 – west of educational lands) at 3.8 ha

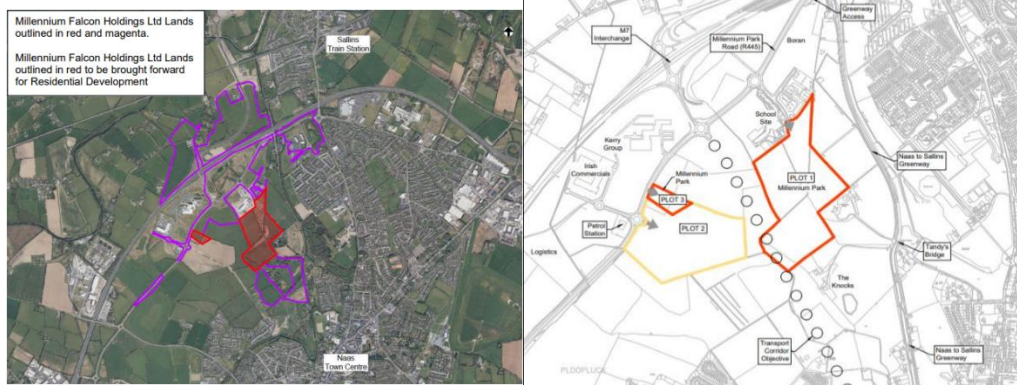
The submission requests:

- The location of the subject lands be zoned New Residential with a Specific Local Objective on part or the entirety of the lands that will ensure the proper planning and sustainable development of the area.

The submission outlines the rationale for this request, as follows:

- Notes overarching policies and objectives of Kildare CDP; Naas LAP; Rebuilding Ireland: Action Plan for Housing and Homelessness; Regional Spatial and Economic Strategy for the Eastern and Midland region 2019-2031; the National Planning Framework, and its recent revision, the NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities, and the Compact Settlement Guidelines for Planning Authorities.
- States based on new density standard under the Variation the subject lands have the capacity to deliver 608 homes based on lowest densities (the three areas are delineated by the white dashed line on map above)
- Submits the subject lands are located on within built-up area of Naas and 1.5km from town centre, within the boundary of the current Naas LAP, are greenfield in nature, serviced, and the majority of lands identified for future development.
- Asserts client also own two further portions of land both inside and outside but immediately abounding the LAP boundary and south of a specific objective under the Naas LAP to create a future link road from the roundabout to open the Jigginstown lands for development.
- Contends the zoning of Area 1 for education purposes is significantly above requirements of the Department of Education to serve this area of Naas and a significant portion of these lands will not be required for uses under the current zoning. Also notes that these lands are a similar distance from the town centre as Phase 2 lands that are identified for being rezoned under Variation no.3.
- Notes Variation No. 3 will need to deliver an additional 7,826 housing units within the County which will accommodate an additional 46,498 people within the plan period.
- Outlines applying the full 50% additional provision to the housing requirement for Kildare in the remaining 3 years of the Plan results in need to accommodate 4,133 dwellings.
- Outlines in Naas Variation no.3 has led to two phase 2 portions of lands on the Kilcullen Road and Blessington/Tipper Road being identified as having the capacity to deliver 455 houses within 16 hectares. Both locations are south-east of Naas.
- States the variation has also identified 112 ha. of lands within the Northwest Quadrant with capacity to deliver 1,294 dwellings. The zoning of these lands is dependent on the completion of the masterplan.
- Supports introduction of the new residential densities for areas, such as subject lands that have characteristics of a suburban/urban expansion site under Table

<p>3.1 of the variation that state the new residential development in these areas shall have net residential densities of 30-50dph.</p> <ul style="list-style-type: none"> • Submits the rezoning of subject lands with new road link objective, will provide ability to develop Areas 1,2,3 of their lands as part of a masterplan and would ensure education needs of Department of Education as being only for a primary school and opening up the Jigginstown area for residential development, amenity provision and linkages to the canal. • States site is within walking distance of local bus services along R445 and connect the area with all parts of Naas and links to Dublin. • Notes site is served by social infrastructure – junior and senior schools, pre-school and community facilities. • Outlines site has no legal, environmental (protected sites or flooding), topographical or servicing restrictions once link road is realised. 	
Sub Ref No:	104
Name:	Millennium Falcon Holdings Ltd.
<p>Issues Raised:</p> <p>This submission has been prepared by RPS Group Limited (RPS) on behalf of Millennium Falcon Holdings Ltd with input from ARUP seeking the rezoning of Tier 2 lands (18.55 ha) located within the Northwest Quadrant (NWQ) in Naas from Strategic Reserve to 'C': New Residential, which will require amendments to the Proposed Variation as follows:</p> <ol style="list-style-type: none"> 1. Include the following objective to facilitate an amendment to the Naas Local Area Plan (2017-2022): <i>"In order to facilitate the development of 1,294 dwellings within the NWQ in the lifetime of the current County Development Plan, the Naas Local Area Plan 2021-2027 should be amended immediately following the passing of the Proposed Variation to designate lands Tier 1 and zone 'New Residential' lands within the NWQ."</i> 2. Add the following text to the end of Objective CS O32: <i>"Prior to the completion of the Northwest Quadrant Masterplan and its integration into Volume 2 of the County Development Plan, the Naas Local Area Plan 2021-2027 should be amended to allow for the immediate zoning of additional lands within the NWQ for residential development."</i> <p>Plot 1 comprises circa 17.23 ha / 42.58 acres and is situated adjacent to Naas Community College. The site is currently undeveloped, and access is available via the R445/Millennium Park Road alongside Naas Community College Road and the lands benefit from proximity to essential services and infrastructure, making it suitable for Tier 1 residential development.</p> <p>Plot 3 comprises circa 1.32 ha /3.26 acres and is situated adjacent to the Glenveagh lands (Plot 2) fronting the R445/Millennium Park Road.</p>	



The submission raises the following points for consideration in relation to the request:

- Submission includes input from ARUP (at Appendix A) to include a Sallins West P&R Position Paper, which it states sets out the status of the Sallins West Park and Ride (P&R) in regional and local planning and transportation policy and presents the strategic need for a rail-based Strategic P&R at this location.
- States that it is vital that the Proposed Variation and subsequently the Naas LAP 2021-2027 provide a more complete policy framework including appropriate land use zoning to support the immediate delivery of new housing and the requisite associated social, community and retail provisions within the NWQ on lands that the landowner and other landowners are eager to develop.
- Notes that the landowner is the owner and responsible for the management and development of extensive lands within Millennium Park and are strategically located proximate to Naas town centre and Sallins and Naas Train Station.
- States that the subject lands occupy a strategically important position within the wider Naas urban area offering an opportunity to consolidate growth in a sustainable, well-connected location and all the necessary major infrastructure to serve the growth and development of these lands is now in place, including:
 - Junction 9A, M7 Millennium Park Interchange and the R407 Sallins Bypass;
 - M7 Naas to Newbridge Motorway Widening Scheme;
 - Upgrade of Osberstown Wastewater Treatment Plant from 80,000PE to 130,000PE; and
 - Enabling infrastructure (roads and services) within the NWQ.
- Refers to the proximity of the lands to key employment, education and services and the adjacent Grand Canal Greenway enabling a high-quality, segregated active travel connections both to Sallins (including rail station) and southwards towards central Naas.
- States that the core enabling infrastructure required to support the development of the NWQ is already in place and refers to the existing vehicular access that is available from the R445/Millennium Park Road and the proximity and direct access to the M7 via Junction 9A and the recent upgrades to the M7/N7 corridor.

- States that the lands benefit from strong public transport connectivity and notes that the Sallins and Naas Railway Station is located c.3km from the NWQ, and there are frequent bus services to local towns and to the Sallins and Naas station.
- Refers to the existing businesses and services within the NWQ and Millennium Park and states that the lands are within walking and cycling distance of the Naas-Sallins Greenway, which offers a safe, segregated route to Naas town centre, Sallins village and Sallins Railway Station.
- Refers to the proposed transport measures identified in the Naas LAP, which include a new bus-only link from Naas to the Sallins By-pass and a new north-south bus-priority link through the subject lands and the proposed rail upgrades identified in the All-Island Strategic Rail Review 2024, which recommends the electrifying of the Dublin-Cork railway through Kildare.
- Notes that the subject lands are already serviced with water supply, wastewater infrastructure and surface-water drainage and is readily serviceable with electricity and telecommunications connections.
- Refers to the Eastern Catchment Flood Risk Assessment and Management (CFRAM) Study was completed in 2022, which it states confirms that the subject lands in this submission are located outside all identified flood zones.
- Refers to the Sustainable Planning and Infrastructural Assessment (SPIA), which was prepared by KCC as a key evidence-based input to the Naas LAP, and states that the outcome of the SPIA demonstrates that the subject lands satisfy the requirements for classification as Tier 1, without dependency on uncommitted investment, major upgrades, or sequential infrastructure delivery.
- Submissions refers to the requirements of the Proposed Variation in relation to the delivery of an increased quantum of housing in Naas, which identifies sites on the Kilcullen Road, Blessington/Tipper Road and the NWQ, but states that in relation to the NWQ, the Variation fails to support the zoning of lands to enable this development to proceed now, notwithstanding that the required infrastructure to support new housing is in place, and instead requires a Masterplan and/or a UDZ be completed to support the development of the NWQ lands, which it states will take many years to secure and be well outside the current CDP period.
- Further states that in the context of the very real urgency of delivering additional housing, the Proposed Variation does not reflect the urgency of the situation and it is wholly unsatisfactory that such obstacles to the development of housing be included in a Proposed Variation which is being brought forward with the explicit objective of increasing housing supply and states that such delays are inexcusable in the context of the current housing shortage, given the level of infrastructure that exists in the NWQ.
- Refers to the provisions of the recent policy statements and policy documents that includes, *inter alia*, the Revised NPF (2025), the s.28 Guidelines NPF Implementation: Housing Growth Requirements – Guidelines for Planning Authorities (2025) and Delivering Homes, Building Communities (the Housing Plan) (2025).

- States that the development of the subject lands at a density of circa 40dph, which comprise 18.55 hectares could accommodate circa 500-600 housing units in addition to the requisite associated social, community and retail provisions.

Sub Ref No: 106

Name: Feldway Ltd.

Issues Raised:

This submission has been prepared by Demesne Architects + Interior Designers on behalf of landowner Feldway Ltd. seeking the zoning of 31.24 ha of land at Tipper Road, Naas to 'C: New Residential'.



The submission raises the following points for consideration in relation to the zoning request:

- Submission notes the majority of residential lands zoned new residential have been built out or is subject to planning permission with little remaining for development.
- States the subject lands have the potential to deliver up to 1550 units at 50 per hectare which would support the county's revised housing targets and compact growth principles.
- States the lands have no identified natural or heritage constraints, with minimal flood risk along the eastern site boundary which can be accommodated through a green buffer zone.
- The lands are accessible via existing road connections and preliminary assessments suggest the lands are serviceable.
- Refers to the identification of the Northwest Quadrant and states these lands will not deliver houses in the short term, in comparison to the subject lands.
- States the lands are strategically located 1.5km from the town centre with the potential to accommodate a mix of dwelling types through a high-quality development.
- States the subject lands have the potential to incorporate sustainable transport modes reducing car dependency.

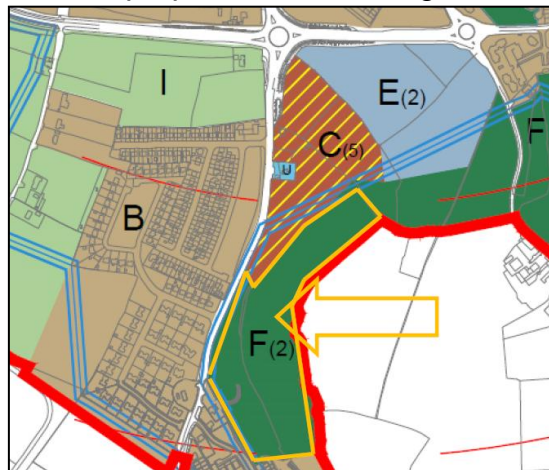
- States the inclusion of subject lands will support the balanced growth and compact development of Naas in a sustainable manner.
- The submission notes the 5,200 housing allocations for Naas under Draft Variation No. 3 which underscores the towns critical role in meeting increased housing delivery with the need to identify and activate additional serviced lands for higher densities.
- The submission includes a supporting preliminary engineering constraints and feasibility report prepared by 'Donnachadh O'Brien and Associates Consulting Engineers'. The report states the lands are located within Flood Zone C, with minor flooding experienced during extreme events adjacent the stream. Refers to the sites topographical context and states the lands are appropriate for zoning which will incorporate a riparian buffer to the Morrell River in accordance with Inland Fisheries guidelines.
- It states the subject lands are serviceable with a public mains and foul sewer connection available nearby along the Tipper Road.
- It further states significant road upgrades, including the proposed Inner Relief Road will be critical to any future development of the lands.
- It notes the presence of overhead cables which may need to be locally diverted, undergrounded or left in position subject to survey and assessment by ESB.
- Concludes the identified lands released for new housing under Draft Variation No.3 is limited with most delivery mechanisms involving future settlement plans and urban development zones.

Sub Ref No: 121

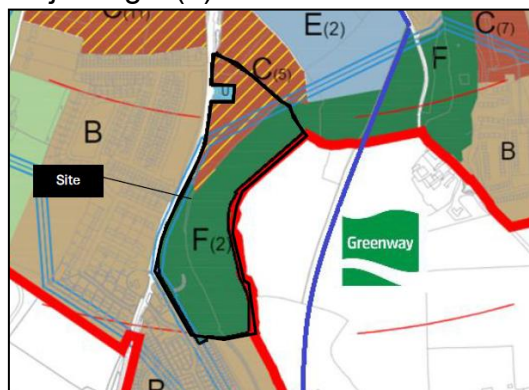
Name: Green Project Management

Issues Raised:

This submission has been prepared by Hendrick W van der Kamp on behalf of Green Project Management. The submission proposes alterations to amendment nos. 2, 10, 12, 13, 14 and 16 contained in proposed Variation No. 3. The submission also requests that 7.8 ha of land along the Kilcullen Road be rezoned from F(2): Open Space and Amenity to enable residential development. Appendix A provides a map of the lands proposed for rezoning.



The submission notes that the Collivet Family as landowners / Green Project Management control the F2: Open Space and Amenity zoned lands and the southern portion of the adjoining C(5) New Residential Phase 2 zoned lands.



The submission outlines the intent of Proposed Variation No. 3 to integrate the housing requirements of the NPF Implementation: Housing Growth Requirements Guidelines (Housing Growth Requirement Guidelines).

Alterations to Amendment No. 2

Amendment No. 2 should be revised to incorporate a total housing provision of 19,580 (an additional 2,609 units) for the county over the Development Plan period, rather than the currently proposed 16,970. This revision is based on the following:

- Amendment No. 2 proposes an increase in the total housing provision for the 6-year County Development Plan period from 9,144 to 16,970. This increase (+7,827) is derived from the requirements of the Housing Growth Requirement Guidelines for the remaining 3 years of the Plan (2026, 2027 and 2028).
- However, the submission highlights that the annual housing growth requirements contained in the Guidelines include 2025 as the start year.
- While it is not possible to revise the Development Plan during 2025, the housing requirement for 2025 (+ 2,609 units) should also be included in the housing increase for the county. This revises the additional housing to be incorporated into the County Development Plan from + 7,826 to + 10,436 units.

Alterations to Amendment No. 10

Based on the proposed revision to Amendment No. 2 above, proposed Table 2.4A in Amendment No. 10 should be revised / replaced with the following:

Year	Current CDP Core Strategy Allocation (i.e. 1,524 p/a)	New Housing Growth Requirement (i.e. 2,755 p/a)	New Additional Provision (i.e. up to 50% of 2,755 p/a)
2025	1,524	+1,231	+1,377.5
2026	1,524	+1,231	+1,377.5
2027	1,524	+1,231	+1,377.5
2028	1,524	+1,231	+1,377.5
Sub Totals	6,096	+4,924	+5,510
New Additional Requirement		+10,434 in addition to Core Strategy	

Alterations to Amendment No. 12

It is suggested that item 1 under Amendment No. 12 be used to identify additional land for residential development, either in place of or in addition to Item 4 in relation to Urban Development Zones. This proposal is provided in consideration of the following:

- Amendment No. 12 lists the delivery mechanisms to facilitate the additional housing growth. Item 4 provides for the designation of 'Strategic Reserve' lands at Naas (Northwest Quadrant) and Leixlip as long-term Urban Development Zones (UDZ) under the new Planning and Development Act 2024 (2024 Act).
- However, the UDZ provisions of the 2024 Act are not yet commenced. In addition, UDZ designations must follow a certain procedure before development applications can be considered. Furthermore, a masterplan for the Northwest Quadrant is listed for medium term delivery in the Naas LAP, while support from the State is also listed as necessary.
- Accordingly, it is submitted that the delivery mechanism of the Northwest Quadrant is less appropriate to facilitate short-term solutions to the need for residential zoned lands under the Housing Growth Requirement Guidelines. It is stated that the Minister has directed planning authorities, through these Guidelines, to increase the amount of land zoned for residential development.

Alterations to Amendment No. 13

It is suggested that the requirement for 1,362 units and 40 hectares of zoned land for Naas in the Core Strategy table be increased to 1,566 units and 64 hectares. This is based on the pro rata application of the additional housing requirement detailed in the proposed revisions to Amendment Nos. 2 and 10 above.

Alterations to Amendment No. 14

The subject lands are proposed to be rezoned for residential development as an alternative approach to accommodating the additional housing need for Naas in the short term, considering the following:

- The subject lands adjoin the Phase 2 'Kilcullen Road' residential site that is proposed to be released for development under the variation.
- Appendices C, D and E of this submission present assessments of the lands in terms of infrastructure services and ecological constraints.
- The Phase 2 'Blessington/Tipper Road' residential site proposed to be released for development under the variation is not appropriate, as it benefits from a planning permission that is being currently implemented.
- The designation of Strategic Reserve lands in the Northwest Quadrant as a UDZ is an inappropriate response to the Housing Growth Requirement Guidelines given the long lead in time for designation as a UDZ.

Alterations to Amendment No. 16

Core Strategy Objective CS 029 should be revised to incorporate the subject lands for rezoning by adding '*land zoned Open Space in the Naas Local Area Plan 2021 – 2027 on the Kilcullen Road*'. The submission further adds to the rationale for the proposed rezoning as follows:

- The lands have frontage along the Kilcullen Road and adjoins existing / planned residential development.

- The lands score well under the criteria contained in the Settlement Capacity Audit.
- The owners of the subject lands and the adjoining Phase 2 'Kilcullen Road' residential site are committed to developing a comprehensive and integrated development.

Appendices B, C and E, provided with the submission are summarised below:

Appendix B: A report prepared by Waterman Moylan Engineering Consultants which concludes that the land is well serviced and is Tier 1 and provides an overview of:

- Water supply and foul drainage infrastructure in the vicinity, noting that Uisce Éireann have confirmed capacity in the network for a housing development of 290 units on the subject lands (refer to **Appendix D**).
- Available gas, ESB and telecommunications services.
- The road/cycle/pedestrian network surrounding the lands and in Naas, noting recent upgrades to the Kilcullen Road and future planned upgrades,
- The connectivity between the subject lands, the town centre (1.3km / 16-minute walk), the Pipers Hill educational campus to the south (450m) and the Sallins train station (4.6km).
- The range of bus services available from stops in the Naas town centre and at the Naas General Hospital (1.0km/13 minute walk), noting that routes provide convenient access to the Sallins Train Station. 2 no. bus stops on the Kilcullen Road are not serviced by any route but are capable of being serviced by 5 routes that travel along the road.
- Surface water drainage requirements for development, noting the presence of a stream along the eastern boundary of the subject lands.
- The results of the Hydrology and Hydraulic Modelling Extents in Naas, undertaken in 2022 as part of the Naas Flood Relief Scheme. There is a relatively low risk of river flooding in Naas, less than as shown in the Naas LAP.

Appendix C: A Preliminary Ecological Appraisal Report prepared by Teire Consulting which concludes that:

- While the land supports several habitats, none are of high ecological value. The only habitat of significance is the hospital stream.
- Breeding birds were the only species group recorded on the lands with ecological importance, noting that some red and amber listed species were observed.
- The baseline ecological value of the lands is low due to a lack of biodiversity, gappy hedgerows, a silted stream and the presence of invasive species.
- Biodiversity enhancement measures are recommended.
- Further targeted surveys are recommended, as due to the nature of the report, the presence or absence of protected species/habitats cannot be definitively confirmed.

Appendix E: A report by Green Project Management in relation to the rezoning request, providing the following:

- This report reiterates the current zoning of the subject lands in the Naas LAP, noting that these lands are identified for the development of an active recreation area. It is considered that such uses would have limited passive surveillance, encourage anti-social behaviour and be uncomfortable for users.
- States that the adjoining Phase 2 lands are Tier 1 in the Sustainable Planning and Infrastructural Assessment for the Naas LAP. It is logical that the current F(2): Open Space and Amenity lands would score similarly but was not assessed in the SPIA.
- The rationale behind the current zoning of the subject lands appears to relate to the potential flood risk and a higher-level ecological status due to the presence of the stream along the eastern boundary.
- The submission provides extracts from the Naas LAP and notes that the flood risk constraints for Naas have been clarified through the examinations carried out as part of the Naas Flood Relief Scheme, illustrating that the risk zones are far less than in the LAP. Whilst the current zoning along the eastern portion along the stream makes sense and is supported, it is difficult to comprehend the zoning across the remaining portion, which consists of agricultural lands that are unremarkable in relation to ecology.
- The conclusions of the Preliminary Ecological Appraisal Report by Teire are noted. It is considered that an ecological corridor and green link along the eastern boundary with the stream can be accommodated, connecting to Pipers Hill.
- The report supports the Greenway objective in the Naas LAP.
- The report notes the accessibility of the lands and available public transport options in the area.
- There is space to accommodate other community uses on the lands, including a sports/community hub, creche and medical centre.

Sub Ref No: 122

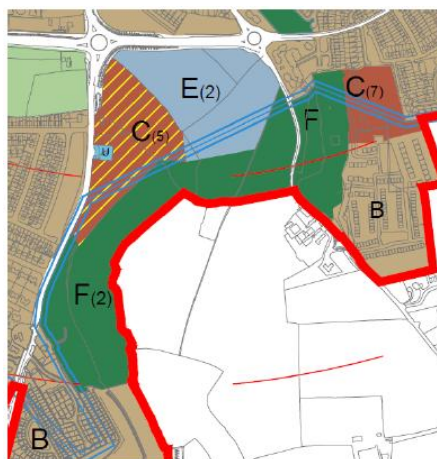
Name: Pierce Greaney and Sallyann Freyne

Issues Raised:

The submission has been prepared by Pierce Greaney and Sallyann Freyne and asserts that the Kilcullen Road site in Naas, identified in Variation No. 3 for the additional housing capacity requirements, is unsuitable.



The Kilcullen Road site in Proposed Variation 3 is illustrated as site 1 in the above extract. The submission asserts that the Kilcullen Road residential site (zoned C: Phase 2 Residential Development) forms part of a parcel of land that also contains F (Open Space and Amenity) and E (Community and Education) zoned lands, as per the Naas LAP 2021-2027, as shown below.



The submission states that this complete parcel of land should be developed in an integrated fashion, with extensive input from locally impacted citizens. Accordingly, the people of Naas can benefit from a cohesive educational, residential and active leisure spaces strategy. Allowing the Kilcullen Road Phase 2 – Residential site to be considered is premature.

The submission details that, in addition to the Blessington/Tipper Road site for Naas in Variation No. 3, KCC should also consider the proposal submitted to this process by Bluebell Farms (referred to as Submission 271125), which is assumed to be Submission No. 089. It is considered that this location has all the requirements to address current and projected needs to any additionally required housing.

The submission asserts that the development of the Kilcullen Road site could compromise areas that have been identified to support the Active Leisure needs of the people of Naas.

Sub Ref No: 125

Name: Cairn Homes Properties Ltd.

Issues Raised:

This submission has been prepared by John Spain Associates (JSA) Planning and Development Consultants on behalf of Cairn Homes Properties Ltd seeking the following key requests:

Key Request – Naas South Lands:

Rezone lands (circa 12.4 ha) at Naas South from 'I': Agriculture and 'F: Open Space' and Amenity to 'C: New Residential' to facilitate a potential 343 no. dwelling units and include the lands in Table 2.8A as Tier 1 lands to support the change of

zoning either as a settlement plan or in a subsequent update to the LAP – see figures below:



Naas South:

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

Sub Ref No: 135

Name: Green Project Management

Issues Raised:

The submission provides a letter from Acorn Montessori and Crèche Ltd, addressed to Kildare Community Infrastructure Ltd., and the Colivet Family regarding an expression of interest for the development and operation of a childcare facility as part of a proposed community and recreational hub at Kilcullen Road, South Naas. Accordingly, the submission states that balanced investment in Social Infrastructure has been provided also at this location.

The letter recognises the growing demand for high-quality early years and after-school childcare in Naas, with the location having a strong potential to serve families in the south of Naas. It is asserted the emerging active-travel connections and future greenway linkage make it a well-positioned setting for a childcare facility.

The submission outlines that Acorn Montessori and Crèche Ltd would be pleased to further engage with Kildare Community Infrastructure and the Collivet Family regarding the potential development and operation of a centre on the lands identified. This would be subject to normal planning, design and funding

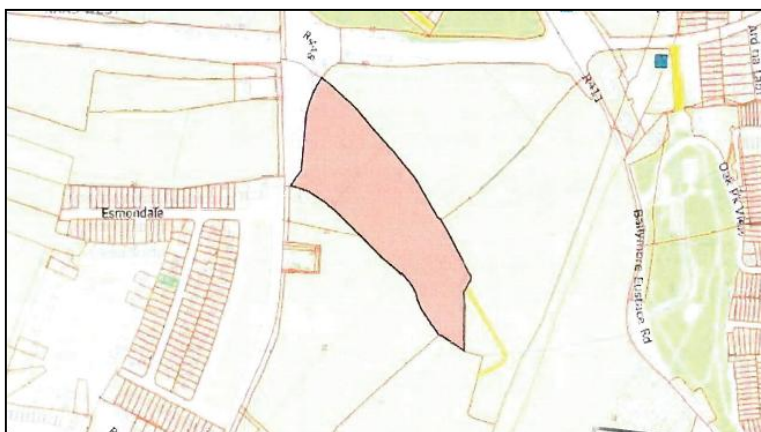
considerations. The facility could accommodate full-day care, sessional preschool and after school programmes, depending on community needs.

Sub Ref No: 137

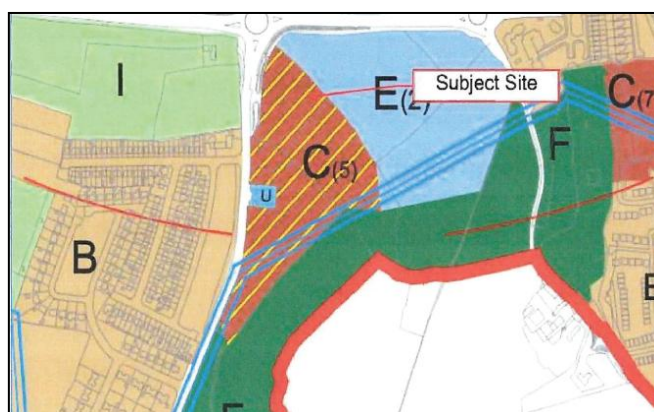
Name: Dr William Purcell and Dr Liz Purcell

Issues Raised:

This submission has been prepared by Farry Town Planning Ltd. on behalf of Dr William Purcell and Dr Liz Purcell in relation to approximately 3.29 ha of lands at Naas East / Broadfield.



The submission notes that the subject lands form part of a larger area zoned C New Residential, which is qualified by a 'Tier 2' control (meaning it cannot be developed for housing) in the Naas LAP. The submission asserts that the proposed Variation intends to change the status of these zoned lands from 'Tier 2' to 'Phase 2', which will enable the speedy erection of dwellings on the subject lands.



Conversely, the submission also states that the lands are designated for 'rural / agricultural development / production' and that the Council envisages the redesignation of the lands as 'Phase Two New Residential'. Notwithstanding, the submission requests that the Council allow the existing 'Tier 2' designation to remain in situ, given that this label forms part of the Naas LAP which was adopted just four years ago.

The submission requests that the subject lands retain its current designation arrangement considering the following:

- The submission notes that the housing target for Naas in Table 2.8 of the County Development Plan is 1,362 homes on 40 hectares and is not proposed to be changed in the proposed Variation. The Naas LAP did not require development on the subject lands in order to meet this target.
- The submission notes that Table 3.3 of the Naas LAP indicates that 2,394 dwellings are needed in the town by 2027, while Table 3.5 of the Naas LAP estimates that schemes on new residential lands can accommodate up to 1,962 units.
- Development Plans incorporate a level of provision (25%) over and above baseline housing supply targets as 'headroom' spare capacity. The submission refers to the NPF Implementation: Housing Growth Requirement Guidelines in relation to the increase in headroom from 25% to 50%, noting that this yields a requirement for enough land for 2,043 houses.
- Much of this spare capacity has already been provided on new residential lands in Naas as detailed in Table 3.5 of the Naas LAP (1,962). As such, it is contended that there is an adequate supply of housing land in Naas to meet housing output targets and headroom requirements. Therefore, there is no need to change the designation of the subject lands to meet the existing and proposed targets.
- The landowner has no intention of providing housing on the subject lands in the short-medium term and the policy change for this land would not achieve the Government or Council's aim of housing provision.
- It is noted that lands to the south of the Naas town centre have somewhat limited public transport options. It is suggested that the planning authority should give preference to new housing to the north of the town centre, closer to Dublin and Sallins roads, which accommodate bus routes to the Sallins Train Station and commuters. Reference is made to the content of the Variation, which seeks to focus new housing in accordance with Transport Orientated Development. Changing the designation of the site is premature considering other available sites, contending that development on these lands would involve 'leap frogging'.
- The subject lands represent the northern portion of a wider agricultural landholding. The southern portion of this wider agricultural landholding is landlocked, with access from the Kilcullen Road provided through a single agricultural entrance on the subject lands / northern portion. Development of the subject lands / northern portion for residential use would give rise to conflict between residential amenity and farming. A layout to satisfy both uses would be difficult to devise.
- There is an existing watercourse on the subject lands which may be subject to flooding and which may link with a Natura 2000 site. It would be unwise to change the status of the subject lands without detailed flooding and ecological studies.
- The lands are outside the principal built up area of Naas, are 1.04km to the south of the commercial core, are used for agricultural purposes and are

productive. The submission reproduces sections of the Development Plan - Guidelines for Planning Authorities in relation to the sequential approach to zoning.

Sub Ref No: 138

Name: Ger Kavanagh

Issues Raised:

This submission is prepared by Ger Kavanagh concerning lands approximately 6.7 ha at Craddockstown North, as outlined in the excerpt below. The submission seeks the zoning of the land to C: New Residential.



The submission provides the following information in relation to the stated request:

- There will be a planning gain based on the zoning sought, particularly an increase supply of dwellings close to public transport with established connections to Naas Town Centre.
- The site is a greenfield, with houses adjoining to the north and west and currently has no zoning.
- There is no change associated to the lands under the Variation. The lands are at the edge of town, directly adjoining existing residential development and are of a single ownership.
- Established vehicular access from Craddockstown Road with potential access from Eustace Demesne Drive.
- There is an established pedestrian and cycle connections from northeast of the site into Naas.
- No built or natural constraints of note.

Sub Ref No: 139

Name: Naas Town Strategy Group

Issues Raised:

The submission outlines that the new housing targets in the Housing Growth Requirement Guidelines may result in 5,534 new homes in Naas over the next 15 years (2025 – 2039). It is stated that planning and infrastructural decisions need to take the full 15-year allocation into account to ensure sustainable growth and delivery of infrastructure.

The submission notes the press release from Kildare County Council in response to the increased housing targets which refers to the delivery of '*requisite community facilities*' and '*critical enabling infrastructure*'. The submission fully supports this approach and provides the following:

- **Childcare:** The submission notes that there is a deficit in early years childcare provision in Naas and states that creches in planning permissions for residential developments may be delayed or not delivered. It is requested that this Variation should:
 - Include mandatory creche provision for all developments with a defined threshold.
 - Conditioned delivery of childcare in the earliest phases of development to ensure operational readiness prior to significant occupation. This should require that the childcare be built first and not left to the end of development, excluded or abandoned at a later stage.
 - Occupation or sale of residential units is contingent on creche completion.
- **Education:** The submission states that while land use zonings are provided for new schools, past experiences indicate that delivery can be decades long. Accordingly, Variation no. 3 should include a specific objective which priorities the delivery of new schools in conjunction with the Department of Education. Key requirements include matching school delivery with residential growth and incorporating mechanisms for close co-ordination with the Department of Education regarding land allocation, funding prioritisation and approvals.
- **Community and Leisure Infrastructure:** The submission states that existing facilities in Naas are operating beyond their capacity. Any lands that are zoned should deliver requisite community facilities and critical enabling infrastructure, including appropriate neighbourhood facilities. The submission considers the Elsmore development in Naas as a good example of such provision. The submission requests that Proposed Variation No. 3 should require the delivery of:
 - Population based minimum standards for sports pitches, playgrounds, multi-use courts and youth facilities.
 - Phased delivery aligned with residential occupation, ensuring functional community infrastructure as residents arrive.
 - Guarantee that developments provide accessible and attractive spaces for all ages.
- **Rail Capacity:** The submission notes that the Sallins Train Station is already near capacity and states that Variation No. 3 should require:
 - Upgrades to station capacity and parking to meet current and projected demand.
 - A dedicated public transport spine linking the Train Station to Naas Town Centre, via the Northwest Quadrant
 - An additional park and ride facility close to the Train Station.
- **Congestion:** The submission asserts that the Kilcullen Road and Pipers Hill junction are beyond functional capacity, and that cycle infrastructure is fragmented. The Dublin Road also experiences serious congestion and must

be incorporated into an updated Transport Strategy. The submission requests that Variation No. 3 acknowledge that:

- Road capacity is exhausted at peak times on the Kilcullen Road, particularly at the Pipers Hill and Kilashee primary school junction.
 - Additional development that is depended on this route would exacerbate congestion.
 - Infrastructure upgrades and alternative access routes are preconditions and not optional future considerations.
 - No further land zonings can be designated accessing the Kilcullen Road without adequate transport solutions to address existing congestion.
 - The submission supports the proposed development of lands at the top of the Kilcullen Road based on accessibility to the town centre, proximity to public transport.
- **Naas – Dunlavin Railway Greenway:** It is stated that this greenway is identified in the Greater Dublin Area Transport Strategy. If constructed from Ballymore to Pipers Hill this would provide an off-road walking and cycling route to the school campus. Accordingly, Variation No. 3 should require:
 - Immediate commencement of a feasibility study for the Ballymore Road to Pipers Hill section of the greenway, including route appraisal, costing, land requirements, integration, safety and sequencing.
 - Prioritisation of the route as a congestion relief measure for school traffic and a safe, independent travel route.
 - A feasibility study for a second access to the Pipers Hill Campus and adjacent residential areas to reduce corridor pressure.
- **Sustainable Transport:** Variation No. 3 should acknowledge that:
 - Pedestrian, cycle and public transport must be priorities over car dependency;
 - New homes must be located with genuine access to walking, cycling and public transport infrastructure,
 - That Naas requires a cohesive public transport network connecting town busses and the Sallins Train Station.
 - That a revised Transport Strategy is necessary to address how new zonings will be served by sustainable travel modes.
- **Naas Northwest Quadrant:** The submission notes the potential for integrated development in the Northwest Quadrant and provides the following:
 - It is unclear how homes can be provided here in the short-medium term in relation to the current lack of a UDZ designation or the issuing of a Masterplan.
 - That the variation should consider zonings in south of Naas to address the imbalance in the town identified by the OPR as the northern part of Naas is maxed out.
 - New zonings for large scale residential areas should be not reliant on cars, with active travel embedded into design.
 - Residential growth, in the Northwest Quadrant in particular, must be linked to upgraded rail and station capacity, a bus spine and park and

ride to Sallins station, early delivery of social/community infrastructure, greenways and safe cycling/walking routes.

- **Naas Town Centre:** It is stated that Naas town centre has experienced a decline in retail and public realm activity. Variation No. 3 should acknowledge the need for:
 - Investment in retail, leisure and cultural amenities.
 - Enhancement to the public realm.
 - Measures to ensure the town centre remains vibrant and attractive.
- The submission states that the removal of town centre overhead wires would help the visual appeal of the town.
- The submission considers that a new strategy document is required to bring about the renewal of the Naas town centre.
- **Conclusion:** The submission concludes by noting that zoning alone is insufficient and that the planning of Naas must ensure that homes are supported by functional infrastructure, sustainable mobility and a vibrant town centre.

Chief Executive's Response

The contents of the submissions are noted.

Submissions 012, 026, 045, 049, 051, 058, 063, 064, 065, 089, 096, 099, 104, 106, 121, 125 and 138 seek the zoning of lands in Naas. Proposed Variation No. 3 is a targeted variation to amend the Core Strategy of the Kildare County Development Plan 2023-2029 (County Development Plan) in accordance with the provisions of the 2000 Act. This is the first of a number of steps required to full deliver on the intent of the revised NPF and the Housing Growth Requirements Guidelines. Further actions will be taken including, not limited to, variations to integrate local area plans into the County Development Plan.

The zoning of land for the town of Naas is contained within the Naas Local Area Plan 2021-2027 (Naas LAP 2021-2027) and not the Kildare County Development Plan 2023-2029. The statutory process for varying a Local Area Plan is a separate process set out under Sections 19 and 20 of the 2000 Act. Therefore, the zoning of land in Naas cannot be considered in this Variation.

Submissions 012 and 045 seek the zoning of lands to H: Industry and Warehousing. Submission 012 primarily seeks to amend a current F: Open Space and Amenity zoning to reflect the current use of the site for a logistics business and the historic use of the site. Submission 045 seeks the creation of an additional strategic employment hub in Naas for such uses in the vicinity of Junction 10 of the M7 Motorway. Both submissions consider that the rezoning requests are supported by proposed Objective CS O28 (which supports the development of new and the expansion of existing Foreign Direct Investment sites), the need to provide and support employment in tandem with housing growth and by the assertion there is an insufficient supply of zoned / serviced land and suitable sites for logistics/industrial uses in Naas and the surrounding areas. Notwithstanding that this Proposed Variation relates exclusively to the incorporation of particular guidelines relating to housing growth requirements and design, these assertions are rejected.

A recent audit carried out by the Planning Department of Kildare County Council identified approximately 63 ha of 'H: Industrial and Warehousing' specific lands currently available and undeveloped in the town. While it is recognised that there has been activation of such zoned land in recent times, the quantum of available land and the location of such sites is deemed more than appropriate to support prospective economic investment in the short - medium term for Naas, including with additional population growth.

Submissions 026, 049, 051, 058, 063, 064, 089, 096, 099, 106, 121, 125 and 138 seek the zoning of lands that are not identified in Variation No. 3 for residential development in Naas. Proposed Variation No. 3 updates the Core Strategy to align with the Housing Growth Requirements – Guidelines for Planning Authorities (July 2025) and does not provide residential zonings to any lands in Naas. In any event, residential zonings should be informed by evidence-based assessments and audits at both the site and settlement level. This is in accordance with best planning practice for the sustainable development of settlements, the integration of land use and transportation planning and the creation of communities that are supported by appropriate infrastructure.

The Housing Growth Requirement Guidelines provide that the requirements contained therein should be incorporated into existing Development Plans by variation as quickly as possible (Policy and Objective No. 3 refers). Accordingly, Proposed Variation No. 3 details a series of plan-led and evidence-based mechanisms that Kildare County Council intends to utilise in accommodating the additional housing growth provided by the Housing Growth Requirement Guidelines. For Naas, additional housing allocation has been provided to 2 no. sites at the Kilcullen Road and the Blessington/Tipper Road which are zoned Phase 2 New Residential in the Naas LAP, together with the Naas Northwest Quadrant.

Submissions 026, 049, 051, 058, 063, 064, 089, 099, 106, 121, 125 and 138 assert that the proposed delivery mechanisms for incorporating additional housing growth are limited (particularly for Naas) and will not yield the required housing delivery in the short term in accordance with the Housing Growth Requirement Guidelines. Accordingly, additional 'ready to go' or immediately developable residential land use zonings are required. In particular, some submissions raise issue with:

- The identification of only 2 no. sites in Naas for additional residential development at the Kilcullen Road and the Blessington/Tipper Road, together with the allocation of housing to long term Strategic and Sustainable Development Sites in Table 2.8B, in particular the Naas Northwest Quadrant.
- The preparation of the Masterplan and UDZ designation for the Northwest Quadrant, would delay development and noting that the infrastructural requirements/capacity for these lands have not been definitively established.
- The reliance on the preparation of Settlement Plans, without a clear timeframe, to zone additional lands and subsequently deliver housing.

Reference is also made to the need to conduct a comparative and townwide / countywide review of all potential residential lands based on infrastructural availability/capacity to establish tiering and site characteristics to determine such additional residential zoned lands.

The assertion that the mechanisms in Proposed Variation No. 3 will not yield appropriate short-term housing growth and that additional residential zoned land need to be provided in this Variation is noted. As detailed in Section 1.1 above, the proposed mechanisms are deemed to be the most expedient methods to unlock substantial areas of land in higher order settlements that have been previously assessed for residential development potential within Kildare's existing land use plans (including the Naas LAP), while also applying a Settlement Plan led and evidence-based approach to zoning new lands in settlements with expired Local Area Plans in accordance with best practice.

The Proposed Variation provides for the immediate release of remaining residential zoned lands (sites at the Kilcullen Road and the Blessington/Tipper Road) in the Naas LAP, which have a Phase 2 designation, for residential development proposals. These sites were identified in the Naas LAP as suitable lands for the sequential expansion and consolidation of the town in terms of housing delivery when future need arose.

Regarding the growth assigned to the Naas Northwest Quadrant and Leixlip Confey, it is considered that the assignment of part of the 50% 'additional provision' above the housing growth requirements to such sites fully accords with the Housing Growth Requirement Guidelines. The allocation provided to these lands will enable the delivery of initial development phases in the short – medium term, with the Long Term Strategic and Sustainable Development Site designation provided in consideration of the long-term development potential of these lands. Regarding the Northwest Quadrant, the proposed allocation will enable the commencement and delivery of the initial phases of the estimated 4,000 dwellings that can be provided in the Northwest Quadrant, in accordance with the development and infrastructural phasing arrangement that will be contained in the Masterplan.

In addition, evidence from the Central Statistics Office (CSO) in the form of the Census 2022 results and housing completions indicates that County Kildare has a record of delivering significant housing and population growth at a scale that is generally above housing growth targets, except for the previous period of economic downturn in line with national trends.

Furthermore, the KCC Chief Executive's Report on the NPF Implementation – Housing Growth Requirements Guidelines for Planning Authorities (2025) incorporates the results of a full audit of zoned land to assess the capacity for residential development in the county. This report was submitted to the Elected Members of Kildare County Council on 22nd September 2025. The Audit found that as of August 2025, approximately 432 hectares of land remain undeveloped across the county with the potential to deliver approximately 13,795 houses. This does not include other lands, including 'A: Town Centre' and 'B: Existing Residential/Infill' zoned lands across the county which collectively have the potential to deliver significant levels of additional housing. It is therefore considered that both the quantum and capacity of the undeveloped zoned lands, in conjunction with the delivery mechanisms set out in Proposed Variation No. 3, is sufficient to cater for the additional housing targets required in County Kildare over the remaining life of the County Development Plan.

Notwithstanding the above, as detailed in the response to the OPR submission (Submission 116), a number of further amendments, including additional mechanisms, are proposed to be made to facilitate delivery and provide a continuity of supply to meet the housing growth requirements. These proposals place a particular emphasis on enabling delivery on existing zoned land in the short term and on achieving equitable, balanced and proportionate growth across the county (see Section 3 of this report).

The proposed mechanisms have also been informed by the ongoing transition of planning legislation from the 2000 Act to the 2024 Act and the upcoming preparation of a new County Development Plan, which is scheduled to formally commence in August 2026. The new 2024 Act provides that zoning maps and development strategies / objectives for all settlements are to be contained in new County Development Plans with a 10-year timeframe. Accordingly, these land use zoning requests will be considered as part of the preparation of the new County Development Plan and the integrated development strategy for Naas. It should be noted however that all lands will be assessed on their merits through the implementation of a comprehensive evidence-based methodology, having regard to planning, environmental and infrastructural considerations, including compliance with national policies on compact growth and sequential development. A Settlement Capacity Audit (SCA) will assist in the identification of appropriate sites to meet future housing requirements.

Submission 121 further requests that the annual housing requirement for the year 2025 be included in the calculations of Variation No. 3. In this regard, the Housing Growth Requirement Guidelines were only published in July 2025 and the timeline for a development plan variation is an absolute minimum of 3 months. Accordingly, it is not feasible or practical to retrospectively apply a new annual growth requirement for 2025. It is noted that the Office of the Planning Regulator (OPR) has confirmed in its submission (Submission No. 116) that the calculation of the growth requirement, including the incorporation of the full 50% 'additional provision' is fully consistent with the Housing Growth Requirement Guidelines.

Submissions 065, 088 and 104 relate to lands in the Naas Northwest Quadrant and are generally supportive of the variation. However, the submissions request the following:

- Submission 065 requests that the variation including the Masterplan is brought forward as soon as possible and that Variation No. 3 incorporate a zoning map for Naas to zone residential lands in the Northwest Quadrant for short term housing delivery.
- Submission 088 seeks to bring the entire allocation of the Northwest Quadrant into Table 2.8A to enable short term housing delivery, together with an amendment to proposed objective CS O32 and a new objective in the variation to immediately produce a variation of the Naas LAP to zone lands in the Northwest Quadrant, prior to the Masterplan.
- Submission 104 provides a similar request to 088, seeking an amendment to proposed objective CS O32 and a new objective for the immediate production of a variation of the Naas LAP to introduce residential zoning to the NWQ, prior to the Masterplan.

The requested alterations to Variation No. 3 are noted. The process to bring forward land use zonings in the Northwest Quadrant is through the finalisation of a Masterplan, for which significant work is already underway. It is anticipated that the NWQ Masterplan will be published in Q1/Q2 2026 and integrated into the County Development Plan by way of a Variation, which will be subject to its own public consultation. To this effect, and for clarity, it is considered appropriate to incorporate alterations to Proposed Variation No. 3 which clearly outlines that:

- The Variations of the County Plan in 2026 to incorporate the Northwest Quadrant Masterplan and Confey Masterplan will include associated land use zoning objectives for the area,
- The housing allocation in Table 2.8B enables residential development in the short to long term at the Strategic and Sustainable Development Sites, subject to appropriate land use zonings and masterplans, and
- The initiation of the process to designate both Confey and the Naas Northwest Quadrant as candidate UDZs will take place after the incorporation of Masterplans and zoning maps for these lands into the County Development Plan by variations.

In addition to residential zoned lands, Submission 096 also requests that their lands be included in objective CSO 32 of Variation No. 3 as an additional Strategic and Sustainable Development site. This request is considered premature pending the publication of the Northwest Quadrant masterplan and would prejudice the preparation of a new development strategy for Naas in the new County Development Plan, supported by necessary settlement level assessments.

The contention in Submission 137 that part of the lands at Kilcullen Road have been changed from a designation for '*rural / agricultural development / production*' and Tier 2 to '*Phase Two New Residential*' in Variation No.3 is incorrect. To provide clarity, the subject lands are zoned New Residential Phase 2 under the Naas LAP and therefore have been previously identified as an appropriate and ideal area for residential development as need arises. In addition, the Sustainable Planning and Infrastructural Assessment prepared for the Naas LAP identified the Kilcullen Road as a 'Tier 1' site, referring to its serviceability to accommodate new development. The submission also considers that the development of the site would make access to an agricultural field to the south very difficult, which is a matter for appropriate site design to resolve.

Submission 137 also asserts that the release of the subject lands at the Kilcullen Road to meet the revised housing requirements is not necessary, based on the previous assessment of potential housing delivery in Table 3.5 of the Naas LAP. The assessment in Table 3.5 of the Naas LAP was undertaken in 2021 and incorporates extant local authority housing schemes and planning permissions, several of which were under construction at the time of preparation. The County Development Plan came into effect in 2023 and provides a Core Strategy housing allocation of 1,362 to Naas from 2023 to the end of 2028. From Q1 2023 to Q3 2025, 362 units have been constructed on lands within the built-up area of Naas defined by the CSO. This does not include approximately 692 permitted dwellings on New Residential zoned lands in Naas that are within the CSO boundary (including units under construction), or outside the CSO boundary (including recently completed and under construction).

Given the potential for further residential development potential on remaining uncommitted residential zoned (7.02 ha) or town centre infill lands in Naas, it is both prudent and necessary to release residential zoned lands with a Phase 2 designation in Naas to enable continuing growth of this Key Town.

The assertion by Submission 122 that facilitating development on the Phase 2 lands at Kilcullen Road would be prejudicial to an integrated design that incorporates adjoining educational and open space zoned lands is not supported. The policies and objectives of the County Development Plan seek to ensure that development proposals have due consideration to and connectivity with adjoining existing and planned land uses. Proposals are also to have due regard to the policies and objectives contained in the Naas LAP.

Submissions 049 and 121 contend that the inclusion of the Phase 2 lands at Blessington / Tipper Road as additional housing is inappropriate considering that these lands benefit from an extant permission that is under construction and will therefore not yield any new additional houses. In response, it is noted that the parent permission for the 'Stonehaven' development (Planning Ref. 151060, Appeal Ref. PL09.247411) extends across both the Phase 2 New Residential lands (subject to Variation No. 3) and an adjoining New Residential zoned landholding in the Naas LAP. This planning permission was granted prior to the coming into effect of the Naas LAP and was extended in duration until 2027 (Planning Ref. 21777).

Applications have been received for amendments to the Stonehaven parent permission across the southern portion of the Phase 2 landholding to increase unit yields and construction has commenced in this area. Considering the above, it is considered prudent and appropriate that the Phase 2 lands be considered as released in a policy context and that additional allocation be provided to ensure continuing increases in unit yield across these Phase 2 lands.

In addition, it should be noted that Amendment No. 15 of Proposed Variation No. 3 revises Section 2.12 of the Core Strategy and provides that where planning applications are received for housing developments on appropriately zoned lands and where the development would result in an exceedance of core strategy allocation for that settlement, the planning authority may consider granting permission for such developments having regard to the provisions of Section 86(7) of the Planning and Development Act 2024 and where commensurate social infrastructure is delivered as part of the development scheme in accordance with objectives SC O15, SC O16 and SC O17 of this Plan.

The content of Submission 139 in relation to the delivery of social and physical infrastructure including childcare, schools, community/leisure facilities, rail services and sustainable transport measures in tandem with residential growth in Naas over the next 15 years is acknowledged.

Proposed Variation No. 3 is targeted in nature and is not a full review of the County Development Plan, Local Area Plans, Settlement Plans, Town Renewal Masterplans or Transport Strategies, nor does it include new land use zonings. Future residential zonings will be informed by evidence-based assessments and audits at both the site and settlement level to ensure the integration of land use and transportation planning

and the creation of communities that are supported by appropriate infrastructure. It is reiterated that the approach undertaken by Kildare County Council in the application of the revised housing growth requirements in Proposed Variation No. 3 is to utilise plan-led and evidence-based mechanisms.

Significant progress has been made in preparing the Draft Masterplan for the Northwest Quadrant, which will include a phased implementation programme for its delivery to include a range of land uses, including social and community infrastructure. The Masterplan and associated land use zonings will be subject to its own public consultation process as part of a variation to the County Development Plan in 2026.

It is an objective of the County Development Plan to support the delivery of a bus-only link to the Sallins bypass through the Northwest Quadrant to provide a bus service to the train station from Naas Town Centre (TM O46) and to facilitate park and ride facilities (TM O45). In relation to childcare, it is an objective of the CDP that childcare facilities are delivered in tandem with phase 1 of development (SC O79). The initiation of a feasibility study for the Naas-Dunlavin railway line is an operational matter for KCC and is subject to the availability of resources.

The Naas Local Area Plan 2021-2027, which includes an Urban Regeneration and Development Strategy, will remain in effect until 2027. The review of this plan will be considered under the new provisions of the Planning and Development Act 2024 when issues pertaining to further housing growth allocation for the next 10 years and the phased delivery of infrastructure in Naas will be addressed as part of the overall county development strategy.

Chief Executive's Recommendation

Update Amendment No. 12 [Preferred Development Strategy] as follows:

Kildare County Council's Approach to New Housing Growth Requirements (2025)

It is proposed to accommodate the Government's revised housing targets for County Kildare in a targeted, plan-led approach so that additional housing may be delivered in the short, medium and long term in accordance with the provisions of the Ministerial Guidelines.

The updated housing growth requirements for County Kildare are presented in two tables, which are separate and in addition to Table 2.8 Core Strategy Table, as follows:

- (iii) Table 2.8A Core Strategy Supplementary Table for revised National Housing Growth Requirements 2025: Short and Medium Term*
- (iv) Table 2.8B Core Strategy Supplementary Table for revised National Housing Growth Requirements 2025: Short to Long term Strategic Development Sites.*

Where specific sites are identified in Tables 2.8A and 2.8B, accompanying maps are provided for reference purposes (see Maps Vol 1-2.3 to 2.9 inclusive).

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

1. *The release of lands zoned Phase 2 in Local Area Plans (LAP) / Settlement Plans for Naas (New Residential Phase 2), Newbridge (New Residential – Phase 2) and Kildare Town (Phase 2 New Residential) by way of a Core Strategy objective to allow planning applications to be considered in the short term.*
2. *The allocation of additional housing growth to the settlements of Monasterevin, Kilcock and Sallins to inform the preparation of new Settlement Plans in 2026 for inclusion in Volume 2 of the County Development Plan.*
3. *The identification of strategic sites in Athy and Celbridge for future housing delivery to be integrated into new settlement plans in 2026/2027, the zoning for which will be determined during the plan making process having regard to strategic flood risk assessment and other environmental assessments.*
4. *The progression of strategic sites in the short term to medium, which given their scale, also form long-term Urban Development Zones (UDZ), as provided for in the Planning and Development Act 2024, at two locations as follows:*
 - *Northwest Quadrant, Naas. A variation to integrate the completed Masterplan (in progress) and related zoning provisions and objectives into the County Development Plan will be published in 2026, prior to the commencement of the UDZ process.*
 - *Confey, Leixlip. A variation to integrate the Masterplan and related zoning provisions and objectives into the County Development Plan will be published in 2026, prior to the commencement of the UDZ process.*

Amend the title of proposed Table 2.8B in Amendment No. 14, as follows:

Table 2.8B: *Core Strategy Supplementary Table for revised National Housing Growth Requirements (2025) Short to Long Term Strategic and Sustainable Development Sites Additional Provision [to be read in conjunction with Table 2.8 and Table 2.8BA]*

Amend footnote no. 16 of Table 2.8B in Amendment No. 14 to state as follows:

¹⁶ The lands identified in these maps (i.e. for Northwest Quadrant, Naas and Confey, Leixlip) will include a range of land use zonings, not just residential, and will be brought forward through. The Confey masterplan and existing related zoning provisions and objectives will be incorporated into the County Development Plan by Variation in 2026. The masterplan for the Northwest Quadrant in Naas (currently being prepared), together with associated land use zoning provisions and objectives will be incorporated into the County Development Plan by Variation in 2026. These lands will also be subject to the UDZ process in due course.

Update Amendment No. 16 [Chapter 2, Core Strategy Objectives] by amending CS O32, as follows:

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


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

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

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

Issues Raised: Maynooth

(5 Submissions) Submissions 007, 008, 085, 119 and 125

Sub Ref No:	007
Name:	John Doyle and Paul Doyle
<p>Issues Raised: Submission by JP and M Doyle on behalf of John Doyle and Paul Doyle seeks to rezone approximately 2.35 ha of at Carton Wood, Maynooth from F: Open Space and Amenity to residential.</p>  <p>The submission includes a cover letter and an attachment document which outlines the rationale for this request, as follows:</p> <ul style="list-style-type: none"> • Notes context of the site and its high suitability for residential development, adjacent to an existing residential estate. Highlights its accessible and serviceable character, proximate to Maynooth Town Centre, amenities, employment opportunities and services, as well as public transport options. • States that the request is logical and justified as residential development represents a sequential infill and consolidation opportunity that aligns with planning policy at all levels of the plan hierarchy, including the NPF, RSES, the Kildare CDP 2023-2029 and the Local Area Plan for Maynooth. • Submission includes a sample site layout of a residential scheme and states that such a development would represent compact growth, deliver much needed housing and utilise existing infrastructure and services. 	
Sub Ref No:	008
Name:	John Doyle and Paul Doyle
<p>Issues Raised: Submission by JP and M Doyle on behalf of John Doyle and Paul Doyle seeks to rezone approximately 5.5 acres (2.23 hectares) of land at Dublin Road, Maynooth from its current 'Q(1): Enterprise and Employment' zoning to a new residential land use designation.</p>	



The submission includes a cover letter and an attachment document which outlines the rationale for this request, as follows:

- Notes strategic location of the lands and highlights its suitability for residential development, referring to its highly accessible location and the presence and availability of utility services. Notes the proximity of the site to the services of town centre along with the presence of bus and train services (all within walking distance).
- Contends that the development of the site represents an opportunity to shorten the distance between the Dublin Road and the train station via access through the site to the Royal Canal Greenway which borders it to the south. States that this will promote sustainable mobility and climate action.
- Outlines the planning rationale for the request referring to policy alignment with national, regional and county planning policy. The submission specifically references National Planning Objectives of the NPF including, inter alia, those relating to compact growth, regeneration and infill development, urban design and public transport investment.
- Submission includes 3D renderings of an example residential scheme on the site and states that the exceptional accessibility and fully serviced nature of the lands support a density range of 80-120 units per hectare, with a potential yield of 176–264 units. States that such a development can effectively deliver on policy requirements for compact urban growth while also delivering high standards of residential amenity.

Sub Ref No: 085

Name: St Patrick's College, Maynooth

Issues Raised:

The submission by John Spain Associates on behalf of St Patrick's College, Maynooth relates to a request to amend the proposed Objective CS O32 to include provision for the Maynooth West Masterplan Area to be added to the locations to be designated as an Urban Development Zone (UDZ) to reflect its strategic significance and development potential.



The submission outlines the rationale for this request, as follows:

- Notes the provision for planning authorities to identify UDZs under the Planning and Development Act 2024 commenced in June 2025. Notes that that the concept allows for a coordinated, plan-led approach to the delivery urban development and is intended for large-scale development areas, including transport-oriented development (TOD).
- States that the designation of the lands as a UDZ satisfies the requirements outlined under the 2024 Act.
- Refers to the strategic importance and scale of the lands which extend to 174 ha and includes existing college and agricultural lands adjoining Maynooth University.
- Notes the location of the subject lands have the capacity to deliver significant housing alongside economic social and environmental benefits but requires, the delivery of the Maynooth Outer Orbital Route (MOOR) and a second train station. Submits that the UDZ designation would support coordinated planning and funding for these projects as both are essential to deliver housing at the required densities, sustainable transport development and compliance with the Joint Plan.
- Submits that a UDZ designation would align with recent guidelines published by the Government on housing growth requirements (2025) and sustainable residential development (2024) as well as Delivering Homes, Building Communities 2025–2030, which promotes UDZs as a tool for accelerated housing delivery.
- Notes the provisions of the RSES for Maynooth, including the identification of consolidation opportunities to the northwest and southwest.
- Further notes the provisions of the Joint Local Area Plan for the lands including multi-zoning designations, along with the designation of the Maynooth West Masterplan Area and Maynooth West TOD. States that on this basis the lands are highly suitable for a UDZ designation.

Sub Ref No: 119

Name: Roger Satchwell

Issues Raised:

Submission by Roger Satchwell relates to a request to swap the land use zoning designation for lands zoned C(8): New Residential and I: Agriculture lands in Mariavilla, Maynooth.



The submission makes the following points in support of their submission:

- Submits that the C(8) lands are being actively farmed and the current zoning is not supported by his family. Submitter provides a herd number. States that this will not yield any residential use under the life of the current Development Plan.
- Notes that the lands were zoned Agricultural under the Maynooth Local Area Plan 2013-2019 (LAP) and requests that this zoning be retained to reflect the historic and ongoing use of the land.
- Refers to the NPF Implementation: Housing Growth Requirements Guidelines (July 2025) which states that as part of carrying out Settlement Capacity Audits Local Authorities when looking at sites should consider the likelihood of land being made available for development. Also notes the Development Plan Guidelines (2022) which states that there must be an emphasis on development of settlements based on the availability and activation of serviced land. The submission contends that this zoning of active farmland is consequently misaligned with Government policy.
- Submits that in order to meet the housing targets the lands zoned I: Agricultural at Mariavilla could be for new residential and the C (8) and zoned for agriculture, allowing the same quantum of housing to be delivered. Notes that this agricultural land has had new drainage pipes installed in July 2025 to improve the quality of the ground and soil fertility.
- Concludes by noting that Maria Villa House is a Protected Structure and its curtilage extends to include the front meadow. The submission includes an old OSI map which it contends clearly shows the meadow as part of the overall setting.

Sub Ref No: 125

Name: Cairn Homes Properties Ltd.

Issues Raised:

The submission prepared by John Spain Associates (JSA) Planning and Development Consultants on behalf of Cairn Homes Properties Ltd., requests the rezoning of circa 8 ha of a 39 ha landbank at Maynooth West from SR: Strategic Reserve to C: New Residential to facilitate a potential 310 – 350 no. units and be included in Table 2.8A as Tier 1 lands to support the change of zoning either as a settlement plan or in a subsequent update to the LAP.



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

- Rezone to include the remainder of the landbank as a 'Long Term Strategic and Sustainable Development Site' (proposed Phases 2-4) so as to allow for phased development of the lands in tandem with the delivery of the MOOR and Maynooth Train Station, the location of which is on Cairn lands.
- States that Cairn own circa 39 hectares of greenfield land within the Newtown area to the south-west of the town. The lands lie to the west of existing residential development in Newtown and are situated approximately 1.2km from the town centre. Notes the surrounding area characterised by a mix of low-density rural dwellings, agricultural fields and established housing estates.
- Contends that the time is now appropriate for an initial phase of these 'Strategic Reserve' lands of c.8 hectares to come forward for development, with the appropriate development framework in place to facilitate the development of a sustainable new residential community between (310 and 350 units) in tandem with a creche and high quality public open spaces.
- Refers to the Maynooth Joint Plan and the proposal for Transit Orientated Development on lands within the Maynooth West Masterplan, which will be required to be phased.
- The subject lands are considered to be 'Tier 1: Serviced Lands' as the lands are able to connect to existing development services (i.e. roads, foul drainage, surface water drainage and water supply, etc) and the lands are located contiguous to existing development lands. States they also meet the 2022 Guidelines suitability criteria based on road access, pedestrian and cycle access, foul sewerage, water supply, surface water and community facilities.
- States that the subject lands are ideally located to contribute to the increase in the requirements for residential zoned land/core strategy review and requests a meeting with KCC in relation to this proposed rezoning request at the earliest convenience.
- Submission includes a Vision for the lands prepared by MCORM architects and urban designers which outlines a design concept for the area and illustrates phased development of the lands with Phase 1 being located in the southeast of the site.

Chief Executive' Response

The contents of the submissions are acknowledged.

Submissions 007, 008, 119 and 125 relate to the zoning of lands in Maynooth. In this regard, Proposed Variation No. 3 seeks to amend the Kildare County Development

Plan 2023-2029 in accordance with the provisions of Section 13 of the 2000 Act. The zoning of land in Maynooth is contained in the Joint Maynooth and Environs Local Area Plan 2025-2031 and not within the County Development Plan. Accordingly, this Variation does not contain any provisions relating to the zoning of lands in the settlement of Maynooth, noting that the statutory process for varying a Local Area Plan is a separate process set out under Sections 19 and 20 of the 2000 Act. Proposed Variation No. 3 updates the Core Strategy to align with the Housing Growth Requirement Guidelines and does not provide new residential zonings to any lands, noting that such zonings should be informed by evidence-based assessments and audits at both the site and settlement level. This is in line with best planning practice for the sustainable development of settlements, the integration of land use and transportation planning and the creation of communities that are supported by appropriate infrastructure.

The Joint Maynooth and Environs Local Area Plan 2025-2031 was recently adopted by Kildare County Council and Meath County Council in February 2025. The Joint Plan incorporates a very ambitious target for the delivery of 3,670 new homes from 2025 to Q1 2031, representing a potential population increase of 57.4% from the Q1 2023 estimated population of the town. Excluding the Moygaddy lands in County Meath, approximately 84.63 hectares of land is provided for residential development (including a town centre settlement consolidation site).

The level of growth in the Joint Plan represents the maximum increase (in terms of population/housing) which Maynooth can sustainably accommodate over the life of the Joint Plan, devised having regard to a comprehensive range of evidenced-based supporting documents including *inter alia* a Settlement Capacity Audit (SCA), a Social Infrastructure Audit, a Strategic Flood Risk Assessment and other environmental reports. The Joint Plan was also informed by the Maynooth and Environs Area Based Transport Assessment. As such, it is not accepted that further residential zoned lands are currently required in the settlement of Maynooth.

In response to Submissions 007 and 008 it should be noted that the subject sites were subject to a Settlement Capacity Audit (SCA) to determine, *inter alia*, their overall suitability for residential and/or employment development. The SCA assessed sites on a range of criteria and results for the subject sites were, as follows:

- The site adjacent to Carton Wood (SCA Site 5) was found to be serviceable (Tier 2) for residential development. However, it scored just 507 out of 1,000 potential marks, with some 20 other sites within Maynooth (County Kildare) scoring higher. Given that the quantum of potential residential lands audited far exceeded the required housing target as set out in the Joint Plan, the subject site was not zoned for residential development, as more suitable sites which scored higher in the SCA were prioritised.
- The site on the Dublin Road (SCA Site 6) scored well for potential residential development, scoring third highest out of 28 sites assessed in Maynooth (County Kildare). However, it scored highest out of 19 sites assessed for potential employment development. Furthermore, it was also the only potential employment site within the Plan area that was considered as Tier 1 (Serviced). This was the evidence basis for its subsequent zoning in the Joint Plan as Q(1): Enterprise and Employment.

The request in Submission 085 to designate the Maynooth West Masterplan Area as an Urban Development Zone (UDZ) as part of Proposed Variation No. 3 is not accepted. It is considered that such a designation is premature and requires a more detailed consideration, particularly having regard to the lands to the south of the railway which are zoned SR: Strategic Reserve SR(2). Furthermore, it is considered that the sites selected for UDZ status (Confey, Leixlip and the Northwest Quadrant, Naas) are at a more advanced stage, in terms of the preparation of supporting masterplans for these respective areas. It is agreed that, subject to available resources, the feasibility of designating lands identified in Section 11.2 of the Joint Plan as comprising the Maynooth West Sustainable Urban Extension will be investigated as part of the review of the County Development Plan. This process is due to formal commence in August 2026.

The request in Submission 119 to swap the zoning objective from C: New Residential to I: Agricultural on two respective sites in Mariavilla is not accepted. The Joint Plan for Maynooth only came into effect in April 2025, and it is not considered appropriate for this Proposed Variation to amend the provisions within the JLAP, noting that a separate statutory process would be required. It is also noted that the lands zoned C(8): New Residential scored highest among all 28 sites assessed for potential residential development in the town in the SCA. This site is considered to be Tier 1 (Serviced) land and eminently suitable for compact residential development.

Furthermore, the lands zoned I: Agriculture in Mariavilla were zoned on the basis of the Habitats Mapping Survey. This found that they constituted 'wet grassland' and therefore contributed significantly to the local green and blue infrastructure network of the area. It is further noted that statutory Objective GBIO 2.1 of the Joint Plan seeks to protect and enhance such identified infrastructure over the life of the Plan.


The request in Submission 125 to amend the zoning of approximately 8 hectares from SR(2): Strategic Reserve to C: New Residential and be included in Table 2.8A as Tier 1 (Serviced) lands is not accepted. It is noted that the lands are not considered to be Tier 1 (Serviced) as they were subject to the SCA (SCA Site 22) in which they were determined to be Tier 2 (Serviceable) for potential residential development. Scoring 554 out of 1,000, some 17 other sites within Maynooth (County Kildare) received higher marks. Furthermore, while the Joint Plan fully acknowledges the long term potential of the subject site to facilitate a future Transport Oriented Development (TOD), a specifically tailored zoning objective (SR(2)) was applied to the lands due to the lack of clarity surrounding the delivery of key transport infrastructure projects in the general area (i.e. MOOR, potential interaction with any M4 Motorway upgrade and location of the new train station). Accordingly, in addition to the reasons outlined above, it is considered that these issues still remain to be resolved.

Chief Executive's Recommendation

No change recommended.

Issues Raised: Newbridge

(2 Submissions) Submissions 110 and 120

Sub Ref No:	110
Name:	Andrew Bergin
<p>Issues Raised:</p> <p>The submission by Tom Phillips and Associates, on behalf of Andrew Bergin, is concerned with the modest additional growth of 850 dwellings afforded to Newbridge under Variation No. 3. It also relates to lands comprised of circa 54 ha located at Great Connell, Newbridge which it is submitted has the potential for residential development.</p>	
	
<p>It is stated that a submission in respect of the consultation for the Proposed Variation No. 2 (Newbridge Settlement Plan) of the Kildare CDP 2023- 2029 (as varied) was also made by Tom Phillips + Associates, on behalf of Andrew Bergin. It is further stated that the submission (for Variation No.3) should be read in conjunction with the submission made on Proposed Variation No. 2.</p>	
<p>The submission includes an attachment document which outlines the rationale for this request, as follows:</p> <ul style="list-style-type: none"> • The site is strategically located to the southeast of Newbridge's built-up area, an obvious location for the natural extension of the town and well positioned for housing development. • The site is undeveloped greenfield lands – predominantly flat and currently used for agriculture. • The Southern Relief Road will unlock the potential to deliver residential development on the subject site. • The lands are not located within a Natural Heritage Area (NHA) or European Site (Natura 2000 site); but associated archaeology within site needs to be investigated. • The site has the potential to form the basis of a masterplan for the area. • A Quietway has been identified in the Newbridge Area Based Transport Assessment to link the pre-existing access on site. 	

- The site is served by good social infrastructure (schools and community facilities).
- Site would supply a residential neighbourhood near the Littleconnell Strategic Employment Area to complement its economic function.

The Core Strategy

- Will fall well short of achieving its revised targets if one or more of these sites do not deliver housing (Confey in Leixlip, Northwest Quadrant Naas and Simmonstown/Ballyoulster lands in Celbridge).
- In previous development plans (CDP 2017-2023) envisaged growth of housing over 32,000 units – Variation No.3 states actual growth was just under 14,000.
- There is no definition for what is considered to be short to medium term for housing delivery but reasonable to assume this translates to 1-3 years. Therefore, the potential growth identified falls short of the required 7,826 units for the three-year period from 2026 – 2028.
- Long term strategic development sites (one in Naas and one in Leixlip) are unlikely to contribute towards the required 7,826 units in the remaining three years of the Plan.
- A wider distribution of lands across main settlements in the County should be considered.
- The Chief Executive's Report: NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities (2025), identifies capacity of 1,236 units for Newbridge. The reasons for the reduction in the target number of units are therefore unclear, and there needs to be consistency across Proposed Variation No. 2 and No. 3 in relation to the future projected need.
- Three sites identified as Phase 2 under the Draft Newbridge Settlement Plan are located far from key employment hubs and the town centre than the subject site. The submission questions their ability to significantly contribute to housing growth requirements over the plan period.

Housing Targets Versus Delivery

- Not all land zoned for residential will come forward for development.
- Housing completions are well short of the targets set out in Newbridge LAP 2013-2019 and Kildare CDP 2023-2029.
- All three sites zoned 'New Residential' in Draft Newbridge Settlement Plan had been previously zoned in the Newbridge LAP but not delivered.
- The three sites comprise of c.30 ha – taking account to provide open space and services it is assumed a developable area of circa 20 ha – resulting in only 700 units. The submission sites that this based on the likely low density of 35 dph.
- The subject site is able to progress development as soon as practicable.
- Subject site (c. 54 ha) provides unique opportunity to provide a significant quantum of housing in a phased manner.

NPF (2025)

- Reinforces the importance of developing sites (including greenfield lands that are, or can be, efficiently served by existing or planned high-capacity public transport infrastructure and that can accommodate significant development.
- Notes National Policy Objectives 9, 10, 12, 42, 43 to support development of subject site.

Housing Plan - Delivering Homes, Building Communities 2025-2030

- Aims to speed up the delivery of new homes and targets the construction of 300,000 homes.
- Reinforces the need for a strong pipeline of zoned and serviced land and plans to invest in the infrastructure necessary to support housing development.

Sub Ref No: 120

Name: McGreevy Construction/Enterprises

Issues raised:

The submission by Hughes Planning and Development Consultants, on behalf of McGreevy Construction/Enterprises, requests that the Core Strategy in Proposed Variation No. 3 be reviewed and amended to appropriately allow for an increase in houses across the county of Kildare, in particular Newbridge. It also seeks the re-zoning of lands comprising of circa 11.4 ha located to the East of Blackberry Lane and Morristown Road in Newbridge as New Residential – Phase 2, outlined in the excerpt below:



The submission outlines the rationale for this request, as follows:

- Variation No. 3 does not amend the Housing Target Allocation in the existing core strategy (Table 2.8) to include for the additional housing growth requirement for Kildare County but includes tables which sets out additional dwellings for specific towns and villages.
- Adversely impacts on the development of a large number of zoned residential lands across County Kildare which are readily available for development.
- Housing unit allocation for Newbridge has not been updated to reflect the potential of the subject site.
- States the numbers are too conservative and the level of provision currently proposed falls far short of what is required to meaningfully address the scale of the crisis for housing.
- Notes the site is readily serviceable, well-located to Newbridge town centre (c.1 km), close to train station and bus stops and capable of delivering houses at pace.
- Site is located immediately adjacent to existing residential land uses.
- McGreevy has the expertise and resources to provide housing short to medium term.

- Subject lands were zoned Agriculture under the Newbridge LAP 2013-2019 but under Variation No. 2 the proposed Newbridge Settlement Plan, the town boundary has been moved to omit part of the subject site and rezones another part as Strategic Reserve.
- The section of land omitted from the town boundary is suitable for rezoning as 'Residential' or 'New Residential – Phase 2' and zoning the whole lands would allow for continuous development of the entire site.
- Subject lands are currently located closer to the train station and town centre than some of the zoned lands further to the northwest.
- Planning permission was granted for lands east of the subject site by An Bord Pleanála in 2018 for 281 units and creche facility, open spaces and link roads.
- Refers to Objective 1 of the NPF Housing Growth Requirements and contends subject site provides suitable lands for revised targets.
- Notes National Policy Objectives of the NPF (NPO 3, 7, 9, 10, 12, 13, 14, 20, 22, 25, 26, 37, 38, 42, 43, 45) as relevant to reflect the type of growth sought.
- Notes National Strategic Outcomes of the NPF (NSO 1, 5, 10) and rezoning and development of subject site would support these.
- States development of subject site is in keeping with sequential approach to development.
- Asserts the projected unit numbers are significantly understated and lacking in ambition and unlikely to exert any meaningful influence on the escalating cost of housing or pressures faced by households seeking suitable accommodation.
- Notes Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031 and Objectives 3.2 and 3.5 as relevant to subject site which is located in the Self-Sustaining Growth Town of Newbridge.
- Refers to Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) as recognising the need to develop on land which can be integrated into the existing built-up footprint of the settlement.
- Residential development on the subject site could comprise a scheme of between 399 to 570 dwellings for a suburban/urban extension location.
- Market trends would suggest that buyers prefer medium density development over high density, which requires additional lands to be zoned residential.
- Notes that the locations for housing growth in Newbridge are recorded in Table 2.8A as 'to be determined' and would suggest that the subject site would be a suitable location to meet the housing target.
- Notes Kildare CDP Objectives (CS O4, CS O5, HO P4, HO O2, HO O5, HO O6, HO O7) and Policy HO P7 as relevant for subject site to meet the housing target.
- Lists existing social infrastructure in Newbridge, and Census 2022 demographic and travel statistics for the town.
- Provides examples of affordable and private housing developments completed by McGreevy Enterprises in Rathnew and Enniskerry.

Chief Executive's Response

The contents of the submissions are acknowledged.

The specific land use zoning requests in Newbridge outlined in Submission 110 and Submission 120 are not accepted. Aside from the lands zoned 'C: Phase 2 New Residential', as identified in Proposed Variation No. 2 (Draft Newbridge Settlement Plan), Proposed Variation No. 3 does not relate to any other lands in Newbridge. The purpose of the Proposed Variation and specifically Objective CS O29, with regard to the Phase 2 New Residential lands in Newbridge, is to release these lands under the current County Development Plan, to accommodate the increase in housing requirements assigned to the county.

The statutory process for the consideration of land use zoning in Newbridge is Proposed Variation No. 2 (Newbridge Settlement Plan). The Chief Executive's Report on Submissions/Observations Received to Proposed Variation No. 2 has been published and provides detailed responses and recommendations regarding the zoning request outlined in Submission 110 (pages 231-233 of the CE report dated 11 November 2025, available online²). It is further noted that no zoning request relating to the lands subject to Submission 120 was received to Proposed Variation No. 2. Land use with the settlement of Newbridge has been carefully considered having regard to a Settlement Capacity Audit, Social Infrastructure Audit, Strategic Flood Risk Assessment and other environmental reports.

The views outlined in Submission 110 and Submission 120 that the Proposed Variation No. 3 adversely impacts on housing delivery, lacks ambition and is too conservative is noted but rejected. The request in Submission 120 for the Core Strategy in the variation to be reviewed and amended appropriately to allow for an increase in houses across the county and in particular for Newbridge is acknowledged. In addition to the reasons outlined above, it is considered that the Proposed Variation is ambitious about delivering housing growth in County Kildare. As detailed in Table 2.4B of Variation No. 3 and in Section 1.1 of this report, 3,693 units are required to be provided in addition to the existing Core Strategy requirement for the remaining 3-year period of the County Development Plan under the Housing Growth Requirement Guidelines. This has been calculated by applying the additional housing required per year (+1,377.5 units) to meet the new annual requirement of the Housing Growth Requirement Guidelines (2,744 units) to the remaining years of the Development Plan. Furthermore, the Housing Growth Requirement Guidelines provide that an 'additional provision' is to be incorporated into the County Development Plan, being 'up to 50%' of the annual requirement of the Housing Growth Requirement Guidelines. Notwithstanding the element of discretion afforded, Variation No. 3 has incorporated the full 50% 'additional provision' available in the Housing Growth Requirement Guidelines.

Accordingly, the proposed amendments to the Core Strategy over the last three years of the County Development Plan (2026, 2027 and 2028) provide for a potential additional 7,828 new housing units. This represents a 171% increase on the current Core Strategy allocation for these years. Whilst ambitious, the approach taken reflects the need for growth to be facilitated in a targeted, plan-led manner so that additional housing may be delivered in the short, medium and long term.

² The Chief Executive's Report on Submissions/Observations Received to Proposed Variation No. 2 (Newbridge Settlement Plan) is available at: <https://consult.kildarecoco.ie/en/consultation/proposed-variation-no-2-newbridge-settlement-plan-kildare-county-development-plan-2023-2029-varied>

Notwithstanding the above, as detailed in the response to the OPR submission (Submission 116), a number of further amendments, including additional mechanisms, are proposed to be made to facilitate delivery and provide a continuity of supply to meet the housing growth requirements. These proposals place a particular emphasis on enabling delivery on existing zoned land in the short term and on achieving equitable, balanced and proportionate growth across the county (see Section 3 of this report).

The assertion in Submission 110 that the variation will fall well short of its revised target allocations if one or more of the sites in Confey, the Northwest Quadrant and Simmonstown / Ballyoulster do not deliver housing is not accepted. On foot of a recommendation included in the NPF: Housing Growth Requirements Guidelines (July 2025), the Planning Authority undertook a full audit of zoned land to assess the capacity for residential development in the county, the results of which are detailed in the Chief Executive's report on the NPF Implementation Guidelines, dated 22 September 2025. The Audit found that, as of August 2025, approximately 432 hectares of land remain undeveloped with the potential to deliver approximately 13,795 houses across the county. This does not include other zoned lands in the county that are also available to deliver infill and brownfield development, including 'A: Town Centre' and 'B: Existing Residential / Infill' zoned lands, which collectively have the potential to deliver significant levels of additional housing. It is therefore considered that both the quantum and capacity of the undeveloped zoned lands, in conjunction with the delivery mechanisms set out in Proposed Variation No. 3 and as proposed to be revised in response to the OPR, is amply sufficient to cater for the additional housing requirements in County Kildare over the remaining life of the County Development Plan.

The contention in Submission 110 that Long Term Strategic Development Sites are unlikely to contribute towards the revised housing requirements of the remaining years of the CDP is not accepted. With respect to the Northwest Quadrant, the preparation of the Masterplan, including associated land use zonings, for the lands is at an advanced stage. It is anticipated that this will be published and included in the County Development Plan by way of a statutory variation in 2026. Regarding the lands at Confey, there is potential for the delivery of 450 units in the short term as Phase 1a of the Confey Masterplan. Submission 073 confirms that Ballymore, as the majority landowner of the Confey Masterplan lands, intend to submit a planning application for Phase 1A in Q1 2026 with remaining phases to follow. Proposed Table 2.8A (short -medium term) is proposed to be amended to reflect this short-term potential, with a consequential reduction in Table 2.8B, as detailed in the response to the submission by the Office of the Planning Regulator (Submission 116). For clarity, it should be noted that development of these lands is not constrained by the intent of the variation to initiate the process for designating both Confey and the Northwest Quadrant as Urban Development Zones in accordance with the 2024 Act.

With regard to the reference in Submission 110 to the previous housing requirements provided in the Kildare 2017-2023, it should be noted that all County Development Plans align with the requirements set out in the plan hierarchy in place at the time they are prepared.

Submission 110 notes that there is no definition of what is 'short to medium' term. For the purposes of this Variation, it is confirmed that 'short to medium term' is 1-3 years, which covers the remaining period of the County Development Plan.

The view expressed in Submission 110 that there is a reduction in Proposed Variation No. 3 compared to the Chief Executive's Report: NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities (2025) is not accepted. It is noted that the Chief Executives Report on the Housing Growth Requirement Guidelines was an analytical exercise in relation to existing zoned lands in the county. Proposed Variation No. 2 provides for 1,114 units in Newbridge and Proposed Variation No. 3 contains mechanisms which allocates an additional 850 units in the town over and above that outlined in Proposed Variation No. 2 (Draft Newbridge Settlement Plan). Proposed Variation No. 2 was required to comply with the allocations outlined in the Core Strategy for Newbridge at the time of its publication. Whilst both variations are subject to their own statutory process they were very much produced in tandem. Hence, the designation of New Residential: Phase 2 lands in the town under Proposed Variation No. 2 which could be subsequently released under the mechanisms outlined in Core Strategy Objective CS O29 of Proposed Variation No. 3, once adopted.

The contention in Submission 120 that market trends would suggest that buyers prefer medium density development over high density, which requires additional lands to be zoned residential is noted. Planning Authorities are obliged to comply with the provisions of the Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities (2024) which sets out a range of residential density standards for different areas within various settlement categories. The density ranges and site-specific densities for settlements outlined in Table 2.8, Table 2.8A and Table 2.8B of the Proposed Variation fully align with the provisions of the Guidelines in this regard. It is noted that the Variation also contains amendments to formally integrate the provisions of the Guidelines into the CDP.


The assignment of a '*to be determined*' designation for the location of housing in Newbridge raised by Submission 120 is acknowledged. It should be noted that 'to be determined' means that the location of housing in the town will be determined through the Newbridge Settlement Plan (i.e. Proposed Variation No. 2).

Chief Executive's Recommendation

No change recommended.

Issues Raised: Leixlip

(3 Submissions) Submissions 069, 073 and 125

Sub Ref No:	069
Name:	Pat Toolan
<p>Issues Raised:</p> <p>This submission has been prepared by Hughes Planning and Development Consultants on behalf of Pat Toolan, seeking the rezoning of 0.61 ha of lands at Distillery Lane, Leixlip from Open Space and Amenity to enable residential development.</p>	
	
<p>The submission notes the intent of the proposed variation to align the County Development Plan with the NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities.</p>	
<p>The submission outlines the following rationale in support of the rezoning request:</p> <ul style="list-style-type: none"> • The Government has clearly articulated the need for local government to unlock land for housing and accelerate delivery through the above Guidelines, the NPF – First Revision, the establishment of the Housing Activation Office and by a Ministerial directive. • The submission states that there is significant unmet housing demand in the Eastern and Midlands Region and that the demand for housing is acute in areas that are experiencing strong economic and population growth. • The submission notes that Kildare is one of the fastest growing population centres in the country and that Leixlip is within the Dublin Metropolitan Area. The settlement is proximate to the city centre and benefits from national transport links. States it is imperative that further lands are zoned to future proof the delivery of housing in the area. • The submission gives an overview of the strategic location of the lands, being proximate to the town centre (including associated community amenities) and existing/planned public transport options, including 3 no. bus stops that have services to Dublin and other areas. The lands are also stated to be within walking distance of 2 no. train stations (Leixlip - Confey) and Leixlip - Louisa Bridge). • Bus services in Leixlip are anticipated to be enhanced through the delivery of a Bus Connects route to Dublin. Improvements to public transport will result in further housing demand, which current zoned lands cannot facilitate. 	

- The submission provides an overview of the planning history of the subject lands and surrounding lands, stating that it is evident that Leixlip has a demand for housing.
- The land is accessible to the surrounding road network from Captain's Hill via Distillery Lane.
- The subject lands are currently underutilised, are serviced by essential infrastructure and can deliver housing at pace. Development on these lands will assist in meeting housing delivery targets, aligned with the objectives of the NPF – First Revision and the servicing criteria stated by the Minister.
- The immediate surrounding area is urban in nature, defined by residential development. The submission details how development on the subject lands would align with various National Strategic Outcomes (NSO) and National Policy Objectives (NPOs) of the NPF – First Revision. The lands will contribute to compact growth within an existing settlement (NPO 7) that is served by public transport options (NPO 10) in a sequential manner.
- The submission recognises that zoned lands in Leixlip are outside the township and would face delays in the short to medium term. In comparison, the subject lands could be brought forward swiftly to meet housing needs during the lifetime of the County Development Plan.
- It is estimated that the lands could accommodate 20 no. dwellings.
- Contends zoning of the lands for residential development represents a realistic, policy-consistent, strategically located and shovel ready solution to the current housing crisis.

Sub Ref No: 073

Name: Ballymore

Issues Raised:

This submission has been prepared by John Spain Associates on behalf of Ballymore. The submission notes that Ballymore is the majority landowner of the zoned lands at Confey, which form part of the Confey Masterplan Lands area in the Leixlip LAP. Ballymore is currently progressing proposals for Phase 1a of development on the Confey Masterplan lands. An application for development is intended to be submitted in Q1 2026, with remaining development phases to follow.

The submission details that Ballymore welcomes the content of the variation in relation to Confey, however, it requests minor alterations to clarify that:

- The growth allocation for Confey (Phases 1a, 1b and 2 in particular) can come forward to meet short to medium term allocation, whilst the wider masterplan lands can also provide for longer growth.
- That planning applications at Confey will be assessed against the Leixlip LAP and Confey Masterplan until such a time as a new plan or UDZ planning framework is adopted.

The proposed alterations to the text of Proposed Variation No. 3 are shown in green below:

Alter the text of delivery mechanism no. 4 in proposed Amendment No. 12 of Variation No. 3 as follows:

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

- Northwest Quadrant, Naas
- Confey, Leixlip.

Revise the title of Table 2.8B in Variation No. 3 to state as follows:

Table 2.8B: Core Strategy Supplementary Table for revised National Housing Growth Requirements (2025) *Short to Long term Strategic and Sustainable Development Sites Additional Provision* [to be read in conjunction with Table 2.8 and Table 2.8B]

Amend footnote 18, relating to Table 2.8B, as follows:

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

Sub Ref No: 125

Name: Cairn Homes Properties Ltd.

Issues Raised:

The submission prepared by John Spain Associates (JSA) Planning and Development Consultants on behalf of Cairn Homes Properties Ltd. requests that lands at Black Lane, Leixlip be rezoned from F: Open Space and Amenity to C: New Residential and include the lands in Table 2.8A as Tier 1 lands to support the change of zoning either as a settlement plan or in a subsequent update to the LAP.



The submission raises a number of issues, as follows:

- The submission states that such a zoning would facilitate approximately 440 no. units, creche and circa 3.81 hectares of high quality public open spaces
- Requests that the subject lands be re-assigned their Key Development Area status as per the provisions of the Draft Leixlip Local Area Plan.

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

Chief Executive's Response

The contents of the submissions are acknowledged.

Submissions 069 and 125 request the zoning of land for residential development in Leixlip. In this regard, Proposed Variation No. 3 seeks to amend the Core Strategy of the Kildare County Development Plan 2023-2029 in accordance with the provisions of Section 13 of the 2000 Act. The zoning of land in Leixlip is contained in the Leixlip Local Area Plan 2020-2023 (as amended and extended to 2026) and not within the Kildare County Development Plan 2023-2029. The separate process for varying a Local Area Plan is set out under Sections 19 and 20 of the 2000 Act.

Proposed Variation No. 3 updates the Core Strategy to align with the Housing Growth Requirements – Guidelines for Planning Authorities (2025) and does not propose any new residential zonings to any lands. Such zonings should be informed by evidence-based assessments and audits at both the site and settlement level. This is in accordance with best planning practice for the sustainable development of settlements, the integration of land use and transportation planning and the creation of communities that are supported by appropriate infrastructure.

However, the Housing Growth Requirement Guidelines provide that the housing growth requirements contained therein should be incorporated into existing Development Plans by variation as quickly as possible (Policy and Objective No.3 of the Guidelines refers). Accordingly, Proposed Variation No. 3 details a series of planned and evidence-based mechanisms that Kildare County Council intends to utilise in accommodating the additional housing growth for the remaining three years (2026, 2027 and 2028) of the County Development Plan. As detailed in Section 1.1 above, the proposed mechanisms are deemed to be the most expedient methods to unlock substantial areas of land in higher order settlements that have been previously assessed for residential development potential within Kildare's existing land use plans. This strategy has also been informed by the ongoing transition of planning legislation from the 2000 Act to the 2024 Act and the upcoming preparation of a new County Development Plan, which is scheduled to formally commence in Q4 2026.

Notwithstanding the above, as detailed in the response to the OPR submission (Submission 116), a number of further amendments, including additional mechanisms, are proposed to be made to facilitate delivery and provide a continuity of supply to meet the housing growth requirements. These proposals place a particular emphasis on enabling delivery on existing zoned land in the short term and on achieving equitable, balanced and proportionate growth across the county (see Section 3 of this report).

As part of the preparation of the next County Development Plan, the land use zoning objectives and settlement strategies for all settlements in the county (including Leixlip) will be reviewed. It should be noted however that potential lands will be assessed on their merits having regard to a comprehensive range of evidenced-based supporting documents including inter alia a Settlement Capacity Audit (SCA), a Social Infrastructure Audit, a Strategic Flood Risk Assessment and other environmental reports.

In relation to Leixlip, Proposed Variation No. 3 reaffirms that the lands at Confey, which benefit from existing land use zonings and a dedicated masterplan, is a large and strategically located landbank proximate to an existing rail station with substantial residential development potential. Given the scale of Confey and its development potential over the short to long term, Proposed Variation No. 3 has designated the Masterplan area as a Long Term Strategic and Sustainable Development Site. The Council also seeks to ensure that an uninterrupted planning policy framework is in place to facilitate ongoing development on these lands in the short and longer term through:

1. A variation of the current County Development Plan to integrate the Masterplan, associated zonings and objectives in 2026; and
2. The initiation of the process to designate these lands Urban Development Zones under the relevant provisions of the Planning and Development 2024 Act (as amended).

Development on these lands in the short term is not dependent on the above. The request in Submission 073 to make non-material changes to the text of proposed Amendment No. 12, the revision of the title of Table 2.8B is acceptable. These requests have already been integrated into the Chief Executive's recommendations

to the issues raised in Naas, following a request for similar clarifications in relation to the Northwest Quadrant masterplan lands.

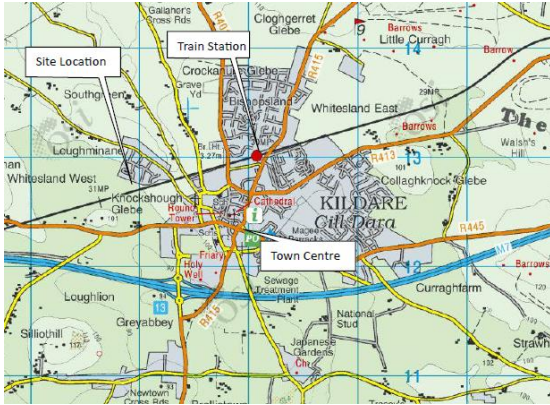

The request in Submission 073 to amend footnote 18 of proposed Table 2.8B is noted. However, considering the clarification to the title of Table 2.8B proposed in response to the issues raised in Naas, it is considered that this amendment is not required.

Chief Executive's Recommendation

Refer to the Chief Executive's recommendation to issues raised in Naas in relation to the title of Table 2.8B.

Issues Raised: Kildare Town

(7 Submissions) Submissions 014, 047, 048, 070, 079, 109 and 114

Sub Ref No:	014
Name:	Keshmore Construction Ltd.
<p>Issues Raised:</p> <p>Submission by David Mulcahy Planning Consultants Ltd on behalf Keshmore Construction Ltd relating to circa 2 ha of lands at Whitelands West and Knockshough Glebe in Kildare Town. The submission seeks to rezone the lands from Strategic Reserve to Phase 1 New Residential or allow this site to be included in the proposed Core Strategy Objective CS O29.</p>	
<div style="display: flex; justify-content: space-around;">   </div> <p>The submission provides the following points for consideration in relation to this request:</p> <ul style="list-style-type: none"> • The subject lands adjoin an existing residential estate and are located 500m from the town centre, 1km from the train station (1.8 km walking or driving) and 1.5km (walking distance) from the bus stop in Market Square. • The lands were previously zoned new residential in the Kildare Town Local Area Plan (LAP) 2012-2018 and are currently zoned Strategic Reserve in the LAP 2023-2029. Submits that the lands are closer to the town centre than some new residential zoned lands in the LAP 2023-2029. • States planning permission for 67 units (Ref. 19/1359) on the land was only refused by An Bord Pleanála due to the Strategic Reserve zoning. No technical issues were raised in relation to the development. The lands are serviceable, with no natural or built heritage constraints, and are suitable for the quick delivery of circa 64 residential dwellings. Flood risk was addressed in the application and was not a refusal issue. • The land was previously assessed as part of a larger landholding in the Settlement Capacity Audit (SCA) for the Kildare Town LAP 2023-2029 and was designated as Strategic Reserve. It is asserted that the subject lands, if assessed separately, would have received a higher score in the SCA. • Previous infrastructure constraints to housing delivery in Kildare Town have either been resolved or are in the process of being addressed. Accordingly, few new residential sites remain in the town due to rapid development. Planning 	

applications for the development of currently remaining residential lands are considered unlikely, as the Kildare Town LAP has been in force for some time.

- The submission refers to national plans and guidelines in relation to housing including the Action Plan on Housing Supply and Targeting Homelessness, the NPF – First Revision, the Sustainable and Compact Settlement Guidelines and the NPF Implementation: Housing Growth Requirements Guidelines. The submission also refers to the Eastern and Midlands RSES.
- The submission notes that other sources (including Stockbrokers, the Central Bank and Department of Finance) contend that annual housing growth beyond the provisions of the NPF – First Revision may be required to address existing shortfalls.
- Whilst Kildare has received the highest increase in housing growth requirements from the NPF Implementation: Housing Growth Requirements Guidelines, this is against the backdrop of an 80% reduction in January 2020 from 32,407 units to 6,023 units, followed by a modest increase to the current 9,144-unit allocation in the Core Strategy of the Development Plan.
- The goal of the recent Housing Growth Requirement Guidelines is to deliver houses on 'ready to go' lands within the lifetime of the County Development Plan. However, the proposed variation only releases limited lands under the proposed delivery mechanisms.
- Except for the release of New Residential - Phase 2 zoned lands for development (including in Kildare Town), the proposed delivery mechanisms in Variation 3 involve the preparation of future settlement plans and urban development zones. Accordingly, this variation will not deliver the required homes within the remaining life of the County Development Plan as per the Guidelines. KCC should consider zoning lands which have the capacity to deliver housing in the short-medium term, such as the subject site.
- Only lands in larger towns have been identified for housing in the variation. Strategic reserve lands such in smaller settlements, which are attractive for growth and serviceable, should be considered where houses can be provided quickly.

Sub Ref No: 047

Name: Estate of PJ Burke (Deceased)

Issues Raised:

Submission by Clarke and Company – Consultant Engineers and Architects on behalf the Estate of PJ Burke (deceased) concerns a 0.8 hectare site zoned Existing Residential/Infill at Rathbride Road, Kildare Town. Submission requests that the zoning of the site be changed to C: Phase 2 New Residential.



The submission makes the following points in support of their submission:

- The submission refers to revised NPF and the implications for housing targets in County Kildare. Outlines the potential of the site to accommodate 28-40 residential units along with the provision of public space and accommodation of a new greenway which is proposed to traverse the site.
- States that the lands are subject to a 25m Irish Rail setback line to facilitate the proposed greenway and new footbridge.
- Notes the location of the site to northeast of the town centre and 230 metres from the train station. Outlines the context of the site, adjacent to Rathbride Road and bordering the rail line to the south. Notes that the site is bordered to the east by the undeveloped An Talamh Bán site and the Thoival Properties owned site to the north-east.
- States that the upgrade of the site to C: Phase 2 New Residential would allow it and the adjacent An Talamh Bán be developed in tandem by means of the same core strategy objective.
- Notes that the Thoival Properties site is currently under construction and that road and services access to the subject site will be from the permitted access road from the Thoival site. Notes that development on the site is dependent on this.
- Refers to related to development of the Thoival site (Plan Ref. AP-313008-22) to where Condition No. 9 of An Bord Pleanála's decision on the site relates to (inter alia) a revised site layout showing vehicular and active travel links with eastern, southern and northern boundaries of the site and Condition No. 35 relates to the upgrades of water and wastewater networks. In this regard, it states the conditions attached to the granting of permission by KCC for an additional phased of development at the Plans (Plan Ref. 2560274) did not include similar conditions. Notes that this was subsequently appealed to the Bord and a decision is pending on this. Submission requests that an objective be included in the Proposed Variation which incorporates above-mentioned conditions and ensures that all related roads and services for the development subject to Plan Ref. 2560274 are completed to a standard which will allow them to be immediately taken in charge.
- inclusion of such conditions. A decision in relation to this appeal is pending.
- Refers to the evolving national and local planning context with regard to housing targets and housing delivery. Notes that 1,987 additional units have been delivered in the county between Q2 2023 and Q2 2025. States that this level of delivery, 30% over the Core Strategy's annual growth target, demonstrates a high level of demand and strong population growth. Contends that there is a growing and urgent shortfall in zoned residential lands.
- Submission incorporates a Settlement Capacity Audit (SCA) for the subject site, in accordance with the criteria as outlined by National Policy Objective (NPO) 72a, 72b and 72c of the NPF (2018). This audit finds the subject site to be 'Tier 1' (Serviced) lands.

Sub Ref No: 048

Name: Estate of PJ Burke (Deceased)

Issues Raised:

Submission by Clarke and Company – Consultant Engineers and Architects on behalf the Estate of PJ Burke (deceased) concerns a 1.6 hectare site at An Talamh Bán, Kildare Town that is subject to proposed new Core Strategy Objective CS O29, as provided for in Proposed Variation No. 3.



The submission makes the following points in support of their submission:

- The submission refers to revised NPF and the implications for housing targets in County Kildare. Outlines the potential of the site to accommodate 56-80 residential units along with the provision of public space and accommodation of a new greenway which is proposed to traverse the site.
- Notes the location of the site to northeast of the town centre and 400 metres from the train station. Outlines the context of the site. Notes that the site is bordered to south by the rail line, to the west by an undeveloped site (in the same ownership) and to the north by the Thoival Properties owned site.
- States that the lands are subject to a 25m Irish Rail setback line to facilitate the proposed greenway.
- Notes the provisions of Proposed Variation No. 3 for the site.
- Notes that the Thoival Properties site is currently under construction and that road and services access to the subject site will be from the permitted access road from the Thoival site. Notes that development on the site is dependent on this.
- Refers to related to development of the Thoival site (Plan Ref. AP-313008-22) to where Condition No. 9 of An Bord Pleanála's decision on the site relates to (inter alia) a revised site layout showing vehicular and active travel links with eastern, southern and northern boundaries of the site and Condition No. 35 relates to the upgrades of water and wastewater networks. In this regard, it states the conditions attached to the granting of permission by KCC for an additional phased of development at the Plans (Plan Ref. 2560274) did not include similar conditions. Notes that this was subsequently appealed to the Bord and a decision is pending on this. Submission requests that an objective be included in the Proposed Variation which incorporates above-mentioned conditions and ensures that all related roads and services for the development subject to Plan Ref. 2560274 are completed to a standard which will allow them to be immediately taken in charge.
- Refers to the evolving national and local planning context with regard to housing targets and housing delivery. Notes that 1,987 additional units have been delivered in the county between Q2 2023 and Q2 2025. States that this

high level of delivery, 30% over the Core Strategy's annual growth target, demonstrates the high level of demand and strong population growth. Contends that there is a growing and urgent shortfall in zoned residential lands.

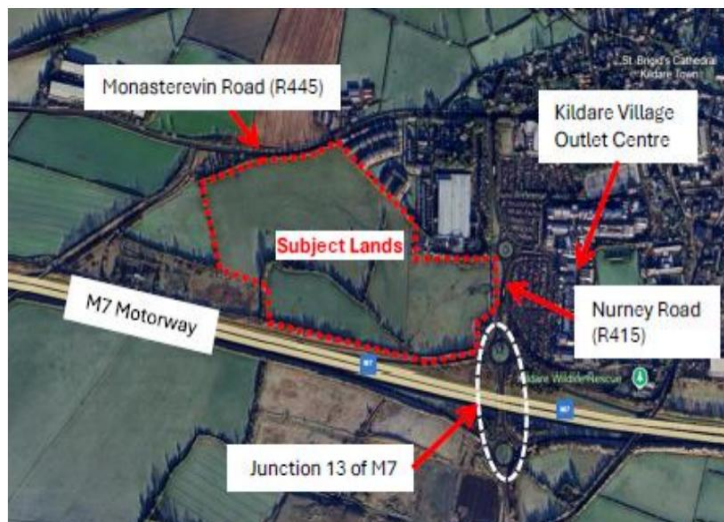
- Submission incorporates a Settlement Capacity Audit (SCA) for the subject site, in accordance with the criteria as outlined by National Policy Objective (NPO) 72a, 72b and 72c of the NPF (2018). This audit finds the subject site to be 'Tier 1' (i.e. Serviced) lands.

Sub Ref No: 070

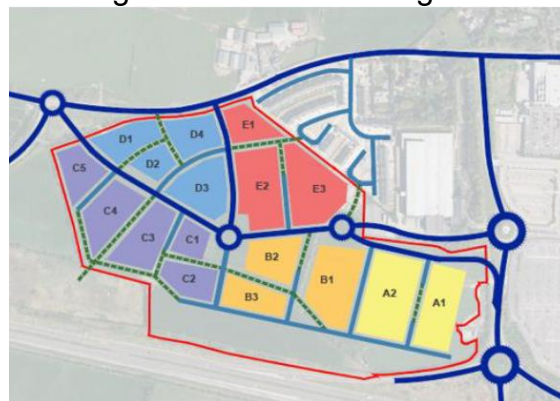
Name: Elstown Limited

Issues Raised:

This submission has been prepared by SCA Planning and Development Consultants on behalf of Elstown Limited concerning lands at Greyabbey, Kildare Town. The submission seeks the re-zoning of a portion (3.33 ha) of this approximately 18 ha landholding from 'Q: Enterprise and Employment' in the Kildare Town LAP 2023 – 2029 to residential.



The portion of land subject of this request relates to areas E (shown as E1, E2 and E3) and D (shown as D1, D2, D3 and D4) and illustrated in the masterplan map below, prepared by DMOD. Submits that Area E takes precedence over area D as it is sequentially the best integrated into the existing urban fabric of Kildare Town.



The submission outlines that the purpose of the Proposed Variation is to allocate added population to towns based on the settlement hierarchy, with preference on towns with good public transport options (e.g. train station), such as Kildare Town.

The submission provides the following for consideration in relation to the rezoning request:

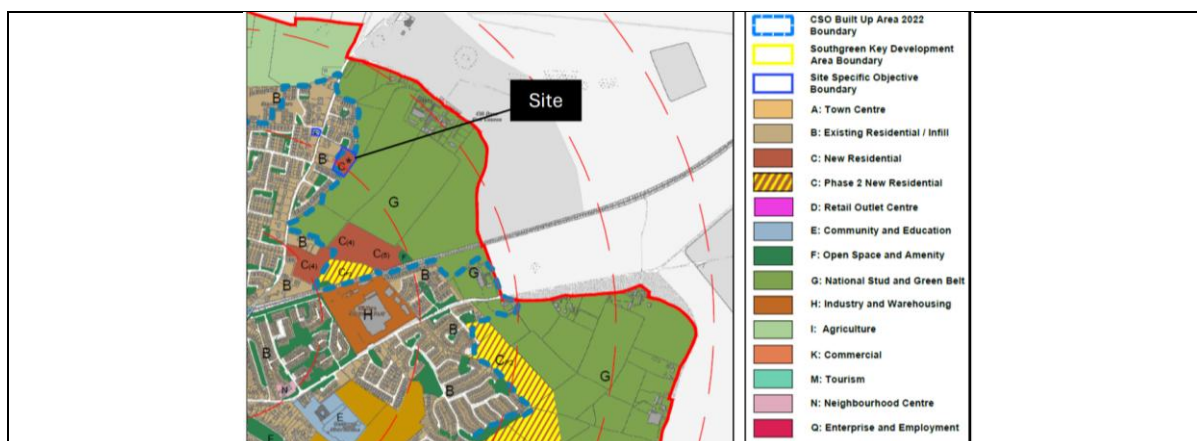
- It is noted that there are no Tier 1 lands identified for release in Kildare Town as part of the Variation. It is asserted that these lands can be categorised as Tier 1, being serviceable and benefitting from planning permission for accessibility infrastructure. Submits an updated Services Report (November) is available in relation to the lands from Waterman Moylan Consulting Engineers on request.
- States capacity has been confirmed by the Uisce Éireann wastewater capacity register (December 2024).
- Confirmation of Feasibility has been received from Uisce Éireann for connections under Kildare County Council Plan Ref. 23/102. This permission provides infrastructural development to support the current zoning including connections to existing networks, internal roads / paths / cycle paths, lighting, services and surface water drainage.
- There are good active travel connections to shopping, services and public transport.
- The lands are not liable to flooding as per the Strategic Flood Risk Assessment of the Kildare Town LAP and surface water drainage has been addressed in the permitted development.
- The lands are owned and available with no snags to title.
- The proposed zoning would not upset the provision of a Conference / Exhibition Centre provided by the existing zoning objective in the Kildare LAP on the southern part of the overall landholding.
- The identified land parcels have a combined capacity for c.133 units at 40 units per hectare.
- The lands should be seen and identified for their 'ready to go' status in the next iteration of the Kildare County Development Plan, facilitated by appropriate zoning, or by way of variation of the current Plan, incorporating the Kildare Town Framework Plan.

Sub Ref No: 079

Name: Karen and Maurice Meaney

Issues Raised:

This submission is prepared by David Mulcahy Planning Consultants Limited on behalf of Karen and Maurice Meaney concerning lands 0.7 ha on the east side of the Rathbride Road (R415), as outlined in the excerpt below. The submission seeks the re-zoning of the land from 'C*: New Residential' in the Kildare Town LAP 2023–2029 to New Residential – with low density restriction removed (only 4 houses allowed on a site of 0.7 ha).



The submission provides the following information in relation to the stated request:

- Submits that there are no natural constraints associated with the site and there is no flood risk associated with the site.
- The subjects lands are at the edge of the town and directly adjoins existing dwellings and their development would represent efficient use of serviceable lands.
- Kildare Town has Self-sustaining growth status in the Kildare County Development Plan 2023 – 2029.
- The submission acknowledges the Government guidelines issued in 2025 increased housing targets in all local authorities and asserts that County Kildare received the highest increase in new housing growth requirements above the current adopted development plan annual housing targets (171% increase) reflecting the significant population growth and need for new housing. The submission further asserts that this reflects the demand for new housing in the county on account of significant population growth.
- The submission asserts that this is against the backdrop of housing targets in County Kildare being reduced in June 2020 by 80% from 32,407 units to 6,023. Following on from this assertion, the submission contends that the housing targets were only then modestly increased in the Kildare County Development Plan 2023 – 2029.
- It is asserted within the submission that only very limited lands will be released for new housing under the proposed delivery mechanisms, involving future settlement plans and urban development zones.
- The submission raises that the currently drafted variation will not deliver houses on the ground within the remaining lifetime of the Plan, which is a goal of the Section 28 Guidelines.
- The submission further raises that the low density restriction associated with the subject site (resulting in only 4 dwellings and a density of only 5.7 units per hectare) needs to be removed in order to develop the site to its maximum potential given its proximity to Kildare Train Station, approximately 800 - 900 metres from the site and that bus stops serving the 883 route are located 200m from the site.
- It is asserted that the lands in question are owned entirely by the Meaney's who also own the adjoining lands to the west and there is no change proposed for the lands under the draft Variation. It is also noted that the removal of the

density restriction of the site would improve the ability to deliver a larger housing development on adjoining lands owned by the same landowner.

- The submission provides an overview of the planning context of the site and outlines that the site is zoned 'New Residential' (C*) under the Kildare Town LAP 2023 – 2029 and it is asserted that there is no reference to this Asterix in the zoning map. The submission notes Residential Objective HCO 2.6 and that this objective clarifies the Asterix.
- Refers to Table 3-7 Residential Development Capacity Audit extracted from the Kildare Town LAP with the subject site outlined with the stated yield and site area.
- The submission states that the zoning to the north, west and south is Existing Residential/Infill and provides an outline of the zoning objective in the Plan. Also, it is stated the zoning to the east is Greenbelt. Accompanying this narrative is a figure of an extract from Kildare Town LAP 2023-29 Zoning Map showing the site zoned C*.
- The submission states that the rationale behind this submission is that the subject site is in very close proximity to high quality public transport and that the provision of low density restriction does not accord with Government policy in order to maximise the efficiency of lands.
- It is stated in the submission that a Pre-Connection Enquiry was submitted to Uisce Éireann for a draft scheme of 40 dwellings on the subject site and adjoining lands to the west. Uisce Éireann issued a Confirmation of Feasibility in August 2022 confirming that the site was serviceable – ref. CDS22004741. The submission further states that serviceable land should be maximised in terms of density and that no infrastructure upgrade is required.
- The submission further provides an outline of a stated established precedent at Whitesland East on the same side of the Rathbride Road but closer to the train station. The submission refers to Kildare Town LAP 2012-2018 and states that the eastern portion of lands at Whitesland East were zoned C1* with an objective to provide for low density residential development. The submission further asserts that the lands at Whitesland East have been the subject of several planning applications approved by both Kildare County Council and An Coimisiún Pleanála, all with significantly higher density than was referenced in the Kildare LAP.
- The concluding remarks of the submission asserts that the removal of the density restriction would represent, inter alia, efficient use of land, consolidation of development, sustainable development availing of proximity to transport options and accords with adopted climate strategies, and the optimisation of an existing fully serviceable site.
- The submission states that the current zoning objective was established before the recent Section 28 guidelines—namely the Compact Settlement Guidelines (2024) and Housing Target Guidelines (2025).
- The submission asserts that the proposed removal of the density restriction associated with this New Residential zoning objective would be consistent with the proper planning and sustainable development of the area given the proximity of the site to a high-quality public transport node.

Attached to the submission there are maps and a Confirmation of Feasibility (in response to housing layout for the subject site and adjoining site owned by landowner).

- A map illustrating the location of the subject lands is outlined.
- A map illustrating the context of the subject lands is noted.
- A satellite image of the subject lands is acknowledged.
- A map illustrating the location of the site relative to bus stops and train station and a map showing the distance (12 minutes) of the site to the train station along Rathbride Road is noted.
- In addition to the maps outlined above, the confirmation of feasibility (dated 26th August 2022) for a draft scheme of 40 dwellings, as outlined above, is attached and noted. The confirmation of feasibility states that, inter alia, a water connection / wastewater connection is feasible without infrastructure upgrade by Uisce Éireann.

Sub Ref No: 109

Name: Pousterle Limited

Issues Raised:

This submission is prepared by Brock McClure Planning and Development Consultants on behalf of Pousterle Limited and relates to two land zoning requests.

The first landholding relates to at Southgreen Road and Old Road, Kildare Town is zoned 'C: Phase 2 New Residential' under the Kildare Town Local Area Plan (LAP) 2023-2029.



- The submission outlines the location and planning context of the subject site.
- Notes the provisions of Proposed Variation No. 3 and supports the release of the Phase 2 lands at Southgreen under Objective CS O29.
- Further welcomes the provisions in the variation relating to the alignment with the Sustainable Residential Development and Compact Settlement Guidelines (2024) and the NPF Implementation: Housing Growth Requirements Guidelines (2025).

The submission also refers to additional lands comprising of approximately 83 hectares located to the northwest of Kildare town at Green Road, South Green Road, and Old Road. Requests the lands which are zoned 'SR: Strategic Reserve', 'I: Agriculture' and 'F: Open Space and Amenity' under the Kildare Town LAP be zoned as residential.



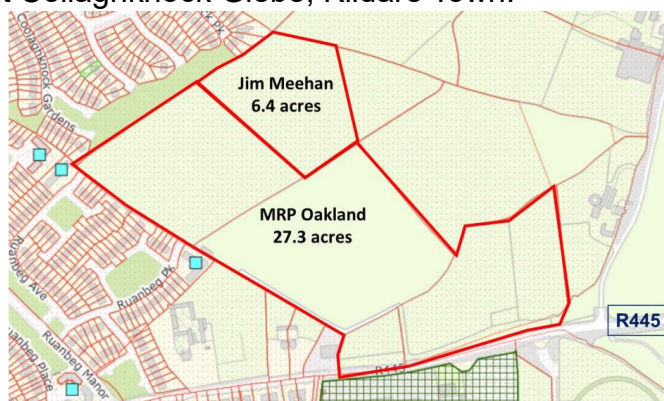
- Contends that there are a number of fundamental points that should be considered vis-à-vis the subject site, in any forthcoming review of additional lands that may be required to address housing targets set by national policy, either over the lifetime of the CDP, the LAP or any future review as may be required.
- The submission asserts that the overall lands have access to public services including, inter alia, water supply, public drainage network, and there has been significant investment on critical infrastructure unlocking the northwestern development axis of Kildare including the Southern Internal Link Road.
- Notes the area to the north of the railway line as being at the heart of the long term vision for Kildare Town, as outlined in the current and previous LAPs.
- Contends that that the future enlargement of the South Green 'Key Development Area' to the subject site represents a natural and sequential approach to development of Kildare Town and that such development can support the principle of a 10 minute settlement.
- Notes the potential of the land to deliver approximately 2,000 units and asserts that Pousterle Ltd. have a proven track record in delivering housing in the town.
- Submits that the land is serviced and well provisioned in relating to infrastructure capacity for roads, active travel, water and wastewater services. States there is no risk of flood risk on the site.

Sub Ref No: 114

Name: MRP Oakland and Jim Meehan

Issues Raised:

This submission is prepared by Corcom on behalf of MRP Oakland Limited in relation to c.11 ha of land at Ruanbeg, Kildare Town, and Jim Meehan in relation to c.2.6 ha of land at Collaghknock Glebe, Kildare Town.



- The submission welcomes the provisions in Proposed Variation No. 3 to release lands zoned Phase 2 in Local Area Plans, in particular the zoning of lands at Ruanbeg and Collaghknock Glebe as Phase 1 New Residential.
- States that this will deliver new residential homes with scale and expediency, benefitting from proactive developers.
- The submission provides an overview of the planning history of the Ruanbeg lands, noting a 2025 refusal (Kildare County Council Planning Ref. 23/510) for 295 units and a creche. It is stated that this permission was refused by An Bord Pleanála for 2 reasons:
 1. Development was inappropriate given the Phase 2 residential zoning, with the submission noting that the lands were rezoned from Phase 1: New Residential to Phase 2: New Residential in the Kildare Town LAP 2023-2029 during the planning application process.
 2. An absence of definitive proposals for the provision of cycling connections and calming measures for the town centre.Regarding the refusal, the submission states that the Planning Inspector's Report deemed the lands as serviceable in terms of foul drainage and water supply, and that the SuDS strategy employed was appropriate.
- In addition, it is further outlined that substantial road and vulnerable road user improvement works have been completed on the Dublin Road (R445) from the lands to the town, by the Municipal District Office, since the permission was refused.
- The submission states that MRP Oakland will expeditiously engage with the Planning Department, following the adoption of Variation No. 3, to bring forward a new planning application on both landholdings. This application will include:
 - A large creche facility and age friendly / independent living housing units to the front of the lands, and
 - Housing units and public open spaces on the remaining lands.

The submission is accompanied by an excel spreadsheet which is stated to contain a summary of the feedback received from owners / representatives / selling agents of each Tier 1 designated / Phase 1 Residential or Mixed-Use zoned site in the Kildare Town LAP 2023 - 2029. The following is noted from the excel spreadsheet with the submission:

- **Magee Barracks Phase 1:** As of November 2025, 290 of 375 granted units are completed / commenced and 271 units are sold /sale agreed. The estimated date for the completion of sale of all units is in Q4 2027.
- **Magee Barracks Phase 2:** A planning application for up to 80 units is to be submitted in December 2025 / January 2026, with an estimated date for completion of sale of all units in Q4 2027 / Q1 2028.
- **Lands West of Old Road:** As of November 2025, all 168 granted units have been completed, with 164 units sold / sale agreed. The estimated date for the completion of sale of all units is in Q2 2026.
- **Whitelands East:** As of November 2025, the 87 granted units on the part of the site (3.59 ha) have been completed, with 40 units sold / sale agreed. The estimated date for the completion of sale of all units is in Q2 2026. Planning permission for 66 homes on part of the Whitelands East site (1.89 ha) was

granted in September 2025 but is subject to a third-party appeal. The estimated date for the completion of sale of these units, subject to planning, is in Q4 2027.

- **Oak Church:** As of November 2025, 250 of 297 granted units are completed / commenced and 245 units are sold /sale agreed. The estimated date for the completion of sale of all units is in Q3 2026.

Based on the feedback received, it is stated that the owners of these sites intend to complete development on each of these sites, subject to planning, by the end of 2027. Accordingly, it is imperative that Proposed Variation No. 3 is adopted to ensure the delivery of much needed housing in County Kildare, and in Kildare Town.

Chief Executive's Response

The comments of the submissions are noted.

Submissions 014, 047, 070, 079, 109 and 114 relate to the zoning of lands for residential development in Kildare Town. Proposed Variation No. 3 is a targeted variation to amend the Core Strategy of the Kildare County Development Plan 2023-2029 in accordance with the provisions of the 2000 Act. The zoning of land in Kildare Town is contained in the Kildare Town Local Area Plan 2023-2029 (Kildare Town LAP) and not within the Kildare County Development Plan 2023-2029. The statutory process for varying a Local Area Plan is a separate process set out under Sections 19 and 20 of the 2000 Act. Therefore, the zoning of land in Kildare Town cannot be considered in this Variation.

Proposed Variation No. 3 updates the Core Strategy of the County Development Plan to in a targeted manner to align with the Housing Growth Requirement Guidelines and does not provide residential zonings to any lands, noting that such zonings should be informed by evidence-based assessments and audits at both the site and settlement level. This is in accordance with best planning practice for the sustainable development of settlements, the integration of land use and transportation planning and the creation of communities that are supported by appropriate infrastructure.

However, the Housing Growth Requirement Guidelines provides that the housing growth requirements contained therein should be incorporated into existing Development Plans by variation as quickly as possible (Policy and Objective No. 3 of the Guidelines refers). Accordingly, Proposed Variation No. 3 details a series of planned and evidence-based mechanisms that Kildare County Council intends to utilise in accommodating the additional housing growth for the remaining three years (2026, 2027 and 2028) of the County Development Plan.

For Kildare Town, proposed Objective CS O29 releases lands currently zoned 'C: Phase 2 New Residential' in the Kildare Town Local Area Plan 2023 - 2029 to enable planning applications for residential development to be considered on these lands, to accommodate the increased housing requirements assigned to the county on foot of the Housing Growth Requirement Guidelines. Variation No. 3 does not contain any other provisions which relate to lands in Kildare Town.

The Kildare Town LAP, with its associated land use zonings, will remain in effect until the LAP is replaced or revoked. In this regard, it is noted that the preparation of a new County Development Plan will formally commence in August 2026. As part of the preparation of the next County Development Plan, the land use zoning objectives and settlement strategies for all settlements in the county (including Kildare Town) will be reviewed.

The contention in Submission 014 that other sources state that annual housing growth beyond the provisions of the NPF (2025) may be required to address existing shortfalls is noted. The provisions of the Housing Growth Requirement Guidelines (July 2025) which set out additional housing requirements are based on updated research from the ERSI which modelled population growth, structural housing demand and assumptions relating to unmet demand. These guidelines oblige Local Authorities to ensure that the housing requirements contained therein are incorporated into their respective development plans '*as quickly as possible*' (Policy and Objective 3 of the Guidelines refers). Accordingly, the overarching purpose of the variation is (inter alia) to align with stated Government policy in this regard.

The assertion in Submission 014 that the mechanisms in the Proposed Variation, other than the release of Phase 2 lands, will not deliver the required homes within the remaining life of the County Development Plan as per the Housing Growth Requirement Guidelines is noted. However, Kildare has a track record over the past number of years/decades in having exceeded its housing target requirements under the current Core Strategy of the County Development Plan. It is considered that the Proposed Variation represents an ambitious approach to accommodating the Government's revised housing growth requirements in a targeted, plan-led manner so that additional housing may be delivered in the short, medium and long term in accordance with the provisions of the Housing Growth Requirements Guidelines (2025).

Notwithstanding the above, as detailed in the response to the OPR submission (Submission 116), a number of further amendments, including additional mechanisms, are proposed to be made to facilitate delivery and provide a continuity of supply to meet the housing growth requirements. These proposals place a particular emphasis on enabling delivery on existing zoned land in the short term and on achieving equitable, balanced and proportionate growth across the county (see Section 3 of this report).

In relation to the request in Submission 047 to rezone the subject site on Rathbride to Phase 2 New Residential is not accepted for the reasons previously stated. However, it should be noted that the identified lands are zoned 'B: Existing Residential/Infill' under the Kildare Town LAP, with residential development permitted in principle subject to assessment. Accordingly, the rezoning sought would not result in any changed policy impetus to develop the subject lands.

The request in both Submission 047 and Submission 048 to include an objective in the proposed variation to incorporate specific provisions in relation to conditions of the permission granted by An Bord Pleanála (Plan Ref. AP-313008-22) is not accepted. Such a request relates to a planning application and development management issue which is still linked to a pending appeal to An Coimisiún

Pleanála, and which in does not relate to the overarching provisions of Proposed Variation No. 3.


The contention in both Submission 047 and 048 that there is a growing and urgent shortfall in zoned residential lands is not accepted. It should be noted that on foot of a recommendation included in the NPF: Housing Growth Requirements Guidelines (July 2025), the Planning Authority undertook a full audit to assess the capacity of undeveloped zoned land in the county the results of which are detailed in a Chief Executive's, dated 22 September 2025. The Audit found that, as of August 2025, approximately 432 hectares of land remain undeveloped with the potential to deliver approximately 13,795 houses. It is considered that the quantum and capacity of the undeveloped zoned lands, in conjunction with the delivery mechanisms set out in Proposed Variation No. 3 and as proposed to be amended in response to the OPR, is amply sufficient to cater for the additional housing targets required in County Kildare over the remaining life of the County Development Plan.

Chief Executive's Recommendation

No change recommended.

Issues Raised: Athy

(11 Submissions) Submissions 003, 015, 016, 029, 083, 086, 087, 141, 142, 143 and 144.

Sub Ref No:	003
Name:	Orchard County Residential Estates Ltd.
<p>Issues Raised: Submission by Genesis Planning Consultants on behalf of Orchard County Residential Estates Ltd. relates to a request to rezone lands at Coneyborrow, Athy comprising 4.37 ha from F: Open Space and Amenity to mostly C: New Residential, with a portion remaining F: Open Space and Amenity alongside the River Barrow.</p>	
	
<p>The submission, which includes two Appendices, outlines the reasons for the request, as follows:</p> <ul style="list-style-type: none"> • Notes the current planning policy context, including the revised NPF, and the increase in housing targets to at least 55,000 dwellings per annum to 2034. • Outlines a vision for the development of a high quality 72-unit residential scheme on the lands, with a variety of unit types and significant levels of open space along the riverside, of which 14 units are social/affordable. • Submission notes the accessible location of the lands adjacent to the Carlow Road, 420 metres south of the town centre and 1 km from the train station. • Refers to recent housing delivery trends including pent-up housing demand and demographic pressures. Also refers to the provisions of the NPF Implementation: Housing Growth Requirements Guidelines (2025) and contends that the county is rapidly running out of zoned lands and that consequently, an additional 670 hectares of residential lands above current zoning is required. • Notes the previous new residential and open space zoning of the site under the Athy Town Development Plan 2012-2018 and refers to the context of the site being rezoned as open space in the Athy LAP 2021-2027. • Notes the provisions of the Athy Flood Relief Scheme which undertook a comprehensive study of flood risk in the area. States that this found there is no flood risk affecting the lands and that consequently the lands can be reinstated as per the 2012 Development Plan. 	

- Refers to the requirements for Development Plans as set out under Section 10(1a) and states that the variation must set out compliance with the NPF and RSES, along with the 2025 NPF Implementation Guidelines.
- It further contends that the variation should avoid a core strategy or housing needs demand assessment based solely on population growth forecasts.
- Notes the planning policy context regarding residential densities and states that the lands are sequentially well suited for development.

Appendix 1 – Settlement Capacity Audit (Infrastructure Assessment)

Noting the requirement to undertake a Settlement Capacity Audit (SCA) to determine the serviceability of land, the submission has undertaken an assessment of the subject site, in accordance with the criteria as outlined by NPO 72a, 72b and 72c of the NPF (2018). This audit finds the subject site to be 'Tier 1' (Served) lands.

Appendix 2 – Site-Specific Flood Risk Assessment

- The submission includes a detailed Site-Specific Flood Risk Assessment (SSFRA) of the subject site which assessed both the potential flood risk to the site and examined the impact that the proposed residential scheme may or may not have on the hydrological regime of the area.
- SSFRA includes a Screening Assessment, Scoping Assessment and 'Assessed Flood Risk'.
- The SSFRA states that in the context of the Flood Risk Management Guidelines (DoEHLG, 2009) the proposed development site does not fall within Flood Zone 'A' or Flood Zone 'B'. This is supported by an image of the flood zones superimposed on the area, lying outside the boundary of the subject site.
- The SSFRA concludes by noting, inter alia, that the proposed development site falls within Flood Zone 'C' and that the development as proposed is not expended to result in an adverse impact to the hydrological regime of the area or to increase flood risk elsewhere.
- The appendix contains a number of drawings and maps (including CFRAMs Maps) related to the SSFRA.

Sub Ref No: 015

Name: John McDonnell

Issues Raised:

Submission by David Mulcahy on behalf of John McDonnell concerning land located at Prusselstown, Athy (3.86 hectares) that is currently not zoned and for which a 'New Residential' zoning objective is sought.



The submission includes an attachment document which outlines the rationale for this request, as follows:

- Notes that the site lies outside but adjoins the Athy Local Area Plan (LAP) boundary and is partially covered by the CSO settlement boundary. Also notes that part of the subject site was zoned new residential under previous plans.
- Refers to the provisions of the Proposed Variation in relation to the rezoning of the Strategic Reserve lands at Chanterlands, Athy but contends that this will only be addressed in new Settlement Plans with no identified date for delivery.
- Outlines the planning gain that would be delivered alongside residential development on the site, including public open space with playground, childcare facility and outdoor multi use games area. States that if zoned, new housing can be delivered on the site within the life of the CDP.
- Notes the site's greenfield character, adjoining uses, distance for water and wastewater services along with its location adjoining the L4007 local road, approximately 1.5 km from the town centre. States that the site has footpath access to the town.
- Refers to the 10-minute settlement concept and states that the site is within a 10-minute cycle of the train station and town centre.
- States that there is no known planning history, archaeological heritage or natural heritage designations affecting the site.
- Refers to the evolving national and regional planning policy context. Notes the implications for County Kildare in terms of delivering more housing at increased densities. States that at a density of 35 units per ha the subject site could accommodate 120 units.
- Notes the population growth of the town and the associated increased demand for housing. Refers to Athy's designation as a Self-Sustaining Growth Town.
- Refers to various provisions of the NPF, RSES, Kildare County Development Plan, the Athy Town Development Plan 2012-2018 and the Athy Local Area Plan 2021-2027. States that housing estimates in the Revised NPF do not take into consideration the existing pent-up demand for housing.
- Refers to the provisions of the NPF Housing Growth Requirements Guidelines. Notes that it places emphasis on bringing forward 'ready to go' lands. Submits that the delivery mechanisms outlined in the Proposed Variation will not deliver housing on the ground within the life of the CDP to meet the increased housing targets outlined in the Guidelines.

Sub Ref No: 016

Name: David Owens

Issues Raised:

Submission by David Mulcahy Planning Consultants Ltd. on behalf of David Owens concerns land that is not zoned at present, extending to approximately 37 hectares at Shanrath East, Athy for which it is requested to be included in the strategic site along with Chanterlands and to be zoned New Residential.



The submission includes an attachment document which outlines the rationale for this request, as follows:

- States that the site is very close to the strategic site of Chanterlands and notes its greenfield agricultural character along with its location on the R418 Regional Road to the south-east of Athy.
- States there is no known planning history, flood risk or natural heritage designations affecting the site. Notes there is archaeological heritage present, but this is confined to the northern portion of the site.
- Refers to the evolving national and regional planning policy context. Notes the implications for County Kildare in terms of delivering more housing at increased densities.
- Notes the population growth of both County Kildare and Athy town and the associated increased demand for housing. Refers to Athy's designation as a Self-Sustaining Growth Town.
- Refers to various provisions of the Revised NPF, the RSES, the Kildare County Development Plan, the Athy Local Area Plan 2021-2027, recently published Section 28 Guidelines along with the housing action plan (November 2025). States that housing estimates in the Revised NPF do not take into consideration the existing pent-up demand for housing.
- Refers to the provisions of the Proposed Variation in relation to the rezoning of the Strategic Reserve lands at Chanterlands.
- Submits that the land is closer to the train station and the town centre than other zoned residential lands in Athy and that the opportunity exists to connect the site to the ring road via the zoning of lands to the north.
- Outlines the planning gain that would be delivered with the rezoning of the site, including the provision of much needed housing, Part V housing and the potential for recreational and sporting facilities.

Sub Ref No: 029

Name: Gareth and Austin McHale

Issues Raised:

Submission by David Mulcahy Planning Consultants Ltd. on behalf of Gareth and Austin McHale concerns unzoned lands extending to approximately 5.51 hectares at Prusselstown Green, Athy for which it is requested to be zoned New Residential.



The submission outlines the rationale for this request, as follows:

- Notes that the site is unzoned but adjoins lands zoned B: Existing Residential/ Infill in the Athy Local Area Plan (LAP).
- Further notes that the landholding forms part of the incomplete housing estate of Prusselstown Green which has issues related to foul drainage due to low flow from 13 finished homes. States that client who was not the original developer of the site has maintained all the access roads, power and services for several years with the intention of completing the development and this cannot continue indefinitely without zoning.
- Refers to the provisions of the Proposed Variation in relation to the rezoning of the Strategic Reserve lands at Chanterlands, Athy but contends that this will only be addressed in new Settlement Plans with no identified date for delivery.
- In addition to providing approximately 190 much needed new dwellings including Part V units, the submission states that the planning gain would be in the form of allowing the existing housing estate to be completed addressing the current foul arrangements, as well the potential delivery of recreational and sporting facilities, along with a childcare facility.
- Notes the site's context and location approximately 1.5 km from the town centre adjoining the L4007 local road with three established access points to the adjacent estate and that the site has footpath access to the town.
- Refers to the 10-minute settlement concept and states that the site is within a 10-minute cycle of the train station and town centre. States that the development of the site would represent sequential development and provide an alternative to one-off rural housing.
- Refers to the site history including its original permission, granted in 2003 for over 100 units, reduced to 84 by a permission granted in 2005. Notes the refusal of permission for an application for 69 residential units (Ref. No. 18/718) in 2019.
- States that there is no known archaeologic heritage or natural heritage designations affecting the site.
- Refers to various provisions of the Revised NPF, the RSES, the Kildare County Development Plan, the Athy Local Area Plan 2021-2027, recently published Section 28 Guidelines and the housing action plan. States that housing estimates in the Revised NPF do not take into consideration the existing pent-up demand for housing.

- Refers to the evolving national and regional planning policy context. Notes the implications for County Kildare in terms of delivering more housing at increased densities and the provisions of Proposed Variation No. 3 in this regard. Submits that the delivery mechanisms outlined in the Proposed Variation will not deliver housing on the ground within the life of the CDP to meet the increased housing targets outlined in the Guidelines.
- Notes the population growth of the town and the associated increased and pent-up demand for housing. Refers to Athy's designation as a Self-Sustaining Growth Town.
- Refers to the provisions of the NPF Housing Growth Requirements Guidelines. Notes that it places emphasis on bringing forward 'ready to go' lands. States that the landowners have a housing scheme ready to go if the subject lands are zoned.

Submission includes as an attachment, a letter from Kavanagh Burke Consulting Engineers regarding Drainage and Watermain Services at Prusselstown Green.

- States that discharge from the existing 13 houses is not sufficient for maintenance/odour free operation of the rising main and pumping station. Further states that additional dwellings would improve the situation by allowing more sewage to be pumped through the main.
- Notes the potential for future development to connect into the existing stormwater and water supply infrastructure on the site. States that any new development would comply with Kildare SuDS policies.

Sub Ref No: 083

Name: David Walsh Homes Limited

Issues Raised:

The submission by Armstrong Planning Ltd on behalf of David Walsh Homes Limited relates to unzoned lands extending to approximately 16.74 ha at Ardreich, Athy for which it requested to be zoned as 'Strategic Reserve' lands in Table 2.8.A Maps (Map Ref: V3 2.3) of Variation No. 3.



The submission outlines the rationale for this request, as follows:

- Notes the site's greenfield context and location at the southern edge of Athy, adjacent to serviced residential areas at Ardreich Road and near the Coneyboro and Bridgefield Manor estates. States that the site can be accessed by the R417 Regional Road to the west and the L8075 Ardreich Road to the north which leads to the R418 road.

- Outlines the planning history of the site stating that an area of the lands was approved for 56 dwellings under Plan Ref: 0700057. Notes that a portion of the site was zoned New Residential in the Athy 2012-2018 Plan, indicating that it was previously recognised as suitable for housing.
- States that the area is not located in a flood zone and there is no recorded flood risk. Further submits that there are no ecological constraints on the site.

Supporting Documentation

- Appendix A: Letter of support from landowner Gerald Farrell
- Appendix B: Site Location Map

Sub Ref No: 086

Name: Patrick J Lawler

Issues Raised:

Submission by Patrick J Lawler relates to unzoned lands extending to approximately 0.42 hectares at Woodstock North, Athy for which it is requested to be zoned New Residential.



The submission raises a number of issues, as follows:

- States that the rationale behind the request to quickly deliver houses on the ground during the lifetime of the current County Development Plan in response to increased housing targets as per the revised NPF.
- Notes that the site was zoned for residential for 16 years but was dezoned in the Athy Local Area Plan 2020-2027.
- Notes the site's proximity to the town centre (1.2 km), the train station (2.1 km), bus stop (1 km) and Blueway (500m). Is open to discussing the potential of extending the footpath by 500 metres along the R428 Regional Road to service the subject site on foot of any rezoning.
- Refers to the planning history of the site noting previous permissions granted (2009, extended to 2019) for 3 dwellings and an application (Plan Ref: 21/67) in which was refused for reasons relating to access and road safety concerns, citing Policy RR2 (states that this is now Policy HOP29).
- Submission contends that Policy HOP29 applies to one-off dwellings, not multi-unit developments. Further submits that sightlines of 150 metres are available in both directions. Also suggests that the reduction in speed limit from 80kph to 50kph could be extended 300 metres to the west to the subject site.
- Notes concerns raised related to water supply. State that this is not a prohibitive issue and the provision of three independent wells on the site could be applied as a planning condition.

- Notes the changing national policy context regarding the increase in housing delivery targets and the implications for County Kildare. Refers to the NPF Implementation: Housing Growth Requirements Guidelines and states that in keeping with the provisions of Section 3.1, it is considered that subject lands constitute '*lands identified for residential development*' which '*will come forward for development within the remaining period of the plan*'.
- Submission notes various recent developments and investments made in Athy including American Fruit and Flavours Ireland located 500 metres from subject site. Notes that as a condition of planning was the requirement of an upgrade to the pedestrian infrastructure. States that this shows such concerns can be addressed.
- Submits that in the face of increased house building Kildare is rapidly running out of zoned lands. Also states that development on the subject lands is consistent with the provisions of both the NPF and the Housing Requirements Guidelines

Appendix 1

This appendix contains a site location map outlining the subject site.

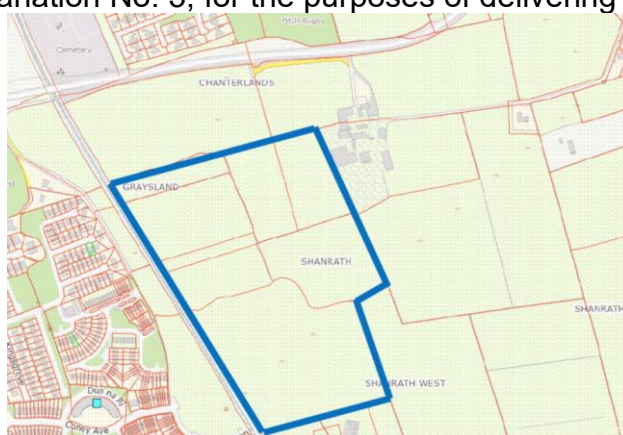
Appendix 2

This appendix contains a cover letter and an accompanying appeal report of Plan Ref. 21/67 prepared by Farry Town Planning Ltd (dated 6 April 2021). The contents of this report address key points of contention, including access and road safety, policy interpretation, pedestrian connectivity and water supply. The report is referred to a number of times in the main body of the submission.

Sub Ref No:	087
Name:	Karl Colton

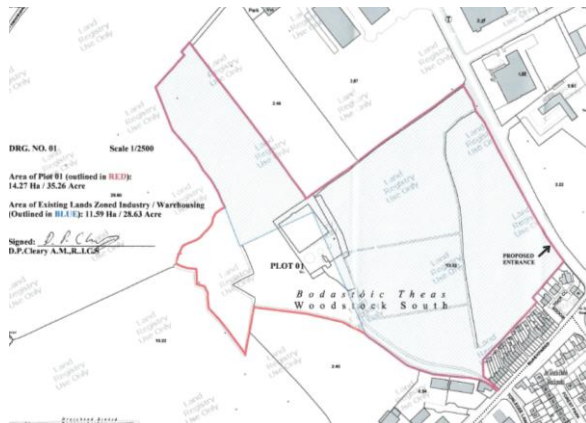
Issues Raised:

The submission by Dooley Cummins Architects + Engineers Ltd. on behalf of Karl Colton relates to unzoned lands extending to approximately 18 ha at Chanterlands, Athy for which it requested to be zoned as 'Strategic Reserve' lands in Map V3 2.3 of Variation No. 3, for the purposes of delivering housing.



The submission outlines the rationale for this request, as follows:

- Notes that the bulk of the lands at Chanterlands which are identified as Strategic Reserve in the Proposed Variation are under their client's ownership.
- States that the client is fully supportive of Core Strategic Objective CS O30; however, they request that it be amended to include the additional lands to the

south (as identified in blue on the map above) in order to be used for housing development.	
Sub Ref No:	141
Name:	Joe Kelly
<p>The submission was prepared by D.P Cleary Chartered Surveying Consultant, on behalf of Joe Kelly, regarding lands of Woodstock South, Athy which extends to 14.27 hectares of which 11.59 hectares is zoned Industry / Warehousing and 2.68 hectares is zoned Agriculture. The submission requests the land be zoned for residential use.</p> 	
<p>The submission outlines the rationale for this request, as follows:</p> <ul style="list-style-type: none"> • Notes that variation key updates include increasing county housing targets from 9,144 to 16,970 by 2028, this includes 50% additional provision. • Notes sites identified in the Proposed Variation in Naas, Kildare, Athy and Celbridge which can accommodate the planned increase in housing which includes 480 dwellings in Athy but asks does this exclude the uplift figure? • Notes the provisions of National Planning Framework First Revision along with research by ESRI and The Housing Commission and their implications in terms of additional housing requirements. • The submission refers to changes for housing requirements outlined in the ministerial guidelines and notes the implications for County Kildare • States the subject site is located on the southern side of Athy Town Centre, accessed off Upper William Street with proposed entrance 100 metres north of R428, less than 600m from the town centre. • Contends that the Upper William Street Road has a carriageway in excess of 8 metres with footpath with ESB kw station and facilities the Athy Business campus. • The site adjoins housing at Woodstock CI and opposite Forest Park. • The R428 links the N78 Athy Southern Distributor Road. • Athy is a key town in the settlement hierarchy. • KCC previous housing strategy planned for additional housing in Athy but did not cater for any additional migration of population towards the town. 	
Sub Ref No:	142
Name:	Michael P. Kelly

The submission was prepared by D.P Cleary Chartered Surveying Consultant, on behalf of Michael P. Kelly regarding lands in Gallowshill, Athy which extends to a total of 26.31 hectares. Submission states the land is zoned Agriculture and requests a residential zoning.



The submission outlines the rationale for this request, as follows:

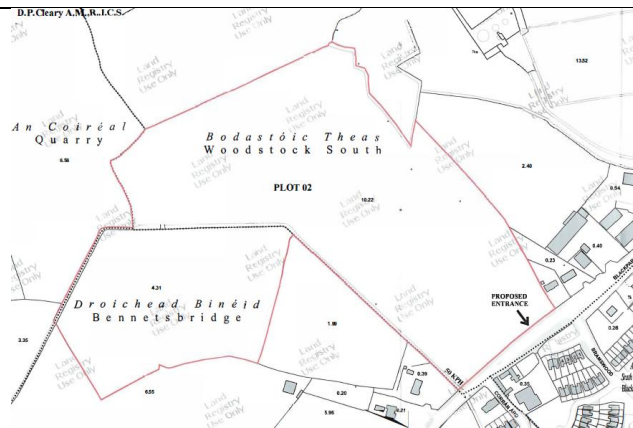
- Notes that variation key updates include increasing county housing targets from 9,144 to 16,970 by 2028, this includes 50% additional provision.
- Notes sites identified in proposed variation in Naas, Kildare, Athy and Celbridge which can accommodate the planned increase in housing which includes 480 dwelling in Athy but excludes proposed uplift figures.
- Notes the provisions of National Planning Framework First Revision along with research by ESRI and The Housing Commission and their implications in terms of additional housing requirements.
- The submission refers to the changes for housing requirements outlined in the ministerial guidelines and notes the implications for County Kildare.
- States the subject site is located on the northern side of Athy Town Centre, accessed off Kilcullen Road and the R418 links the N78 Athy Distributor Road.
- Contends the proposed site has access to wastewater manhole opposite entrance on R418 Regional Road.
- Athy is a key town in the settlement hierarchy.
- KCC previous housing strategy planned for additional housing in Athy but did not cater for any additional migration of population towards the town.

Sub Ref No: 143

Name: James Kelly

The submission prepared by D.P Cleary Chartered Surveying Consultant, on behalf of James Kelly regarding lands in the townland of Woodstock South and Bennetsbridge, Athy which extends to 14.68 hectares. Submission states the land is zoned Agriculture. The submission requests the land for residential zoning.

Chief Executive's Report on Proposed Variation No. 3
of the Kildare County Development Plan 2023 – 2029 (as varied)



The submission outlines the rationale for this request, as follows:

- Notes the variation key updates include increasing county housing targets from 9,144 to 16,970 by 2028, this includes 50% additional provision (50% of the Core Strategy plus an uplift figure)
- Notes sites identified in proposed variation in Naas, Kildare, Athy and Celbridge which can accommodate the planned increase in housing which includes 480 dwelling in Athy, excluding proposed uplift figures.
- Notes the provisions of National Planning Framework First Revision along with research by ESRI and The Housing Commission and their implications in terms of additional housing requirements.
- States the subject site is located on the northern side of Athy Town with possible access off the R428 Regional Road opposite Branswood and Corran Aird Housing Developments.
- Asserts the proposed access is facilitated by a 3-lane carriageway, existing footpaths and grass verges.
- The submission refers to the changes for housing requirements outlined in the ministerial guidelines and notes the implications for County Kildare.
- KCC previous housing strategy planned for additional housing in Athy but did not cater for any additional migration of population towards the town.

Sub Ref No: 144

Name: John Lynch

Issues Raised:

The submission from John Lynch relates to lands at The Abbey Field, Athy for which it is proposed to be developed for the purposes of regenerating the town centre.



The submission comprises a number of components, as follows:

- A cover page detailing the contents of the submission. States that by its very size and its serviced location, the site is ready to transform, repopulate and reinvigorate Athy Town Centre.
- A copy of the published notice for Proposed Variation No. 3
- A copy of correspondence between the submitter and Kildare County Council between 2003 and 2021. Earlier correspondence relates to the development potential of the lands and later correspondence refers to Planning Enforcement procedures on potential unauthorised development within the subject site which was subsequently withdrawn.
- An extract of tourism and waterways policies from the Kildare County Development Plan 1999.
- The cover page of 'Unlocking the Barrow, releasing the economic potential of Ireland's second longest river'.
- An extract of a feasibility study commissioned by Athy County Council entitled 'Strategic Exploitation of Waterways' prepared by O'Carroll and Associates. This extract is annotated and highlighted in several places seeks to put in place a plan to harness the potential of the River Barrow and Grand Canal in Athy. The document recommends that the marina area (located within the subject site) be designated as the pivotal point for recreation surrounding the waterways.
- The submission also contains an extract of the submission to the Draft Athy Local Area Plan 2021-2027 by the submitter which puts forward the rationale objecting to the proposal in the Plan to change the zoning designation on most of the subject site from A: Town Centre in the Athy Town Development Plan 2012-2018 to F: Open Space and Amenity under the Draft LAP. Portions of this document are also highlighted and annotated.
- Other material provided as part of the submission includes:
 - An aerial shot of the site, a preliminary 3D rendering of illustrating proposed development scheme by RKD.
 - A number of maps showing the location and extent of the subject site and plans illustrating the layout of a proposed marina type development on the lands.
 - A map illustrating potential road access arrangements for the site.

Chief Executive' Response

The contents of the submissions are acknowledged.

Submissions 003, 015, 016, 029, 083, 086, 087, 141, 142 and 143 request the zoning of lands in Athy. Proposed Variation No. 3 seeks to amend the Kildare County Development Plan 2023-2029 in accordance with the provisions of Section 13 of the 2000 Act. The zoning of land in Athy is contained in the Athy Local Area Plan 2021-2027 and not within the Kildare County Development Plan 2023-2029. The statutory process for varying a Local Area Plan is a separate process set out under Sections 19 and 20 of the 2000 Act. Therefore, the zoning of land in Athy cannot be considered in this Variation.

Proposed Variation No. 3 updates the Core Strategy to align with the Housing Growth Requirements Guidelines and does not provide new residential zonings to any lands, noting that such zonings should be informed by evidence-based assessments and audits at both the site and settlement level. This is in accordance with best planning practice for the sustainable development of settlements, the integration of land use and transportation planning and the creation of communities that are supported by appropriate infrastructure. These audits and assessments include inter alia Settlement Capacity Audits, Social Infrastructure Assessments, Strategic Flood Risk Assessments, Area Based Transport Assessments / Transport Plans (where relevant) and environmental assessments.

However, the NPF Implementation: Housing Growth Requirements - Guidelines for Planning Authorities (published in July 2025) provides that the housing growth requirements contained therein should be incorporated into existing Development Plans by variation as quickly as possible (Policy and Objective No. 3 of the Guidelines refers). Accordingly, Proposed Variation No. 3 details a series of plan-led and evidence-based mechanisms that Kildare County Council intends to utilise in accommodating the additional housing growth for the remaining three years (2026, 2027 and 2028) of the County Development Plan as planning legislation transitions from the 2000 Act to the 2024 Act.

Proposed Variation No. 3 provides an allocation of 480 units (proposed Table 2.8A refers) to the 'SR: *Strategic Reserve*' landbank at Chanterlands, which was recognised in the Athy Local Area Plan 2021-2027 as an '*appropriate area to cater for future strategic requirements to accommodate the orderly and sequential expansion of the town.*' The appropriate plan-led mechanism for integrating the additional allocation for Chanterlands is the review of the Athy Local Area Plan 2021-2027 and its replacement with an Athy Settlement Plan, inserted into the County Development Plan by a separate variation. Variations of the County Plan have recently been undertaken to insert Settlement Plans for Kilcullen (Variation No. 1) and Newbridge (Proposed Variation No. 2).

The contention of Submission 003 and Submission 086 that County Kildare is rapidly running out of zoned lands is rejected. Additionally, the assertion outlined in Submission 003 that the county requires an additional 670 hectares of residential lands above current zoning is not accepted. It is unclear from the submission how this figure was calculated. The full audit of zoned land in the Chief Executive's report on the NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities (2025) found that as of August 2025, approximately 432 hectares of land remain undeveloped with the potential to deliver approximately 13,795 houses across the county.

The request in Submission 003 that the variation should avoid a Core Strategy or Housing Needs Demand Assessment based solely on population growth forecasts is noted. The contention in Submissions 141, 142 and 143 that Kildare County Council's previous housing strategy planned for additional housing in Athy but did not cater for any additional migration of population towards the town is also noted. The provisions of the Housing Growth Requirement Guidelines set out additional housing requirements in response to the recently revised National Planning Framework (NPF). The housing and population growth figures outlined in the guidelines are

based on updated research from the ERSI which modelled population growth, structural housing demand and assumptions relating to unmet demand. It should be noted that these guidelines oblige Local Authorities to ensure that the additional housing requirements set out in Appendix 1 of the Guidelines are incorporated into their respective development plans '*as quickly as possible*' (Policy and Objective 3 of the Guidelines refers). Accordingly, this variation *inter alia* simply seeks to align with stated Government policy in this regard. An updated Housing Needs Demand Assessment will be prepared as part of the upcoming review of the Kildare County Development Plan. This process will formally commence in August 2026.

Submissions 015 and 029 assert that the mechanisms in Proposed Variation No. 3 will not deliver housing on the ground within the life of the County Development Plan to meet the increased housing targets outlined in the Housing Growth Requirement Guidelines. The submissions note the provision to incorporate the Chanterlands site through the preparation of a new Athy Settlement Plan and consider that no confirmed date for the new Settlement Plan has been provided. This is incorrect as Amendment No. 12 of the Proposed Variation, which seeks to update Section 2.11 of the County Development Plan, states that a new settlement plan for the town will be prepared in '2026/2027'. Accordingly, land use zoning requests in Athy submitted to Proposed Variation No. 3 will be considered as part of the preparation of the Settlement Plan for the town. It should be noted however that all lands will be assessed on their merits having regard to a comprehensive range of evidenced-based supporting documents as listed above. This data-driven approach will also align with national policy requirements relating to low carbon development and the sequential and compact growth of settlements.

The assertion in that the delivery mechanisms outlined in the Proposed Variation will not deliver housing on the ground within the life of the Plan to meet the increased housing requirements outlined in the Guidelines is noted. Kildare has a track record over the past number of years in having exceeded its housing target requirements under the current Core Strategy. It is considered that the Proposed Variation represents an ambitious but realistic approach to accommodate the Government's revised housing growth requirements in a targeted, plan-led manner so that additional housing may be delivered in the short, medium and long term. Notwithstanding the above, as detailed in the response to the OPR submission (Submission 116), a number of further amendments, including additional mechanisms, are proposed to be made to facilitate delivery and provide a continuity of supply to meet the housing growth requirements. These proposals place a particular emphasis on enabling delivery on existing zoned land in the short term and on achieving equitable, balanced and proportionate growth across the county (see Section 3 of this report).

In response to a query in Submission 141 asking if 480 dwellings identified for Chanterlands is additional to the original allocation in the Core Strategy, it should be noted that this does represent an additional provision to the original allocation.

Chief Executive's Recommendation

No change recommended.

Issues Raised: Celbridge - Former Parochial House Site

Sub Ref No:	021 Vincent Casey 023 Fifi Smith 024 June Fitzgibbon 027 Cllr Claire O'Rourke 038 Carmel Hughes 041 Patrick Boyd 050 PlayActing Youth Theatre 059 Celine Hanratty 061 Helen Comerford 075 Ena Fitzpatrick 091 County Kildare Orchestra 127 Robert O'Brien
<p>Issues Raised: Several submissions were received in relation to the former Parochial House site in Celbridge which are summarised as follows:</p> <p>Submissions 021, 023, 024 and 038 request that no part of Variation No. 3 should diminish the Council's commitment to establishing a new cultural centre in Celbridge. The submissions note that the subject site has already been identified for cultural use and must be expressly excluded from any repurposing for housing, and that this should be clearly stated in the Council's response to the Proposed Variation No. 3. The submissions note this position is consistent with the Celbridge Local Area Plan (LAP) objectives and that there is already land zoned in Celbridge for housing and requests that this site remains dedicated to culture. The submissions request the development and funding of this cultural centre is considered in the preparation of the new LAP. Submission 023 includes an attachment of an indicative layout for 'Riverbank building' at the subject site.</p> <p>Submission 027 states that the Council published a vision for the subject site in 2022 identifying this key town centre site for a new multi-purpose community facility including library, cultural centre, meeting spaces, playground, performance location, sensory garden and outdoor amenities for all ages. This vision was adopted by the elected members at the time and represents a critical social and cultural infrastructure commitment to the town.</p> <p>The submission requests that the Council preserve and embed in Variation No. 3 to the County Development Plan the agreed vision for the subject site as a multi-purpose community facility. The submission notes the Celbridge Town Renewal Masterplan (2024) includes an erroneous or misleading impression that the subject site is available for housing. The submission requests that the Council clarify in the Masterplan and Variation that the subject site is not allocated for standalone housing development but is part of the community and cultural facility parcel as per the town-centre vision.</p> <p>The submission requests that the Council ensures that the policy framework in the Variation and Masterplan is aligned and provide for the timely delivery of social and cultural infrastructure in Celbridge in step with growth. It is also requested that the Council provide clarity on phasing and delivery mechanisms and ensure that</p>	

the subject site's community and cultural purpose is protected from being subsumed by purely residential or commercial development.

Submission 059 notes the lack of community arts and performance spaces in Celbridge and states that libraries and theatre spaces are successfully combined in many parts of the country, The Source Arts Centre in Thurles is cited as an example. The population difference of Thurles (8,000) and Celbridge (20,000+) is highlighted.

Submissions 041, 050, 061, 075, 091 and 127 are members of various community arts groups supporting and highlighting the need for a cultural centre/facility in Celbridge.

Chief Executive's Response

The contents of the submissions are acknowledged. Proposed Variation No. 3 does not include any reference to the former Parochial House site or proposed cultural centre in Celbridge. There is no change to Chapter 10: Community Infrastructure and Creative Places of the current County Development Plan or the Celbridge Land Use Zoning Objectives Map under this proposed Variation.


The Celbridge Town Renewal Masterplan 2024 (TRMP) referred to in several submissions is a non-statutory masterplan prepared by the Council's Strategic Projects and Public Realm (SPPR) team. It is a separate document to the County Development Plan 2023-2029 and the Celbridge Local Area Plan 2017-2023 and was published after both these statutory Plans were formally adopted by the Elected Members. Any projects emerging from the TRMP at the former Parochial House site will be brought forward through a separate Part 8 planning application. This process will include project specific public consultation prior to a final decision being made by the Elected Members of the Celbridge-Leixlip Municipal District.

Chief Executive's Recommendation

No change recommended.

Issues Raised: Celbridge – Land Use Zoning

(14 Submissions) Submissions 017, 035, 036, 037, 062, 088, 092, 095, 101, 112, 126, 128, 129 and 134

Sub Ref No:	017
Name:	Sheila Doyle
<p>Issues Raised:</p> <p>This submission has been prepared by David Mulcahy Planning Consultants Ltd. on behalf of Ms. Sheila Doyle seeks a change in the zoning of circa 10 ha of land at Ballyoulster, Celbridge from unzoned lands to New Residential.</p>	
	
<p>The submission outlines the rationale for this request, as follows:</p> <ul style="list-style-type: none"> • The lands have significant frontage along the southern side of the Dublin Road, opposite the Orchard Garden Centre and between the established Ballyoulster Estate (zoned Existing / Residential Infill) and O'Hanlon Park (an unzoned community and educational facility). • The lands are accessible to the Celbridge town centre (circa 15-minute walk from Town Centre zoned lands) by footpaths. The lands are proximate to public transport options including Hazelhatch Train Station (7-minute cycle) and bus services along the adjoining Dublin Road. The delivery of an adjoining road objective in the Celbridge LAP 2017-2023 would further improve connectivity. • The lands are currently underutilised; directly adjoin the development boundary of the Celbridge LAP 2017-2023; would contribute to the creation of a compact urban settlement through sequential development; are closer to the town centre than some existing zoned lands. • The lands are of a size to accommodate residential and associated social/community infrastructure to the benefit of the wider public. Development of the lands would also facilitate new footpath infrastructure along the Dublin Road. • The site does not have any natural heritage or flood risk constraints. The potential presence of 3 no. recorded monuments on the land does not preclude zoning, as archaeological assessments can be carried out to inform future development layouts. • The submission is accompanied by a Preliminary Engineering Report prepared by Donnachadh O'Brien Consulting Engineers. The report details that the lands 	

are serviceable and feasible for development, subject to detailed surveys, Uisce Éireann confirmations and coordination with Kildare County Council for infrastructure upgrades.

- The submission refers to national plans and guidelines in relation to housing including the Action Plan on Housing Supply and Targeting Homelessness, the NPF – First Revision, the Sustainable and Compact Settlement Guidelines and the NPF Implementation: Housing Growth Requirements Guidelines. The submission also refers to the content of the Eastern and Midlands RSES. The submission notes that other sources (including the Housing Commission and Department of Finance) contend that housing growth beyond the provisions of the NPF – First Revision may be required to address existing shortfalls.
- Notes the provisions for Celbridge in the County Development Plan. Census data for Celbridge points to a need to zone additional residential lands to accommodate sustained and continued population growth.
- Whilst Kildare has received the highest increase in housing growth requirements from the NPF Implementation: Housing Growth Requirements Guidelines, this is against the backdrop of an 80% reduction in January 2020 from 32,407 units to 6,023 units, followed by a modest increase to the current 9,144-unit allocation in the Development Plan.
- The goal of the recent Housing Growth Requirement Guidelines is to deliver houses on 'ready to go' lands within the lifetime of the County Development Plan. However, the proposed variation only releases limited lands under the proposed delivery mechanism, such as the release of New Residential - Phase 2 zoned lands for development. The remaining delivery mechanisms involve the preparation of future settlement plans and urban development zones. Accordingly, this variation will not deliver the required homes within the remaining life of the County Development Plan as per the Housing Growth Requirement Guidelines. Kildare County Council should consider zoning of additional lands, which have the capacity to deliver housing in the short-medium term, such as the subject site.
- No new residential zoning has been provided in Celbridge since the Celbridge LAP 2017-2023, which was based on the 2016 Census and by sewerage infrastructure capacity at the time. It is considered that there are now less sewerage infrastructure constraints relating to lands to the south of the Liffey in Celbridge, including the subject lands.
- A significant portion of the current residential zoned lands in Celbridge are developed, under construction or benefit from planning permission.
- The remaining zoned lands in Celbridge are identified for new housing in Variation No. 3. These sites will not deliver any additional housing beyond what is in the current Core Strategy. In addition, one of the identified landholdings requires significant enabling infrastructure prior to residential development (new bridge over River Liffey). The development of the subject lands would not require such infrastructure.

Sub Ref No: 035

Name: Peter and Aisling Connolly

Issues Raised:

The submission by David Mulcahy Planning Consultants Ltd. on behalf of Peter and Aisling Connolly regarding circa 2.07 ha of land at Newtown House, Newtown,

Celbridge. The submission requests that the existing 'New Residential' zoning is extended to include 'Agricultural' zoned land within their landholding.



The zoning extension request is made in consideration of the following:

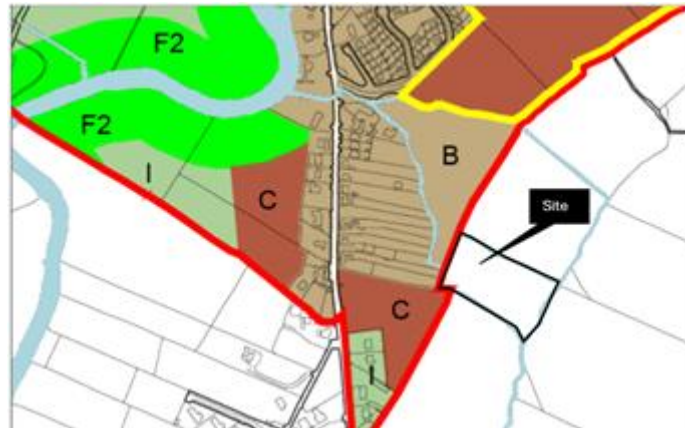
- National policy promotes new housing supply in existing settlements to create compact settlements.
- Celbridge is a self-sustaining town in CDP with significant population growth.
- The subject site directly adjoins residential zoned land where housing is under construction. The extended zoning would make use of an underutilised site adjoining the town boundary to deliver compact urban growth and sequential development.
- Majority of new residential zoned land in Celbridge is built out or under construction. The submission includes an attachment illustrating the 'built' or 'under construction' status of New Residential zonings in Celbridge LAP map extract.
- It is submitted the Proposed Variation will only release very limited lands and it will not deliver housing on the ground in the short term to meet the increased housing targets as per NPF Implementation guidelines.
- It is submitted that expanding the size of the existing New Residential lands to include the subject site would facilitate the delivery of more houses within the lifetime of the current Development Plan.
- Notes the contextual location of the site and adjoining uses including lands to the north that are being developed for housing. Also notes its accessibility via Newtown Road with an existing footpath connection to Celbridge town centre.
- Bus and rail public transport links are available with bus routes from town centre and rail connections from Hazelhatch Train Station.
- The lands are serviceable and there are no built/natural heritage constraints.
- Refers to the evolving national and regional planning policy context. Notes the implications for County Kildare in terms of delivering more housing at increased densities.
- Majority of the site is free from flood risk, however, the western portion of the site is subject to flood risk, as shown on flood map extract provided. It is submitted this area could be identified for public open space.
- It is noted the planning gain from the subject site would result in much needed new housing which could provide 10% social housing.

Sub Ref No: 036

Name: Peter and Aisling Connolly

Issues Raised:

The submission by David Mulcahy Planning Consultants Ltd. on behalf of Peter and Aisling Connolly seeks the zoning of circa 1.6 ha of land at Newtown, Celbridge from its current un-zoned status to 'New Residential'.



The zoning request is made in consideration of the following:

- National policy promotes new housing supply in existing settlements to create compact settlements.
- Celbridge is a self-sustaining town in CDP with significant population growth.
- The subject site is close to the town centre and represents underutilisation of a site that could contribute to compact urban settlement.
- The subject site directly adjoins land zoned Existing Residential/Infill to the west and would represent sequential development of the town.
- Majority of new residential zoned land in Celbridge is built out or under construction. The submission includes an attachment illustrating the 'built' or 'under construction' status of New Residential zonings in Celbridge LAP map extract.
- It is submitted the Proposed Variation will only release very limited lands and it will not deliver housing on the ground in the short term to meet the increased housing targets as per NPF Implementation guidelines.
- It is noted that the subject site is greenfield with no existing vehicular entrance from the public road, but it is stated that there is a legal agreement for access, foul and water supply services to be extended from the adjoining Kildroch Court housing estate.
- It is submitted that zoning the subject site as 'New Residential' would facilitate the delivery of more houses within the lifetime of the current Development Plan.
- Notes the greenfield location and context of the subject site and that it adjoins residential areas to the west and lands to the north, south and east are greenfield/agricultural.
- Bus and rail public transport links are available with bus routes from town centre and rail connections from Hazelhatch Train Station.
- It is noted there are no built/natural heritage constraints.

- The submission notes the site is subject to flood risk and states this should not preclude a zoning objective as any application on site will be subject to site specific flood risk assessment.
- Refers to the evolving national and regional planning policy context. Notes the implications for County Kildare in terms of delivering more housing at increased densities.
- It is noted the subject site could provide 10% social housing.
- It is highlighted that the subject site is large enough to accommodate social and community infrastructure in the form of amenity spaces, childcare facilities, neighbourhood centre facilities which would be of benefit to the wider public and deliver significant planning gain.

Sub Ref No: 037

Name: Peter and Aisling Connolly

Issues Raised:

The submission by David Mulcahy Planning Consultants Ltd on behalf of Peter and Aisling Connolly seeks the zoning of circa 6.1 ha of land at Newtown, Celbridge from its current un-zoned status to 'New Residential'.



The zoning request is made in consideration of the following:

- National policy promotes new housing supply in existing settlements to create compact settlements.
- Celbridge is a self-sustaining town in CDP with significant population growth.
- The subject site is close to the town centre and represents underutilisation of a site that could contribute to compact urban growth.
- It is stated that the subject site is partly zoned 'New Residential' (east), partly zoned Existing/Infill and partly zoned Agricultural (west).
- Majority of new residential zoned land in Celbridge is built out or under construction. The submission includes an attachment illustrating the 'built' or 'under construction' status of New Residential zonings in Celbridge LAP map extract.
- It is submitted the Proposed Variation will only release very limited lands and it will not deliver housing on the ground in the short term to meet the increased housing targets as per NPF Implementation guidelines.
- It is noted that the subject site is greenfield with an agricultural entrance from Newtown Road, but it is stated that there is a legal agreement for access, foul

and water supply services to be extended from the adjoining Kildroch Court housing estate.

- It is submitted that zoning the subject site as 'New Residential' would facilitate the delivery of more houses within the lifetime of the current Development Plan.
- Bus and rail public transport links are available with bus routes from town centre and rail connections from Hazelhatch Train Station.
- It is noted there are no built/natural heritage constraints.
- The submission notes the subject site is not subject to flood risk.
- Refers to the evolving national and regional planning policy context. Notes the implications for County Kildare in terms of delivering more housing at increased densities.
- It is noted the subject site could provide 20% social housing.
- It is highlighted that the subject site has potential to deliver social and community infrastructure in the form of childcare, open space and neighbourhood centre uses.

Sub Ref No: 062

Name: Andrews Construction Ltd.

Issues Raised:

The submission by The Planning Partnership on behalf of Andrews Construction Ltd. relates to lands at Celbridge Lodge, Tea Lane/Church Road, Celbridge.



The submission welcomes the incorporation of the Sustainable Residential Development and Compact Settlements guidelines in the proposed Variation, particularly the metropolitan town density range which will be applicable to Celbridge.

- The submission notes the subject site was previously granted residential development by the Council (Reg Ref: 22/562) and was subsequently refused by An Bord Pleanála (ABP-315804-23). The submission notes ABP understood the subject site's potential, notwithstanding built heritage and green infrastructure, to deliver "*objectives to provide compact residential growth on appropriate, centrally located urban sites.*"
- An extract from the Board's decision states: "The Board noted the built heritage and green infrastructure context of the site but considered that these aspects could be appropriately safeguarded while in tandem providing an increased density of new housing on the site." The submission notes a new Large Scale

Residential Development (LRD) is being prepared for the subject site and that the new policy context regarding density is crucial.

Sub Ref No: 088

Name: Glenveagh Homes Ltd.

The submission includes an attachment document by John Spain Associates, on behalf of Glenveagh Homes Ltd. and seeks to demonstrate the suitability of the sites identified in this submission for residential development, particularly in the short-term and to propose changes to the Proposed Variation No. 3, to ensure housing can be delivered on site in the short-term to contribute to the increased housing target for the county within the lifetime of the Development Plan.

The submission seeks requesting that lands at Killadoon, Celbridge (circa 16.14 hectares – with approximately 10 hectares developable) are brought forward for development and included as zoned Tier 1 lands, so that the core strategy numbers can be delivered over the remainder of the Development Plan 2026-2028.



Killadoon, Celbridge

- Circa 16.14 hectares – approximately 10 hectares developable (draft layout at lands could deliver 366 dwellings with density of 36 dph)
- Zoned 'I: Agricultural' and 'F2: Strategic Open Space' in the expired Celbridge Local Area Plan 2017-2023.
- States the proposed variation has identified Celbridge as suitable for an additional 2,000 units but notes the lands identified have been zoned for an extended period and allocated to lands indicated as 'Tier 2' zoned lands. Submits transportation and movement deficits for both sites identified.
- Asserts additional lands should be included over and above the historical legacy of zoned lands in order for sites to be developed within the life of the Plan.
- Subject lands are Tier 1 serviced lands and located sequential to the built envelope of Celbridge. Asserts that its development will make a contribution to the compact and sustainable growth of Celbridge.
- Located immediately adjacent to 'Abbey Farm' residential estate and 1.5km from town centre.
- Asserts the lands are able to connect to existing development services:

- Road access - direct via Killadoon Lane and central aspects of sites via R403.
- Pedestrian and Cycle Access - opportunities at R403 and link to existing estates.
- Foul sewerage - can be serviced and connected to existing infrastructure.
- Water supply - can be serviced and connected to existing infrastructure.
- Surface water - attenuation and discharge possible.
- Community facilities - close proximity to the retail district of Celbridge.
- Submits an excerpt of a Feasibility Layout at Killadoon as shown, below which could provide circa 366 dwellings developed at a density of 36 dph.



Sub Ref No: 092

Name: Celbridge Community Council

Issues Raised:

This submission on behalf of the Celbridge Community Council (CCC) is summarised as follows:

- Recommends Settlement and Site Capacity Audits are extended to include assessments of social, educational and community infrastructure, as set out in section 3.2.2 of the Department of Housing, Local Government and Heritage's Development Plans: Guidelines for Planning Authorities and section 2.4 of the NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities issued under Section 28 of the Planning and Development Act, 2000 (as amended).
- CCC supports the inclusion of the Ballyoulster and Simmonstown KDAs in the proposed variation, in accordance with the boundaries defined in the Celbridge LAP 2017-23. CCC do not support the addition of any further sites at this stage. Any further sites should only be considered in the framework of an evidence-based settlement plan that will succeed the LAP.
- Recommends no further increase in the target dwellings per hectare for Ballyoulster and Simmonstown beyond the proposed variation draft of 37 dwellings per hectare. If an increase is foreseen then the Site Capacity Audits need to be re-run to correctly assess the infrastructure capacity need, including social infrastructure, to meet higher dwelling densities.
- Notes the provisions under the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities regarding the application of residential density ranges in Celbridge. States that the 37dph estimate for Simmonstown and Ballyoulster is appropriate do to the sensitivity

of their settings and there location vis-à-vis the Train Station. Recommends no increase in this level.	
Sub Ref No:	095
Name:	Land Development Agency
<p>Issues Raised:</p> <p>The submission by the Land Development Agency (LDA) is made in respect of their residential zoned site at Ballyoulster, Celbridge. It is noted the subject site has an SHD planning application pending determination by An Coimisiún Pleanála (ACP) under ACP Ref: 313825.</p> <ul style="list-style-type: none"> • The LDA welcomes the confirmation of an additional 7,826 housing units to the existing core strategy under Table 2.4B of the proposed Variation in line with the NPF Implementation guidelines. • The proposed adoption of the <i>Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities</i> is also welcomed to provide certainty and clarity to development management standards. • The LDA notes objectives CS O27 and CS O30 regarding the subject site. • Regarding CS O27, the LDA notes the pending SHD application facilitates access to the school campus site via the proposed road network. The LDA welcomes the opportunity to engage with the Council, the Department of Education and other stakeholders regarding the proposed school campus development. • Regarding CS O30, the LDA welcomes the clarity it provides and looks forward to the preparation of a new settlement plan for Celbridge which will integrate the subject site. • The LDA respectfully contends that the subject site is mischaracterised by being identified as Tier 2 in Table 2.8A of the proposed Variation, defined as “Serviceable Zoned Land” comprising lands that are not currently sufficiently serviced to support new development but have the potential to become fully serviced within the life of the plan. • It is stated that the accompanying Settlement and Site Capacity Audit (SCA) notes that the subject site benefits from existing natural surface water drainage channels, that water mains are located immediately adjacent to the site and that Uisce Éireann has confirmed the distance to the nearest sewer is less than 200m and that the new gravity sewer to Primrose Hil has been sized for this area under the ongoing works of the Celbridge Sewer Network Improvement Project. It is therefore submitted that there are no limitations on the immediate delivery of residential development in respect of surface water, water supply and wastewater. • Regarding Movement and Transport, the LDA notes the SCA highlights requirement for improved pedestrian and cycle accessibility, including a bridge over the River Liffey, which is a limiting factor on the site’s development potential. Section 5.2 of the SCA relates. The LDA observes that this requirement is also identified in the Celbridge LAP 2017-2023, however, the LAP recognises that a significant portion of the lands can be delivered in advance of this infrastructure being provided. The LDA notes that the Council has made significant progress in the delivery of the bridge with tender documents due to be completed in 2025 and a €4.5m allocation to the project under the Kildare County Council Capital Programme 2025-2027. The LDA 	

considers that the required infrastructure to improve connectivity will likely be in situ by the time any dwelling would be available for occupation at the subject site.

- The submission requests that the Council give due consideration to a review of the Ballyoulster lands from Tier 2 to Tier 1 in Table 2.8A of the proposed Variation given their status as sequential to the built-up area, serviced and available for immediate development, proximate to employment and supported by robust social and physical infrastructure. It is considered this position is supported by, inter alia, the content of the various supporting documents in the SHD application pending decision by ACP.

Sub Ref No: 101

Name: Ad Meliora Management Ltd.

Issues Raised:

The submission by John Spain Associates on behalf of Ad Meliora Management Ltd. seeks the zoning of approximately 27.1 ha of lands at Mooretown and Kilwoghan, Celbridge from its Agricultural/un-zoned status to 'New Residential'.



The submission and zoning request is made in consideration of the following:

- The proposed Variation and allocation of an additional 2,000 no. units to Celbridge, a designated Self-Sustaining Town', for the remaining plan period is welcomed. It is noted the future Settlement Plan to be delivered in 2026/27 can build on this foundation.
- The submission includes three appendices comprising a booklet and two indicative masterplan concept map layouts for residential development at the subject site.
- It is submitted that insufficient lands are identified in the proposed Variation for the short to medium term delivery of housing within the remaining duration of the Development Plan. Additional/alternative lands including the subject site should be considered to ensure the updated housing targets for the remainder of the plan period are met.
- The subject site located to the north-west of Celbridge comprises a small portion of Agricultural zoned lands to the south with the remainder of the site being un-zoned. It is noted that the eastern portion of the subject site was previously included in the Celbridge LAP 2010-2016 and the Draft LAP 2016-2023 clearly representing the logical expansion of the town to the west.

- It is noted that the planning context surrounding Proposed Variation No. 3 and requests that an updated zoning map for Celbridge be incorporated into the proposed Variation to include the subject site as a Key Development Area (KDA).
- It is stated that most residential zoned lands in Celbridge, including three out of five KDAs in the current LAP are substantially built out with the remaining two KDAs at Simmonstown and Ballyoulster requiring infrastructure upgrades to facilitate development.
- It is submitted that the subject site has development potential to deliver circa 1,000 residential units at an average density of 37 units per hectare, with the ability to meet significant portion of the allocated 2,000 short term residential units identified in Table 2.8a of the Proposed Variation. The development potential includes provision for childcare and a neighbourhood centre as well as 17% public open space, green infrastructure and active travel routes. It is submitted the proposed scheme aligns with Section 2 Guidelines emphasising infrastructure-led, compact growth in metropolitan areas.
- It is submitted that extending the settlement boundary to the west will deliver community gain for the wider area by facilitating 'developer-driven delivery' of the Western Orbital Route.
- It is submitted that the subject lands are Tier 1 serviced zoned lands as they are spatially sequential to the built-up footprint of Celbridge and have connections to roads, water, gas, foul and electricity networks through the southeastern portion of the site, making the subject site suitable for the delivery of housing in the short term.
- It is noted the Celbridge LAP 2017-2023 includes an objective (MTO 3.11) to explore by way of feasibility the need for a road. It is submitted that the vision for the western orbital road can be accommodated at the subject site alongside residential development.
- It is noted the Proposed Variation is in response to updated NPF and NPF Implementation guidelines which provided updated housing growth requirement figures, as well as to align with
- States that the final MASP allocation of only 3,656 of 10,000 persons was given to Maynooth. Highlights strategic opportunity for residual population headroom in the MASP to be redistributed from Maynooth to Celbridge given its strategic location adjacent to south County Dublin, strong transport links and growth potential.
- The submission generally welcomes the Proposed Variation, in particular, the housing growth target of 7,826 additional residential units and the commitment to avail of the full 50% additional provision.
- The submission highlights that the 2,000 additional units allocated to Celbridge are within the Ballyoulster and Simmonstown KDAs, which are designated Tier 2 (un-serviced) and require infrastructure improvements to facilitate delivery.
- It is noted the subject site benefits from excellent connectivity to R405 Maynooth Road, M4 Motorway, bus and rail public transport connections and the planned DART+ South West which will further increase the rail capacity making the area suitable to accommodate a significant portion of residential growth.
- It is further noted that the subject site is well served by existing social, educational and community infrastructure with schools, childcare and

recreational amenities all within walking and cycling distance. In addition, it is stated to be strategically proximate to key employment hubs.

- Considers that additional short-term housing areas need to be identified in the County, such as the subject lands in Kilwoghan and Mooretown, as a number of the long-term sites will not be able to contribute to meeting the housing need outlined in the Variation.

Appendix 1

- The submission contains an attachment relating to the lands at Mooretown and Kilwoghan and their potential for residential development. This comprehensive document outlines the site context and location, the planning policy context, a review of existing zoned lands in Celbridge, zoning history and section highlighting the development potential of the lands. This includes an indicative proposed masterplan for the lands.

Appendix 2: Details relevant planning history for lands in Celbridge

Appendix 3: Contains details of indicative with road objective on subject lands

Appendix 4: Illustrates the Flood Risk Map Celbridge LAP 2017-2023

Sub Ref No: 112

Name: Celbridge Estates Limited

Issues Raised:

Submission made by Coonan Property on behalf of Celbridge Estates Limited seeks the expansion of KDA 5 Simmonstown (C: New Residential lands) to include the entirety of the subject lands.



The submission includes a cover letter and two attachments outlining that the zoning request is made in consideration of the following:

- The publication of the Proposed Variation is welcomed and the need for increased core strategy numbers in the short term is supported. Focus should be on sites that can deliver much needed housing in the short term, such as the subject site. It is submitted the Proposed Variation identifies several sites which can deliver medium to long term housing.
- Considered to constitute Tier 1 lands as the lands are able to connect to existing development services (i.e., roads, foul drainage, surface water drainage and water supply etc.), and the lands are located contiguous to existing developed lands.
- It is noted a portion of the subject site was zoned New Residential under KDA 5 in the LAP. The remainder of the site is put forward as an alternative site for the

short to medium term delivery of additional dwellings, as listed in Table 2.8A of the proposed Variation.

- Requests an additional provision of circa 2,568 residential units to be provided for the lands at Simmonstown.
- It is submitted that the subject site is located sequential to the built envelope of Celbridge, is less than 1km to the town centre, is immediately adjacent to existing residential estates and is sequential to an LRD site that is currently under construction. The subject site is accessible via existing road network to north and east. In addition, the Celbridge Hazelhatch Mobility Corridor pending decision with An Coimisiún Pleanála will allow progress of masterplan for the subject lands.
- Given its proximity to Hazelhatch and Celbridge Train Station, the subject site offers opportunity to locate residential development near quality, high frequency public transport corridors in accordance with Transport Orientated Development objectives.
- Notes the provisions of Proposed Variation No. 3 and refers to the Housing Growth Requirements Guidelines which places a particular focus on identifying lands for residential development will come forward for development within the remaining period of the plan.
- A submitted draft layout for the overall subject lands (comprising c. 72 ha and a portion of KD5 Simmonstown) indicates that the lands have potential to deliver approximately 2,568 dwellings at a density of circa 38.5 dwellings per hectare, a school campus, retail facilities and circa 7.4 ha of high quality public open spaces, circa 10.6% of the total site area).

Attachments

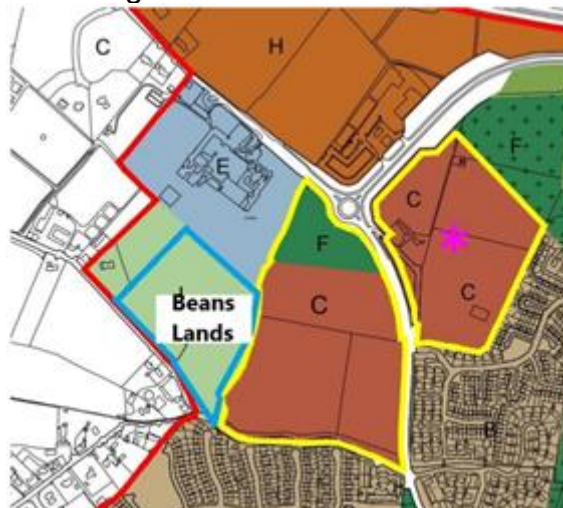
- Contains a Map outlining the site ownership and areas of the subject lands.
- An indicative site layout proposal for the lands, in conjunction with KDA 5 Simmonstown.

Sub Ref No: 126

Name: Montane Developments

Issues Raised:

Submission made by McGill Planning Ltd on behalf of Montane Developments seeking the zoning of circa 5.75 ha of lands known as “Beans Lands” at Moortown, Celbridge from its current ‘I: Agricultural’ zoned status to New Residential.



The submission and zoning request is made in consideration of the following:

- Montane Developments are a Kildare based property developer having built 1,750 homes in Kildare and the GDA over the last eight years and have a current pipeline of 1,250 units in planning and construction design stage.
- The national planning policy behind the Proposed Variation is outlined in addition to its contents. It is noted that Kildare have been allocated the highest annual housing growth targets of any local authority in the country.
- The submission states that overall, the Council is to be supported in seeking to provide for the full extent of the increased housing target under the NPF First Revision, including the 50% additional provision. However, submits that the allocation strategy outlined in the Proposed Variation which relies on a small number of settlements and large sites to deliver the increased targets is precarious and will result in the county falling far short of the 12,937 units to be delivered over the remaining three years of the County Development Plan (CDP). Contends that its highly likely the majority of the increased housing targets will not be met at those identified sites/locations for several reasons, including delivery of required infrastructure upgrades, preparation of Masterplans and designation as UDZ, amongst others.
- The submission recommends the Council amends the strategy as follows:
 1. Provide a better distribution of the increased housing allocation across a greater number of sites within Celbridge, Newbridge, Naas and Athy to improve the prospect of swift housing delivery in these towns in the short term.
 2. In providing for (1) also revise the housing allocation for Confey, Naas Northwest Quadrant, Celbridge Ballyoulster and Celbridge Simmonstown to reflect a more realistic, actual housing delivery at those locations over the remaining three years of the CDP.
- It is submitted that all residential zoned lands at the northern end of Celbridge has been granted permission on and either developed on or are under construction.
- It is noted that the subject site facilitates extension of residential development at the northern end of the town as the lands are fully serviceable and accessible with access and water service connections available and agreements in place from the adjoining Kilwoghan Woods scheme. It is stated condition 3(c) of the Kilwoghan Woods permission relates to provision of a 6m wide road that will provide a future link to the subject site.
- It is highlighted the subject site has potential to accommodate circa 175+ units, based on density range for “Key Town/Large Town – Suburban/Urban Extension” as set out in Compact Settlements guidelines.
- It is submitted that housing delivery at the subject site would represent only a small portion of the 2,000 units earmarked for Celbridge in the proposed Variation and would not prejudice the delivery of early phases of housing at Ballyoulster or Simmonstown in the coming years.

Sub Ref No:	128
Name:	David Bean
Issues Raised:	

Submission by McGill Planning Limited on behalf of David Bean seeking the re-zoning of circa 3 ha of lands at Moortown, Celbridge from its current 'I: Agricultural' status to 'C: New Residential'.



The submission and zoning request is made in consideration of the following:

- The subject site is directly adjacent to the development boundary of the Celbridge LAP.
- It is submitted that all residential zoned lands at the northern end of Celbridge has been granted permission on and either developed on or are under construction.
- It is noted that the subject site facilitates extension of residential development at the northern end of the town as the lands are fully serviceable and accessible.
- States that the lands in question could accommodate circa 90+ units based on the density range for “*Key Town / Large Town - Suburban/Urban Extension*” sites in the Sustainable and Compact Settlements Guidelines (2024).
- It is submitted that housing delivery at the subject site would be only a small portion of the 2,000 units earmarked for Celbridge in the proposed Variation and would not prejudice the delivery of early phases of housing at Ballyoulster or Simmonstown in the coming years.

Sub Ref No: 129

Name: Helen O'Brien, Elizabeth Donovan and Hugh Donovan


Issues Raised:

Submission by Hughes Planning and Development Consultants on behalf of Helen O'Brien, Elizabeth Donovan and Hugh Donovan seeking rezoning of 8.56 ha of lands to the west of Shackleton Road, Celbridge from 'Agricultural' to 'New Residential'.



The submission and zoning request is made in consideration of the following:

- National, regional and local planning policy informing the submission on the Proposed Variation are outlined.
- Notes the provisions of the Proposed Variation and submits that the clear intention of the NPF Implementation guidelines is to bring forward land capable of delivering houses in the short term.
- Contends that the proposed Core Strategy revision is over-reliant on a limited number of sites and settlements to deliver the unprecedented housing target increases and will result in the county falling far short of its housing targets over the remaining life of the CDP.
- Notes the 2,000 unit allocated to Celbridge and submits that the current Core Strategy as set out in the Proposed Variation does not adequately allow for the development of the town and this is contrary to the NPF Implementation guidelines intention.
- It is noted the subject site is immediately adjacent to the existing built-up area of Celbridge, is readily available for development and can be quickly released for residential use in line with the guidelines.
- It is stated the subject site is located circa 1km from Celbridge Town Centre and various services, community amenities and public transport bus routes.
- It is noted there is no relevant planning history on the subject site.
- It is stated the subject site has potential to comprise between 299 to 428 dwellings based on Metropolitan Towns (>1,500 population) – Suburban/Urban Extension density range, as set out in Compact Settlements Guidelines.
- The submission considers the subject site would better suit being zoned as New Residential to form a consolidated parcel of residential lands on the town's western boundary, would be consistent with the Compact Settlements guidelines and would address housing demand in Celbridge.
- The proposed rezoning would align with a range of outlined objectives of the NPF (in particular NPO 7 and NPO 10), the Regional Spatial and Economic Strategy and the Kildare County Development Plan 2023-2029
- The submission highlights revised future population projections in the NPF and notes that County Kildare has been identified as one of the fastest growing population centres in the country. It is states that it is imperative that further lands are appropriately zoned to future proof the delivery of housing.
- The subject site is readily serviceable and well-located. It will be served by the Shackleton Road providing direct access to the existing street network and water, sewage and telecoms infrastructure.

Sub Ref No:	134
Name:	Montane Developments
<p>Issues Raised:</p> <p>Submission made by McGill Planning Ltd. on behalf of Montane Developments seeking the zoning of circa 36.41 ha of lands at Hazelhatch, Celbridge from its current un-zoned status to 'New Residential'.</p>	
	
<p>The submission and zoning request is made in consideration of the following:</p> <ul style="list-style-type: none"> • Montane Developments are a Kildare based property developer having built 1,750 homes in Kildare and the GDA over the last 8 years with a current pipeline of 1,250 at planning and construction design stage. • The national planning policy behind Proposed Variation No 3 and the provisions contained in the variation is outlined. Notes Kildare has been allocated the highest annual housing growth targets of any local authority in the country. • The submission states that overall, the Council is to be supported in seeking to provide for the full extent of the increased housing target under the NPF First Revision, including the 50% additional provision. However, submits the allocation strategy outlined in the Proposed Variation relying on a small number of settlements and large sites to deliver the increased targets is precarious and will result in the county falling far short of the 12,937 units to be delivered over the remaining three years of the CDP. • Contends that its highly likely the majority of the increased housing targets will not be met at those identified sites/locations for several reasons, including delivery of required infrastructure upgrades, preparation of Masterplans and designation as UDZ, amongst others. • The submission recommends the Council amends the strategy as follows: <ol style="list-style-type: none"> 1. Provide a better distribution of the increased housing allocation across a greater number of sites within Celbridge, Newbridge, Naas and Athy to improve the prospect of swift housing delivery in these towns in the short term. 2. In providing for also revise the housing allocation for Confey, Naas Northwest Quadrant, Celbridge Ballyoulster and Celbridge Simmonstown to reflect a more realistic, actual housing delivery at those locations over the remaining three years of the CDP. 	

- The submission notes that Montane Developments own and control extensive lands at Hazelhatch along with, and in agreement with the O'Connor family and O'Flynn Group. It is stated the Montane/O'Connor area is circa 28.32 ha and the O'Flynn Group area is circa 8.09 ha.
- It is submitted the subject site has potential to deliver over 1,000 residential units along with employment, commercial lands and community uses.
- It is noted the town is well served by bus and rail public transport and is set to benefit from increased services with the proposed DART+ expansion to Hazelhatch/Celbridge.
- It is submitted that the subject site's proximity to the train station (circa 5-minute walk) and to the town centre (circa 20-minute walk) is an ideal location to provide for the delivery of new housing and employment representing a highly sustainable development with excellent public transport facilities.
- It is submitted the residential zoning proposal at the subject site is consistent with sections 4.6 and 5.2.3 of the Celbridge LAP regarding consideration of longer-term growth of Celbridge and the potential of lands in the vicinity of Hazelhatch / Celbridge Train Station.
- It is requested that the subject site which is accessible and can be serviced be considered for inclusion in the list of Celbridge sites in Table 2.8A and 2.8B of the Core Strategy for housing delivery within the next three years, and that the lands be brought into the Development Boundary of the town and zoned for a proportion as 'C: New Residential' in the new Settlement Plan for Celbridge. The remaining lands could also be zoned Strategic Reserve for consideration in the next CDP process in 2028.

Chief Executive's Response

The contents of the submissions are acknowledged.

Aside from the lands currently zoned 'C: New Residential' comprising the Ballyoulster and Simmonstown Key Development Areas (KDAs) under the Celbridge Local Area Plan 2017-2023 and identified as strategic sites for future housing delivery to be integrated into new settlement plans in 2026/2027, Proposed Variation No. 3 does not contain any provisions relating to the zoning of other lands in Celbridge at this point. The overarching purpose of Proposed Variation No. 3 is to make a targeted variation to the County Development Plan (CDP) for the remaining three years of the plan period only, to provide for the additional housing growth requirements of the Government's Housing Growth Requirement Guidelines (2025). It is not a full review of the CDP, nor does it include new land use zoning maps. Consequently, the land use zoning requests for Celbridge outlined in Submissions 017, 035, 036, 037, 088, 101, 112, 126, 128, 129 and 134 cannot be considered.

It is the intention of Kildare County Council to prepare a new Settlement Plan for Celbridge to replace the Celbridge Local Area Plan 2017-2023 (LAP). This will be adopted into the County Development Plan by way of a statutory variation. As part of this process, a review of land use zoning objectives in the town will be undertaken. This assessment will examine all potential residential development lands on their merits, having regard to a comprehensive range of evidenced-based supporting documents including *inter alia* a Settlement Capacity Audit (SCA), a Social Infrastructure Audit, a Strategic Flood Risk Assessment and other environmental reports. This data-driven approach will also align with national policy

requirements relating to low carbon development and the sequential growth of settlements. This is especially pertinent in ensuring the optimal distribution of a limited quantum of housing by directing such new residential units to locations that have been determined to be the most suitable, in terms of their ability to deliver compact growth development that maximises access to the services and social infrastructure of the town.

The concerns outlined in Submissions 017, 035, 036, 037, 088, 101, 112, 113, 129 and 134 regarding the provisions of the Proposed Variation, including the delivery mechanisms employed, the limited quantum of lands being released and its potential to realise the housing target requirements for County Kildare, particularly over the short term are noted. It is considered that the Proposed Variation represents an ambitious but realistic approach to accommodating the Government's revised housing growth requirements in a targeted, plan-led manner so that additional housing may be delivered in the short, medium and long term in accordance with the provisions of the Housing Growth Requirements Guidelines (2025).

As detailed in Table 2.4B of Variation No. 3 and in Section 1.1 of this report, 3,693 units are required to be provided in addition to the existing Core Strategy requirement for the remaining three year period of the County Development Plan under the Housing Growth Requirement Guidelines. This has been calculated by applying the additional housing required per year (+1,377.5 units) to meet the new annual requirement of the Housing Growth Requirement Guidelines (2,744 units) to the remaining years of the Development Plan. Furthermore, Variation No. 3 has incorporated the full 50% 'additional provision' available in the Housing Growth Requirement Guidelines. Notwithstanding the above, as detailed in the response to the OPR submission (Submission 116), a number of further amendments, including additional mechanisms, are proposed to facilitate housing delivery and provide a continuity of supply to meet the housing growth requirements. These proposals place a particular emphasis on enabling delivery on existing zoned land in the short term and on achieving equitable, balanced and proportionate growth across the county (see Section 3 of this report).

The comments made in Submission 092 in relation to the Settlement and Site Capacity Audit are noted. There is no national standardised methodology for preparing such audits. It is considered that the Settlement and Site Capacity Audit carried which was prepared and published alongside Proposed Variation No. 3 adheres to the requirements for Settlement Capacity Audits, as outlined in Section 4.5.2 of Development Plans – Guidelines for Planning Authorities (2022). As noted above, an audit of social infrastructure will be undertaken as part of the preparation of the Settlement Plan for Celbridge.

The contention in Submission 095 that the subject site is mischaracterised by being identified as Tier 2 in Table 2.8A is not accepted. It should be noted that the Celbridge Local Area Plan 2017-2023 was not accompanied by an infrastructure assessment, as it was adopted prior to the requirement for the tiering of lands for residential development under the National Planning Framework (NPF). Under the

NPF, 'serviced lands' have been defined as '*lands that are able to connect to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply.*' The Settlement and Site Capacity Audit for Proposed Variation No. 3 identified Ballyoulster as Tier-2 (Serviceable) on the basis that there are existing infrastructural constraints present on the lands which could be resolved through developer-led actions, as part of the overall development of the site.


The request in Submission 101 that there is opportunity to redistribute the headroom from the additional allocation of 10,000 persons which was allocated to the Metropolitan Key Town of Maynooth under NPO 68 of the NPF (2018) is rejected. As noted in Section 3.2.1 and Table 3.4 of the Maynooth and Environs Joint Local Area Plan 2025-2031 this MASP allocation was assigned to Maynooth (County Kildare) only by the Eastern and Midland Regional Assembly in consultation with the MASP Implementation Group (July 2020) and cannot be redistributed to other settlements.

Chief Executive's Recommendation

No change recommended.

Issues Raised: Kilcock

(4 submissions) Submissions 004, 018, 053 and 103

Sub Ref No:	004
Name:	Comer Group Ireland
<p>Issues Raised:</p> <p>This submission has been prepared by Genesis Planning Consultants on behalf of the Comer Group Ireland in relation to 2 no. land parcels (Parcel 1 – 52.8 ha and Parcel 2 – 148 ha) at Courtown Demesne, Kilcock and its future development vision. The proposal is for lands to be zoned in phases in line with the sequential approach in the Development Plan Guidelines.</p>  <p>It is stated that parcel 1 is the next sequential development area for Kilcock and is partly zoned for enterprise / employment, open space and amenity and agriculture under the Kilcock LAP. Parcel 2 was previously zoned for integrated leisure development in the Kildare County Development Plan 2011-2017.</p> <p>The submission details the vision and masterplan for the lands as a new urban quarter for Kilcock, providing a balanced residential and community focused development as follows:</p> <ul style="list-style-type: none"> • Parcel 1 can deliver 1,500 units (including social and affordable units) at an indicative medium density, parklands, creches and an East-West Link Road (an objective under the Kilcock LAP) in phases. Phase 1 aligns with the 15-minute settlement model, being served by the train station and M7. • Parcel 2 is also available for development and has the capacity to deliver a further 3,000 units in the longer term. Development and access will be dependent on the delivery of parcel 1. • The vision will bring significant investment in the area, together with key jobs and increased employment, including 200 construction jobs and 100 jobs at operational stage. • A comparable precedent is in Wicklow at Fassaroe along the N11 – 171 ha zoned for c.6000 homes since 2018. The subject land parcels are ideal for 	

linkages with the Kilcock and Maynooth train stations and have no abnormal development costs.

- Justification for extending the development boundary of Kilcock is based on the need for a strategic change in the approach to zoning to provide an adequate supply of residential lands to cater for projected growth. The submission reiterates CSO data which shows a slow-down in unit delivery and that only 40% of planning permissions have been commenced. It is stated that that delivery of development on greenfield lands is necessary and forms part of best practice land use principals in the UK, with greenbelt lands being released to meet housing demand.

Appendix 1 of the submission provides a supporting Settlement Capacity Audit (infrastructure assessment), concluding that the lands represent a tier 1 serviced site with no constraints to the development of the lands.

Appendix 2 of the submission provides a 'Briefing note on lands in Kilcock regarding infrastructure strategy' with associated key plan, drainage, watermain and roads plan drawings by Barret Mahony Consulting Engineers (BMCE). It is stated that BMCE were originally engaged to develop the masterplan layout and infrastructure phasing for the subject lands. The note provides a brief overview of the designed foul water drainage, watermain supply, surface water drainage and road infrastructure to serve zones A-E of parcel 1 and the general strategy for the remainder of the lands.

An analysis of housing delivery for Kildare shows that the County is rapidly running out of zoned lands based on housing delivery between Q2 2023 and Q2 2025 in excess of existing targets. Such trends result in a zoning shortfall in Kilcock and at County level. Reference is also made to publications, presentations and letters regarding population growth trends, housing delivery and demand.

The submission provides an overview of the NPF together with Government policy and guidance in relation to housing. The submission outlines the housing growth requirement for Kildare, together with the key objectives and guidance regarding zoning contained in the NPF Implementation: Housing Growth Requirements Guidelines. The submission contends that a minimum of 74 hectares per year of additional residential zonings are required to meet the new housing growth requirement to 2034. It is forecast that an additional 670 ha of residential lands are needed, above the current County Development Plan.

The submission states that the Core Strategy approach to zoning land has not achieved the delivery of housing to meet demand, noting CSO statistics on falling housing delivery and planning permissions. The submission contents that a revised approach is required regarding Housing Need and Demand Assessments (HNDA), with Variation No. 3 to be based on:

- Town and County population growth over the last 15 years.
- Total housing stock per head of population and pro-rata decreases.
- The shortage of zoned lands for housing delivery.
- Local surveys from elected members and the community.
- Engagement with landowners who can and/or intend to deliver housing.

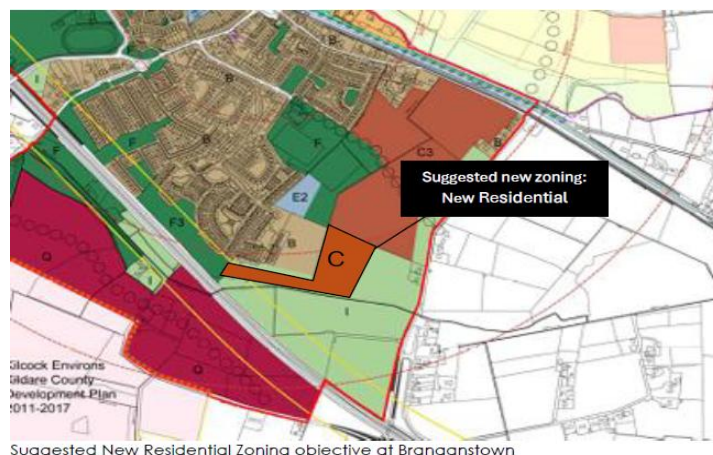
- Avoidance of a Core Strategy or HNDA based solely on population projections, which are cyclical in nature with population growth being hindered by a lack of available housing.

Sub Ref No: 018

Name: Patrick Tierney and Patrick O'Reilly

Issues Raised:

This submission has been prepared by David Mulcahy Planning Consultants Ltd on behalf of landowners Patrick Tierney and Patrick O'Reilly seeking the rezoning of 4.15 ha of lands at Branganstown, Kilcock from 'I – Agriculture' to 'C – New Residential'.



The submission raises the following points for consideration in relation to the rezoning request:

- The submission notes Draft Variation No.3 does not include any additional zoned land for Kilcock due to an upcoming settlement plan review in 2026.
- It asserts that the delivery mechanisms outlined will not deliver housing on the ground for Kilcock as per the guidelines, noting a settlement plan review in 2026 is unlikely to deliver new housing within the lifetime of the existing development plan period (Q4,2028).
- The submission states the lands are currently serviceable and do not pose any known flood risk or built/natural heritage constraints.
- The lands do not currently provide access from public roads, however an agreement has been obtained from adjoining landowner 'Glenveagh' in the event of the lands being zoned for residential use.
- The lands have not been subject to any planning history, however it states a new road has been developed up to the eastern boundary of the subject site due to neighbouring development.
- The submission notes a recent permission granted for 133 units to the northeastern boundary of the site, indicating the principle of residential development to accord with the proper planning and sustainable development of the area.
- The submission refers to evolving national and regional planning policy context, noting the implications for County Kildare in terms of delivering more housing at increased densities, including the provision of additional zoned land beyond original baseline targets.

- The submission refers to existing core strategy allocation for Kilcock which does not reflect the towns strong population growth and need for additional zoned land to accommodate continued and sustained population growth.
- It states emphasis should be placed on identifying serviceable lands in smaller settlements such as the subject lands in Kilcock.
- The submission notes the subject lands are of sufficient scale to facilitate supporting social infrastructure such as childcare, playground and recreational amenities that can benefit the town.

Sub Ref No: 053

Name: Jennifer Doyle McQuaid

Issues Raised:

The submission notes the following regarding proposed amendments:

Chapter 2, Amendment No. 2

It is submitted the county will be unable to cope with nearly doubled housing targets unless there is significant investment in public transport, healthcare, childcare and education in tandem.

Chapter 2, Amendment No. 4

It is submitted that housing should not be planned based on proposed public transport unless delivery is in tandem. It is stated there is no plan to extend the proposed Dart+ West to Kilcock and it would be worrying if housing targets for Kilcock were based on a proposal and not an approved plan.

Chapter 3, Amendment No 19: 3.7 Residential Densities

This submission contends that it is incorrect and unsustainable to include Kilcock as a Metropolitan Town or Village given its public transport has lower capacity and frequency. Not sustainable to propose the same densities as other north Kildare towns.

Comments on other submissions

The submission refers to two other submissions regarding rezoning of lands at Kilcock, as follows:

- Site south of the M4 at Courtown/Laragh
This submission considers the site to be too far from the rail line for sustainable housing and notes there is no water or road infrastructure to facilitate development of scale in that area.
- Site at Branganstown
The submission has no issue with housing on the site; however, notes road upgrades are required and notes piecemeal development in the area, smaller housing applications are being made without providing childcare or play spaces.

Sub Ref No: 103

Name: Mounkerry Ventures Ltd.

Issues Raised:

This submission has been prepared by John Spain Associates on behalf of landowner Mounkerry Ventures Ltd. in respect of lands at Boycetown Co. Kildare,

with the majority currently zoned 'C-New Residential' and a minor element zoned 'E – Community and Education'.



The submission raises the following points for consideration in relation to the subject lands:

- The subject lands comprise 9.29 ha and currently are subject to a planning application (Phase 1 submitted Nov 19th, 2025) for a total of 268 residential units in a 3-phase development together with a childcare facility, public open space, internal roads and infrastructure upgrades.
- Notes a recent permission granted for a pumping station on the adjacent site which will serve the wastewater needs arising from the subject lands if developed.
- Submission welcomes Draft Variation No.3 which identifies Kilcock as an area that can facilitate additional housing growth within the lifetime of the development plan.
- Submission acknowledges **Proposed Amendments 10, 12 and 14**, stating Kilcock is well positioned to cater for future additional housing growth should a need to reallocate additional units from long term strategic sites identified. States Kilcock is in a position to cater an additional 250 units.
- Submission welcomes **Proposed Amendment No. 15** and recommends references should also be made to National Planning Objective 11 'NPF First Revision' stating;
"Planned growth at a settlement level shall be determined at development planmaking stage and addressed within the objectives of the plan. The consideration of individual development proposals on zoned and serviced development land subject of consenting processes under the Planning and Development Act shall have regard to a broader set of considerations beyond the targets including, in particular, the receiving capacity of the environment."
- The submission requests an amendment to **Proposed Amendment No.15** as follows; (revised text shown in **green text** below):
*"Where planning applications are received for housing developments on appropriately zoned lands and where the development would result in an exceedance of core strategy allocation for that settlement, the planning authority may consider granting permission for such developments **having regard to the NPF First Revision NPO11 and the provisions of Section 86(7) of the Planning and Development Act 2024** and where commensurate social*

infrastructure is delivered as part of the development scheme in accordance with objectives SC O15, SC O16 and SC O17 of this Plan.”

- Submission notes that planning authorities should as an immediate priority determine the suitability of lands for development over a 12 year plus period and recommends this approach should be followed when preparing the Settlement Capacity Audit and Settlement Plan for Kilcock.
- Submission recommends an amendment to **Proposed Amendment No. 16** which would have regard to current practise and provide greater certainty for applicants and consent authorities until such time as the new settlement plans are prepared.

The following **additional text** is recommended for Proposed Amendment No.16 as follows:

*“CS O31 Prepare settlement plans for Monasterevin, Kilcock and Sallins to include the additional housing growth requirement included in Table 2.8 and Table 2.8A on serviced lands to be informed by infrastructural and environmental assessments. **Until such time as the new settlement plans are prepared, applications will be assessed against the land use zoning maps contained in the Local Area Plans for such settlements”.***

- Refers to **Proposed Amendment No. 28** ‘Section 15.6.6 Public Open Space for Residential Development’, suggesting the standard outlined is contrary to national planning guidelines ‘*Water Sensitive Urban Design Best Practice Interim Guidance Document (2022)*’ which requires stormwater to be attenuated and treated in nature-based solutions.
- It further states this document promotes the integration of surface SuDS features within open space and such features can contribute to the visual interest of spaces.
- It states that under the Compact Growth Guidelines (2024), public open space is now considered to be part of green and blue infrastructure within new developments.
- It asserts a maximum of 10% open space occupied by SuDS features is not feasible and inconsistent with the policies of neighbouring local authorities in South Dublin and Dublin City.
- It suggests the re-wording of **Proposed Amendment No.28** in respect of SuDS and Public Open Space for Residential Development which will align more closely to evolving national policy and best practise standards which can provide greater flexibility to homebuilders. Suggested re-wording as follows; **(new text in green)**

Nature Based SuDS features are generally acceptable within public open space where they contribute in a positive way to the design, biodiversity, and quality of open space. ~~SuDS are not generally acceptable as a form of public open space provision, except where they contribute in a significant and positive way to the design and quality of open space. Where the Council considers that this is the case, in general a maximum of 10% of the open space provision shall be taken up by SuDS.~~

Chief Executive's Response

The contents of the submissions are acknowledged.

Submission 004 and 018 seek the zoning of lands in Kilcock. In this regard, Proposed Variation No. 3 updates the Core Strategy of the County Development Plan in a targeted manner to align with the Housing Growth Guidelines and does not provide residential zonings to any lands, noting that such zonings should be informed by evidence-based assessments and audits at both the site and settlement level. This is in accordance with best planning practice for the sustainable development of settlements, the integration of land use and transportation planning and the creation of communities that are supported by appropriate infrastructure.

However, the Housing Growth Guidelines provides that the housing growth requirements contained therein should be incorporated into existing Development Plans by variation as quickly as possible (Policy and Objective No. 3 of the Guidelines refers). Accordingly, Proposed Variation No. 3 details a series of plan-led and evidence-based mechanisms that Kildare County Council intends to utilise in accommodating the additional housing growth for the remaining three years (2026, 2027 and 2028) of the County Development Plan.

For Kilcock, proposed Objective CS O31 in Variation No. 3 provides that the Council will prepare a new Settlement Plan for Kilcock, integrated into the County Development Plan by statutory variation to replace the Kilcock Local Area Plan 2015-2021. The new Settlement Plan will include the current housing allocation in Table 2.8 (366 units) and the additional housing growth requirement in proposed Table 2.8A for Kilcock (250 units, as outlined in the Proposed Variation and subject to change). Preparatory work on the new Settlement Plan is underway, with publication anticipated in Q1/Q2 2026.

Clarity on the timeframe for the Settlement Plan and a proposed increase in the additional housing growth requirement from 250 to 500 units for Kilcock has been provided in response to the submission from the Office of the Planning Regulator (Sub Ref No. 116). It is also proposed that the Variation should provide clarity the Council will have regard to the relevant provisions (including Land Use Zoning) of any expired Local Area Plan (such as Kilcock) and the provisions of the County Development Plan Core Strategy in its consideration of proposals for new development. This will apply until such a time as the relevant LAP is replaced, revoked or integrated into the County Development Plan.

Land use zoning requests in Kilcock submitted to Proposed Variation No. 3 will be considered as part of the preparation of the Settlement Plan for the town. It should be noted however that all lands will be assessed on their merits having regard to a comprehensive range of evidenced-based supporting documents including *inter alia* a Settlement Capacity Audit (SCA), a Social Infrastructure Audit, a Strategic Flood Risk Assessment and other environmental reports. This data-driven approach will also align with national policy requirements relating to low carbon development and the sequential and compact growth of settlements.

The new Kilcock Settlement Plan will remain in effect from the date of adoption to the expiration of the Kildare County Development Plan 2023-2029, noting that the preparation of a new County Development Plan is scheduled to formally commence in August 2026. The preparation and consultation process for the new County

Development Plan will also facilitate the consideration of further lands in Kilcock, subject to requisite assessments.

The contention of Submission 004 that County Kildare is rapidly running out of zoned lands is rejected. Additionally, the assertion that the county requires an additional 670 hectares of residential lands above current zoning is not accepted. It is also unclear from the submission how this figure was calculated. It should be noted that on foot of a recommendation included in the Housing Growth Requirement Guidelines (July 2025), the Planning Authority undertook a full audit of zoned land to assess the capacity for residential development in the county, the results of which are detailed in the Chief Executive's report on the NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities (2025), which was presented to the Elected Members of Kildare County Council on 22 September 2025. The Audit found that, as of August 2025, approximately 432 hectares of land remain undeveloped with the potential to deliver approximately 13,795 houses across the county. It is considered that both the quantum and capacity of the undeveloped zoned lands, in conjunction with the delivery mechanisms set out in Proposed Variation No. 3 and proposed revisions in response to the OPR submission, is sufficient to cater for the additional housing targets required in County Kildare, over the remaining life of the County Development Plan.

The contention of Submission 053 that the designation of Kilcock as a Metropolitan Town including new density range identified as unsustainable is noted. Kilcock is designated a metropolitan town within the Metropolitan Area Strategic Plan (MASP), a key part of the Eastern and Midland Regional Spatial and Economic Strategy (RSES). The national 'Sustainable Residential Development and Compact Settlements' guidelines, set out the required densities for metropolitan towns in this regard. The density range applied to future sites will range between 35-150 dwellings per hectare depending on factors such as site location, proximity to high-capacity transport and surrounding environment.

The contention of Submission 004 that a revised approach is required regarding the Housing Need and Demand Assessment (HNDA) is noted but not accepted. It should be noted, Objective NPO 47 of the NPF 'First Revision' (April 2025) requires all local authorities to prepare a Housing Need and Demand Assessment (HNDA), which provides a robust methodology and evidence base to inform future housing policy, housing strategies and associated land use zoning policies as part of future development plans.

The contention of Submission 053 that the county will be unable to cope with increased housing targets unless significant investment follows with the delivery of appropriate healthcare, childcare and open space provision is noted. A Social Infrastructure Audit (SIA) will be undertaken as part of the upcoming settlement plan which seeks to examine the availability and capacity of existing social infrastructure/facilities and make recommendations through specific land use objectives and associated zonings. Furthermore, objectives SC O13, SC O15 and SC O16 of the County Development Plan requires the provision of community facilities and appropriate amenity space as part of any proposed residential schemes.

The request in Submission 103 that Proposed Amendment No. 15 should be amended to include reference to National Planning Objective 11 is noted. NPO 11 refers primarily to the plan making stage, and it is not considered necessary to duplicate this reference in the Plan; therefore, no change is recommended.

The request in Submission 103 and the re-wording of Proposed Amendment No. 28 in respect of public open space and Sustainable Urban Drainage Systems (SuDS) requirements is noted. It is accepted that the provision of SuDS can contribute to the visual amenity and high-quality design of urban spaces when it comes to managing rainfall. However, in order to protect and ensure the quality, safety and long-term effectiveness of open space provision in future development, a general standard of 10% is deemed appropriate in the context of Kildare and the nature of typical development. As outlined in the KCC 'Sustainable Drainage Systems Guidance', the Council is committed to facilitating discussions as part of pre-application stages to inform concept ideas and design features which can appropriately integrate and achieve a greater percentage of open space SuDS functionality. Therefore, minor amendments are recommended.

Chief Executive's Recommendation


Refer to Chief Executive's Recommendation – Submission 116 (OPR) in respect of Proposed Amendment No. 14 and updating of Table 2.8A and Table 2.8B as this relates to Kilcock and additional reference to expired Loca Area Plans.

Update Amendment No. 26 [Chapter 15, Development Management Standards] in relation to SuDS as follows:

- SuDS are ~~not generally acceptable as a form of public open space provision, except where they~~ *recognised for their potential to* contribute in a significant and positive way to the design and quality of open space. Where the Council considers that this is the case, ~~in-general a maximum of generally~~ 10% of the open space provision shall be taken up by SuDS, *subject to agreement with the planning authority and in consideration of the overall quality, quantum and function of the open space.*

Issues Raised: Monasterevin

(5 Submissions) Submissions 044, 055, 066, 074 and 115

Sub Ref No:	044
Name:	Denis Holligan
<p>Issues Raised: Submission by David Mulcahy Planning Consultants on behalf of Denis Holligan seeking the zoning of a portion of circa 1.38 ha of land at Barraderra, Monasterevin from 'I: Agriculture' to 'C: New Residential'.</p>	
	
<p>The submission outlines that the zoning request is made in consideration of the following:</p> <ul style="list-style-type: none"> • The submission contends that the variation as currently drafted will only release a limited amount of land for new housing and will not deliver houses on the ground within the remaining lifetime of the CDP which is the goal of the NPF Implementation guidelines. • The submission notes a new settlement plan will be prepared for Monasterevin in 2026 but considers this ambitious considering the amount of supporting documentation to prepare. The submission considers by the time a planning application for housing is prepared and determined, it is likely to be after the expiry of the current CDP by the time any housing is delivered. It is submitted that the proposed residential zoning of the subject site under this variation would result in a planning application in 2026 which would deliver housing within the lifetime of the current CDP. • The submission refers to various provisions of the RSES, Kildare County Development Plan and the Monasterevin Local Area Plan 2016-2022. • The submission refers to the evolving national planning context and the implementations for Kildare regarding housing requirements and residential densities. • The subject site is within the Monasterevin settlement boundary, which is a self-sustaining town in the settlement strategy. • There is a previous outline planning permission for a house on the site, which has lapsed. • The greenfield site is currently zoned agricultural and the adjoining site to the east, further from the town, are zoned Industrial/Warehouse and include an objective for a new road link between the Dublin Road and the L3009. 	

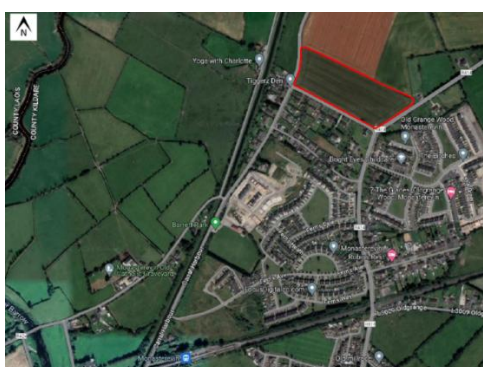
- The submission notes the southern portion of the site is subject to predicted flood risk, but the remainder of the site is developable.
 - The site has extensive road frontage onto the L3009. There is no public footpath or lighting.
 - The site is free from any built or natural heritage constraints.
- The submission includes two attachments comprising Uisce Éireann water mains and wastewater mapping.

Sub Ref No: 055

Name: Masonbrook Holdings Ltd.

Issues Raised:

Submission by Armstrong Fenton Associates on behalf Masonbrook Holdings Ltd. relates to un-zoned lands extending to approximately 4.17 ha at Old Grange, Monasterevin for which it is requested to be rezoned 'C: New Residential'.



The submission makes the following points in support of their submission:

- Incorporates a survey of the status of C: New Residential lands in the town and notes that only circa 2.9 ha of "C: New Residential" land remains undeveloped out of 25.5 hectares of C lands zoned in the Local Area Plan (LAP) 2016-2022. States that this is insufficient to meet the Core Strategy target of 238 dwellings by 2028 which would require 8 ha, and accordingly the subject site by its size and nature represents the most logical site for a sustainable expansion of the town's boundary.
- Submits that existing undeveloped sites (C4, C7 remainder and C10) are limited, with some having no planning history or past planning difficulties.
- Notes the site's greenfield and flat character outside but adjacent to the LAP boundary. States that the site is 1 km from the town centre with access to schools, services, the train station and Barrow Blueway.
- Submits that the site is sequentially appropriate for development given that it is serviced on three sides by public roads, and contiguous to existing residential areas.
- States that Masonbrook Holdings have a proven track record of delivering housing locally in Brocan Wood, Ferns Bridge and Ferns Wood.
- Notes Proposed Variation No. 3 and the provision to allocate an additional 250 units to Monasterevin. Submits that Monasterevin does not have enough undeveloped residentially zoned land to meet current and future housing targets.

- Contends that applying town's 2.6% county allocation in the County Development Plan proportionally would mean Monasterevin should cater for around 441 dwellings to 2029 and c.962 dwellings to 2040.
- Notes Monasterevin's self-sustaining town designation and has the capacity and potential for continued growth.
- States that rezoning the site would support compact growth and avoid future housing supply bottlenecks. Notes that the site is serviceable with no infrastructural bottlenecks. Submits that development on the site at approximately 35 units per hectare would help meet the shortfall of housing required by 2028 and beyond along with contributing to national housing growth targets
- Submission includes an Appendix A which contains a copy of the OS Map identifying the location of the subject site.

Sub Ref No: 066

Name: Brereton Building Services Ltd.

Issues Raised:

Submission by KBM Architects Ltd on behalf Brereton Building Services Ltd. relates to lands zoned I: Agriculture extending to approximately 2.94 ha at Cowpasture, Monasterevin for which it is requested to be rezoned C: New Residential.



The submission makes the following points in support of their submission:

- Notes that no change to the lands is proposed as part of Variation No. 3 and that new residential development on the site would be consistent with the proper planning and sustainable development of the area and would increase the potential deliverable housing supply in the town.
- Outlines greenfield context of the lands located between two existing housing developments, within 800 metres of the town centre and 500 metres of a school.
- Submits that the lands have a favourable topography and ground conditions and have services directly accessible off a public road.

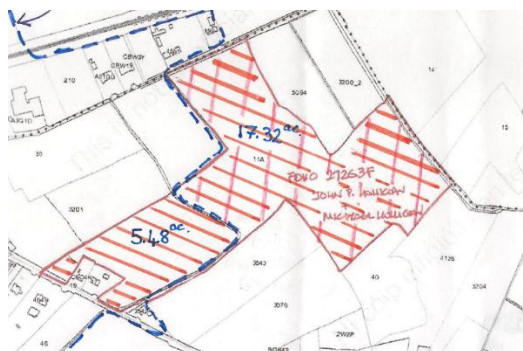
Sub Ref No: 074

Name: JP Holligan and Michael Holligan

Issues Raised:

Submission by JP Holligan and Michael Holligan relates to unzoned lands extending to 5.48 acres (2.22 ha) at Borradera, Monasterevin for which it

requested to be rezoned to accommodate the delivery of housing, serviced sites, sheltered housing, a nursing home and associated amenities.



The submission makes the following points in support of their submission:

- Notes the location of the lands with the subject site (5.48 acres) fronting onto the L3009 local road (and cul-de-sac) being adjoined to the northeast by a further 17.32 acres of land. Notes the subject site is within the CSO Census 2022 Built-Up Boundary.
- Refers to the growth of the town over recent years and states that it is now appropriate to rezone the 5.48 acre portion of the lands.
- Submits that such a zoning would be consistent with the Core Strategy and objectives of the County Development Plan (CDP). Also notes the Government's increase housing targets.
- Refers to the context and characteristics of the site, located approximately 1.5 km distance radius from the town centre. States that this is within easy walking distance of schools, local amenities and the train station. States that there is no need for a Site-Specific Flood Risk Assessment.
- Notes that the Local Area Plan includes an objective for a distributor road which links into the Borradera Road directly opposite the subject site.
- States that the development on the site will assist the creation of active travel infrastructure linking the subject site to the town centre. Refers to the provisions of the Greater Dublin Area Draft Transport Strategy 2011-2030 supporting the development of this infrastructure in such locations. States this can contribute to resolving issues experienced in Monasterevin.
- The submission is accompanied by two annotated maps showing the extent of the subject site and the larger landholding in conjunction with the location of the Census 2022 Built-Up Boundary.

Sub Ref No: 115

Name: Brook Advantage Ltd.

Issues Raised:

Submission by McCutcheon Halley Planning Consultants on behalf of Brook Advantage Ltd. seeking the zoning of circa 4.5 ha of lands at Old Grange Wood, Monasterevin from its current partially zoned 'Agricultural' status to 'New Residential'.



The submission includes a booklet and two appendices comprising an Engineering Report and Site Masterplan prepared by BCA Consulting Engineers. The submission and zoning request is made in consideration of the following:

- The submission sets out general locational context of the subject site within the settlement of Monasterevin.
- Notes the national, regional and local planning policy context and its implications for County Kildare in terms of housing requirements. Contents that as a result the total housing allocation for Monasterevin rise to 431 homes. When using a dwelling density of 35 units/ha, the housing land requirement increases to a minimum of 12.31 ha. States however, when considering the headroom figure allowed within the Implementation Guidelines, the housing land requirement increases to as much as 18.44 ha.
- It is noted the subject site is serviced by existing water supply, wastewater treatment, stormwater and transport infrastructure.
- The subject site is partially within the existing development boundary of Monasterevin with existing and future residential uses adjoining to the north and west. The remainder of the site is bound by woodlands to the east and the railway line to the south. It is stated that any development of the subject site would be led by the principles of compact and sequential urban development.
- The subject site is free of any flood risk or environmental constraints that would reduce the potential residential yield on the site.
- It is highlighted that the subject site could contribute circa 141 dwellings to the housing growth requirement targets.
- It is stated the median price of new houses in Monasterevin has increased substantially since 2020; however, it is still significantly below the median house prices in Dublin which would present Monasterevin as an affordable option with excellent existing access to the GDA.
- It is noted the subject site is proximate to good public transport services being less than 2km from Monasterevin train station and several local and regional bus services.
- It is submitted the subject site is proximate to good social infrastructure being within 2km of primary schools, a post primary school, childcare facilities and several general services, all of which have capacity to accommodate additional growth.

Appendix 1: Engineering Report by BCA Consulting Engineers

- The report examines the characteristics of the site with regard to topography, roads access, water and wastewater services, surface water drainage and flood risk.

Appendix 2: Site Masterplan prepared by BCA Consulting Engineers

- Illustrates an indicative masterplan concept of a residential scheme on the site.

Chief Executive's Response

The contents of the submissions are noted. It is acknowledged that Proposed Variation No. 3 does not contain any provisions to amend the land use zoning objectives of any lands in Monasterevin. Proposed Variation No. 3 seeks to make a targeted variation to the County Development Plan (CDP) for the remaining three years of the plan period only, to provide *inter alia* for the additional housing growth requirements of the Government's Housing Growth Guidelines (2025). It is not a full review of the CDP, nor does it include new land use zoning maps. Consequently, land use zoning requests for Monasterevin cannot be considered.

Proposed Objective CS O31 in Variation No. 3 provides that the Council will prepare a new Settlement Plan for Monasterevin, integrated into the County Development Plan by statutory variation to replace the Monasterevin Local Area Plan 2016-2022 (LAP). The Monasterevin Settlement Plan will include the current housing allocation in Table 2.8 (238 units) and the additional housing growth requirement (250 units) in proposed Table 2.8A for the town. Preparatory work on this Settlement Plan is underway, with publication envisaged in Q1/Q2 2026.

Land use zoning requests in Monasterevin submitted to Proposed Variation No. 3 will be considered as part of the preparation of the Settlement Plan for the town. It should be noted however, that all lands will be assessed on their merits having regard to a comprehensive range of evidenced-based supporting documents including *inter alia* a Settlement Capacity Audit (SCA), a Social Infrastructure Audit, a Strategic Flood Risk Assessment and other environmental reports. This data-driven approach will also align with national policy requirements relating to low carbon development and the sequential and compact growth of settlements.

The contention in Submission 044 that the variation as currently drafted will only release a limited amount of land for new housing and will not deliver houses on the ground within the remaining lifetime of the CDP is noted. It is considered that the Proposed Variation represents an ambitious but realistic approach to accommodating the Government's revised housing growth requirements in a targeted, plan-led manner so that additional housing may be delivered in the short, medium and long term, fully in accordance with the provisions of the Housing Growth Guidelines. Furthermore, it is noted that in their submission to the Proposed Variation, the Office of the Planning Regulator (Submission 116) considers that a transparent and evidence-based approach has been followed by the Council in preparing the Proposed Variation. Notwithstanding the above, as detailed in the response to the OPR submission (Submission 116), a number of further amendments, including additional mechanisms, are proposed to be made to facilitate delivery and provide a continuity of supply to meet the housing growth requirements. These proposals place a particular emphasis on enabling delivery on existing zoned land in the short term and on achieving equitable, balanced and proportionate growth across the county (see Section 3 of this report).

The comments in Submission 055 relating to envisaged housing growth allocation to Monasterevin over the period to 2039 are noted. The new Settlement Plan will cover

the period to 2029, in keeping with the housing allocations provided for under the current County Development Plan (as varied). The housing requirements for the town for the following 10-year period will be determined under the next CDP.

With regard to the request for Serviced Sites in Submission 074, it should be noted that the aim of Kildare County Council's Serviced Sites Scheme is to provide a sustainable alternative to one-off housing in rural areas. It is not designed to cater for urban generated demand in a town subject to development pressures. It is considered that Monasterevin by virtue of its identification as a Self-Sustaining Town and its highly accessible location within the Greater Dublin Area is unsuitable for such Serviced Sites development. It is further noted that given the town's population is in excess of 5,000 persons, residential density ranges of 30-50 dwellings per hectare (net) are required under Section 3.3.3 (ii) under the Sustainable Residential Development and Compact Growth Guidelines (2024) for '*Suburban/Urban Extension*' areas in Monasterevin.


The contention outlined in Submission 115 regarding the quantum of land that will need to be zoned for new residential development in Monasterevin is noted. The zoning of lands for C: New Residential uses will be determined on the basis of a range of factors, including the outputs of the Settlement Capacity Audit and compliance with the compact growth guidelines. Furthermore, a portion of the housing growth allocation given to Monasterevin will be assigned to suitably identified locations in the town centre and within existing residential/infill zoned lands. Regarding the reference to 'headroom' in Submission 115, it should be noted that this provision for '*up to 50% in excess of the baseline provision*' is assigned by the Housing Growth Requirements Guidelines (2025) at county level and not to individual settlements.

Chief Executive's Recommendation

No change recommended.

Issues Raised: Clane

(1 Submission) Submission 090

Sub Ref No:	090
Name:	Westar Investments Ltd
<p>Issues Raised:</p> <p>This submission has been prepared by Huges Planning and Development Consultants on behalf of Westar Investments Ltd in relation to lands at Capdoo, Clane. The submission requests that the Core Strategy, as set out in Variation No. 3, be reviewed and amended to:</p> <ul style="list-style-type: none"> Consider the subject lands as part of the housing unit targets for Kildare over the lifetime of the County Development Plan and amend the allocations in Table 2.8 to align with the completion of development on the subject lands; Increase the housing unit allocation for Clane from its current 219 units to 470 units (+251). 	
	
<p>The submission outlines the Government policy / guidance context regarding housing, stating that the intention of the NPF Implementation Guidelines is to bring forward lands capable of delivering housing in the short term.</p> <p>The submission outlines the local planning context and history of the subject site as follows:</p> <ul style="list-style-type: none"> The lands are zoned and make up Key Development Area 1 of the Clane LAP, which has been earmarked for development for a number of years but has been delayed due to litigation. A Strategic Housing Development (SHD) determination is currently awaited from An Coimisiún Pleanála for 333 units, childcare and a community building (Planning Ref. ABP-320511-24). This planning application was originally permitted in 2021, but the grant was quashed and remitted back to An Coimisiún Pleanála for re-determination by the High Court. In the interim, planning permission has been granted for the partial phased development of the lands to deliver the original proposed SHD development. 34 homes (Planning Ref. 22/1400) are fully complete. 59 homes, a large 5-acre parkland and play spaces (Planning Ref. 22/899) are also practically complete. Servicing infrastructure has been provided to enable further construction on the remaining landholding under the above permissions. The remaining lands 	

subject of the SHD application will include 240 homes, a 90-100 pupil creche and a community building. The submission states that the developer is committed to prioritising the delivery of social infrastructure elements.

The submission notes that Kildare County Council's approach to the Housing Growth Requirement Guidelines does not amend the existing Core Strategy (Table 2.8) as a whole but instead proposes new supplementary tables (Tables 2.8A and 2.8 B) to distribute the additional housing requirement across identified locations / towns in the short and long term.

This approach is considered detrimental to the ethos of the Guidelines and the delivery of housing on many zoned and serviced sites in Kildare, which are constrained by the current Core Strategy. The approach represents a missed opportunity to identify and support the quick delivery of housing. It is stated that this adversely impacts the development of a large number of zoned residential lands across County Kildare which are available for development, including the subject lands. Completion of the subject lands is hindered / prohibited by the 219-unit allocation to Clane in the County Development Plan, noting that significant enabling infrastructure for the development of the subject lands is or will be in place shortly. Permission has been refused for 51 units on the lands due to the quantum of housing permitted, completed and under construction in Clane since the adoption of the Plan indicating exceedance of the housing allocation.

The submission notes the proposed additional text in Section 2.12 of the Plan, which allows the planning authority to consider granting permission for development which exceeds the Core Strategy. However, the risk of a legal challenge regarding an exceedance of the Core Strategy allocation remains substantial. Accordingly, proposed Variation No. 3 does not currently support the continued development of these lands.

The subject lands are an excellent example of an available zoned site that can be quickly released to deliver housing at pace. Further development on the subject lands can only be delivered by an increase in the housing allocation for Clane in the Core Strategy.

Chief Executive' Response

The content of the submission is acknowledged.

The assertion in Submission 090 that the approach of Proposed Variation No. 3 to the integration of the additional housing growth requirements of the Housing Growth Requirement Guidelines for Planning Authorities (2025) is detrimental to the ethos of the Guidelines is not accepted.

The aforementioned Guidelines provide that the housing growth requirements contained therein should be incorporated into existing Development Plans by variation as quickly as possible (Policy and Objective No. 3 of the Guidelines refers). As detailed in Section 1.1 above, the proposed mechanisms are deemed to be the most expedient methods to unlock substantial areas of land in higher order settlements of the county for residential development in a plan-led and evidence

based manner that accords with best practice to enable the sustainable growth of settlements, the integration of land use and transportation planning and the creation of communities that are supported by appropriate infrastructure. This strategy has also been informed by the ongoing transition of planning legislation from the 2000 Act to the 2024 Act and the upcoming preparation of a new County Development Plan, which is scheduled to formally commence in August 2026.


However, the unique circumstances with respect to the settlement of Clane in the context of land use zoning and Core Strategy allocation, together with the content of the submission in relation to the short-term completion of development on zoned and serviced lands in a Key Development Area are noted. As such, the requested additional allocation of units (251 units) to Clane has been addressed in response to the OPR submission to provide amendments to Table 2.8A. This increased allocation aligns with the provisions of the NPF Implementation: Housing Growth Requirements Guidelines (2025) in terms of the delivery of additional housing in the short term (Refer to Section 3 of this Report).

Chief Executive's Recommendation

Refer to Chief Executive's Recommendation – Submission 116 (OPR) in respect of Proposed Amendment No. 14 and updating of Table 2.8A and Table 2.8B as this relates to Clane.

Issues Raised: Sallins

(11 submissions) Submissions 002, 005, 006, 032, 033, 071, 088, 093, 105, 108, and 117

Sub Ref No:	002
Name:	Kehoe Family
<p>Issues Raised:</p> <p>Submission by Gerry Kehoe on behalf of the Kehoe Family seeking the rezoning of a 6.07 ha of land at Osberstown, Sallins from 'I: Agricultural' under the Sallins Local Area Plan 2016 –2022 (LAP) to 'C: New Residential'.</p>	
	
<p>The submission provides the following points for consideration in relation to the rezoning request:</p> <ul style="list-style-type: none"> • The land is within the settlement boundary and is bordered by new and existing residential development, the M7 Motorway, Millennium Park and the Grand Canal / Naas to Sallins Greenway. • The lands are in a single ownership and are available for immediate development, containing a dwelling and childcare facility. • There are a range of land use zonings adjoining and near the subject lands. • The lands are accessible to public transport options (c.500m to train station) and are well serviced by pedestrian and cycle infrastructure (<i>inter alia</i> the Canal greenway) connections to employment and services locations, urban centres, local schools and wider local networks. • The lands are well serviced, being approximately 1km from Sallins town centre, 2km from Naas town centre, 700m – 1.2km from educational facilities (primary and secondary), 700m from a medical centre and 300-800m from a range of other businesses / employment / service locations. • Development on these lands will have no negative impact on the provision of public parks / recreation facilities, with the lands benefitting from the Canal and the future Sallins Amenity Lands development. • The submission asserts that there is no evidence of past flooding on the subject lands and was not identified for further assessment as part of the Strategic Flood Risk Assessment for the Sallins LAP. • Some features of the site should be preserved free from development to protect biodiversity and green infrastructure. The landowners are committee 	

members of the local Tidy Towns and intend to enhance and protect the on-site green infrastructure should the lands be rezoned.

- There is no evidence of archaeological heritage on the lands.
- There are no known surface water constraints, with the lands benefitting from on-site surface water drainage pipes / manholes.
- The submission outlines that the lands are serviced by a water supply connection and can be serviced with a wastewater connection (c.400m distance from lands).
- The subject site is in single ownership and are available for development.

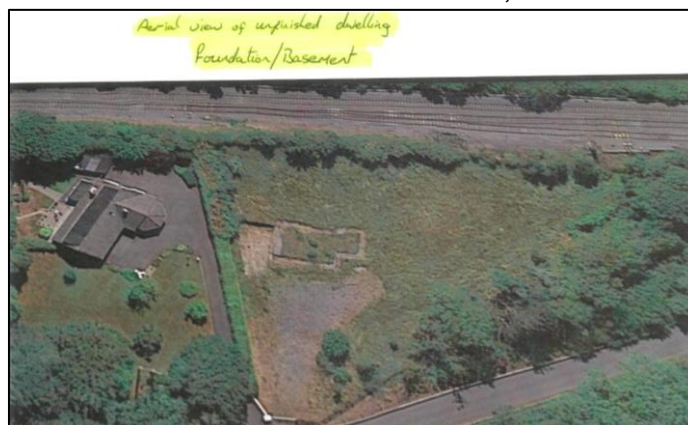
The submission concludes that the proposed rezoning would facilitate sequential and compact growth of the town through the delivery of a high-quality housing that benefits from active travel connectivity and proximity to public transport options (incl. rail), employment opportunities and supporting services, consistent with the NPF and the Eastern and Midland RSES objectives for transit-orientated development and the consolidation and compact growth of serviced settlements.

Sub Ref No: 005

Name: Ken and Kim Davis

Issues Raised:

This submission requests a change in zoning for a small piece of land (area not stated) adjoining Eircode W91 X3KA at Kerdiffstown, Sallins.



The submission states that the land is currently rural, at the border between Sallins rural and Sallins Town and that a new zoning would better utilise the site. Planning permission was previously granted (Planning Ref. 15639) on the site for a dwelling, however it was not completed. It is considered that the completion of the previously permitted dwelling and the development of the lands will greatly add to the development of the area, noting that a lot of money has been spent upgrading and developing the surrounding area, especially the Sallins canal walkway.

Sub Ref No: 006

Name: John Kehoe

Issues Raised:

Submission by John Kehoe seeking the rezoning of a 6.07 ha of land at Osberstown, Sallins from Agricultural to Residential in the review of the Sallins Local Area Plan (LAP).



The submission outlines that the rezoning request is made in consideration of the following:

- The landholding is too small to be a viable farm holding.
- The lands represent the logical, sequential and sustainable growth of Sallins. It is proposed that the area be prioritised for development and investment. It is asserted that planners are encouraged to ensure that land is zoned for housing within the LAP boundary before considering land outside the boundary.
- The lands should be considered as an 'infill' landholding, being bound to the south by the M7 Motorway, to the west by the canal, to the east by an estate and to the north by the Osberstown Road. An additional estate is located to the north of the Osberstown Road.
- The lands benefit from its proximity to existing services and have the potential to deliver a low / zero carbon transport orientated development. The lands are c.1km from Sallins Town Centre, 2km from Naas Town Centre, 800m from Sallins Train Station, 200m from a bus stop and 1km from shopping, medical and major commercial /employment facilities (including Millennium Park). There is an established primary school in Sallins and a new 1,000+ pupil secondary school is within 0.7km cycling and walking distance of the lands.
- It is stated that it would be possible to create a green corridor along the M7 to the canal, which would be environmentally friendly and an asset to the community. Development of the subject lands along the canal as a green corridor would be environmentally friendly, contribute to the quality of life for future residents and be an asset to the community.
- The submission considers that the lands would contribute to achievement of the ambitious targets for compact growth in urban areas outlined in the NPF, together with the development strategy for Naas and the vision for a low carbon town in the Naas Development Plan.

Sub Ref No: 032

Name: Vaughan Whelan

Issues Raised:

This submission has been prepared by David Mulcahy Planning Consultants Ltd. on behalf of Vaughan Whelan seeking the rezoning of (c.2.8 ha) land at Sallins Pier/Wharf, Sallins, from 'F: Open Space and Amenity' to 'C: New Residential'.

The site adjoins the Grand Canal to the north and west, the Cork-Dublin rail line to the south and residential dwellings to the east.



The submission raises the following points for consideration in relation to the rezoning request:

- Refers to the increased housing requirements for County Kildare, as set out in the Section 28 Guidelines – NPF Implementation: Housing Growth Requirements (July 2025).
- Notes the population growth of both County Kildare and Sallins.
- States that the rezoning of the lands to New Residential accords with national and regional planning policy to deliver compact urban settlements and the sustainable use of a vacant, underutilised, infill site, which will increase housing supply to the town of Sallins within convenience distance of Sallins Train Station.
- States that the site is located in a residential area and is connected back into the town centre and Sallins Train Station (located c.750m away) via established roads and footpaths.
- Refers to the bus routes that are served by bus services along the Main Street.
- States that there is no known archaeology associated with the site, and it is not located within or near any Natura 2000 site.
- States a small portion of the site is identified in predictive flood mapping but adjoins a controlled canal.
- States that the Grand Canal pNHA extends onto the subject lands as indicated in Figure No. 8 of the submission.
- Refers to the proposed Sallins Amenity Lands, which will include pitches, wetland areas, car park and playgrounds, which it states reduces the need for additional public open space on the site that is the subject of this submission. However, the submission highlights a shortfall of €7.5m will need to come from central Government for the development of the amenity lands.
- Refers to various provisions of the Revised NPF, the RSES, the Kildare County Development Plan 2023-2029, the Sallins Local Area Plan 2016-2022, and recently published Section 28 Guidelines.
- Provides an outline of the planning history on the subject site and adjoining lands. Refers to the permission for 36 houses granted on the part of the previous by-pass road reservation which was zoned New Residential.
- Refers to requirements of Variation No. 3 and current housing targets and states that the zonings for the additional 250 housing units allocated to Sallins will not take place until the preparation of a new Settlement Plan for Sallins is

finalised which is likely to be 2027. States that the reality therefore is that very little housing will be delivered during the remaining 3-year life of the Kildare County Development Plan arising from the Variation.

- Contends that if lands are zoned in Sallins town now, under the current Variation there is a realistic chance of houses being delivered on the ground within the lifetime of the current development plan.
- Submits that the subject site presents as an ideal candidate for New Residential zoning given its proximity to Sallins Train Station and the fact that it is serviceable.
- States that the planning gain includes increased dwellings in close proximity to train station and town centre, new bridge over canal with access to large park and passive surveillance of park.

Sub Ref No: 033

Name: Frank Reynolds

Issues Raised:

This submission has been prepared by David Mulcahy Planning Consultants Ltd on behalf of Frank Reynolds seeks the rezoning of unzoned land (c.1.8 ha) in Sallins to 'C: New Residential'. The subject site is located outside the Sallins LAP 2016-2022 boundary and is located at the eastern end of the Willousie housing estate, south of the L6013 (Sherlockstown Road) within the 50kph speed limit, and backs on to the Grand Canal on its southern boundary.



The submission raises the following points for consideration in relation to the rezoning request:

- Refers to the increased housing allocation for County Kildare as set out in the Section 28 Guidelines – NPF Implementation: Housing Growth Requirements (July 2025).
- States that the rezoning of the lands to New Residential accords with national and regional planning policy in respect of promoting the development of brownfield sites (site previously a compound associated within the development of the Willousie estate) to deliver compact urban settlements and the sustainable use of a vacant, underutilised, infill site, which will increase housing supply to the town of Sallins.
- States that the applicant has previously obtained planning permission for an entrance onto the L6013 and also has access to estate roads and estate services retained by legal agreement and reserved rights.

- States that the site is located c.1km from Sallins Train Station via the pedestrian bridge over the Grand Canal and refers to the bus routes that run along the Sallins Main Street.
- The site is within the 50kph speed limit.
- States that there are no known archaeological sites or designated sites in the immediate vicinity of the site and the site has no flood risk.
- Refers to the Grand Canal pNHA and the protected woodland on adjoining lands to the south of the site and states that this does not preclude zoning of the site but any future development of the site for residential development will warrant a buffer at the south end of the site from any physical development.
- Refers to the planning application associated with the site (14/376).
- Refers to various provisions of the Revised NPF, the RSES, the Kildare County Development Plan 2023-2029, the Sallins Local Area Plan 2016-2022, and recently published Section 28 Guidelines.
- Refers to requirements of Variation No. 3 and current housing targets and states that the zonings for the additional 250 housing units allocated in Sallins will not take place until the preparation of a new Settlement Plan for Sallins is finalised which is likely to be 2027.
- The zoning of the site would deliver housing on the ground within the lifetime of the Plan.
- Submits that the subject site presents as an ideal candidate for New Residential zoning given its proximity to Sallins Train Station and the fact that it is serviceable.
- States that the planning gain includes increased dwellings in close proximity to train station and town centre, passive surveillance of canal, new footpath and pedestrian connection to town centre.

Sub Ref No: 071

Name: Neville Homes Limited

Issues Raised:

This submission has been prepared by SCA Planning and Development Consultants on behalf of Neville Homes Limited seeking the following:

- An amendment to Variation No. 3 to increase the housing unit allocation for Sallins from 250 units to 500 units to ensure that existing zoned lands can be zoned in the new Settlement Plan for Sallins; and
- The amendment of Proposed Variation No. 3 to confirm the status of LAPs including the Sallins LAP by the inclusion of the following: *Existing Local Area Plans shall remain in effect until such time as they are superseded by new statutory plans.*



The submission raises the following points for consideration in relation to the request:

- States that Neville Homes Limited owns a substantial landholding in the north-western quadrant of Sallins (6.9 ha of which is zoned 'New Residential').
- Refers to the increased housing allocation for County Kildare as set out in the Section 28 Guidelines – NPF Implementation: Housing Growth Requirements (July 2025) and the additional housing growth allocated to Monasterevin, Kilcock and Sallins to inform the preparation of new Settlement Plans for 2026.
- Refers to the existing housing target for Sallins (174 no. units) and the additional 250 no. units allocated to Sallins, which it contends would give a combined total of 424 no. new units.
- States that some of the sites listed in Table 5 of the Sallins LAP (2016-2022), which provides for a potential yield of 758 units, have been developed and the remaining undeveloped sites have a combined yield of circa 500 units in addition to small plots throughout Sallins that provide further development potential.
- Refers to the C4 site owned by Neville Homes that has a current planning application for 99 homes and creche and refers to the pre-planning consultation in relation to Site C6 for development of circa 160 units.
- States that proposals for sites A3, K1 and C5 are in preparation by other landowners.
- States that it is essential that the CDP Core Strategy does not compromise the long-established development potential of Sallins and should safeguard the lands that are already zoned and to secure this will require a greater allocation of units to Sallins.
- States that all the lands zoned under the LAP constitute Tier 1 serviced lands and are close to excellent public transport and within walking distance of the town centre.

Sub Ref No: 088

Name: Glenveagh Homes Ltd.

Issues Raised:

The submission includes an attachment document by John Spain Associates, on behalf of Glenveagh Homes Ltd., which raises the following issues in relation to Sallins:

- Supports that Sallins is identified as an area that can facilitate additional housing growth required within the remaining Plan period.

- Supports recognition of TOD opportunities in supporting the delivery of new and sustainable residential communities.
- Notes the additional 250 no. units and that Proposed Amendment No. 12 and 14, identifies Sallins for additional short-/medium-term growth with location and zoning to be determined through a new Settlement Plan.
- It is submitted that additional core strategy numbers are allocated to Sallins to take advantage of unique TOD opportunities in the area.

Sub Ref No: 093

Name: Patrick Murphy

Issues Raised:

This submission has been prepared by John Spain Associates (JSA), Planning and Development Consultants on behalf of Patrick Murphy seeking the re-zoning of lands (c.17 ha) at Deerpark, Clane Road, Sallins from 'I: Agriculture' and 'F: Open Space and Amenity' to 'C: New Residential' to facilitate additional housing growth in the Settlement Plan for Sallins. The lands are in agricultural use and are bound to the north by the Sallins By-Pass, to the east by the Clane Road, to the south by the existing built-up area of Sallins and to the west by the River Liffey. Submission requests the following:

- Allocation of additional units to lands in Sallins that can realistically be brought forward for delivery in the short-term, such as the subject lands and suggests that the additional housing allocation for Sallins should be increased from 250 no. units to 750 no. units and noting that the land use zoning will be addressed through the forthcoming Settlement Plan.
- That in the absence of a zoning map for Sallins as part of the Proposed Variation, which would include the subject lands, the Sallins Settlement Capacity Audit and the Sallins Settlement Plan should determine the suitability of lands for development over a 12-year plus period (to encompass the remaining period of the current adopted plan and the lifespan of the new 10-year development plan).



The submission raises the following points for consideration in relation to the request:

- The submission includes a Development Potential/Vision for the lands prepared by O'Mahony Pike (OMP) Architects, which provides for the potential delivery of 420-480 no. residential units plus 15% of the site area (circa 2 ha) as public open space in a sequential, phased expansion of Sallins.

- The OMP document also sets out the planning, accessibility, deliverability and development context for the subject lands and provides an indicative layout plan for residential development on the site.
- JSA submission states that the lands comprise of circa 17 ha, of which circa 14 ha is considered suitable for residential development, allowing for circa 3 ha of open space zoned along the River Liffey.
- Also states that the Murphy lands at Deerpark on the northern edge of Sallins present as a suitable option to meet the short-term housing requirements for Sallins on Tier 1 lands which are ready to be brought forward for development once re-zoned.
- States that the site is dry and flat and benefits from a new sewer pipeline that was constructed across the site in early 2022 as part of the Upper Liffey Valley Sewerage Scheme, access to fibre optic broadband, a 110kv electricity line that runs overhead through the site and is not located within Flood Zones A and B.
- Refers to the increased housing allocation for Sallins to meet the vision set out in the Revised NPF 2025 and relevant s.28 Guidelines and rezoning of the lands would provide for additional residential development to accommodate future population growth in the town and the county as a whole.
- Refers to the Sallins and Naas Train Station and planned improvements in commuter services and potential active travel opportunities on the open space along the River Liffey and Grand Canal Greenway.
- States that road access can be achieved with minimal impact on traffic in Sallins, ensuring integration with the existing road network.
- Refers to the employment zones in the wider area including the M7 Business Park and Millennium Park.
- Refers to the identification of Sallins for additional short-/medium-term growth and the potential additional housing of 250 no. units in the proposed Sallins Settlement Plan, which is in addition to the housing unit target of 174 in Table 2.8 of the CDP.

Sub Ref No:

105

Name:

Gerald Kehoe

Issues Raised:

Submission by Gerald Kehoe on behalf of the Kehoe Family seeking the rezoning of lands (c. 17 acres) at Osberstown Road, Sallins from 'I: Agriculture' under the Sallins Local Area Plan 2016-2022 (LAP) to 'C: New Residential'.



The submission supports earlier submissions to Variation No. 3 (it is requested should be read in tandem) the submission comprises of two elements the original submission and 'Part 2 Further Information to the original Submission'.

The submission provides the following points for consideration in relation to the rezoning request:

- The proposal is in line with the National Planning Framework (NPF).
- The lands are serviced and are located within the current Sallins LAP boundary and should be considered infill and an existing childcare facility is located on the site.
- States that the lands are bounded on two sides by existing residential developments, the M7 Motorway to the south (a high-capacity connectivity route) and the Grand Canal Greenway to the west.
- States that the development of the lands will consolidate the urban form of Sallins, and within walking distance of schools, retail, public transport, and employment lands and will reduce dependence on private car use and align with the Government's Climate Action Plan 2024.
- Contends that proximity to the Grand Canal Greenway (active travel route) and public transport nodes and corridors reduces commuting distances and provides a unique opportunity to strengthen rural economic activity and provide for sustainable mobility.
- States that the rezoning of the lands provides for the expansion and enhancement of recreational and heritage assets and protect the Canal's historic landscape character and delivery significant biodiversity enhancement along a strategic water corridor and the wider Kildare Green Infrastructure Network.
- The submission refers to the feasibility connection letter from Irish Water.
- The proposal can enable new community infrastructure, new amenity space, a canal side public green, allotments/community garden and attract tourism footfall while consolidating the settlement.
- Direct access to an existing childcare facility and the ability to provide for medical practice on the site subject to appropriate zoning.
- The lands are located proximate to the M7 Motorway interchange and Sallins Train Station.

Sub Ref No: 108

Name: T.D. Housing Limited

Issues Raised:

This submission has been prepared by The Planning Partnership on behalf of landowner T.D. Housing Limited in relation to lands (circa 1.17 ha) at Church Avenue, Sallins that consists of two triangular areas and it is submitted that the principle triangular area extends to circa 0.9 ha.

The submission welcomes the spirit of Variation No. 3 but seeks that the following targeted modifications be made to the Variation, in the interests of delivery, and to improve the ability of both the planning authority and landowners/developers to be able to plan ahead to some extent, compared to the current deadlock in terms of settlement plans.



1. Housing target for Sallins be updated, on at least a pro-rata basis, having regard to the significant uplift for the County as a whole;
2. That the housing target for the county and Sallins be set to at least 2038, as required by the s.28 Guidelines on NPF Implementation – Housing Growth Requirements;
3. That the actual lifetime of the CDP be taken into consideration, anticipating a potential extension to the current 2023-2029 Plan period, due to transitional requirements arising from the implementation of the Planning and Development Act 2024 (as amended) or otherwise;
4. That interim policies be included in the Variation to remove any absolute obstacles to the progression of unzoned/expired zoned land within Settlements (including but not limited to Sallins), on a case-by-case basis.

The submission provides the following points for consideration in relation to this request:

- The submission refers to the landowner's site at Church Avenue and submits two Google Maps images annotated by the Agent. States that the principal triangular area extends to circa 0.9 ha., and that the site has the benefit of services.
- The submission also includes a Briefing Document at Annex A, which provides a detailed description of the subject site along with a rationale for the removal of the Specific Objective relating to the expansion of the St Laurence's NS and the rationale for the rezoning of the lands to 'C: New Residential'. It also includes a Site-Specific Capacity Audit – Church Avenue, Sallins at Annex B.
- States that preparing to submit an application for 80 units marketed for older right sizing housing scheme for early 2026, which had pre-planning.
- States that with the inclusion of the above amendments, the subject lands can form an important part of the delivery of the overall aims and objectives of the Variation, and that its aims are deliverable in Sallins.

In addressing the proposed Variation set out above, it is submitted that:

1. The Absence of updated Targets for Sallins – Amendment Nos. 13 and 14 relate.

- States that the Variation does not sufficiently adjust housing targets for Sallins relative to the s.28 guidelines and that the CDP is the forum for setting the overall strategy for the town, rather than the forthcoming settlement plan, according to NPO 11 of Revised NPF.
- States that the preservation of the CDP target of 174 units in addition to the 250 units in Table 2.8A under Amendment No. 14 is inappropriate and would act as a barrier to Sallins fulfilling its role in the settlement and core

strategies and falls significantly short of the estimated need to 2038 of 836 no. units, not including headroom of 50%, or circa 1,255 no. units and states that the aim of the Plan should be that Sallins would retain its relativity with the county population (being 2.53% of same) – Footnote 1 refers.

- Submits that the Variation Objective CS O31 is not sufficient in terms of enabling or facilitating delivery of housing in the short to medium term.

2. The absence of targets to (at least) 2038 – Amendment Nos. 9 and 10 Relate.

- States that Amendment No. 9 should be expanded, in terms of housing delivery to date, to outline the degree to which housing targets have or have not been met on a settlement-by-settlement basis, which would highlight the housing shortfall in Sallins.
- States that in relation to Amendment No. 10, the NPF Guidelines requires that the time period must be to 2038.
- States that the medium-term housing targets for Sallins requires up to 1,255 dwellings to 2038 (including 50 % headroom).

3. The potential for the Review of the Existing Plan to be Delayed – Amendment 15 and 16 relate.

- Refers to the potential for the review of the CDP to be delayed due to the delays in the rollout of the Planning and Development Act 2024.
- States that this risk emphasises the need to plan beyond the 2029 horizon of the CDP as required by the NPF guidelines.
- States that this risk also affects the progress of a new settlement plan for Sallins and that the previous LAP expired in 2022 with the town being 'unplanned' in the interim, a situation that could continue indefinitely.
- States that a series of practical measures can be introduced under the Variation to mitigate the impact of this lacuna in planning policy in the short term and this would aid delivery and release of housing.

4. The need to prevent procedure being a barrier to appropriate development – Amendment Nos. 15 and 16 relate.

- Refers to Government policy in *Delivering Homes, Building Communities 2025-2030* and the Report of the Housing Commission.
- States that the Sallins Settlement Plan could be delayed until 2027 or later and notes that Amendments Nos. 15 and 16 of the Variation includes positive elements in terms of flexibility, adaptability and these positive elements should be expanded to specifically address lands that are left 'unplanned' due to the expiry of older settlement plans, such as in Sallins.
- Submission suggests a revised wording of Objective CS O31 (or solely applicable to Sallins, as appropriate), as follows:

'Prepare settlement plans for Monasterevin, Kilcock and Sallins to include the additional housing growth requirement included in Table 2.8 and Table 2.8A [as amended herein] on serviced lands to be informed by infrastructural and environmental assessments.

During the transition period to their coming into effect, individual planning applications within the settlements will be considered on a case by case basis, having regard to the objectives, policies and standards of the Development Plan, the sequential approach, and being subject to a

satisfactory (Tier 1) Site-Specific Capacity Assessment (as per the criteria of 'Settlement and Site Capacity Audit – A Supporting Document of Proposed Variation No. 3'.

- Submission states that the enclosed Site-Specific Capacity Assessment demonstrates that the subject lands achieve Tier 1 status, with a score of 326 (out of 400, with Tier 1 requirement being a score of 300).

Sub Ref No: 117

Name: Vaughan and Whelan

Issues Raised:

This submission has been prepared by Stephen Little and Associates (SLA) on behalf of Vaughan and Whelan seeks the rezoning of lands (circa 3.5 ha) from 'F: Open Space and Amenity' to 'C: New Residential'. The lands are located in Sallins between Osberstown Drive and Sallins Pier and are bounded by the railway line to the south, the Grand Canal to the west and north and the built-up area of Sallins at Sallins Wharf and Sallins Pier to the east. The lands adjoin the Grand Canal to the north and west. There is an existing estate road crossing part of the subject lands.



The submission raises the following points for consideration in relation to the request:

- Refers to the provisions of Variation No. 3, Revised NPF, the s.28 Guidelines NPF Implementation – Housing Growth Requirements (2025) and the Kildare CDP 2023-2029 and provides an assessment of the additional dwelling units required for Sallins during the lifetime of the current CDP and 10-year life of the next CDP. States that an additional 665 units are needed over the next CDP, assuming the current targets are met.
- States that the lands are proximate to train and bus services, town centre, school, shops, post office and public park/playground, there are no environmental constraints to the immediate development of the site, and the lands are connected to the town centre via existing roads and footpaths.
- States that there are service connections (gas, water, electric and sewer) available to service development at the subject site.
- Contends that the Open Space and Amenity zoning for the subject site is the product of a by-pass which did not proceed at this location, and the site was never intended as an amenity space and should not preclude its consideration to be rezoned on the basis of the greater good of the town.

- States that the rezoning of these lands would enable the Planning Authority to realise its objective providing a pedestrian/cycle connection over the canal into the (proposed) town park area to the west (zoned F1).
- States that the subject lands primarily consist of open grassland and trees and are 350m from the town centre and 750m from the train station.
- States that the site is heavily screened by mature hedgerow from the Grand Canal.
- Refers to the planning history of the site (Planning Ref. Nos. 21/1276 (ABP-3124749-22) and 24/61359 refers).
- Refers to an objective for a pedestrian/cyclist bridge access route over the Grand Canal to the west of the site which would facilitate residential development of the subject site.
- Refers to the number of development sites in Sallins and notes recent planning applications in the town.
- States that the need for Open Space and Amenity zoning is now reduced by the provision of a large park in the immediate vicinity which will cater for the needs of residents subject to a pedestrian/cycle bridge over the canal being provided.
- Notes that public open space provision and pedestrian/cyclist/access connections over the Grand Canal would be provided as part of a future residential planning application on the subject lands if rezoned.

Chief Executive's Response

The contents of the submissions are noted. It is acknowledged that Proposed Variation No. 3 does not contain any provisions to amend the land use zoning objectives of any lands in Sallins. Proposed Variation No. 3 seeks to make a targeted variation to the County Development Plan (CDP) for the remaining three years of the plan period only, to provide *inter alia* for the additional housing growth requirements of the Government's Housing Growth Guidelines (2025). It is not a full review of the County Development Plan, nor does it include new land use zoning maps. Consequently, land use zoning requests for Sallins cannot be considered.

Proposed Objective CS O31 in Variation No. 3 provides that the Council will prepare a new Settlement Plan for Sallins, integrated into the County Development Plan by statutory variation to replace the Sallins Local Area Plan 2016-2022 (LAP). The Sallins Settlement Plan will include the current housing allocation in Table 2.8 (174 units) and the additional housing growth requirement in proposed Table 2.8A for the town (250 units, as proposed in the Draft but subject to change). Preparatory work on this Settlement Plan is underway, with publication envisaged in Q1/Q2 2026.

Land use zoning requests in Sallins submitted to Proposed Variation No. 3 will be considered as part of the preparation of the Settlement Plan for the town. It should be noted however that all lands will be assessed on their merits having regard to a comprehensive range of evidenced-based supporting documents including *inter alia* a Settlement Capacity Audit (SCA), a Social Infrastructure Audit, a Strategic Flood Risk Assessment and other environmental reports. This data-driven approach will also align with national policy requirements relating to low carbon development and the sequential and compact growth of settlements. Furthermore, while lands may appear suitable for residential development, whether classified as Tier 1 (Served)

or Tier 2 (Serviceable) as part of any future Settlement Capacity Audit, other land use considerations may take precedence, such as the need to accommodate education/community uses or provide for public open space. The proper planning and sustainable development of a settlement such as Sallins demands a balanced approach to land-use zoning designations.

The request in a number of submissions that the zoning targets or allocations to Sallins or the county to be set to 2038 is not accepted. Such an action would not be permissible given the expiry of the present County Development Plan (CDP) in early 2029. It should be noted that the process for reviewing the CDP is due to formally commence in August 2026. Furthermore, the request in Submission 093 that the Sallins Settlement Capacity Audit and the Sallins Settlement Plan should determine the suitability of lands for development over a 12-year plus period is also not accepted. The new settlement plan for Sallins is required to be prepared in accordance with the housing requirements set out in the Core Strategy of the Kildare County Development 2023-2029 (as varied). The upcoming review of the CDP will also involve updating the Sallins Settlement Plan. This will address zoning and phasing requirements over a longer period of time, in keeping with the provisions of the Planning and Development Act 2024 (as amended) for 10-year development plans.

With regard to the request in Submissions 032, 033, 071, 088, 093, 108 and 117 for additional residential units to be allocated to Sallins, it is noted that in response to the submission of the Office of the Planning Regulator (Submission 116) an increase in the additional housing growth requirement from 250 to 500 units for Sallins is proposed to be provided in Table 2.8A (see Section 3 of this report).

The issues raised in a number of submissions regarding the provisions of proposed Core Strategy Objective CSO 32 are noted. As stated above, it is envisaged that the new Sallins Settlement Plan will be published in Q1/Q2 2026. The concerns raised regarding the status of expired local area plans for settlements including Sallins in Submission 071 and Submission 117 are also acknowledged. In its response to the submission of the OPR, it is recommended that additional text be included to clarify that the Council will have regard to the relevant provisions (including Land Use Zoning) of any expired Local Area Plan and the provisions of the County Development Plan Core Strategy in its consideration of proposals for new development until such a time as the relevant LAP is replaced, revoked or integrated into the County Development Plan (see Section 3 of this report). Accordingly, the suggested amendment to the text of Objective CS O31 outlined in Submission 108 is considered unnecessary. Furthermore, it should be noted that this proposed additional provision applies to zoned lands within the respective LAP boundaries of settlements only.

The contention in Submission 108 that Amendment No. 9 should be expanded to provide detail of housing delivery to date and to outline the degree to which housing targets have or have not been met on a settlement-by-settlement basis, which would highlight the housing shortfall in Sallins is rejected. As noted above, the overarching purpose of the proposed Variation is to provide a concise, targeted and focused approach to integrating the revised housing requirements, in accordance with the provisions of the Housing Growth Guidelines. In keeping with the provisions of the

Development Plans Guidelines (2022), the Council prepares an Annual Monitoring Report which details a range of information including housing completions in settlements across the county. These reports are published on the website of Kildare County Council.

The contention in Submission 108 that 50% additional provision (referred to as headroom in the submission) provided in the Housing Growth Guidelines (2025) be applied to settlements such as Sallins is not accepted. This allocation of '*up to 50% in excess of the baseline provision*' is given to the planning authority as a whole and there is no stipulation in the guidelines which requires local authorities to apply this to each settlement. Additionally, the contention in Submission 108 that the aim of the Plan should be that Sallins would retain its relativity with the county population is also not accepted. The Council seeks to allocate growth to settlements on an evidence-led and data driven basis, in accordance with the settlement hierarchy. Such an approach aims to ensure that the relevant settlement has the social and physical infrastructure capacity (existing and planned) to sustainably accommodate a commensurate level residential development over the life of the Plan.

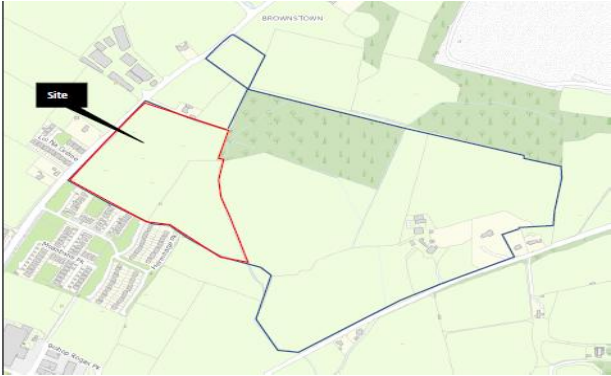
The concerns in Submission 108 that there could be potential for the review of the CDP to be delayed due to the hold-up in the rollout of the Planning and Development Act 2024 is noted. Kildare County Council will be working towards commencing the formal review process of the CDP in August 2026. It is considered that the publication of the Sallins Settlement Plan will be unaffected by any potential delay to the review of the CDP.

Chief Executive's Recommendation

No change recommended.

Issues Raised: Kilcullen

(3 Submissions) Submissions 046, 082 and 098

Sub Ref No:	046
Name:	Nolan Family
<p>Issues Raised:</p> <p>This submission has been prepared by David Mulcahy Planning Consultants Ltd on behalf of landowner Nolan Family seeking the rezoning of 8.7 ha of lands at Brownstown, Kilcullen from 'SS – Service Sites' to 'C – New Residential'. The submission is accompanied by a site location map, a confirmation of feasibility letter from Uisce Éireann and a letter from Furey Consulting Engineers in relation to the Uisce Éireann letter.</p>	
	
<p>The submission raises the following points for consideration in relation to the rezoning request:</p> <ul style="list-style-type: none"> • The submission notes Draft Variation No.3 does not include any additional zoned land for Kilcullen, urging the existing zoning designation to be changed from low density 'SS - Service Sites' to 'C – New Residential' in order to maximise the output of zoned land. • It asserts the existing serviced sites zoning is restrictive in terms of local need provision, low density output (10 units per ha) and requirement for the local authority to purchase and service the lands. • The submission states the lands are currently serviceable and feasible as confirmed by a supporting Uisce Éireann Pre-Connection Enquiry for the delivery of 99 units. It also asserts the lands do not pose any flood risk or any built/natural heritage constraints. • The lands have not been subject to any planning activity. It notes a recent completed development of 15 units to the west of the lands, and a recent refusal for 9 units to the northern site boundary which was not zoned. • The submission refers to the evolving national and regional planning policy context. Notes the implications for County Kildare in terms of delivering more housing at increased densities. States that a density of 25-40 units per ha under the new guidelines at the subject site will not be met under the existing service sites policy. • The submission welcomes the proposed changes to the service sites policy. • The submission states that the serviced sites policy is still too restrictive and means that a person in Kilcullen will not be able to build on the serviced site and is unreasonable. The wording in Table 3.4 should be amended further to 	

permit people living in the small towns where Serviced Sites are located to build on them.

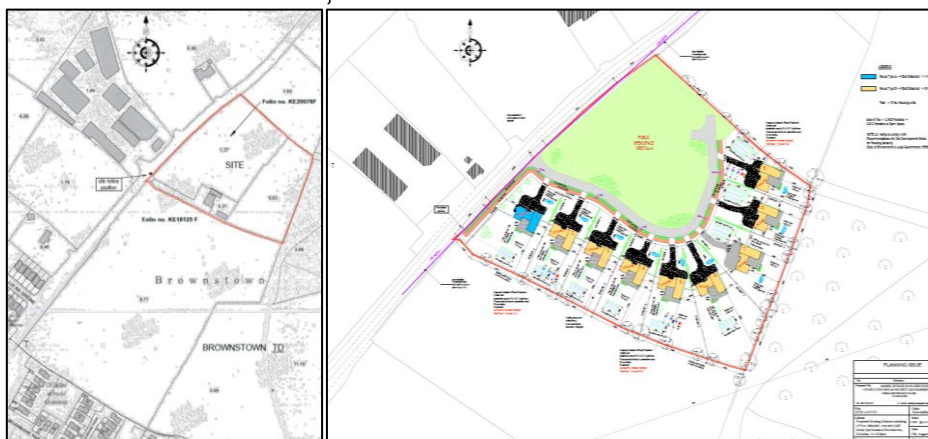
- It asserts the existing service sites designation conflicts national planning guidelines relating to increased residential densities, stating the density at the subject lands should be increased to 25-40 units per ha as per current compact settlement guidelines.
- It states the existing road's objective identified will require substantial investment which can only become viable if sufficient housing numbers are attributed to the entire site.
- It asserts the delivery mechanisms outlined in Draft Variation No.3 will not deliver housing solutions on the ground for Kilcullen, stating the existing zoning designation should be changed on the subject lands which has the potential to provide circa. 250 units at a serviceable site.
 - The submission notes the subject lands if zoned 'C - New Residential' with a density of 40 units per ha would deliver circa 310 units, including a 20% social housing provision for Kilcullen.
 - It notes the proposed zoning change will support the delivery of the new road objective including social and community infrastructure for the wider community.

Sub Ref No: 082

Name: Nyle Rafferty

Issues Raised:

The submission by Nyle Rafferty states 'Serviced sites in Kilcullen' and consists of a site location plan and a layout plan prepared by 'Mark Byrne Engineering Services' for a housing scheme of 9 no. detached, one and a half storey houses on a site of 2.42ha at Brownstown, Kilcullen.



Sub Ref No: 098

Name: Summix NKK Developments Ltd.

Issues Raised:

This submission has been prepared by Thornton O'Connor Town Planning on behalf of landowner Summix NKK Developments Limited seeking the rezoning of 8.63 ha of land at Nicholastown, Kilcullen from 'SR:Strategic Reserve' to 'C: New Residential'.

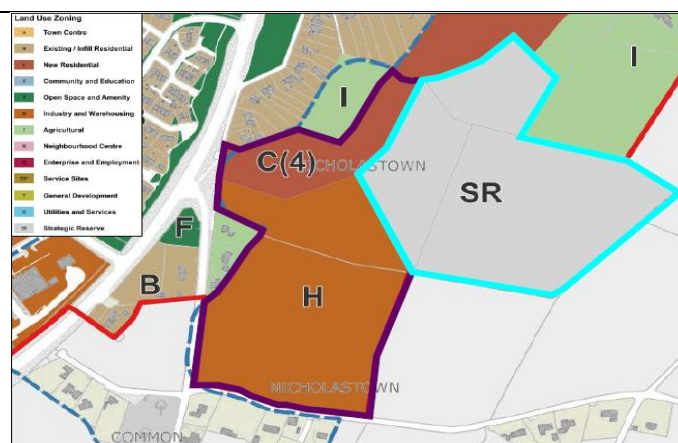


Figure 3.2: Zoning of the subject site (outlined in turquoise) and adjacent Client-owned lands that are not directly subject to this submission (outlined in purple)

The submission raises the following points for consideration in relation to the rezoning request:

- The submission contends that efforts should be prioritised to deliver short term housing solutions more rapidly considering the review of the development plan is not to commence for a further two years.
- Refers to the subject lands as having potential to provide a 'quick win' site in a lower tier settlement that can come forward for immediate development.
- Notes the subject lands are bound by additional lands in same ownership which are zoned 'C – New Residential' and 'H – Industry and Warehousing', which are well serviced and have the potential to deliver the first section of proposed relief road objective.
- Submission raises concerns in relation to short, medium and long term sites identified within Draft Variation No.3. States approx. 83% outlined housing units are highly unlikely to be developed in the lifetime of the development plan period due to pending land use plans, legislation change and necessary infrastructure delivery.
- Submission seeks to have the subject lands released and rezoned for immediate residential-led development by either creating a new objective that is similar to Objective CSO29 that will identify the subject lands in the Kilcullen Settlement Plan. Alternatively, the submission recommends the amendment of Objective CSO29 to include the following;
"Land zoned 'Strategic Reserve' in the Kilcullen Settlement Plan...", etc. and creating an associated map.
- States the subject lands have the potential to deliver 289 units with a creche and community building, including the delivery of a section of the proposed relief road for the town.
- States the development of the subject lands will have significant benefits for the town such as reducing congestion issues by unlocking sites to enhance connectivity and the delivery of social infrastructure and supporting amenities.
- Refers to the subject lands and existing street/road Objective ST KL81 of the Kilcullen Settlement Plan, stating the lands will be a key piece in the delivery of this infrastructure.
- Refers to the proximity of pertaining infrastructure, existing social infrastructure and important services which are important to the sites activation.

- The submission expresses concern with the short-medium term delivery mechanisms outlined, stating no sites have been identified and adopted in Newbridge, Kilcock, Sallins and Monasterevin. As a result, it states no housing is likely to be delivered in the short term due to factors such as pending settlement plans and timelines associated with the planning process.
- Submission notes concerns regarding Simmonstown and Ballyoulster KDA's and their ability to deliver housing in the short-medium term. It states a pending settlement plan review, and the delivery of key infrastructure will be key constraints to supporting the eventual activation of these locations.
- Refers to infrastructure requirements identified for Ballyoulster and Simmonstown sites as part of the existing Celbridge LAP. States these requirements will limit the progression of these locations due a number of external factors and constraints such as landownership and construction time. It further states these locations do not provide realistic solutions that can contribute to the delivery of housing units outlined in Draft Variation No. 3.
- Submission notes similar concerns in respect of the lands identified 'SR – Strategic Reserve' in Athy, stating these lands are not likely to provide short-medium term housing solutions in the lifetime of the development plan due to a pending settlement plan review, planning process timelines and subsequent construction time.
- Submission also raises concerns in respect of UDZ sites identified at Northwest Quadrant and Confey. Notes both sites must meet multiple milestones before they can come forward for development which will take considerable time and resources. It states no estimated timelines have been provided for these locations and states these locations will not be available for development in the lifetime of the development plan, hence providing no contribution to the housing growth requirements.
- Submission notes that while sites identified in Proposed Variation No.3 merit inclusion, consideration should be promptly focused on sites that can be instigated immediately rather than focusing on large complex sites.
- The submission requests the release of the subject lands and rezoning to 'C – New Residential' or alternatively including the lands as part of delivery mechanism 1.
- States the subject lands could be incorporated into delivery mechanism 3 by apportioning some of the new housing growth requirement to Kilcullen settlement for immediate delivery.
- Recommends long term sites and allocations for Naas and Leixlip should be reallocated to smaller sites that are less complex such as the subject lands.
- Refers to Section 95(1)(a) of the Planning and Development Act 2000 (as amended):

“In conjunction with the inclusion of the housing strategy in its development plan, a planning authority shall, having regard to the overall strategy for the proper planning and sustainable development of the area of the development plan referred to in section 10, ensure that sufficient and suitable land is zoned for residential use, or for a mixture of residential and other uses, to meet the requirements of the housing strategy and to ensure that a scarcity of such land does not occur at any time during the period of the development plan.”

- The submission states the selected sites contained in Draft Variation No.3 does not directly ensure sufficient and suitable land is zoned and available for residential uses as they cannot be delivered for such use in the lifetime of the development plan.
- The submission includes a supporting expert and indicative layout prepared by 'JFA Architects' for the subject lands and emerging uses for the wider landholding, including a supporting site context map.
- The supporting site layout of the subject land's highlights two sites B1 and B2 which seeks to deliver to 86 and 203 units respectively, including a section of the proposed relief road which will traverse the lands.
- The submission includes details of proposed junction layouts and indicative relief road location which is intended to connect to the R448 Regional Road.

Chief Executive's Response

The contents of the submissions are acknowledged.

Submissions 046, 082 and 098 seek the zoning of lands in Kilcullen. The Kilcullen Settlement Plan was recently integrated into Volume 2 of the County Development Plan through Variation No. 1 on 31st March 2025. The Kilcullen Settlement Plan was informed by a residential development capacity audit, a Strategic Flood Risk Assessment, a Surface Water Management Strategy and environmental reports. It is noted that an additional housing allocation of 25% (57 units) above the Core Strategy allocation (299 units) was incorporated into the Settlement Plan in consideration of the unmet social housing demand in the settlement, yielding a revised total of 286 units. Table 2.7 of the Kilcullen Settlement Plan provides the residential development capacity audit of the settlement, which indicates that the circa 12.7 ha of New Residential zoned lands in the town, not including town centre sites or designated Serviced Sites, has a potential residential yield of 449 units. Accordingly, as detailed in the Chief Executives Report prepared in response to the submissions /observations to Proposed Variation No. 1, the current Kilcullen Settlement Plan incorporates more than sufficient zoned residential lands, identified in a plan-led and evidence-based manner.

However, the Kilcullen Settlement Plan will expire along with the current County Development Plan in Q1 2029, noting that the preparation of a new 10-year County Development Plan is scheduled to formally commence in August 2026. The preparation and consultation process for the new County Development Plan will also facilitate the consideration of further lands in Kilcullen, if required, to support future housing growth requirements and subject to requisite assessments.

The NPF Implementation: Housing Growth Requirements - Guidelines for Planning Authorities (July 2025) provides that the housing growth requirements contained therein should be incorporated into existing Development Plans by variation as quickly as possible (Policy and Objective No. 3 of the Guidelines refers). However, the zoning of lands for residential development should be conducted in a plan-led and data-driven manner, with requisite assessments in relation to the implications and appropriateness of such zonings. Accordingly, proposed Variation No. 3 details a series of plan-led and evidence-based mechanisms that Kildare County Council intends to utilise in accommodating the additional housing growth for the remaining three years (2026, 2027 and 2028) of the County Development Plan.

Concerns raised regarding these delivery mechanisms outlined in Proposed Variation No.3 in relation to short-term housing delivery within the lifetime of the Plan are noted. As detailed in Section 1.1 and in response to the OPR submission, this is considered the most appropriate approach to integrating the Housing Growth Requirement Guidelines as quickly as possible for the remaining lifetime of the current County Development Plan. The approach leverages the priority of the Planning Authority to update and replace expired Local Area Plans that have been utilised to inform development in respective settlements for a significant period of time, in addition to the availability of existing Phase 2 zoned lands and the availability of other strategic landbanks in higher order settlements that are subject to (or will be subject to in the immediate term) plan-led development, most of which are proximate to existing and future high-capacity public transport options.

Notwithstanding the above, as detailed in the response to the OPR submission (Submission 116), a number of further amendments, including additional mechanisms, are proposed to be made to facilitate delivery and provide a continuity of supply to meet the housing growth requirements. These proposals place a particular emphasis on enabling delivery on existing zoned land in the short term and on achieving equitable, balanced and proportionate growth across the county (see Section 3 of this report).

The assertion in Submission 046 that proposed Serviced Sites need criteria in Table 3.4(a) of Variation No. 3 will not permit people living in the small towns where Serviced Sites are located to build on them is incorrect. Proposed Table 3.4(a) provides that applicants for housing on designated Serviced Sites must be a person who has resided in the rural area of Kildare for at least 10 consecutive years and within 10km of the relevant designated Serviced Site. A rural areas/persons are defined in Table 3.4 (a) as those who are living outside the boundaries of 'higher order settlements' defined by Kildare County Council. The higher order settlements are outlined in Table 3.4 (a) as the 'Key Towns' (Naas and Maynooth), 'Self-Sustaining Growth Towns' (Newbridge, Leixlip, Kildare Town and Athy) and 'Self-Sustaining Towns' (Celbridge, Kilcock, Monasterevin and Clane) in the county. Accordingly, persons living in the town of Kilcullen and those within 10km of the Serviced Site therein, may qualify for such dwellings. However, it is agreed that Table 3.4(a) should be revised for clarity.

Chief Executive's Recommendation

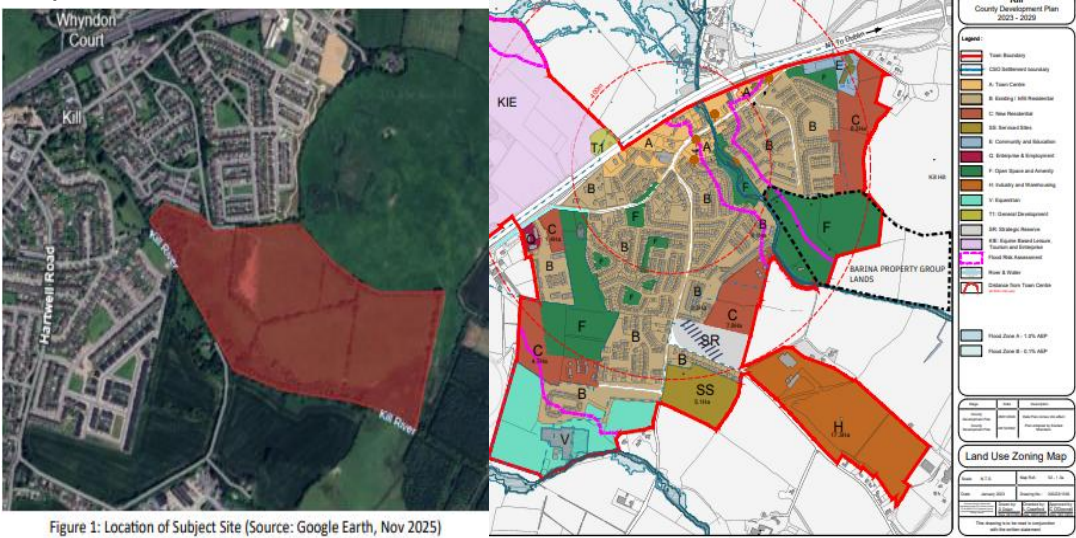
Update Amendment No. 22 [Chapter 3, Serviced Sites] by revising proposed Table 3.4(a) as follows:

<i>Applicant Category</i>	<i>Serviced Sites Local Need Criteria</i>
<i>Category C – Rural Resident as part of a Serviced Site development.</i>	<i>On designated 'Serviced Sites' provided for in Volume 2 of the County Development Plan only</i>
<i>A person who has resided in a rural area in County Kildare*</i>	<i>The Applicant must demonstrate:</i> <i>1. They have resided in a rural area of County Kildare for a period of at least 10 (consecutive) years,</i>

<p><i>* For the purposes of this category, these persons are defined as those being from outside of the defined boundaries of the Key Towns, Self-Sustaining Growth Towns, Self Sustaining Towns and the Blessington Environs higher order settlements in the County Settlement Hierarchy (i.e. Key Towns, Self-Sustaining Growth Towns and Self-Sustaining Towns) as defined by Kildare County Council in respective Local Area Plans, or Settlement Plans in Volume 2 of the County Development Plan.</i></p> <p><i>For clarity, these persons also include those persons living in the designated Towns, Villages and Rural Settlements in the County Settlement Hierarchy.</i></p>	<p><i>and</i></p> <ol style="list-style-type: none"> <i>2. The applicant's home, in which they have resided for 10 years, is within 10km of the designated serviced site, and</i> <i>3. That the proposed house will be the principal private residence of the applicant (applications will be subject to a standard occupancy condition).</i>
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Issues Raised: Kill

(3 Submissions) Submissions 028, 102 and 111

Sub Ref No:	028
Name:	Barina Property Group
<p>Issues Raised:</p> <p>This submission has been prepared by landowner Barina Property Group seeking the rezoning of 23 ha (58 acres) which are partially zoned 'F:Open Space' to 'C: New Residential' in Kill. The subject lands are located approximately 500 meters from Kill Village and are situated to the rear of the 'Rochford Abbey' housing development.</p>	
 <p>Figure 1: Location of Subject Site (Source: Google Earth, Nov 2025)</p>	
<p>The submission raises the following points for consideration in relation to the rezoning request:</p> <ul style="list-style-type: none"> • The submission contains a provisional masterplan prepared by 'Davey+Smith Architects' which aims to deliver approximately 350 affordable units designed at 35-40 units per hectare. • It states the lands are serviced with drainage/water and power infrastructure which have capacity to deliver such a scheme within the townland of Kill. • The submission notes the previous road objective 'Kill Inner Relief Road' identified in the Kill Development Plan 2002, highlighting such development could be accommodated within the subject lands if required. • It states the lands were previously zoned and identified 'C-New Residential' with a small section zoned 'F-Institutional' in the Kill Development Plan 2002, however were not developed due to the presence of a protected structure. The submission proposes to sensitively develop the lands providing a public parkland with supporting community facilities which will be available to the wider community. • The submission states the lands have the potential to facilitate a school facility, subject to further assessment and need. • It asserts the subject lands are the natural sequential development of the town in the short-term providing immediate access to available infrastructure and a range of services. 	

The submission contains a provisional masterplan which includes the following key points:

- The prepared masterplan invites all parties to have an informed conversation about how the subject lands can be developed and connected with the existing amenity/open space.
- The submission highlights a commitment to submitting a planning application within 6 months if the lands are rezoned with development commencing immediately upon successful grant of permission.
- The lands will provide pedestrian and cycleway continuity and connectivity with surrounding areas.
- The proposed parkland will assist with active travel ambitions for the town.
- Provision of a public parkland (9.7 ha / 24 acres) with a hierarchy of open spaces, including playing pitches and sporting facilities if required.
- SUDS Compliance development
- Grid form layout that can accommodate future phased delivery.

The submission also contains a series of concept diagrams which provide an analysis of the existing site and a proposed vision for the lands through the identification of potential character areas and suitable typologies, open spaces, including potential connections and permeability throughout the site.



Sub Ref No: 102

Name: Cavan Developments

Issues Raised:

This submission has been prepared by John Spain Associates on behalf of Cavan Developments in relation circa 9 ha of lands at Kill in two parcels:

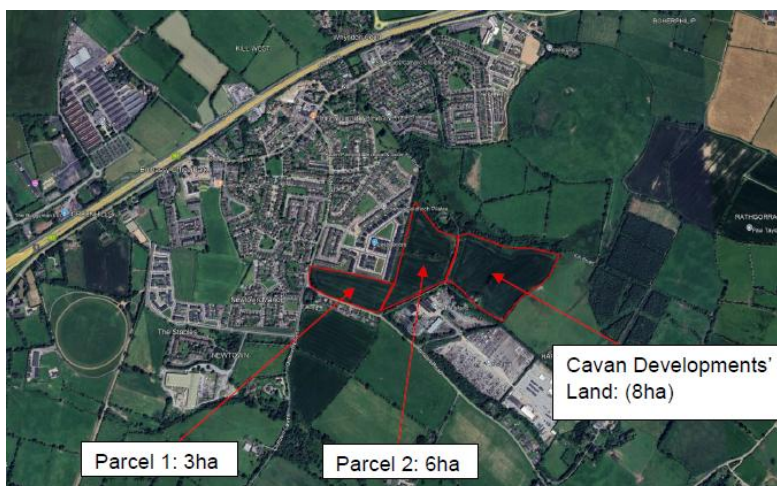
- Parcel 1 of circa 3 ha which are stated as being currently zoned SR: Strategic Reserve, and
- Parcel 2 of circa 6 ha which is stated as currently being unzoned.

The submission requests that:

- Kill receives an appropriate assessment in the Settlement Capacity Audit, together with an adequate and proportionate allocation of the county-wide residential uplift,

- Parcel 1 be rezoned from SR: Strategic Reserve to C – Residential, and
- Parcel 2 be zoned as SR: Strategic Reserve in this Variation and subsequently zoned for residential development in the next Development Plan.

Parcels 1 and 2, along with 8 ha of lands which constitute Cavan Developments' remaining lands are illustrated below:



The submission outlines the rationale for this request, as follows:

- The submission provides an overview of the national planning policy context regarding the National Planning Framework – First Revision (April 2025) and the NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities (July 2025).
- The submission provides an overview of the current Core Strategy of the Kildare County Development Plan 2023-2029, particularly in relation to Kill. The submission states that Parcel 1 was previously zoned for residential development and that Parcel 2 was zoned for agriculture in the previous County Development Plan 2017-2023, as it was located in the settlement boundary.
- The submission notes the intent and content of the proposed Variation, in particular the proposed delivery mechanisms to accommodate the required and additional housing growth provided by the Housing Growth Requirements Guidelines.
- It is stated that the Variation has ignored Kill and its potential to provide residential development. There has not been an assessment of the settlement or any allocation of additional zoned lands despite the following:
 - All previously residential zoned lands in Kill have been developed (The Meadows, Ambassador Place, Kilheale Manor and Hillfort). There is no remaining residential zoned land in Kill.
 - Kill is identified as a town in the Settlement Hierarchy of the Development Plan.
- It is considered that the Council has not carried out an adequate Settlement Capacity Audit to review their existing zoned land as required by the Housing Growth Requirement Guidelines, in line with the Development Plans – Guidelines for Planning Authorities.

- It is considered that the lands identified through the delivery mechanisms in the Variation are insufficient for the short to medium term, as the long term strategic and sustainable development sites in Table 2.8B may not provide all the housing needed for the remaining 3 years of the County Development Plan. Regarding the Naas Northwest Quadrant, this is due to the requirement for a masterplan and a reliance on further variations and an Urban Development Zone designation.
- It is recommended that the Council reassess its stock of zoned residential land to ensure it is deliverable in the next 3 years, together with a review of the proposed delivery mechanisms to provide additional zoned lands in smaller settlements to ensure delivery during lifetime of the Development Plan.
- The subject lands should be considered for zoning as they are serviced and well placed, being surrounded by residential development and connected to the town centre. Parcel 1 benefits from road, footpath and cycle access from the Hartwell Road. There are no known issues in relation to water supply, foul or surface water drainage.
- Cavan Developments has a proven track record and are ready / capable of applying for circa 100 units, a community centre and a creche for circa 150 children as soon as practicable, should the appropriate zoning be in place. The submission includes an indicative site layout for Parcel 1; together with a more detailed description of the community centre and creche, including a ground floor layout and CGI image.

Sub Ref No: 111

Name: Montane Developments

Issues Raised:

This submission has been prepared by McGill Planning Limited on behalf of Montane Developments in relation to the former Kill Equestrian lands (12.5 ha).

The submission seeks the re-zoning of the land from 'V: Equestrian', which only allows for limited uses to:

- Circa 2.34 ha of serviced land in the eastern part of the site to be zoned C: New Residential, with the following objective: *'To provide for new residential development and associated ancillary services. Permission may also be granted for home based economic activity within this zone, subject to the preservation of residential amenity and traffic considerations. New residential areas should be developed in accordance with a comprehensive plan detailing the layout of services, roads, pedestrians and cycle routes and the landscaping of open space.'*
- SR: Strategic Reserve zoning on the western part of the site.
- E: Community and Education zoning in the central part of the site, adjoining the proposed residential lands.
- Q: Enterprise and Employment zoned lands in the central part of the site, between the proposed Strategic Reserve zoning and the Community and Education zoning.

The above zoning arrangement across the subject lands are illustrated in the submission as per the image below:



The submission provides the following in relation to the zoning request:

- The submission provides an overview of the status of Kill in the County Development Plan, being a Town that is comparable with Kilcullen. It has a restricted level of housing allocation, with 4 ha of land to deliver 119 units over the lifetime of the Plan. This represents 1.3% of the original County housing target, or just 0.7% of the revised County housing target arising from Variation No. 3. This is less than half of what the town represents as a proportion of the population of the County.
- The low level of growth is stated as disproportionate to the settlement size, employment levels, quantum of available brownfield redevelopment lands and proximity to excellent transport infrastructure (N7).
- It is considered that Kill is an ideal location for increased employment and residential development. It is submitted that the housing target for Kill should be doubled, and sites should be identified for new employment.
- The subject lands are less than 15 minutes from the town centre on foot or 5 minutes by bicycle.
- The lands adjoin an existing residential development (the Paddocks).
- The proposed zoning on the subject lands could deliver circa 60 units on the residential area and a sustainable mix of uses on the community/education and employment areas in tandem with modest residential development. This will facilitate the sustainable expansion of the town.
- The proposed rezoning would provide an improved housing choice as an alternative, including serviced sites, to housing in the countryside.
- The proposed zonings are justified in the context of meeting the significant housing target for Kildare for the remaining 3 years of the County Development Plan, as detailed below. It is considered that the proposed residential zoned lands can be progressed quickly to deliver housing.

Variation No. 3 Development Strategy

The submission notes the intent and content of Proposed Variation No. 3, providing the following in relation to the strategy for accommodating the additional housing growth arising from the NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities:

- The submission outlines that Kildare has received the largest per-capita increase in housing delivery requirements of any local authority. Over the next 6 years this new housing will amount to 25,000 additional homes delivered in

the County. It is imperative that the Core Strategy for the next Development Plan incorporates sufficient and unimpeded residential zoned lands.

- The submission notes that the Taoiseach and Tánaiste recently met with Kildare County Council in relation to addressing the revised housing targets and to '*press for more zoned lands*'. The planning authority role is to ensure that a critical mass of zoned land that is serviced - or capable of being serviced during the life of the next Plan (noting the above Government commitment) - is provided for.
- The submission outlines that attempting to exactly match zoning quantum's to projected housing demands are a fool's errand. The Development Plan Guidelines provide for the zoning of additional lands beyond minimum requirements for choice, reflecting that not all zoned land will be released for development during the lifetime of a Development Plan. It is considered that Kildare County Council has not generally followed these principles of sustainable and equitable zoning provision, greater flexibility and choice.
- The submission considers that the approach in Variation No. 3 to delivering the housing target increases is over-reliant on a limited number of sites and settlements to accommodate the substantial growth required.
- 56% (4,205 units) of the additional housing target for the next 3 years are allocated to just 4 sites (Leixlip – Confey, Naas Northwest Quadrant and 2 sites in Celbridge – Ballyoulster and Simmonstown).
- Regarding Celbridge, it is considered presumptuous to claim that 2000 units, or any amount near that number, will be delivered in Ballyoulster and Simmonstown within 3 years considering the following:
 - A planning application with a 7 year lifetime for 344 units has been with An Coimisiún Pleanála since October 2022 at Ballyoulster.
 - Public consultation on the compulsory purchase order (CPO) for the Celbridge Hazelhatch Mobility Corridor through Simmonstown is ongoing. In addition, a planning application for the scheme is only likely to be submitted in 2026.
 - It is assumed that planning permission cannot be progressed on the remaining area of Simmonstown until the CPO and permission has been secured to deliver the Mobility Corridor.
- Regarding Leixlip - Confey and the Naas Northwest Quadrant, it is stated that these lands are likely to only deliver a fraction of the envisaged housing over the next 3 years, considering the following:
 - No planning applications (as of November 2025) for housing or road infrastructure upgrades have yet to be submitted on the Confey Masterplan lands. The phasing for the Masterplan assumes planning permission being granted for the first 450 units by the end of 2025 and a further 211 units before the end of 2026. This conflicts with the 1,111-figure designated for delivery in the proposed variation, incorporating Phase 2.
 - Delivery of housing at Confey is closely tied to a phasing and infrastructure strategy, including the delivery of significant road improvements such as the upgrade/replacement of Cope Bridge.
 - Lands in the Northwest Quadrant are zoned Strategic Reserve. Therefore, they will not be immediately available for planning permissions for residential development. No planning permissions have been submitted for residential development (as of November 2025).

- It is assumed that the Northwest Quadrant masterplan (anticipated 2026) will closely tie critical physical / social / community infrastructure provision to housing delivery over many years.
- The submission notes that Policy CS O23 relates to commencing the Urban Development Zone (UDZ) designation process for both sites and bringing the masterplans into the County Development Plan through a variation in the interim. The submission notes the lengthy and prescribed UDZ designation process, noting the previous Urban Development Zone process.
- The above calls into question if any reasonable housing delivery can be achieved in Confey or at the Northwest Quadrant in the next 3 years, with the exception of potentially Phase 1a of Confey.
- The submission notes that Kildare has 17 designated Towns and 38 Villages / Rural settlements, with only 8 settlements identified to deliver the additional housing growth. It is considered extraordinary that the proposed Variation did not distribute some of the substantial additional housing requirement across other well-established towns with populations of at least 3000, with a range of serviced/serviceable sites and with social / physical infrastructure that could accommodate some additional uplift in targets.
- It is asserted that the strategy of Variation No. 3 guarantees that the County cannot meet its revised housing targets over the remaining lifetime of the Plan. It is imperative that a more reasonable distribution of residential zoning and housing allocation across multiple deliverable sites and settlements (including Kill) is critical to ensure that the targets can be met, and so that the non-delivery of one site/location does not prevent delivery on others.

Based on the above, the submission recommends that Kildare amend its strategy in Variation No. 3 as follows:

- Extend a proportion of the housing allocation uplift to available serviced/serviceable sites within the other towns not currently listed in Tables 2.8 A/B (including Kill). This will provide a more equitable distribution and hedge against the risk of the non-delivery of other sites during the 3 year period.
- Provide a better distribution of the increased housing allocation across a greater number of sites within Celbridge, Newbridge, Naas, and Athy, to improve the prospect of swift housing delivery in the short term.
- Revise the allocation for Confey, the Northwest Quadrant, Ballyoulster and Simmonstown to reflect a more realistic housing delivery over the remaining 3 years of the County Development Plan.

Chief Executive' Response

The contents of the submissions are acknowledged.

Submissions 28, 102 and 111 request the rezoning of lands in Kill, contending that the proposed mechanisms to accommodate the additional housing growth requirements will not result in housing delivery by the end of the County Plan period. These submissions consider that Proposed Variation No. 3 should be revised to distribute a part of the additional housing requirement provided by the Housing

Growth Guidelines to Kill, based on the characteristics of the settlement and the lands proposed for rezoning.

In this regard, Proposed Variation No. 3 updates the Core Strategy to align with the Housing Growth Requirements - Guidelines for Planning Authorities (published in July 2025) and does not provide residential zonings to any lands. Such zonings should be informed by evidence-based assessments and audits at both the site and settlement level. This is in accordance with best planning practice for the sustainable development of settlements, the integration of land use and transportation planning and the creation of communities that are supported by appropriate infrastructure.

However, the Housing Growth Guidelines provide that the housing growth requirements contained therein should be incorporated into existing Development Plans by variation as quickly as possible (Policy and Objective No. 3 of the Guidelines refers). Accordingly, Proposed Variation No. 3 details a series of plan-led and evidence-based mechanisms that Kildare County Council intends to utilise in accommodating the additional housing growth for the remaining three years (2026, 2027 and 2028) of the County Plan. As detailed in Section 1.1 above, the proposed mechanisms are deemed to be the most expedient methods to unlock substantial areas of land in higher order settlements that have been previously assessed for residential development potential within Kildare's existing land use plans, while also applying a Settlement Plan led and evidence-based approach to zoning new lands in settlements with expired Local Area Plans, in accordance with best practice. This strategy has also been informed by the ongoing transition of planning legislation from the 2000 Act to the 2024 Act and the upcoming preparation of a new County Development Plan, which is scheduled to formally commence in August 2026.

In addition, the Chief Executive's Report on the Housing Growth Requirements Guidelines (September 2022) provides a full audit of zoned land to assess the capacity for residential development in the county. This report was circulated to Elected Members prior to the preparation of Variation No. 3 and outlines that approximately 432 hectares of land remain undeveloped with the potential to deliver approximately 13,795 houses across the county.

Notwithstanding the above, as detailed in the response to the OPR submission (Submission 116), a number of further amendments, including additional mechanisms, are proposed to be made to facilitate delivery and provide a continuity of supply to meet the housing growth requirements. These proposals place a particular emphasis on enabling delivery on existing zoned land in the short term and on achieving equitable, balanced and proportionate growth across the county (see Section 3 of this report).

Submissions 102 and 111 contend that the mechanisms in relation to Celbridge, Confey (Leixlip) and the Naas Northwest Quadrant will either not deliver or will only deliver a fraction of the envisaged housing over the next three years. In this regard, please refer to the response provided to the OPR submission and in relation to issues raised in Naas, Celbridge and Leixlip.

It is considered that both the quantum and capacity of existing undeveloped zoned lands, in conjunction with the proposed delivery mechanisms are sufficient to cater

for the additional housing targets required in County Kildare, over the remaining life of the County Development Plan. It is submitted that the land use zoning requests in Kill, submitted to Proposed Variation No. 3, will be considered as part of the preparation of the new County Development Plan.

Chief Executive's Recommendation

No change recommended

Issues Raised: Rathangan

(2 Submissions) Submissions 039 and 043

Sub Ref No:	039
Name:	Victor Burrell, Gerard Conway, James Fagan, Pierce Fagan, Joe Flanagan, Thomas Heffernan and Paddy White
<p>Issues Raised:</p> <p>This submission has been prepared by Pierce Fagan Property Advisors on behalf of landowners Victor Burrell, Gerard Conway, James Fagan, Pierce Fagan, Joe Flanagan, Thomas Heffernan and Paddy White, seeking the zoning of 32.58 ha of land at Rathangan Demesne, Rathangan for the following land uses:</p> <p>15 ha – Open Space (Woodland) (A) 1.1 ha – Employment and Innovation (C) 3.36 ha – Community and Education (D) 1.67 ha – Amenity Lands (E) 2.64 ha – Serviced Sites (F) 8.5 ha – New Residential (G)</p> <p><i>It is noted that land use labels referenced correspond with the supporting Land Use Masterplan and map extract provided:</i></p>	
<p>The submission raises the following points for consideration in relation to the proposed masterplan and zoning requests:</p> <ul style="list-style-type: none"> • The submission refers to existing 5.42 ha of lands zoned 'E: Community and Education' (Lands 'B' as per Masterplan Layout) which is subject of a planning application for the development of an 84 bed residential care facility and 146 staff by NUA Healthcare which seeks to provide mental health and intellectual disability services. • The submission states the landowners identified have entered into a joint venture agreement for the purpose of developing the subject lands with the view of providing employment, housing and community gain for Rathangan and the wider area. • It refers to an existing woodland plantation (15 ha) with a proposal to transform the subject lands into a native woodland park, providing a 4km network of forest paths and supporting infrastructure to create a high-quality accessible parkland that enhances local biodiversity and provides a lasting community asset. 	

- It notes the proposed woodland park aligns with national and regional policy context which will require the necessary environmental appraisals.
- The submission seeks the zoning of 3.36 ha of land to support the provision of education and childcare facilities.
- The submission seeks the zoning of 1.67 ha of land to support open space and amenity uses. States the subject site has the potential to provide two full size pitches which situated beside the proposed school, residential and employment-based lands.
- It states the provision of social and community infrastructure aligns with national policy context ensuring access to quality open spaces and amenities in the creation of new sustainable communities
- The submission seeks the zoning of 2.47 ha of land for employment and innovation purposes. States the specific zoning will designate specific uses for business, industry and research promoting local job growth and economic growth.
- It states the provision of employment/innovation uses aligns with national policy context in terms of supporting economic growth in rural locations which has the potential to create local jobs which can reduce the need for commuting.
- The submission seeks the zoning of 2.64 ha of land for serviced sites with the potential to provide 26 units. Refers to local policy context and the promotion of alternatives to one off housing with serviced sites in suitable rural settlements.
- The submission seeks the zoning of 8.5 ha for new residential land with the potential to provide 298 units. It notes the proposed site would exceed existing core strategy allocation for the town, stating other elements of the master plan would ensure commensurate social infrastructure is delivered with proposed housing supply.
- The submission acknowledges the volume of land proposed exceeds core strategy targets, however the indicative masterplan layout could be delivered on a phased basis or other iterations.

Sub Ref No: 043

Name: Oakway Homes

Issues Raised:

This submission has been prepared by David Mulcahy Planning Consultants Ltd. on behalf of landowner Oakway Homes seeking the rezoning of 3.8 ha of land at Rathangan from 'E: Community and Education to 'C: New Residential'.



The submission raises the following points for consideration in relation to the rezoning request:

- The submission notes Draft Variation No.3 does not include any additional zoned land for Rathangan, noting the subject lands can create a feasible site option which can deliver increased housing supply in the short term.
- It states there is currently very limited 'C: New Residential' zoned land in the town with only one site option available for development.
- The submission notes the adjoining lands zoned 'C: New Residential' which is in the same ownership and will be delivering a large housing estate of 94 units.
- The subject lands are circa. 800m from the town centre and can avail of established vehicular and pedestrian access in the immediate area, including established permeability links to neighbouring developments.
- It states surface water and foul network are within the landowner's control.
- It notes a future creche facility due to be delivered on the adjoining lands.
- The submission notes the lands to the east which are currently in KCC's ownership, stating the potential to partner/work in conjunction regarding the development of both sites.
- The submission notes a commitment to delivering supporting social and community infrastructure as part of any residential development which can also benefit the wider community.

Chief Executive's Response

The contents of the submissions are noted. It is acknowledged that Proposed Variation No. 3 does not contain any provisions which amend the land use zoning objectives of any lands in Rathangan. Proposed Variation No. 3 seeks to make a targeted variation to the County Development Plan (CDP) for the remaining three years of the plan period only, to provide for the additional housing growth requirements of the Government's Housing Growth Guidelines (2025). It is not a full review of the CDP, nor does it include new land use zoning maps. Consequently, land use zoning requests for Rathangan cannot be considered.

It should be noted however that as part of the preparation of the next CDP and the move to 10-year development plans, the land use zoning objectives of all settlements in the county will be reviewed. This process will formally commence in August 2026. It should be noted however that all potential lands will be assessed on their merits having regard to a comprehensive range of evidenced-based supporting documents including *inter alia* a Settlement Capacity Audit (SCA), a Social Infrastructure Audit, a Strategic Flood Risk Assessment and other environmental reports.

Towns such as Rathangan will receive a housing requirement allocation in the CDP which will correspond with their position within the settlement hierarchy of the county. Accordingly, while lands may present well in terms of their potential to accommodate new residential development, the priority of the Plan will be to ensure the optimal distribution of housing within the town. This will be achieved by directing new residential development to locations that have been determined to be the most suitable, in terms of their ability to deliver compact growth development that maximises access to the services and social infrastructure of the town.


Furthermore, while lands may appear suitable for residential development, whether classified as Tier 1 (Serviced) or Tier 2 (Serviceable) as part of any future Settlement Capacity Audit, other land use requirements may take precedence, such as the need to accommodate community and education uses. The proper planning and sustainable development of a settlement such as Rathangan requires a balanced approach to land-use zoning designations.

Chief Executive's Recommendation

No change recommended.

Issues Raised: Castledermot

(3 Submissions) Submissions 013, 022 and 081

Sub Ref No:	013
Name:	Aidan Kelly
<p>Issues Raised:</p> <p>This submission has been prepared by David Mulcahy Planning Consultants Ltd. on behalf of Aidan Kelly seeking the rezoning of 3.73 ha of land at Abbeylands, Castledermot from 'F: Open Space and Amenity' to 'C: New Residential'.</p>	
	
<p>The submission raises the following points for consideration in relation to the rezoning request:</p> <ul style="list-style-type: none"> • The subject lands are located approximately 400m from the town centre and are surrounded by residential development. Currently greenfield in nature, the River Lerr runs along the southern site boundary (this waterbody is part of the River Barrow and River Nore Special Area of Conservation (Site code: 002162)). • A portion of the lands to the east have been identified within an archaeology buffer zone due to the presence of archaeology/architectural heritage in the neighbouring site. The submission notes this should not be an impediment to zoning as an appropriate buffer can be applied. • The submission highlights a previous grant of permission (Ref: 07/46) on the subject lands for 52 dwellings with vehicular access and new bridge via Abbeylands Barnhill to the south. The submission notes a supporting Flood Risk Assessment prepared for this application by 'Gavin Kirwan Engineering Services' in 2007 which concluded the lands were not a floodplain and did not pertain any historical evidence. • The submission also notes a supporting archaeological impact assessment prepared by 'Byrne Mullin and Associates, Archaeological Consultants' in 2007 which states a 60 metre distance from the closest Friary structure in the neighbouring site was considered acceptable, however monitoring was recommended. • The submission references an Ecological Impact Assessment prepared by 'Biosphere Environmental Services' as part of the previous permission granted in 2007, which notes a 5metre buffer was recommended along the northern bank of the Lerr River and Abbey stream with existing wildlife corridor and tree lines being retained. 	

- The submission refers to evolving national and regional planning policy context, noting the implications for County Kildare in terms of delivering more housing at increased densities, including the provision of additional zoned land beyond original baseline targets.
- The submission highlights that no residential zoned sites have been activated in the town as of January 2025, with two sites refused permission for development of 43 and 45 units respectively due to design, excessive density and ecological impact.
- It states that Castledermot has an adequate water supply to meet the current demands and future planned growth, including spare wastewater capacity at the Castledermot WWTP.
- The submission notes Objective ST C12 of Volume 2, Kildare County Development Plan 2023-2029 (as varied) which seeks to develop the River Lerr riverside as a linear park.
- The submission notes the southern portion of the lands are identified to be Flood Zone A and Flood Zone B as outlined in Land Use Zoning Map contained in Vol.2 Kildare County Development Plan 2023-2029 (as varied).
- While Castledermot is not included in the delivery mechanisms to provide additional residential zoning as part of Draft Variation No.3, the submission highlights the importance of bringing forward 'ready to go' sites close to urban centres such as the subject lands.
- The submission includes an indicative masterplan layout prepared by 'DCM Consulting Engineers' which includes 60 units to the northern portion of the site, with the southern portion reserved for a landscaped park, walking track and playground facility (subject to SSFRA).



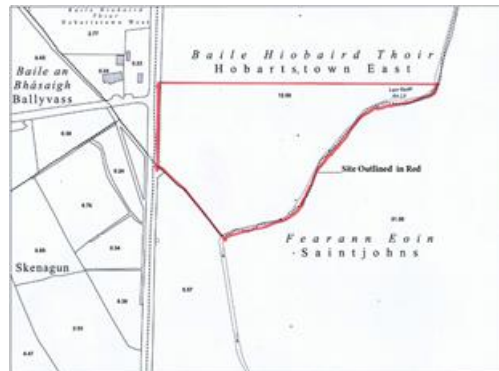
- The submission includes a preliminary Flood Risk Assessment prepared by Donnachadh O'Brien and Associates Consulting Engineering (December 2020) which identified the raising of the western portion of the site for residential development and the lowering of the eastern portion for a sporting pitch including compensatory storage. This design ensured the residential lands were classified as Flood Zone C by marginally lowering ground levels to the east as a water compatible development. While this scheme does not relate to the proposed submission and indicative masterplan, the FRA asserts the site layout would not impact on any upstream or downstream flooding conditions.

Sub Ref No: 022

Name: Cormac Cogan

Issues Raised:

Submission by Cormac Cogan seeking the zoning of circa 2.8 ha of land at Hobartstown, Castledermot to 'Industrial use'.



The submission includes a cover letter and map outlining that the zoning request is made to facilitate expansion of a plant and machinery supply and maintenance business. The submission states the nature of the business requires very large industrial units and surrounding yard areas to facilitate exceptionally large plant and machinery. The location of such workshops within industrial estates is not feasible and as a result many similar businesses are deliberately located away from built-up areas.

Sub Ref No: 081

Name: Castledermot GAA

Issues Raised:

This submission has been prepared by Armstrong Planning Ltd. on behalf of landowner Castledermot GAA, Woodlands East, Castledermot seeking the rezoning of 2.2 ha of land at Abbeylands, Woodlands East, Castledermot from 'F: Open Space and Amenity' to 'C: New Residential'.



The submission also seeks the zoning of 10.19 ha of land at Blue Gardens, Castledermot to 'F: Open Space and Amenity'



The submission raises the following points for consideration in relation to the zoning request:

- The submission refers to Castledermot GAA and their existing location in the town. It notes the club's inability to acquire nearby sites which have the potential to facilitate the expansion of the club to a larger edge of town greenfield location (such as the Blue Gardens site) that would allow the development of a sports hub and recreation park to benefit the wider community.
- Refers to the existing GAA club site and states this location within the town's built-up area offers an ideal site for residential development.
- Refers to amended Table 2.8 of Draft Variation No.3 and notes Castledermot's population growth was significantly below towns such as Rathangan, Kilcock and Monasterevin.
- It notes existing residential lands in the town which have been refused permission for 45 and 43 units respectively due to site constraints such as watercourses and zones of archaeological protection.
- to provide for expanded sports and recreational facilities while freeing up the existing GAA site for housing development.
- Requests that the Planning Authority would consider undertaking a review of Section 2.2 of Volume 2 of the CDP relating to the Small Town and Environs Plan for Castledermot. States this can free up more suitable lands for housing whilst facilitating the expansion of the existing GAA club and delivery of additional recreational amenities to a more suitable location.

Chief Executive's Response

The contents of the submissions are noted. It is acknowledged that proposed Variation No. 3 does not contain any provisions to amend the land use zoning objectives of any lands in Castledermot. Proposed Variation No. 3 seeks to make a targeted variation to the Kildare County Development Plan 2023-2029 (CDP) for the remaining three years of the plan period only, to provide for the additional housing growth requirements of the Government's NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities (July 2025). It is not a full review of the CDP, nor does it include new land use zoning maps. Consequently, land use zoning requests for Castledermot cannot be considered at this time.

In response to the submissions received above, including the request outlined in Submission 081 to review the Castledermot Settlement Plan, it should be noted that as part of the preparation of the next County Development Plan, the respective plans for all settlements in the county, including Castledermot, will be reviewed. This process will formally commence in August 2026. As part of the review process lands will be assessed on their merits having regard to a comprehensive range of evidence-based supporting documents. This approach will also align with national policy requirements relating to low carbon development and the sequential and compact growth of settlements. Furthermore, while lands may appear suitable for residential development, whether classified as Tier 1 (Served) or Tier 2 (Serviceable) as part of any future Settlement Capacity Audit, other land use considerations may take precedence, such as for example, the need to provide for public open space. The proper planning and sustainable development of a

settlement such as Castledermot demands a balanced approach to land use zoning designations.


The request outlined in Submission 022 for the zoning of lands for industrial use is not accepted for the reasons outlined above. Additionally, it is noted that the lands were the subject of a planning application (Planning Reference: 23/60535) for development including a workshop (with a floor area of 1,125sqm), staff facilities, offices, waste water treatment system and parking for 13 cars which was refused by Kildare County Council. The reasons for refusal were *inter alia* that the proposed development failed to meet the requirements for One-Off Enterprises in Rural Areas (as set out in Section 9.3 and Table 9.1 of the Kildare CDP 2023-2029) and contravenes objective TM O95 of CDP, which seeks to restrict new access onto regional roads where the 80 km per hour speed limit currently applies. Notwithstanding the above, it is considered that the subject lands by nature of their unzoned and un-serviced rural location, at a distance from built-up area of Castledermot are unsuitable for any type of industrial zoning. Such land use zoning designations are required to comply with established national policies which favours a plan-led approach that directs industrial and employment related uses to identified appropriate locations within urban settlements, in keeping with the principles of compact growth and sequential development.

Chief Executive Recommendation

No change recommended.

Issues Raised: Villages – Athgarvan, Ballitore, Ballymore Eustace, Johnstown, Straffan and Suncroft

(13 Submissions) Submissions 011, 019, 025, 030, 031, 040, 052, 056, 060, 084, 100, 118 and 140

Athgarvan	
Sub Ref No:	056
Name:	Voussoir Developments Ltd.
<p>Issues Raised: This submission has been prepared by Genesis Planning Consultants on behalf of landowner Voussoir Developments Ltd. seeking the rezoning of 10.5 ha of land at Athgarvan, Co. Kildare to provide 8.35 ha of 'C: New Residential' and 2.05 ha of 'E: Community and Education'.</p>	
	
<p>The submission raises the following points for consideration in relation to the rezoning request:</p> <ul style="list-style-type: none"> • The subject lands comprise 10.5 ha and are currently greenfield in nature with frontage along the L2032 which is within walking distance of a range of local amenities in the village. • The subject lands are partly zoned Existing Residential, Community and Education with the majority zoned Open Space and Amenity. States there are no physical constraints or flood risks restricting development. • Refers to the evolving national and regional planning policy context, including some key findings from the CSO in respect of planning permissions and falling housing delivery across local authorities. • Refers to the core strategy allocation for Kildare and states the county has delivered 1987 units per annum since adoption of the development plan which is 30% greater than the core strategy allocation for towns and villages. • States Kildare and Athgarvan is rapidly running out of zoned land to meet housing demand and recent ESRI population growth projections. • Refers to national policy context and the implications of the increased housing growth requirements for Kildare. States the county will require an additional 670 ha of residential lands above the current zonings to meet forecasted growth set out. 	

- Refers to two sites identified and zoned for residential development in the village which have been built out, including one site approved for 28 units.
- Refers to Draft Variation No.3 of the CDP and recommends a more detailed and revised approach to the housing and demand assessment is carried out having regard to the acute shortage of zoned land in smaller settlements such as Athgarvan.
- States Draft Variation No.3 should consider the following:
 - Population growth in the village and county over the last 15 years.
 - Housing stock per head of population and how it has decreased pro-rata.
 - Shortage of zoned land for delivering homes where no lands are available.
 - Avoiding a core strategy or Housing Needs Demand Assessment solely on population growth forecasts, as this approach is cyclical whereby population growth is hindered by the fact that it cannot grow as simply no houses are available.
 - Engagement with Elected Members and the local community.
 - Landowner engagement who intends to deliver housing.
- Refers to delivery mechanisms and towns outlined under Draft Variation No.3, stating this is not proper planning for the entire county as the majority of settlements including Athgarvan have not been allocated zonings.
- Asserts Draft Variation No.3 and delivery mechanisms outlined will not deliver housing units on the ground in the lifetime of the development plan.
- States smaller settlements with serviceable sites should be considered ahead of long-term complex sites such as the Northwest Quadrant in Naas. Refers to the delivery mechanisms outlined in Draft Variation No.3 and states the identified sites contradict the purpose of the guidelines and overarching policy which is to increase housing targets so lands are ready to come on stream.
- States the subject lands conform to the sequential development of the village which are in close proximity to village centre and surrounding residential development.
- States the subject lands are serviceable with access to existing infrastructure and services at adjacent roadside. There is no none flood risk constraints or ecological sensitives to development.
- Refers to an indicative masterplan vision and residential concept for the lands which seeks to deliver 149 units with a new community centre which will incorporate a new GAA facility on 2.05 ha of land to the south.
- Submission requests the rezoning of the subject lands and provides indicative proposal.
- The submission states the development of the subject lands and indicative masterplan will bring community benefit through the development of a new community centre and sports facility.
- The submission includes a supporting settlement capacity audit (infrastructure assessment), including pre-connection enquiry and confirmation of feasibility letter provided by Uisce Éireann.

Sub Ref No: 060

Name: Andrews Construction Ltd.

Issues Raised:

Submission by The Planning Partnership on behalf of Andrews Construction Ltd. seeking the zoning of a portion of land at Athgarvan from its current un-zoned status to 'New Residential'.




The submission and zoning request is made in consideration of the following:

- The submission notes the proposed Variation has been prepared to align the current CDP with the NPF Implementation Housing Growth Requirements guidelines and the Compact Settlements guidelines. The submission contends the Council should also consider the Government's new housing strategy *Delivering Homes, Building Communities*.
- It is noted the current CDP includes three 'C: New Residential' sites in Athgarvan which have been exhausted in terms of units completed, under construction and recently granted permission (Reg Ref: 24/60775 and appeal ref: ABP-322712-25).
- The submission notes the county's settlement hierarchy and submits it is also appropriate to apportion increases at lower order settlements concurrently as well.
- It is submitted that the subject site is an integrated and consolidated landholding proximate to established residential development and settlement envelope.
- It is noted the subject site is advantageously located on a main road with access proximate to the village core and is well connected to existing wastewater, water supply, public lighting, broadband and electricity infrastructure.
- It is stated there are no physical characteristics to preclude the development of the lands and as previously zoned 'residential'.
- The subject site is presented as additional zoned land for Athgarvan in alignment with NPF housing growth requirements and *Delivering Homes, Building Communities* (November 2025).

Ballitore	
Sub Ref No:	019
Name:	John O'Reilly
Issues Raised:	

Submission by John O'Reilly seeking the zoning of circa 1.15 ha of land at Ballitore Hill, Ballitore to 'New Residential'. The submission includes a cover letter and map and states that the subject site is connected to water, electricity and sewage.



Ballymore Eustace	
Sub Ref No:	030
Name:	Gareth and Austin McHale
Issues Raised: This submission has been prepared by David Mulcahy Planning Consultants Ltd. on behalf of landowners Gareth and Austin McHale seeking the zoning of 19 ha of land at Ballymore Eustace West, Ballymore Eustace to C: New Residential.	
	
The submission raises the following points for consideration in relation to the zoning request: <ul style="list-style-type: none"> • The submission notes Draft Variation No.3 does not include any additional zoned land for Ballymore Eustace, noting the subject lands have the potential to provide increased housing supply in the village. • The lands are currently in agricultural use and located approximately 550m from the village centre with frontage along the northern and eastern site boundaries. • It notes the western portion of the site contains three recorded monuments (NIAH) which can be protected by a buffer in the case of a future proposal. 	

- The submission notes strong demand for one-off housing around the village and surrounding areas which will increase if alternative housing options are not supported in the village.
- It states the subject lands have the potential to provide a new pedestrian connection to the Ballymore Eustace Cemetery which is currently detached from the village.
- The submission notes a recent planning application for 187 units on the subject lands was refused due to the scale of development which would injure the amenities of the area. An application for 79 units to an adjoining site to the north of the lands was also refused due to substandard infrastructure provision and connections serving the village.
- The submission refers to the evolving national and regional planning policy context. Notes the implications for County Kildare in terms of delivering more housing at increased densities.
- The submission highlights existing local policy objectives relating to road/pedestrian improvements and additional amenities in the village. Stating future development of the lands can assist with funding and delivery.
- The submission notes the subject lands were previously identified for low density development (R1) in the Kildare County Development Plan 2005-2011.
- It asserts the delivery mechanisms outlined in Draft Variation No. 3 will not deliver housing solutions on the ground in the lifetime of the existing development plan. States serviceable lands free from constraints should be identified for housing such as the subject site.
- The submission seeks the zoning of the lands to C: New Residential, however an alternative zoning of the lands to SS: Service Sites and its potential to deliver low density housing is supported.
- It notes that only one residential site is currently available in town, stating the subject lands if developed for housing could support much needed physical and social infrastructure for the immediate area and wider community.

Supporting Letter

A supporting letter from 'Kavanagh Burke Consulting Engineers' states the lands are serviceable in terms of water and wastewater connections with access to public mains and sewer networks available.

Sub Ref No: 040

Name: Joe and Ann Headon

Issues Raised:

This submission has been prepared by David Mulcahy Planning Consultants Ltd on behalf of landowners Joe and Ann Headon seeking the zoning of approximately 2.2 ha of land at Bishopsland, Ballymore Eustace which are currently unzoned to 'C: New Residential'.



The submission raises the following points for consideration in relation to the zoning request:

- Notes the subject lands currently adjoins existing residential zoned lands to the north which is currently in the same ownership.
- It states the zoning of the landholding in its entirety will provide much needed housing whilst opening up an attractive woodland to the village which can be incorporated into the existing Ballymore Loop Walk.
- The lands are in agricultural use and approximately 420m from the village centre with site access through a private dwelling via the L2025 Local Road.
- It states the adjoining lands currently zoned is notably small in terms of the costs associated to service the site, making the delivery of housing currently unviable.
- Refers to a supporting archaeological assessment which concludes no findings of archaeology associated with the subject site, however test trenching is recommended prior to any future development.
- The submission notes strong demand for one-off housing in surrounding areas which will increase if alternative housing options are not supported in the village.
- Refers to a planning permission and dwelling which was recently built to the northeast of the site, and which included a new vehicular entrance and footpath servicing the location. Notes other adjoining land uses which agricultural in nature.
- The submission refers to the evolving national and regional planning policy context. Notes the implications for County Kildare in terms of delivering more housing at increased densities.
- It refers to existing water and wastewater services in the area, stating adequate supply and sufficient capacity at the Ballymore Eustace WWTP exists to meet current demands and future planned growth over the life time of the plan.
- Notes a Tree and Woodland Preservation objective which should not preclude a zoning objective. Submits that an arborist assessment would be undertaken as part of any future planning application.
- Refers to the provisions of Draft Variation No.3 and asserts the delivery mechanisms outlined in the variation will not deliver housing solutions on the ground in the lifetime of the existing development plan. Submits that smaller serviceable sites such as the subject site should be considered for housing.

- Refers to three sites identified for new residential in the village, of which two are built out with one remaining which adjoins the subject lands.
- States there is no known flood risk constraints with the subject lands or ecological designations within the vicinity of the subject site.
- Refers to the lands to the northeast zoned B: Existing Residential / Infill which are in the same ownership. Notes support to also rezone this land to C: New Residential to form one overall landholding with the same zoning classification.
- Notes that in addition to the provision of housing, the development would also provide planning gain including an upgrade of the existing pedestrian route to the north of the site, the provision of access to the wooded area along with the potential extension of the walking trail and provision of a car park.

Archaeological Impact Assessment (AIA) for Subject Site

- The submission is accompanied by an AIA prepared by Dr Charles Mount. This report outlines the methodology noting that it is a desk-based assessment.
- Refers to a portion of the adjoining zoned lands to the northwest which is identified within the zone of archaeological potential.
- Concludes by finding no evidence of archaeology associated with the subject site. It also notes that there is potential for any future development to disturb previously unknown subsurface deposits or artefacts.

Engineering Report

- The submission includes an accompanying report prepared by Donnachadh O'Brien and Associates Consulting Engineers which examines the feasibility of the site for residential development. The report exams the existing roads infrastructure, sight lines, water supply, wastewater, flood risk and surface water. The conclusion finds the site to be ideally located from an infrastructural point of view for potential future development of a low-density residential development for services sites. The findings of this report are referred to in the main submission document.

Sub Ref No: 052

Name: David Dowling

Issues Raised:

This submission has been prepared by Clarke and Company Engineers Architects on behalf of David Dowling seeking the rezoning of circa 1.6 ha lands at Bishopsland, Ballymore Eustace from agricultural to residential.



The submission raises the following points for consideration in relation to the request:

- Notes the lands are bounded by a residential property to the east, by agricultural lands on the northern and western boundaries and on the southern boundary by the L2025.
- Refers to the provisions of the Revised NPF and the s.28 NPF Implementation: Housing Growth Requirements Guidelines (2025) in addressing urgent housing need and includes an analysis of housing delivery in County Kildare since the adoption of the CDP 2023-2029, which it states under-zoned residential lands and states that the zoned residential lands are being depleted at a rapid rate, despite only two years having elapsed since the adoption of the CDP.
- It is stated that the site is located approximately 500m from the village square with bus services and other amenities within walking distance such as the 5km long Golden Falls Loop Walk located 50m from the site.
- Refers to the provisions of Table 3.1 of the variation in relation to density targets for Rural Towns and Villages and contends that the subject lands are ideally located for such zoning status and to facilitate additional housing growth.
- Refers to recent Housing Supply Trends and demographic developments Refers to recent ESRI publication on population growth and recognises the need to rezone additional lands.
- States that the revised Housing Growth Requirements for County Kildare now requires at least an additional 1,231 housing units per annum with provision for a 50% uplift on this target. Contents that this equates to a minimum of 74 hectares per year additional residential zoning to meet the new housing growth requirement to 2034.
- States that the development of the subject lands is consistent with the Revised NPF and associated s.28 guidelines, which both place a significant emphasis on the need to increase the availability of residential zoned lands and would represent the sequential development of the village of Ballymore Eustace.
- Requests that the Variation strengthens its policy for the need of residentially zoned lands which will generate valuable housing and result in the strategic growth of Ballymore Eustace.

Sub Ref No: 118

Name: Ballymore Beef Limited

Issues Raised:

This submission by Ballymore Beef Ltd seeks the rezoning of agricultural lands (5.18 ha/12.8 acres) at Ballymore Eustace to 'C: New Residential'.



The submission raises the following points for consideration in relation to the request:

- Notes the location of the site to the south of Ballymore Eustace with direct access to the R411. Notes the existing Liffey Heights residential development to the north and other residential units to the east.
- States that the lands were previously zoned residential in the Kildare CDP 2011-2017 but were 'dezoned' in the 2017-2023 CDP.
- Submits that the lands should now revert to the former residential zoning as the lands represent the next logical location for residential development in Ballymore Eustace and if the site is rezoned to residential, it is the intention of the landowner to progress immediately with a planning application.
- The submission includes a sample scheme layout which shows the potential for 110 homes to include 20% social and affordable housing along with private housing and community services including a creche and a local retail unit and step down units for elderly.
- States that the site is serviced and Uisce Éireann has provided a confirmation of feasibility for the lands.
- Further states that the site has multiple pedestrian connections to the adjacent estate along with
- Contends that the subject lands are highly connected, located within close proximity to the Main Street, village square, River Liffey and local amenities.
- States that the lands represent a logical infill and consolidation opportunity, promoting compact urban growth in accordance with national, regional and local planning policy.
- Contends that the last two significant sites in Ballymore Eustace have been completed and that there is no development land of substance available for residential development in the village.
- States that the objective to add a pedestrian access to the Ballymore Bridge could be advanced immediately with appropriate support and levies from development sites and lands benefited by the new pedestrian bridge and states that a fully costed exercise has been carried out in relation to the development of the boardwalk, which can be shared with KCC.
- Refers to the provisions of the s.28 Guidelines – NPF Implementation – Housing Growth Requirements (2025).
- States that the site is in single ownership with capacity to build in the short term.

Johnstown	
Sub Ref No:	011
Name:	Molozza Ltd.
Issues Raised: Submission by Molozza Ltd. seeking the zoning of circa 3.03 ha of land at Johnstown from its current un-zoned status to 'New Residential'. <div data-bbox="363 465 1217 940" data-label="Image"> </div> <p>The submission includes a cover letter and attachment outlining that the zoning request is made in consideration of the following:</p> <ul style="list-style-type: none"> • The proposed zoning change represents a reasonable and sustainable continuation of the settlement pattern in Johnstown, is fully aligned with national, regional and local planning policy as the lands are strategically located close to Naas, a designated Large Growth Town under the RSES, and public transport links as well as the M7 Motorway and will contribute positively to meeting housing demand in the Naas area, supporting the NPF and CDP objectives to promote compact and sustainable growth. • The site's proximity to existing residential developments would provide an opportunity to create a cohesive, sustainable and well-integrated residential extension to Johnstown village, benefitting from established footpath and cycle links providing connectivity to the nearby villages of Johnstown and Kill. • The submission notes the site is readily serviceable with access to existing water, wastewater and electricity infrastructure. 	
Sub Ref No:	100
Name:	Petrogas Group Ltd.
Issues Raised: Submission by David Mulcahy Planning Consultants on behalf of Petrogas Group Ltd. seeking the zoning of c. 1.47 ha of land at Johnstown from 'Greenbelt' to 'New Residential'.	



The submission for new residential zoning is made in consideration of the following:

- The proposed zoning request is in line with national policy promoting new housing supply in existing settlements to create compact settlements, promotes higher density residential development near public transport and reflects new housing targets along with associated new zonings.
- It is submitted that only limited lands will be released for new housing under the proposed variation with most mechanisms involving future settlement plans and urban development zones. Therefore, it will not deliver houses on the ground within the remaining lifetime of the current CDP, which is the goal of the NPF Implementation guidelines.
- It is submitted that smaller settlements can form part of the solution in terms of delivering housing targets and notes there is only one small site (0.4 ha) zoned for New Residential on Johnstown zoning map.
- The subject site is greenfield and has significant road frontage onto the R445.
- This submission considers the proposed residential zoning to be an optimisation of a fully serviceable site, is proximate to transport options and established pedestrian and cycle connections into Johnstown and Naas.
- It is noted the proposed residential zoning of this site would not give rise to merging or amalgamation of Naas and Johnstown as lands in between would remain zoned Greenbelt.
- The submission notes an archaeological feature on the subject site (KD019-059-: Standing stone: Maudlings) and suggests this feature should not prevent a zoning objective and could be integrated into a future housing development.
- It is noted that part of the site is within the 90m development setback from the M7. The submission states the CDP refers to setback in rural areas and that increased flexibility is allowed for in urban areas. Given there is a public road between the subject site and the M7, this submission considers it reasonable that flexibility would apply at the subject site.

Engineering Constraints and Feasibility Report

The submission includes an accompanying report by Donnachadh O'Brien and Associates Consulting Engineers which examines the feasibility of the site for residential development. The report examines flood risk and surface water drainage, the existing roads infrastructure, proposed access arrangements, along with water supply and wastewater arrangements. The report contains a number of

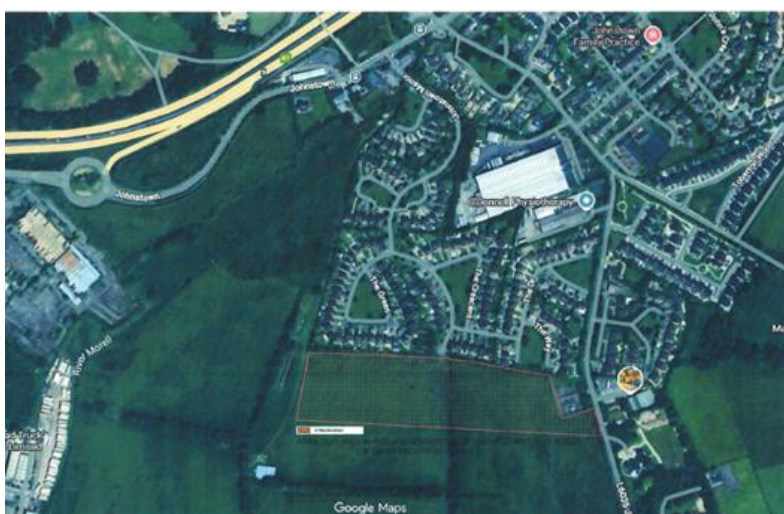
Appendices which identify the site on a zoning map of the Naas Local Area Plan 2021-2027, on CFRAMS mapping, on Uisce Éireann maps and on utilities mapping.

Sub Ref No: 140

Name: Anthony Lawlor

Issues Raised:

This submission has been prepared by Anthony Lawlor on behalf of the Lawlor family seeking the rezoning of lands (c.3.90 ha) at Johnstown, from agricultural use to 'C: New Residential'. The submission also references to the need for Serviced Sites in Johnstown. The lands are located south of the built-up area of Johnstown and is bounded to the west and south by agricultural land. The eastern boundary adjoins the L6035 Local Road.



The submission raises the following points for consideration in relation to the request:

- Appendix 1 to the submission contains a map of Johnstown and a Land Registry map showing the subject site outlined in red along with a Google Maps image showing the subject site outlined in red.
- Refers to the provisions of the Section 28 guidelines 'NPF Implementation: Housing Growth Requirements (July 2025) in relation to the housing growth requirements for County Kildare.
- States that Amendment No. 12 of the Variation sets out the delivery mechanisms by which additional housing growth will be facilitated, including the release of lands zoned Phase 2, the allocation of additional housing lands in some settlements, the identification of strategic sites in some settlements and the progression of long-term Urban Development Zones (UDZ) in the Northwest Quadrant (NWQ), Naas and Confey, Leixlip but that there is no assessment or allocation of additional zoned lands in smaller settlements such as Johnstown.
- States that the delivery mechanisms relating to the NWQ and Confey are acknowledged as 'long-term' and may not provide all the housing needed in the remaining three years of the CDP and alternative lands should be identified to

make up for this shortcoming and settlements such as Johnstown has the potential to provide residential development to address the housing crisis.

- States that the subject lands are fully serviced and are capable of immediate delivery within the three year time frame of the CPD.
- States that the lands are adjacent to Green Belt zoned lands which are in the same ownership and can be used to provide amenities for Johnstown Village, including playing fields and a sports campus.
- Refers to the provisions of the Revised NPF, the Planning and Development Act 2024, the above-mentioned s.28 guidelines and the Kildare CDP 2023-2029.
- Refers to Variation No. 3 and the additional housing units attributed to named towns and states that the additional units allocated to the NWQ and Confey may not be delivered in the remaining 3 years lifetime of the current CDP.
- States that Johnstown is an area under strong urban influence and that in the recent past planning permission has been refused to a number of applicants in this hinterland for housing and contends that there is a strong need for serviced sites in the village to cater for those seeking permission to build their own house.
- Contends that the lands are adjacent to the existing village boundary, have existing water and sewerage connections, with connectivity to the village centre, making them ideal for serviced sites.

Straffan

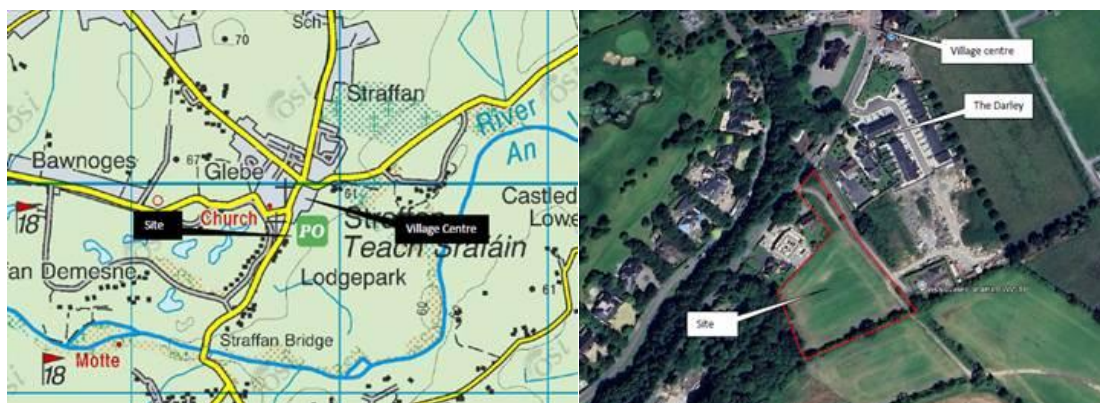
Sub Ref No: 025

Name: Lodgepark Developments Ltd

Issues Raised:

This submission has been prepared by David Mulcahy Planning Consultants Ltd. on behalf of Lodgepark Developments Ltd.

The submission is accompanied by a Flood Risk Assessment prepared by Conor Furey and Associates Ltd. This submission seeks to zone 0.28 ha of unzoned land to New Residential at Barberstown Road, Straffan to quickly deliver houses during the lifetime of the current county development plan in response to increased housing targets.



The submission provides the following rationale for the proposed residential zoning:

- The lands benefit from a vehicular entrance off the Barberstown Road and adjoins the development boundary of Straffan village and zoned lands.
- The lands are located close to the village centre, is close to public transport (circa 250m from bus stops for the 120 service) and directly adjoins a site which is being developed for housing (The Dartry).
- The site is serviceable, with an Uisce Éireann Confirmation of Feasibility letter for 20 dwellings on the lands. There are no built or natural heritage issues, archaeological features or structures on the lands based on a desktop review.
- The submission refers to national/regional plans and national guidelines in relation to increasing housing supply, addressing pent-up demand, promoting compact development and sequential growth in existing settlements.
- The submission references the Action Plan on Housing Supply and Targeting Homelessness, the NPF – First Revision, the Sustainable and Compact Settlement Guidelines and the NPF Implementation: Housing Growth Requirements Guidelines and the Eastern and Midlands RSES. The submission notes that other sources (including the Housing Commission and Department of Finance) contend that housing growth beyond the provisions of the NPF – First Revision may be required to address existing shortfalls.
- CSO statistics indicate that population growth for a reduction in planning applications for residential development.
- The goal of the recent Housing Growth Requirement Guidelines is to deliver houses on 'ready to go' lands within the lifetime of the County Development Plan. However, the proposed variation only releases limited lands under the proposed delivery mechanism, such as the release of New Residential - Phase 2 zoned lands for development. The remaining delivery mechanisms involve the preparation of future settlement plans and urban development zones. Accordingly, this variation will not deliver the required homes within the remaining life of the County Development Plan as per the Housing Growth Requirement Guidelines.
- The village of Straffan is not included in the delivery mechanisms, with emphasis on the larger towns of Kildare only. Kildare County Council should consider identifying lands which are serviced/serviceable and free from constraints.
- The area around Straffan is under pressure for one-off housing and there is a need to provide viable alternatives to attract persons from the area into the village. The site is ideal given its proximity to the centre of Straffan, is serviceable for 20 units and is free from constraints. It is considered that this request will enable the quick delivery of housing on the ground within the lifetime of the County Development Plan.

Flood Risk Assessment Report

- The submission is accompanied by Flood Risk Assessment Report, prepared by Conor Furey and Associates Ltd., which states that there is no identifiable risk to flooding at the proposed development site. This report is referred to in the main submission document.

Suncroft	
Sub Ref No:	031
Name:	Frank Needham
Issues Raised:	

This submission has been prepared by David Mulcahy Planning Consultants Ltd on behalf of landowner Frank Needham seeking the zoning of 6.47 ha of land at Carn, Suncroft to 'C: New Residential' or a combination of Town Centre and New Residential.



The submission raises the following points for consideration in relation to the zoning request:

- The submission notes Draft Variation No.3 does not include any additional zoned land for Suncroft, noting the subject lands have the potential to provide increased housing supply and connect two isolated housing developments north and south.
- The site is currently in agricultural use and is in close proximity to the village centre and a host of local amenities and services.
- It states there are no flood risks associated with the lands including no known natural/built heritage constraints.
- The subject lands and immediate area is not subject to any relevant planning history.
- The submission refers to the evolving national and regional planning policy context. Notes the implications for County Kildare in terms of delivering more housing at increased densities, noting the subject lands infill nature and location.
- The submission notes that one site is currently available for residential development in the village which contains an extant permission to deliver 38 units.
- It asserts the delivery mechanisms outlined in Draft Variation No.3 will not deliver housing solutions on the ground for Suncroft in the lifetime of the existing development plan. States serviceable lands free from constraints in smaller settlements should be identified for housing such as the subject site.
- It notes the recent Government announcement for private developers to deliver wastewater treatment plants in collaboration with Uisce Éireann for development up to 40 units, stating this could be an option as part of future development proposals.
- The submission seeks the zoning of the lands for 'C: New Residential' or a combination of town centre and new residential which would have the potential to support circa 75 units, including a childcare facility for the village.

- Submits that the adjoining Town Centre zoned lands are reserved for a cemetery and therefore other town centre uses cannot be delivered on this site and it would more appropriately be zoned Community/Education.
- It states supporting social infrastructure and recreational amenities including a multi-use games area, playground and bike track could be delivered with any future development.
- It asserts the future growth of the village should be focused on infill sites, stating the subject lands represent sequential development ensuring the compact growth of the village going forward.

Sub Ref No: 084

Name: Kathleen Gill

Issues Raised:

This submission has been prepared by Dooley Cummins Architects and Engineers on behalf of Kathleen Gill in relation to 3.63 ha of land at 'The Glebe', Common North, Suncroft. The submission seeks that the Maps in Variation No. 3 be altered to identify the subject unzoned lands as 'Strategic Reserve' lands.



The submission provides the following information for consideration in relation to the request:

- States the lands are located on a greenfield site on the Suncroft Road between the existing residential developments of Ard Brid and Hawthorn Wood to the north and Askinraw and Church View to the south.
- Contends development of these lands would represent a natural infill scheme that ties the separate elements of Suncroft together.
- Notes Kildare County Council previously identified the subject lands as being suitable for residential development as the site was zoned for New Residential under the Kildare County Development Plan 2017-2023 V2 Suncroft Village.
- Planning permission was granted by Kildare County Council for 63 no. two storey dwellings on the subject lands under Planning Application Ref. 042913.
- It is outlined that a positive pre-planning meeting took place on 8 September 2021 (PP5171) in relation to sketch proposals for potential residential development on the subject lands. The landowner was in the process of scheme development when the site zoning was changed in the KCDP 2023-2029.

- The submission asserts that the lands are not located in a flood risk zone or in an area where historic flooding was recorded.
- The subject lands are not located within or adjoining a protected habitat or Natura 2000 site:
 - The closest designated site, the River Barrow and River Nore SAC, is located some distance to the west. A tributary of the Barrow and Nore is located approximately 4.5km south.
 - The Curragh Proposed Natural Heritage Area is c.3.5km to north.
 - The Brownstown Stream is to the east (within 150m) and the Sheshoon Stream is to the west (within 450m).

Chief Executive's Response

The contents of the submissions are noted.

Zoning and land use designation requests for Villages in the county comprise the following:

- Submissions 056 and 060 in Athgarvan;
- Submission 019 in Ballitore;
- Submissions 030, 040, 052 and 118 in Ballymore Eustace;
- Submissions 011, 100 and 140 in Johnstown;
- Submissions 025 in Straffan; and,
- Submissions 031 and 084 in Suncroft.

It is acknowledged that Proposed Variation No. 3 does not contain any provisions to amend the zoning objectives or land use designations of any lands in the Villages of the county, as contained in Volume 2 of the County Development Plan, including Athgarvan, Ballitore, Ballymore Eustace, Johnstown, Straffan and Suncroft.

Proposed Variation No. 3 seeks to make a targeted variation to the County Development Plan (CDP) for the remaining three years of the plan period only, to provide for the additional housing growth requirements of the Government's Housing Growth Guidelines (2025). It is not a full review of the CDP, nor does it include new land use zoning maps. Consequently, requests for land use designations or zonings in these Villages cannot be considered.

The contention outlined in Submissions 052 and 056 that there is persistent under-zoning of land and a significant and growing shortfall in zoned residential land across the county is not accepted. The respective contentions in submissions 052 and 056 that 74 hectares per year and that a total of 670 hectares of residential land is required is rejected. In accordance with the Housing Growth Guidelines, the Planning Authority undertook a full audit to assess the capacity of undeveloped zoned land in the county. The results of the audit are detailed in a Chief Executive's report on the NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities (2025), submitted to the Elected Members of Kildare County Council on 22nd September 2025. The Audit found that, as of August 2025, there is approximately 432 hectares of land remain undeveloped with the potential to deliver approximately 13,795 houses across settlements in County Kildare.

The assertion of Submission 056 that a more detailed and revised approach is required for the Housing Need and Demand Assessment (HNDA) and the use of population growth forecasts is noted, however rejected. Objective NPO47 of the NPF 'First Revision' (April 2025) requires all local authorities to prepare a Housing Need and Demand Assessment (HNDA), which provides a robust methodology and evidence base to inform future housing policy, housing strategies and associated land use zoning policies as part of future development plans.

It should be noted that as part of the preparation of the next CDP, the land use zoning objectives of all settlements in the county will be reviewed. This process will formally commence in August 2026. During that process, lands will be assessed on their merits having regard to a comprehensive range of evidenced-based supporting documents. Such assessments may include *inter alia* a Settlement Capacity Audit (SCA), a Social Infrastructure Audit, a Strategic Flood Risk Assessment and other environmental reports. This data-driven approach will also align with national policy requirements relating to low carbon development and the sequential growth of settlements. Furthermore, while lands may appear suitable for residential development, whether classified as Tier 1 (Serviced) or Tier 2 (Serviceable), other land use considerations may take precedence, such as the need to accommodate community uses or provide for public open space. The proper planning and sustainable development of the villages in Kildare demand a balanced approach to land-use zoning designations.

However, the site identified in Ballitore (Submission 019) is some distance from the current settlement boundary. Accordingly, a new residential zoning on the site would result in the leapfrogging of development over more suitable locations in the village. This would set an undesirable precedent for development in Ballitore and would be contrary to established national and regional planning policy on compact growth.

The contention in Submissions 025, 030, 031, 040, 056, 060, 084, 100 and 140 that the delivery mechanisms outlined in the Proposed Variation will only release limited lands and will not result in housing on the ground within the life of the County Development Plan to meet the increased housing requirements is noted. Kildare has a track record over the past number of years in having exceeded its housing target requirements under the current Core Strategy of the CDP. Accordingly, it is considered that the Proposed Variation represents an appropriate approach to accommodate the Government's revised housing growth requirements in a targeted, plan-led manner so that additional housing may be delivered.


Notwithstanding the above, the housing delivery mechanisms are proposed to be amended in response to the overall request by the OPR in relation to short term housing delivery and in consideration of equitable, balanced and proportionate growth of the county. As detailed in the response to the OPR submission, it is proposed to remove the housing target for Villages in Table 2.8 to release capacity for housing on undeveloped zoned lands in these settlements (see Section 3 of this report).

Chief Executive's Recommendation


No change recommended. Refer to the recommendation provided in response to the OPR submission (Submission 116) regarding Villages.

Issues Raised: Rural Settlements – Ardclough, Ballyshannon, Calverstown, Cutbush, Kilmead, Lackagh/Mountrice, Milltown and Two Mile House


(8 Submissions) Submissions 020, 067, 078, 113, 123, 130, 133 and 136

Ardclough	
Sub Ref No:	067
Name:	Dr. Louie Harris and Babette Harris
<p>Issues Raised: This submission has been prepared by RW Nowlan and Associates on behalf of landowners Dr. Louie Harris and Babette Harris seeking the zoning of 4.0 ha of land at Ardclough to 'SE – Settlement Expansion'.</p>	
	
<p>The submission raises the following points for consideration in relation to the zoning request:</p> <ul style="list-style-type: none"> • The subject site is located in the village and is adjoined by agricultural uses with frontage along the L2008 Local Road at the southern and eastern boundaries. • Refers to the subject lands as being serviced and having the potential to support and consolidate the compact growth and sequential development of the area. • The submission notes the subject lands were previously included in the boundary of the Policy Theme Area (equivalent of current rural settlement boundary) under the Kildare County Development Plan 2005 – 2011. States this zoning should be reinstated during the current review process. • States the development of the subject lands for residential units would utilise an appropriate greenfield location which is served by quality social infrastructure that can support increased growth. • Refers to the 'Ardclough Rural Settlement Renewal Masterplan 2024' which describes the village as an 'attractive settlement core with potential for improvement and people focused placemaking'. States the subject lands can positively contribute to villages long term sustainability and continued growth. • The submission notes available lands for residential expansion in the village have been built out and considers it necessary for additional lands to be identified. 	

- Requests the subject lands are considered in the review of zoned lands and their potential to contribute to achieving population targets set out for Kildare.

Ballyshannon	
Sub Ref No:	136
Name:	Dunne Family
<p>Issues Raised:</p> <p>This submission has been prepared by RSDS Architects on behalf of the Dunne Family seeks the rezoning of circa 2.31 ha lands at Ballyshannon. The landholding consists of:</p> <ul style="list-style-type: none"> • 1.27 ha currently included within the Rural Settlement Boundary and designated for Serviced Sites; and • 1.04 ha contiguous lands currently excluded from the Rural Settlement Boundary and designated as Agricultural. <p>The submission requests that:</p> <p>(2) The entire 2.31 ha landholding be included within the Rural Settlement Boundary; and</p> <p>(2) The full landholding be zoned Residential.</p> <p>The subject lands are located north of the L8008 Ballyshannon Road and west/north-west of its junction with the R418 Regional Road. Lugatanna Park is located to the west and north-west of the lands. The lands sit opposite Ballyshannon Crossroads.</p>	
	
<p>The submission raises the following points for consideration in relation to the request:</p> <ul style="list-style-type: none"> • Refers to the provisions of the NPF, Housing for All, RSES, the Sustainable Residential Development Guidelines (2009) and ESRI Housing Demand Analysis. • States that the residential zoning reduces pressure for one-off rural housing in the hinterland and supports the viability of local services, most notably Ballyshannon National School (NS). • States that the lands are within walking distance of Ballyshannon NS, community hall, existing residential clusters, a public house, bus routes and local services. • There are no recorded monuments, architectural heritage, designated sites or planning history relevant to the site. 	

- States that Variation No. 3 does not alter rural settlement zoning principles, meaning the Council has full discretion to adjust the boundary and zoning at this stage.
- Sets out the justification for the rezoning request under the following headings:
 - Infill development – surrounded by existing housing.
 - Logical extension of the village.
 - Sequential and sustainable development.
 - Supports Ballyshannon National School.
 - Delivers village-scale residential choice, including downsizing options.
 - More sustainable than low density serviced sites.
 - Reduces rural one-off housing pressure.
 - Is fully deliverable – in single ownership, readily serviceable.
- States that the re-zoning request reflects the true built context, promotes compact growth and consolidation, supports local services, reduces rural sprawl, aligns with national, regional and local planning policy, enables a sustainable, sequential and deliverable residential extension to Ballyshannon.

Calverstown	
Sub Ref No:	123
Name:	Cormac Hickey
Issues Raised: This submission has been prepared by Murphy Design and Build Solutions on behalf of landowner Cormac Hickey seeking the rezoning of 2.03 ha of land at Calverstown from 'SS: Service Sites' to 'SE: Settlement Expansion'.	
	
The submission raises the following points for consideration in relation to the re-zoning request:	
<ul style="list-style-type: none"> • The subject lands are agricultural in nature and located within the village boundary, surrounded by residential uses to the northern and western site boundaries. • States the subject lands show no known flood risk or built/natural heritage constraints. Notes Calverstown Demesne is situated circa 400m to the south. • Refers to a planning permission on the subject lands for 39 units which was refused in 2007 due to the pending construction of the Calverstown Wastewater Treatment Plant. 	

- Notes a further planning permission on the subject lands for 10 units was also refused in 2018 due to its location outside the settlement boundary and overall site layout concerns. It states such concerns can now be overcome.
 - Refers to planning history in the village for residential units which have failed to be delivered. States the subject lands if rezoned can provide a 'ready to go' solution to deliver housing in the short term.
 - States there is currently 6.75 ha of land zoned for settlement expansion; however, 5.0 ha of this land has been identified for the past 20 years with minimal activation taking place.
 - It states smaller settlements with serviceable sites capable of providing short term housing solutions should be considered. States the subject lands are available to deliver short term housing with a motivated landowner if the lands are appropriately rezoned.
 - The lands can support practical alternatives for persons meeting local needs but are failing to secure planning permission in the surrounding areas where absorption capacity is largely saturated.
 - Refers to the Government's recent announcement permitting private developers, in collaboration with Uisce Éireann to provide wastewater treatment plants. States the landowner is willing to enter an agreement with Uisce Éireann for the upgrading of the treatment plant in the village if successfully rezoned.
 - The submission asserts the subject lands if rezoned offer significant advantages in terms of accessibility, infrastructure and sustainability of the village, while also addressing critical housing needs in the region.
- The submission includes two attachments, as follows:
- A location map of the site and its distance (200-350 metres) from the centre of the settlement.
 - A proposed layout map of a development comprising 28 residential units on the site.

Cutbush	
Sub Ref No:	133
Name:	Noel Dowling
Issues Raised: This submission has been prepared by Murphy Design and Build Solutions on behalf of landowner Noel Dowling seeks the zoning of 1.5 ha of land at Cutbush to 'SS: Service Sites' or 'SE: Settlement Expansion'.	



The submission raises the following points for consideration in relation to the zoning request:

- The subject lands are agricultural in nature and located at the edge of the village which is surrounded by residential uses.
- The lands adjoin a site with extant permission for three detached dwellings which is in the same ownership.
- The lands are currently not within the settlement boundary. States the lands bound an existing zoned site identified for 'SE: Settlement Expansion'.
- States a public foul sewer connection runs adjacent to the subject lands with capacity for future housing.
- States the subject lands show no known flood risk or built/natural heritage constraints.
- Refers to a planning permission refused for a 50-bed nursing home and 16 unit independent living facility on the subject lands due to design, drainage, wastewater and land use issues.
- Refers to a recent planning permission on the adjoining lands which includes an additional three dwellings along an extension of the access road to the western boundary. States this road extension provides an obvious access to the subject lands if zoned for housing.
- Refers to local planning context and the existing 'County Kildare Service Sites Initiative'. States no such lands have been identified in the village and asserts the subject lands are a feasible option for such provision.
- States a 'Serviced Sites' option in the village will provide an alternative housing option for individuals who meet local needs criteria.
- Submission includes a site location map and indicative site layout proposal on the lands for an 11-unit residential scheme.


Kilmead	
Sub Ref No:	113
Name:	KDM Construction Ltd
Issues Raised: This submission has been prepared by Murphy Design and Build Solutions on behalf of landowner KDM Construction Ltd. seeking the zoning of 2.75 ha of land at Kilmead, Co. Kildare to 'SE: Settlement Expansion'.	



The submission raises the following points for consideration in relation to the zoning request:

- The subject lands are located edge of the rural settlement of Kilmead and are currently brownfield in nature having been partly developed for housing with some units lying unfinished.
- The lands currently sit outside the settlement boundary but adjoin neighbouring residential development and land use zonings in Kilmead.
- States the lands were previously zoned for Settlement Expansion in the previous Kildare County Development Plan 2017-2023 and are currently not zoned, notwithstanding the fact that 8 no. partly constructed dwellings are present on the site.
- The submission states the zoning of the subject lands would generate significant planning gain by addressing an unsightly site with much needed housing, a playground, new footpaths and lighting. Development would increase the population of the settlement, which has a primary school 200m from the site.
- States the subject lands show no known flood risk or built/natural heritage constraints.
- The submission states that Kilmead benefits from the national school, a church and the services, amenities and employment in Athy – which is a 10 minute drive from Kilmead. Kilmead is also served by the 130, 130A and UM06 bus routes, connecting to Athy and further afield.
- Refers to previous grants of planning permission on the site in 2004 and 2006. Planning permission was refused in 2022 for 30 dwellings due to a pending upgrade of the local wastewater treatment plant in the village. The submission is accompanied by a site layout plan and site location map submitted as part of the refused application.
- Refers to the Government's recent announcement permitting private developers, in collaboration with Uisce Éireann to provide wastewater treatment plants. States the landowner is willing to enter an agreement with Uisce Éireann for the upgrading of the treatment plant.
- It states only 3.2 ha of land is currently zoned 'SE: Settlement Expansion' in the village which is considerably low in comparison to other rural locations.
- It notes the largest site option currently zoned has not had any planning activity in the course of two county development plans. States smaller settlements should have zoned land available that can provide realistic housing solutions.

- It states the subject lands are 'ready to go' and unencumbered by any identified constraints, providing alternative options for individuals who meet local needs criteria but find it difficult to secure planning permission for one off housing.
- The submission asserts the subject lands if zoned can offer significant advantages in terms of accessibility, infrastructure and sustainability of the village, while also addressing critical housing needs in the region.
- The submission includes an indicative site proposal which includes 29 units over two phases.
- The submission includes a supporting 'Pre-Connection Enquiry' form supplied by Uisce Éireann which states the subject lands are serviceable with water mains connection available, including a public sewer connection available in close proximity to the site boundary.

Lackagh / Mountrice	
Sub Ref No:	130
Name:	The Green Road Partnership
<p>Issues Raised:</p> <p>This submission has been prepared by Tom O'Loughlin Architects on behalf of The Green Road Partnership seeking rezoning of greenfield site (circa 3 ha) to 'C: New Residential' by way of an extension of the Lackagh/Mountrice Rural Settlement boundary to include lands located south of Scoil Bhride, Lackagh, Mountrice, Monasterevin.</p>	
	
<p>The submission raises the following points for consideration in relation to the request:</p> <ul style="list-style-type: none"> • States that the Scoil Bridge National School, which can accommodate circa 120 students, but in September 2025 enrolment for the junior infants' class was only 6 no. pupils, which is the lowest in a number of years. • Contends that given the landholding's proximity to the adjacent school, it would be appropriate to include the subject site within the settlement boundary. • States that planning permission was granted under Pl. Ref. 08/142 for 17 no. dwellings and a creche on the site but given the economic downturn in the following years, the housing scheme did not commence. • States that planning permission was granted in 2019 for 5 no. dwellings (18/275) and includes a site layout plan of the development. • Further states that The Green Road Partnership proposal for the landholding would provide for approximately 10/12 dwellings on 3 ha with a mixture of 3,4 and 5 bedroom dwellings, on circa 2,000sqm sites, which would cater for local 	

people from the wider Kildare area. Provides an indicative site layout of a proposed scheme.

- States that the proposed dwellings would be served by individual on site effluent treatment systems and water is available from the local group water scheme.

Milltown

Sub Ref No: 020

Name: Ciaran Smith, Donal Kearney and Gerry Cosgrove

Issues Raised:

This submission has been prepared by David Mulcahy Planning Consultants Ltd. on behalf of landowners Ciaran Smith, Donal Kearney and Gerry Cosgrove seeking the zoning of 2.36 ha of lands at Milltown, to 'SE: Settlement Expansion'.



The submission raises the following points for consideration in relation to the zoning request:

- The submission notes Draft Variation No.3 does not consider smaller settlements such as Milltown, where the subject lands are serviceable and capable of delivering housing along with supporting social infrastructure.
- It asserts serviced site zonings identified in the Kildare County Development (CDP) to date have yet to yield any new housing, suggesting consideration should be given to alternative site options.
- The subject lands are located within the village which can provide an alternative to one-off housing which poses no flood risk and is free of any built/natural heritage constraints. The western edge of the site abuts adjoins the Canal pNHA.
- The submission states a possible connection to the existing foul sewerage infrastructure servicing Newbridge and Osberstown WWTP is available as proposed in previous application in 2008.
- The submission states there is notable pressure for one-off housing in the area which is likely to increase if alternative housing options aren't provided in the village.
- The submission refers to a previous planning refusal on the subject lands for 39 houses due to a number of reasons such as wastewater capacity which has now been resolved since 2008.

- It notes a recent pre-planning meeting (October 2025) for 40 houses on the subject site where the key issues identified a need to secure a 'Settlement Expansion' designation and wastewater connection.
- The submission highlights the recent Government announcement allowing developers to deliver new wastewater treatment facilities in conjunction with Uisce Éireann for schemes up to 40 dwellings.
- The submission refers to evolving national and regional planning policy context, noting the implications for County Kildare in terms of providing alternative solutions to one-off housing in rural villages. States the subject site would deliver modest level of growth through viable housing solutions.
- The submission notes the significant population growth in Kildare and the need for additional zoned lands. States existing designated sites for housing development in the town have not been activated or subject to any planning history since the adoption of the existing County Development Plan.
- The submission refers to the provisions of the Kildare CDP 2005-2011, which identified the subject lands within the Policy Theme Boundary for the Milltown Settlement Map (extract included) which allowed for residential development.
- Draft Variation No.3 and its delivery mechanisms outlined therein will not deliver housing on the ground for rural settlements under the lifetime of the plan. It states consideration should be given to smaller settlements with the ability to deliver housing on feasible sites.
- The submission includes an indicative site proposal which can deliver 16 units, providing viable alternative housing for the community on an underutilised site.

Two Mile House	
Sub Ref No:	078
Name:	JP Quinn and Sons Ltd.
<p>Issues Raised:</p> <p>This submission has been prepared by David Mulcahy Planning Consultants Ltd. on behalf of JP Quinn and Sons Ltd., who own lands zoned Serviced Sites in Two Mile House. The proposed amendment to Objective HO O56 is welcomed.</p> <p>It is submitted that Table 3.4 needs to make it clear that persons living in rural settlements are included in the 'rural area'. This should be included in the text with the asterisk within the table to avoid any ambiguity.</p> <p>It is submitted that the restriction for applicants to be within 10km should be made more flexible and that 50% of houses should be made available on the open market. This approach has been applied in a previous Development Plan in recognition that it allows some degree of incentive for the developer to develop these sites. The rationale being to deliver houses on the ground in a crisis.</p> <p>It is asserted that the Serviced Sites zoning has not delivered houses on the ground three years into the County Development Plan, and that this would help:</p> <ul style="list-style-type: none"> • Encourage housing delivery in rural settlements, • Make delivery more achievable in terms of funding for up front infrastructure delivery. 	

It is further requested that the wording in the draft amendment be altered to make it clear that flexibility should apply to Serviced Site zonings in villages and settlements, where mains or communal foul treatment is not available, and that a favourable approach will be adopted in such circumstances for on-site treatment systems.

Chief Executive's Response

The contents of the submissions are noted.

Zoning and land use designation requests for Rural Settlements in the county compromise the following:

- Submission 067 in Ardclough;
- Submission 136 in Ballyshannon;
- Submission 123 in Calverstown;
- Submission 133 in Cutbush;
- Submission 113 in Kilmead;
- Submission 130 in Lackagh / Mountrice
- Submission 020 in Milltown; and,
- Submission 078 in Two Mile House.

It is acknowledged that Proposed Variation No. 3 does not contain any provisions to amend the zoning objectives or land use designations of any lands in the county, including in Rural Settlements, as contained in Volume 2 of the County Development Plan.

Proposed Variation No. 3 is not a review of the County Development Plan in its entirety. The Variation instead seeks to make a targeted amendments to the Plan for the remaining three years of its lifetime, to provide for the additional housing growth requirements of the Government's NPF Implementation Guidelines (2025) through a series of plan-based mechanisms. Consequently, requests for land use designations or zonings in these settlements cannot be considered.

It should be noted that Volume 2 of the Kildare County Development Plan 2023-2029 (CPD) clearly states that '*the lands within the defined settlement boundaries [of rural settlements] do not constitute zoned land*'. In this regard, the following should be noted in relation to Submissions 136, 123, 130:

- The 'C: New Residential' zoning objective requested in Submissions 136 and 130 is not applicable to Rural Settlements based on the position of Rural Settlements in the Settlement Hierarchy of the CDP.
- Regarding the request for redesignation from 'SS: Serviced Sites' to 'SE: Settlement Expansion' in Submissions 020 and 123, it should be noted that people purchasing houses built on lands designated as SE: Settlement Expansion still are required to comply with the local need criteria, as outlined in Section 3.13 of the CDP.

Furthermore, as part of the preparation of the next CDP, the land use designations and zoning objectives of all settlements in the county will be reviewed. This process will commence in August 2026. During that process, lands will be assessed on their

merits and having regard to a comprehensive range of evidenced-based supporting documents.

The contention in Submission 020 that the delivery mechanisms outlined in the Proposed Variation will only release limited lands and will not deliver housing on the ground in such settlements within the life of the County Development Plan is noted. Kildare has a track record over the past number of years in having exceeded its housing target requirements under the current Core Strategy of the CDP. Accordingly, it is considered that the Proposed Variation represents an appropriate approach to accommodate the Government's revised housing growth requirements in a targeted, plan-led manner so that additional housing may be delivered.

Notwithstanding the above, the delivery mechanisms are proposed to be amended in response to the overall request by the OPR in relation to short term housing delivery and in consideration of equitable, balanced and proportionate growth of the county. As detailed in the response to the OPR submission, it is proposed to remove the housing target for Rural Settlements in Table 2.8 to release capacity for development in these settlements.

The request in Submission 078 to make it clear in Table 3.4(a) that persons living in Rural Settlements are included in the 'rural area' in relation to Serviced Sites criteria is accepted. Such alterations to Table 3.4(a) are contained in the Chief Executive's recommendation to the issues raised in Kilcullen.

The request in Submission 078 to provide more flexibility in relation to Serviced Sites, such that 50% of houses on Serviced Sites be available on the open market is not accepted. It is considered that such a provision would undermine the primary purpose of Kildare's Serviced Sites Scheme to provide a sustainable alternative to one-off housing in rural areas. If a percentage of these units were put on the open market it is expected that, given both the ongoing housing crisis coupled with Kildare's accessible location within the Greater Dublin Area, many of the prospective buyers would be from higher order urban settlements within or outside the county. It is acknowledged that the development of identified Serviced Site locations in the county has been slower than initially envisaged. It is considered however, that the changes in the criteria set out in Proposed Variation No. 3 will improve the viability of many Serviced Site locations, thereby leading to these sites being developed at a quicker pace.

It should also be noted that Kildare County Council has committed to undertaking a review the Serviced Sites Scheme as part of the review of the CDP. Accordingly, the request that flexibility should apply to Serviced Site zonings in villages and settlements, where mains or communal foul treatment is not available, and that a favourable approach will be adopted in such circumstances for on-site treatment systems is considered to be premature pending the outcome of this review.

Chief Executive's Recommendation

No change recommended.

Refer to the recommendation provided in response to the OPR submission (Submission 116) regarding Rural Settlements and the recommendation provided in response to the issues raised in Kilcullen regarding Table 3.4(a) and Serviced Sites.

Issues Raised: Blessington Environs

(1 Submission) Submission 054

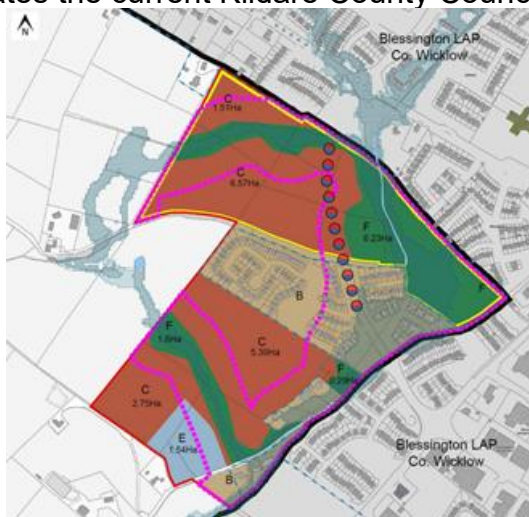
Sub Ref No:	054
Name:	Kelland Homes Ltd

Issues Raised:

This submission has been prepared by Armstrong Fenton Associates on behalf of Kelland Homes seeking the rezoning of part of their lands (c.2.54 ha) i.e. being 40% of the current 'F: Open Space and Amenity' lands at Newtown Little, Blessington, County Kildare be rezoned to objective 'C: New Residential'. The subject lands are circa 14 ha in area, located on the border of the Kildare County Council and Wicklow County Council administrative areas i.e. traversing the townlands of Blessington Demesne (County Wicklow) and Newtown Little (County Kildare).



The map below illustrates the current Kildare County Council boundary:



Within the landholding, approximately 8 ha are currently zoned 'C: New Residential' with the remainder (approx. 6.23 ha) zoned 'F: Open Space and Amenity' under the Kildare CDP 2023-2029. The submission seeks the rezoning of part of the 'F' lands (2.5 ha – being 40% of the 'F' lands) to C: New Residential whilst retaining the remaining 60% of the lands (circa 3.7 ha) for open space and

amenity use and the accommodation of flood zones. The site abuts housing to the north/north-west and to the south.

The submission raises the following points for consideration in relation to the request:

- The submission includes a document prepared by Davey + Smith Architects which illustrates the lands proposed to be zoned, flood extent, active travel linkages to be incorporated into the scheme and the roads objective.
- States that there is a significant roads objective traversing the lands which is to facilitate the delivery of the north-south Blessington Inner Relief Road (BIRR) as well as the identification of land that is liable to flooding.
- States that the entire landholding is subject to the requirement of a masterplan in the CDP.
- States that part of the current 'F: Open Space and Amenity' land use is inappropriate as some of these lands can be developed for housing which will provide ample lands for open space and amenity as well as being free from flood risk.
- Refers to the housing requirements of the current CDP and the Variation.
- Notes that the Variation identifies where the additional housing growth is to be accommodated but does not include Blessington as a potential location for new housing.
- States that the current Core Strategy allows for 91 no. new dwellings to be delivered in Blessington from 2023-2028 and accounts for 1% of the housing and population allocation in County Kildare and if the county is to accommodate a total of 7,826 no. additional units over the next three years, then an additional 78 no. units should be accommodated for in Blessington for the next three years, thus catering for a total of 169 no. dwellings until 2029.
- Refers to the s.28 Guidelines NPF Implementation: Housing Growth Requirements and states refers to Appendix 1 of same, which provides for a target of 2,77 units annually until 2034 and a further 1,919 per annum from 2035-2040 and states that this equates to over 37,000 dwellings up until 2040 for the entire county and notes that 1% of this would equate to circa 370 additional dwellings being accommodated in Blessington until 2040.
- States that further to an examination of the flood risk assessment and associated maps in the current CDP, it is put forward that there is excessive lands zoned objective 'F'.
- States that the proposed 2.5 ha of land to be zoned as 'C: New Residential' are not affected by the flood zones and could accommodate circa 90 no. units and refers to the enclosed document prepared by Davey + Smith Architects which illustrates the three land parcels in the eastern part of the landholding that should be considered for rezoning. The three parcels are not at risk of flooding and will not increase flood risk elsewhere if developed.
- States that the landowner can assist in the delivery of the proposed BIRR, which is critical to the town.
- States that any future development of the lands will be subject to a Site-Specific Flood Risk Assessment and a Justification Test.
- States that the lands that are currently zoned 'F' are privately owned and are currently being grazed by cattle and are not open to the public and there are no long term plans to make this land available for use as open space and no

planning history attached to the site and that in previous CDPs the subject lands were zoned for residential development.

- States that the lands abut existing residential development with future residential use proposed to the west and further south, with an extant planning permission for a new school and housing to the south granted in 2022.
- States that the proposal to zone the lands to cater for housing is in keeping with the character of this area and will complement existing and planned residential development in the environs and will be compliant with the Core Strategy.
- States that the proposal circa 40% of the lands currently zoned 'F' will allow for the BIRR to be delivered.
- Refers to the landowner's track record for delivering housing in the county and beyond.

Chief Executive's Response

The contents of the submission are noted. It is acknowledged that Proposed Variation No. 3 does not contain any provisions to amend the land use zoning objectives of any lands in Blessington. Proposed Variation No. 3 seeks to make a targeted variation to the County Development Plan (CDP) for the remaining three years of the plan period only, to provide for the additional housing growth requirements of the Government's Housing Growth Guidelines (2025). It is not a full review of the CDP, nor does it include wholesale, amended or new land use zoning maps. Consequently, the request in Submission 054 to change the zoning from 'F: Open Space and Amenity' to 'C: New Residential' cannot be considered.

As part of the preparation of the next County Development Plan, the land use zoning objectives and designations of all settlements in the county, including for the Blessington Environs, will be reviewed. This process will formally commence in August 2026.

The comments outlined in the submission regarding the housing allocation provided to the Blessington Environs under the Core Strategy of the CDP and the contention that 78 additional units should be provided under the Proposed Variation are noted. Given the capacity of the lands zoned C: New Residential in the Blessington Environs to accommodate development over and above the Core Strategy allocation of the Kildare CDP 2023-2029, it is considered appropriate to provide an additional housing growth requirement of 100 units to the Blessington Environs in Table 2.8A. This increased allocation aligns with the provisions of the NPF Implementation: Housing Growth Requirements Guidelines (2025) in terms of the delivery of additional housing in the short term and will result in the delivery of much needed critical servicing infrastructure and in addition to new amenity lands, as required under Objective BEO 1 of Volume 2 (Small Towns and Environs) of the CDP. See Chief Executive's Response to Submission 116 from the Office of the Planning Regulator in Section 3 of this report for further details.

Chief Executive's Recommendation

See Chief Executive's Response to Submission 116 from the Office of the Planning Regulator in Section 3 of this report for further details.

6.0 Issues Raised by Themes in Submissions or Observations from all other Persons or Bodies

This Section of the Report discusses the issues raised by themes that were raised in submissions or observations. The themed issues addressed below include the following:

- Core Strategy and Settlement Strategy
- Rural Area Zoning Requests
- Rural Housing
- Rural Nodes
- Education and Dwelling Design Standards
- Public Transportation Infrastructure
- Houseboat Policy and Servicing Infrastructure
- Safeguarding Built Heritage and the Promotion of Traditional Vernacular Architecture
- Public Consultation and Equality

Issues Raised: Core Strategy and Settlement Strategy

(4 Submissions) Submissions 077, 088, 124 and 125

Sub Ref No:	077
Name:	Brian Connolly
<p>Issues Raised:</p> <p>The submission by Brian Connolly of Brian Connolly Associates Consulting Engineers summarises the content and intent of Variation No. 3 and states that the emphasis of the National Planning Framework, Implementation: Housing Growth Requirements - Guidelines for Planning Authorities (2025) is to bring forward 'ready to go' lands that will deliver housing during the lifetime of the County Development Plan.</p> <p>The submission considers that there is an artificial cap on the development of Tier 1 residential zoned lands in the County as planning permissions are being refused on the basis of exceeding Core Strategy numbers in Table 2.8 of the County Development Plan.</p> <p>The additional proposed text provided in Section 2.12 of the County Development Plan is welcomed:</p> <p><i>'Where planning applications are received for housing developments on appropriately zoned lands and where the development would result in an exceedance of core strategy allocation for that settlement, the planning authority may consider granting permission for such developments having regard to the provisions of Section 86(7) of the Planning and Development Act 2024 and where commensurate social infrastructure is delivered as part of the development scheme in accordance with objectives SC O15, SC O16 and SC O17 of this Plan.'</i></p> <p>However, a stronger direction should be given to the Planning Department to grant permission on zoned lands. As the lands were zoned residential and if they</p>	

are serviceable, it is stated that Core Strategy numbers should not be an obstacle/deterrent to housing in accordance with the Housing Growth Requirement Guidelines.

It is suggested that the proposed text in Section 2.12 should be revised to read as follows:

'Where planning applications are received for housing developments on appropriately zoned lands and where the development would result in an exceedance of core strategy allocation for that settlement, the planning authority may grant permission for such developments having regard to the provisions of Section 86(7) of the Planning and Development Act 2024. The development will comply with Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities (2024) and Chapter 15 Development Management Standards.'

The submission believes that this alteration will assist in providing much needed housing in accordance with Government policy and in reaching the revised housing targets.

Sub Ref No: 088

Name: Glenveagh Homes Ltd.

Issues Raised:

The submission includes an attachment document by John Spain Associates, on behalf of Glenveagh Homes Ltd., and seeks to demonstrate the suitability of the sites identified in this submission (at Celbridge, Naas and Sallins) for residential development, particularly in the short-term and to propose changes to the Proposed Variation No. 3, to ensure housing can be delivered on the sites in the short-term to contribute to the increased housing requirement for the County within the lifetime of the Development Plan.

The submission includes an attachment document which outlines the rationale for this request, as follows:

- Housing growth requirement for Kildare increased from 1,524 to 2,755 per year (increase of nearly 81% or 1,231 dwellings per year).
- Notes Housing Commission Report and Housing Plan 'Delivering Homes, Building Communities' and that the Planning Authority needs to ensure that a "sufficient pipeline of suitable zoned land is available for housing development."
- States it is imperative to focus on sites which can deliver housing in the short term as remaining plan period is only three years.
- States that Variation No.3 identifies some sites which can deliver medium to long term housing, which are dependent on Settlement Plans. Long term delivery is also dependent on Masterplans and Urban Development Zones that are yet to be prepared.
- Asserts there shouldn't be an undue reliance on locations which will deliver housing outside the remainder of the plan period, stating that the Tier 2 sites, which are effectively Long-Term Strategic and Sustainable Development Sites/Opportunity Areas' is contrary to the Housing Growth Requirement

<p>Guidelines. The allocation to such sites should be further in addition to both the housing growth requirements and the 50% additional provision provided in the Housing Growth Requirement Guidelines.</p> <ul style="list-style-type: none"> • Delivering the current core strategy will be difficult for Kildare due to the lack of zoned sites within the higher order towns, and it is urged that the core strategy numbers be rectified and identify additional sites / landbanks in Tables 2.8A and 2.8B to enable residential development to come forward in the remaining 3 years of the County Development Plan. • It is also noted that this may entail some serviced (Tier 1) long term strategic sites being brought forward quicker as 'additional provision', while other Tier 2 sites be reassigned to the further additional provision that is above the housing growth requirement and the 'additional' provision. • The Housing Growth Requirement Guidelines provide that planning authorities may consider the zoning of alternative lands where there is capacity to deliver housing in the short to medium term. • Contends that the additional 7,826 dwellings identified by KCC are not capable of being delivered over the remainder of the Plan period – a fact confirmed by the Tier 2 designation applied to some sites in Tables 2.8A and 2.8B. 	
Sub Ref No:	124
Name:	Clane Community Council
<p>Issues Raised:</p> <p>The submission by Clane Community Council highlights the need for plan-led, infrastructure-led, sustainable growth ensuring that housing development is matched by co-ordinated services, compact and sequential development, reduced car dependency and evidence-based assessment in line with national and regional policy.</p> <p>The submission also highlights the requirement for all spatial planning decisions to align with national climate objectives, carbon budgets and the Transport Sectoral Emissions Ceiling, in accordance with Section 15 of the Climate Action and Low Carbon Development Act 2015, as amended.</p> <p>The submission outlines national and regional planning policy with regard to balanced growth, provision of services and reducing car dependency. The submission suggests a new policy be included in the Proposed Variation, as follows:</p> <p>Policy CS OXX – Infrastructure, Sustainable Mobility and Social Capacity Test</p> <p><i>Proposals that would result in housing delivery above the Core Strategy target for a settlement shall only be permitted where the applicant submits an evidence-based assessment demonstrating that all of the following considerations are met. In line with the First Revision of the National Planning Framework, this assessment shall explicitly address the impacts of the proposed development on car dependency, traffic congestion and mode share at local, district, regional and national levels, and shall demonstrate consistency with national carbon budgets, the Transport Sectoral Emissions Ceiling and the</i></p>	

National Climate Objective, as required under Section 15 of the Climate Action and Low Carbon Development Act 2015 (as amended).

1. Physical Infrastructure and Sustainable Mobility Capacity

The proposal demonstrates, through certified statements from relevant service providers, transport modelling, and appropriate Area Based Transport Assessment / Local Transport Plan, that sufficient and sustainable capacity exists, or will be delivered in a secured, timely and phased manner, in:

- *water supply and wastewater;*
- *walking and cycling networks, including safe, direct links to schools, town centre and local services;*
- *public transport services and infrastructure, including bus priority, rail capacity where relevant, and integration with regional networks;*
- *roads, with clear evidence that additional trips will not cause unacceptable congestion or car-dependant patterns of travel and that demand management measures have been maximised before road capacity increases are considered;*
- *surface water management;*
- *energy and digital infrastructure.*

The assessment shall demonstrate consistency with the National Planning Framework's compact growth and sustainable mobility objectives and show how the proposal supports a shift toward walking, cycling and public transport rather than increased car dependency.

2. Local Transport, Traffic and Trip Generation Impact

A Transport and Mobility Impact Assessment (TMIA) is prepared, which:

(a) Quantifies additional person trips in the AM and PM peaks by mode (walk, cycle, public transport, car), and demonstrates that the development will not cause material deterioration in network performance or safety at:

- *site access and immediate junctions (local level);*
- *key town approaches, main streets and distributor roads (district level);*
- *strategic corridors giving access to higher-order settlements and the national road / rail network (regional/national level);*

(b) Demonstrates that design and phasing maximise mode share for walking, cycling and public transport, in line with the NPF's sustainable mobility and climate objectives, with residential parking provision and street design used as tools to actively discourage unnecessary car trips;

(c) Identifies and secures any necessary mitigation measures (e.g. bus priority, junction reconfiguration, school streets, speed management, continuous cycle routes) to ensure that additional development does not worsen congestion or road safety.

3. Social and Community Infrastructure Capacity

A Social Infrastructure Audit demonstrates that existing and committed provision (or facilities delivered as part of the development) provide adequate:

- *early years, primary and post-primary school capacity;*
- *healthcare services;*
- *open space, recreation and community facilities;*

to support both existing and additional population without diminishing service levels, and that these facilities are safely and conveniently accessible on foot, by cycle and by public transport so as not to generate unnecessary car-based trips.

4. Economic and Employment Balance (Self-Sustaining Towns)

For Self-Sustaining Towns, the assessment demonstrates that additional population growth is consistent with the requirement for contained growth and an improved balance between population, employment and services, as set out in the RSES, and does not reinforce a primarily commuter-town function characterised by high levels of long-distance car commuting.

The assessment shall:

- include an analysis of jobs-to-resident workforce ratios and outbound commuting patterns, having regard to the NPF's identification of towns where rapid residential growth has not been matched by employment;*
- identify measures to increase local employment and remote-working opportunities; and*
- demonstrate how the proposal will contribute to a more self-contained settlement and reduced regional car dependency.*

5. Sequential Development, Settlement Hierarchy and Compact Growth

The proposal demonstrates that any exceedance:

- supports compact growth objectives under the NPF (NPO 7-9), with a clear preference for infill and brownfield lands within the existing built-up footprint of the settlement;*
- occurs on sequentially appropriate lands, prioritising locations with safe walking/cycling access to the town centre, schools, public transport stops and local services;*
- does not undermine the role of higher-order settlements in the hierarchy, nor displace growth from better-served regional centres or Transport-Orientated Development locations.*

6. Cumulative Impact (Local, District, Regional and National)

A cumulative assessment demonstrates that the combined effect of existing development, extant permissions and the proposed exceedance, when considered together:

- does not exceed the settlement's capacity to accommodate sustainable growth in terms of transport, social and environmental infrastructure;*
- does not result in unacceptable cumulative congestion or safety impacts on:*
 - local streets and junctions;*
 - district-scale distributor routes and access to schools and services;*
 - regional and national road and rail corridors (including key commuter routes to larger urban centres);*
- remains consistent with national targets for compact growth, sustainable mobility and climate action set out in the NPF and related strategies;*
- complies with national carbon budgets and does not contribute to increased transport-sector emissions inconsistent with the Climate Action Plan or the obligations of Section 15 of the Climate Action and Low Carbon Development Act.*

7. Implementation, Monitoring and Sustainable Mobility Commitments

The proposal includes binding phasing arrangements and delivery triggers for any required infrastructure and can be integrated into the Council's settlement-level monitoring framework. This shall include:

- *measurable indicators related to compact growth (share of units delivered within the built-up footprint), mode share (proportion of trips by walk, cycle, public transport) and traffic volumes on key links and quantified indicators of transport-related emissions to ensure compliance with the Local Authority Climate Action Plan, national carbon budgets and sectoral emissions ceilings;*
- *obligations on the developer to deliver specified sustainable mobility measures (e.g. high-quality active travel links, mobility management plans, car-clubs/shared mobility, limited and managed parking supply) prior to or in tandem with housing occupation;*
- *regular reporting to enable the planning authority, EMRA and the Office of the Planning Regulator to monitor whether cumulative development is reducing or increasing car dependency and congestion relative to NPF objectives.*

Sub Ref No: 125

Name: Cairn Homes Properties Ltd.

Issues Raised:

This submission has been prepared by John Spain Associates (JSA) Planning and Development Consultants on behalf of Cairn Homes Properties Ltd. seeks the zoning of lands (at Leixlip, Naas and Maynooth) and the rectification of the Core Strategy numbers and the identification of additional sites/landbanks and that the correct classification be set out in updated revised Tables 2.8A and 2.8B.

The submission raises the following points for consideration in relation to the request:

- The submission welcomes the publication of the proposed variation.
- Notes the current planning policy context, including the Revised NPF, RSES, and the provisions of the s.28 Guidelines NPF Implementation: Housing Growth Requirements (July 2025).
- Submission refers to Housing Growth Requirements for Kildare in the CDP and the new Annual Housing Growth Requirement Target, and the objective of the s.28 Guidelines that an 'additional provision' of up to 50% over and above the housing growth requirement for each local authority is reflected within the CDP, which it states equates to 12,398 no. units over the remaining 3 years of the CDP, which represents an increase of 171% across the remaining three years of the CDP.
- States that the Government's Housing Plan 'Delivering Homes, Building Communities 2025-2030' (November 2025), which was published after the publication of the Proposed Variation No. 3, supports a significant increase in housing supply but expresses this with greater urgency and clearly identifies the need to zone and service sufficient areas of land to meet demand and seeks to identify a strong pipeline of zoned and serviced land. Refers to Pillar 1 of the Housing Plan focuses on activating supply and to do this the requirement to ensure a strong pipeline of zoned and serviced land is

identified in order to support the delivery of a minimum of 300,000 homes over the lifetime of the Plan.

- Notes that for other settlements, some lands identified may not be in an immediate position to come forward during the Plan period due to infrastructure constraints to meet the growth requirements identified in the variation.
- Notes that a number of lands identified as Tier 2 in Tables 2.8A and 2.8B of the Variation means that they will not come forward during the lifetime of the Plan.
- States that to ensure that a 'sufficient pipeline of suitable zoned land is available for housing development', it is important that the Planning Authority ensures that Tier 1 lands which are serviceable, sequential and well located be brought forward for development now as a matter of urgency.
- While acknowledging that the Variation identifies some sites which can deliver medium to long term housing, it states that the focus should be on sites which can deliver much needed housing in the short term and avoid undue reliance on the long-term delivery of Tier 2 sites, as is currently the case.
- States that only the delivery of all of the potential additional dwellings in the short- and medium-term as listed in Table 2.8A, including those which are dependent on Settlement Plans to be prepared and the potential additional dwellings of the sites identified for long-term delivery through various mechanisms such as Masterplans and Urban Development Zones which are also yet to be prepared, would the target of an additional 7,826 dwellings within the lifetime of the plan be delivered.
- Stating that the reliance on Tier 2 sites, which are effectively Long-Term Strategic and Sustainable Development Sites/Opportunity Areas' is contrary to the Housing Growth Requirement Guidelines. The allocation to such sites should be further in addition to both the housing growth requirements and the 50% additional provision provided in the Housing Growth Requirement Guidelines.
- It is requested that KCC take the opportunity to rectify the core strategy numbers and identify additional sites/landbanks so as to ensure that the correct classifications are set out in updated revised Tables 2.8A and 2.8B, which may entail some of the lands in the Long Term Strategic Sites (Tier 1) being brought forward quicker as 'additional provision' where they can be serviced while other lands which are clearly Tier 2 will revert to being 'further additional provision's' as provided for in the s.28 Guidelines.
- The submission urges the planning authority to be ambitious and zone sufficient zoned land which allow for flexibility and a strong delivery of housing in the right locations.
- Submits that the landowner has a proven track record of activating sites and providing the necessary supporting infrastructure in tandem with development, in high quality schemes.
- States that as the plan period is only three years, it is considered necessary that other sites capable of delivering housing in the short-term are brought forward to allow residential development in the Proposed Variation No. 3 to ensure these targets can be met.

Chief Executive's Response

The contents of the submissions are noted.

The request in Submission 077 to revise the text of Amendment No. 15 is not accepted. Amendment No. 15 relates to the consideration of planning permissions for housing developments on appropriately zoned lands and where the development would result in an exceedance of core strategy allocation for that settlement. The submission requests that reference to objectives SC O15, SC O16 and SC O17 be removed and replaced with reference to compliance with the Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities (2024) and Chapter 15 Development Management Standards of the County Development Plan. It is noted that many settlements in County Kildare have experienced rapid growth in their population over a sustained number of years and in numerous cases this growth in residential population has not been accompanied by the delivery of requisite infrastructure. The provisions of Amendment No. 15 acknowledge this situation, particularly with respect to the need to provide much needed social infrastructure and facilities alongside residential development. Even in the context of a national housing crisis, it is essential that focus is not only on the rapid delivery of new units but on the creation integrated communities that sustainably grow existing settlements. Accordingly, effective planning policy seeks to ensure that developments integrate appropriate levels of social infrastructure in order to secure proper planning and sustainable development of the wider settlement over the longer term. Such an approach is in keeping with the National Planning Framework (2025) which recognises that there is a constant process of infrastructure and services catch-up in towns and cities and urges a moving away from the business-as-usual pattern of development, where there was a lack of co-ordination in the delivery of such infrastructure.

It should be noted that the occurrence of such proposals being brought forward under this provision is considered to be quite limited. The central purpose of Amendment No. 15 in this instance is to cover the short transition period prior to the adoption of the next Development Plan (anticipated to be in late 2028) to cover a 10-year period, where land use zoning maps for all settlements will be integrated into the Plan, and where residential zoning designations will align with the updated housing requirements and density standards. This will result in a situation where there is unlikely to be any land zoned that won't be accommodated under the Integrated Overall Strategy (i.e. the successor strategy to the Core Strategy, as per the provisions of the Planning and Development Act 2024).

The contention in Submission 077 that there is an artificial cap on the development of Tier 1 residential zoned lands in the county is rejected. On foot of the requirement for infrastructure assessments and the need to identify lands as Tier 1 (Served) and Tier 2 (Serviceable) in the NPF, the planning authority has assessed lands in various settlements throughout the county using a range of predetermined criteria in the preparation of Local Area Plans and Settlement Plans. This was initially undertaken through Sustainable Planning and Infrastructure Assessments (SPIA) and latterly through Settlement Capacity Audits (SCA), on foot of the Development

Plans Guidelines (2022). These assessments placed no limits on the identification or quantum of either Tier 1 or Tier 2 lands for relevant settlements. The limitations and designations of Tier 1 and Tier 2 status was determined by the characteristics of the lands that were subject to the assessment. If a particular site was found to be serviced i.e. could accommodate a shovel ready development, it was consequently designated Tier 1. If it was determined that it could accommodate development over the life of a plan (6 years) on foot of the delivery of servicing infrastructure, then it was designated as Tier 2 (Serviceable).

The request in Submission 124 for an additional specific Core Strategy objective requiring proposals for residential development, which would result in housing delivery above the Core Strategy target for a settlement, to be accompanied by a detailed infrastructure, sustainable mobility and social capacity test is not accepted. It is acknowledged that there is a provision under Amendment No. 15 of Proposed Variation No. 3 to allow the planning authority to grant permission for housing developments on appropriately zoned lands and where the development would result in an exceedance of core strategy allocation for that settlement. This is in keeping with Section 86(7) of the Planning and Development Act 2024 (as amended) which states that a planning authority cannot refuse permission solely on the basis of the housing growth requirement for a settlement being reached (noting that this part of the Act has not yet been commenced at time of writing). However, it must be acknowledged that planning permissions are granted or refused in consideration of the proper planning and sustainable development of the area. Planning permission may be refused by a planning authority on an array of planning and environmental grounds, including for example, for reasons related to design, environmental impact or compliance with policies and objectives of a Local Area Plan (if relevant), County Development Plan, NPF and RSES.

It is considered that Amendment No. 15 of Variation No. 3, together with the policies and 1,687 objectives, actions and targets of the County Development Plan, builds in key safeguards to ensure that the social capacity of an area can cater for such new development and also to ensure that the proposed development itself also contributes to the social infrastructure provision of the wider settlement. It should also be noted that such development proposals would, as a matter of course, be required to comply with national policies relating to compact growth and sequential development, along with all relevant County Development Plan provisions, policies and objectives. Accordingly, most of the assessments that are sought under the new objective that is requested in Submission 124 are already required by the planning authority, as part of the assessment of planning applications through the development management process.

Submission 088 seeks the zoning of residential lands in Celbridge, Naas and Sallins, while Submission 125 seeks the zoning of residential lands at Leixlip, Naas and Maynooth. These zoning requests are addressed in the separate sections relating to these settlements. However, both submissions note that the delivery mechanisms will not yield short term housing growth during the lifetime of the County Development Plan and it is requested that the Variation be amended to consider the

zoning of lands in settlements, together with the movement of some lands in identified serviced (Tier 1) long term strategic sites being brought forward quicker. These issues are acknowledged; however, these mechanisms were considered to represent the most appropriate approach to integrating the Housing Growth Guidelines for the remaining lifetime of the current County Development Plan. The proposed mechanisms in Proposed Variation No. 3 leverage the priority of the planning authority to update and replace expired Local Area Plans, the availability of existing Phase 2 zoned lands, in addition to the availability of other strategic landbanks in higher order settlements that are subject to (or will be subject to) planned development, most of which are proximate to existing and future high-capacity public transport options.

In addition, Table 2.4B of Variation No. 3 and Section 1.1 of this report outline that 3,693 units are required to be provided in addition to the existing Core Strategy requirement for the remaining three-year period of the County Development Plan under the Housing Growth Requirement Guidelines. This has been calculated by applying the additional housing required per year (+1,377.5 units) to meet the new annual requirement of the Housing Growth Requirement Guidelines (2,744 units) to the remaining years of the Development Plan. In addition, the Housing Growth Requirement Guidelines provide that an 'additional provision' is to be incorporated into the County Development Plan, being 'up to 50%' of the annual requirement of the Housing Growth Requirement Guidelines. Noting the element of discretion afforded, Variation No. 3 has incorporated the full 50% 'additional provision' available in the Housing Growth Requirement Guidelines (+4,132.5), yielding a combined total of 7,826.

Notwithstanding the above, as detailed in the response to the OPR submission (Submission 116), a number of further amendments, including additional mechanisms, are proposed to be made to facilitate delivery and provide a continuity of supply to meet the housing growth requirements. These proposals place a particular emphasis on enabling delivery on existing zoned land in the short term and on achieving equitable, balanced and proportionate growth across the county (see Section 3 of this report).


Chief Executive's Recommendation

No change recommended.

Issues Raised: Rural Area Zoning Requests

(2 Submissions) Submissions 094 and 097

Sub Ref No:	094
Name:	Deoval Ltd.
Issues Raised: <p>This submission is prepared by Deoval Ltd. and relates to lands on Portfolio No. KE830. The submission seeks the lands be zoned as commercial use as per the activities outlined in Carlow County Council Planning Ref: 25/60051.</p> <p>The submission provides the following:</p> <ul style="list-style-type: none"> • The rezone to commercial use would reflect the lands continuous commercial operation for more than 50 years. • The submission asserts that Deoval Ltd.'s services are essential to efficient maintenance and smooth operation of, inter alia, TFI and J.J Kavanagh Bus Services, both of which will be increasingly critical in supporting population growth and planned housing developments in the region. • The submission contends that rezoning this long-established commercial site will ensure that these vital services can continue to operate reliably and sustainably into the future. • Lastly, the submission asserts that Deoval Limited can further elaborate on additional essential services that they provide, if required, to demonstrate the broader significance of this long-established commercial site. 	

Sub Ref No:	097
Name:	Martin Flinter
Issues Raised: <p>This submission has been prepared by Murphy Design and Build Solutions on behalf of landowner Martin Flinter seeking the zoning of 3.26 ha of land at Knockbane (Palatine), Castledermot to 'SS: Service Sites' or 'SE: Settlement Expansion'.</p>  <p>The submission raises the following points for consideration in relation to the zoning request:</p> <ul style="list-style-type: none"> • The subject lands are agricultural in nature which adjoins Palatine village on the Kildare/Carlow border. 	

- The lands have frontage along the L8094 on the eastern site boundary and is not serviced with footpaths or street lighting.
- It states the subject lands show some flood risk to the west of the site which will require further assessment due the presence of the Palatine Stream.
- There are no known built/natural heritage constraints associated with the subject lands.
- Refers to a conditional planning permission for 20 units on the subject lands which was granted by KCC in 2005 which was not activated and has since lapsed.
- The submission refers to the Carlow County Development Plan 2022-2028 where Palatine is designated as a 'Larger Serviced Village' with a unit allocation of 25 and a policy to promote serviced villages and attractive housing options.
- The submission includes a 'Pre-Connection Report' prepared by 'Murphy Design and Build Solutions' which confirms sufficient wastewater capacity and connection to the nearby WWTP.
- The submission refers to the precedent of zoning land in settlements adjacent county boundaries such as Blessington. States that although the site may be outside the settlement boundary, the lands if developed can support moderate growth and provide alternative housing options for the surrounding area.
- It states the subject lands which are close to the village centre will make it a logical site for sequential development and the compact growth of this rural location.
- The submission asserts the zoning of the lands will make productive use of a long term vacant and underutilised site which can increase housing supply and Part V provision, whilst reducing a reliance on one-off housing.
- States the zoning of the subject lands will help strengthen the rural community and local services whilst providing housing options to older residents who wish to remain within the community.
- The submission includes an indicative site proposal which includes the delivery of 19 units.

Chief Executive's Response

The contents of the submissions are acknowledged.

Submission 094 requests for lands to be zoned for commercial use in a rural area. It is noted that the lands were recently subject to a planning application (Planning Reference: 2560851) for retention permission and permission for development relating to the existing use on the site which was refused by Kildare County Council.

It should be noted that Proposed Variation No. 3 does not include any provisions relating to the zoning of commercial lands. Its overarching purpose is to make a targeted variation to the CDP for the remaining three years of the plan period only, to provide for the additional housing growth requirements of the Government's NPF Implementation Guidelines (2025).

Notwithstanding the above, it is considered that the subject lands by nature of their unzoned and un-serviced rural location, at a distance from any built-up settlement are unsuitable for any type of commercial zoning. Such land use zoning designations

are required to comply with established national policies which favours a plan-led approach that directs commercial, employment and industrial related uses to identified appropriate locations within urban settlements, in line with the principles of compact growth and sequential development.

Submission 097 seeks the zoning of land adjoining the settlement of Palatine, County Carlow as 'SS: Service Sites' or 'SE: Settlement Expansion'. Proposed Variation No. 3 seeks to align the County Development Plan with the new housing growth requirements provided in the Housing Growth Requirements - Guidelines for Planning Authorities (published in July 2025). In this regard, changes to land use zonings or designations should be informed by relevant evidence-based assessments and audits at the settlement and site level in accordance with best planning practice. However, the Housing Growth Guidelines provide that the housing growth requirements contained therein should be incorporated into existing Development Plans by variation as quickly as possible. Accordingly, rather than provide new residential zonings to any lands or changes to rural settlement designations, Proposed Variation No. 3 details a targeted series of plan-led and evidence-based mechanisms that Kildare County Council intends to utilise in accommodating the additional housing growth provided by the new Guidelines for the remaining three years (2026, 2027 and 2028) of the County Plan.

As part of the preparation of the next County Development Plan, the land use zoning objectives and designations of all settlements in the county will be reviewed, with preparation to commence in August 2026. During the review process, every attempt is made to include a broad scope of lands which are accessed on their merits having regard to a comprehensive range of evidenced based supporting documents. It should be noted, the inclusion of sites in the first instance must align with national policy requirements relating to low carbon development, the sequential development and compact growth of settlements.

Chief Executive's Recommendation

No change recommended.

Issues Raised: Rural Housing

Sub Ref No:	001
Name:	Fergus Mahon
<p>Issues Raised:</p> <p>This submission states that Proposed Variation No. 3 makes no reference to acceptable or indicative densities for rural housing development. It is requested that Kildare County Council, through this variation, introduce:</p> <ol style="list-style-type: none"> 1. An indicative range of acceptable rural housing densities that are reflective of existing settlement patterns and environmental sensitivities; 2. Provide explanatory guidance on how to consider rural density in the assessment of planning applications to ensure consistency across rural policy zones; and, 3. Commit to a data driven monitoring framework which draws on Department of Housing and Ordnance Survey datasets to track rural housing trends and inform future policy reviews. <p>The submission references an analysis of rural housing permissions between 2017 and 2020 undertaken in support of Planning Application File Ref. 201501, illustrating a variation in densities from circa 1.27 houses per km² to 341 houses per km² across rural areas.</p> <p>The submission asserts that clear guidance on rural housing density would improve consistency, reduce applicant uncertainty and align with the principals of transparency and fairness under the Planning and Development Act.</p>	

Chief Executive's Response

Section 3.14 of the Kildare County Development Plan 2023-2027 (as varied) refers specifically to Rural Residential Density. It is an objective of the Council, as expressed in Objective HO O59, to '*carefully manage single rural dwelling densities to ensure that the density of one-off housing does not exceed 30 units per square kilometre, unless the applicant is actively engaged in agriculture, or an occupation that is heavily dependent on the land and building on their own landholding*'. Furthermore, KCC has published an online Rural Density Toolkit to assist applicants in assessing rural density in their areas: <https://webgeo.kildarecoco.ie/rrdt>

The submission refers to planning applications submitted to KCC between 2017 and 2020, which were considered and determined under the policies and objectives of the previous County Development Plan 2017-2023 which was in effect at that time.

It is considered that Section 3.14 of the Plan provides clear guidance on rural housing density, and no further change is recommended in this regard.

Chief Executive's Recommendation

No change recommended.

Issues Raised: Rural Nodes

Sub Ref No:	080
Name:	Cappagh GAA, Newtown and Tirmoghan Communities
<p>Issues Raised:</p> <p>This submission demands the following:</p> <ul style="list-style-type: none"> • Formal designation of Newtown and Tirmoghan (Cloncurry Electoral District) as Rural Settlements in the Core Strategy and Settlement Strategy. The ED has a population of 2,138 people and 653 occupied dwellings. <p>(Note: No map submitted)</p> <ul style="list-style-type: none"> • A Servicing Policy whereby KCC approves and mandates clustered Proprietary Wastewater Systems as a servicing solution to address deficits with references to the appropriate statutory and technical standards for decentralised systems. • A detailed response as to why Cloncurry ED has been given a zero allocation and how this is consistent with the NPF objectives. <p>The submission contends that restrictive rural housing policies have prevented local people from building homes, where there is a quantified unmet local housing demand, causing social harm including the demise of rural GAA clubs.</p> <p>This submission is accompanied by the following supporting documents:</p> <ol style="list-style-type: none"> 1. Research Report – a detailed critique of CDP Core Strategy methodology and application of new Growth Allocations (including the use of national average household size); Irish Water infrastructure deficits; Kildare's Urbanisation paradox; role of the OPR and a Case Study analysis for Newtown and Tirmoghan. The conclusions of this report inform the recommendations of the main submission. 2. A Census 2022 Data Report 3. Cappagh GAA Community Housing Needs Survey Report – this identifies 146 young people (ages 16-40) facing housing barriers in the community with 97% of those surveyed indicating that they would stay in the area if affordable housing options were available. 4. Copy of the Settlement and Site Capacity Audit. 	

Chief Executive's Response

The detail included in this submission is noted and acknowledged. It highlights issues pertaining to current rural housing policy and how this restricts local people from building homes in the rural nodes of Newtown and Tirmoghan specifically.

Proposed Variation No. 3 is a targeted variation to the County Development Plan for the remaining three years of the plan period, to provide for the additional housing growth requirements of the Government's NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities (2025). The Guidelines refer specifically to settlements with the emphasis on serviced and zoned lands, noting that the environmental carrying capacity of settlements is a critical consideration and will require environmental assessments through the development plan review or variation process. KCC's method of implementing the Guidelines is a targeted Variation to the CDP, it is not a full review of the County Development Plan. Hence, the site and settlement capacity audit focuses only on the targeted urban areas.

It is therefore not considered appropriate to designate Newtown and Tirmoghan as Rural Settlements at this time. The designation of any area as a rural settlement involves the careful assessment of capacity and accessibility, noting that Tirmoghan does not have a public wastewater network at present.

It is considered more appropriate to review the status of all rural nodes in the preparation of next CDP, which is to formally commence in August 2026. The review will be informed by the anticipated National Planning Statement on Rural Housing which will set out relevant planning criteria to be applied in local authority development plans, which is an Action of the Government's 'Delivering Homes: Building Communities 2025-2030' (Action 8.5). Consideration will also be given to servicing policy for clustered proprietary wastewater systems at that time.

Cloncurry ED is one of 89 Electoral Divisions in County Kildare. It is not a requirement of the Guidelines that housing growth be allocated at the ED level, nor is current core strategy allocation provided on that basis. The Office of the Planning Regulator in their submission acknowledges that the housing growth requirement proposed in Variation No. 3 is consistent with the Guidelines.

The concern raised regarding the use of the average national household size (2.75 persons) is noted and it is agreed that the average county household size (2.97 persons) should be used to provide a more accurate potential population increase band, noting however that the national trend is decreasing household size. This has been addressed in the recommendation provided in response to the submission from the Department of Education and Youth (Submission 131) (See section 4 of this Report).

Chief Executive's Recommendation

Update Amendment No. 15 [Chapter 2, Core Strategy Statement] by incorporating the following new paragraph:

As part of the review of this Plan, and prior to the publication of the Draft new Kildare County Development Plan, the Council will undertake an evidence-based audit of all rural nodes listed in Table 2.6 of this Plan with a view to determining whether any node could be upgraded to rural settlement status in the settlement hierarchy. This review will have regard to the anticipated National Planning Statement on Rural Housing, the publication of which is an Action of the Government's Action Plan on Housing Supply and Targeting Homelessness. The audit will also have regard to infrastructural services in particular the consideration of standalone wastewater treatment solutions in line with the foregoing Action Plan, with a view to preparing a policy for services in this regard.

Issues Raised: Education and Dwelling Design Standards

Sub Ref No:	132
Name:	Vanessa Liston
<p>Issues Raised: The submission raises a number of issues with regard to Proposed Variation No. 3, as follows:</p> <p>Amendment No. 16</p> <ul style="list-style-type: none"> • With regard to Objective CS 27 the submission states that it is too weak and should be strengthened. States it does not reflect the realities of slow school delivery timelines. • Submits that educational infrastructure must be delivered in tandem with high-density development and that access to schools via public and active transport should be a condition of planning. • States that the Proposed Variation does not explain how increased densities will be supported by educational facilities. <p>Amendment No. 24 Welcomes the focus on daylight and sunlight standards in new developments, noting their importance.</p> <p>Amendment No. 28</p> <ul style="list-style-type: none"> • Submission outlines concern about Public Open Space provision. Submits that the requirement that open spaces “enhance biodiversity” is too vague without measurable baselines. • Contends that developments should aim for biodiversity net gain, especially given density increases and reduced private open space. • Submits that the Proposed Variation misses an opportunity to increase ambition on nature restoration. • States it unclear how higher densities align with other CDP objectives including those for children and young people. Asks if there are any clashes with these, especially regarding the provision of children and young people’s facilities in urban areas. Also questions if biodiversity goals can still be achieved. • Submits that the rationale behind the percentages (8%, 6%, 4%) for natural/semi-natural green space is unclear and requires explanation. <p>Amendment No. 29 Questions the provision to allows up to 50% of units to meet only the minimum private open-space standards. Asks why it is proposed to allow such a high proportion to meet only minimum standards, especially when the text of the amendment states these should be ‘discouraged’.</p> <p>Amendment No. 31 Notes that this amendment appears to provide for an increase in car parking from 1 to 1.5 spaces per unit in accessible locations. Submits that this does not make sense because "accessible" areas are defined as within 500m of high-frequency public transport. Requests clarification if this is not the intended change.</p>	

Chief Executive' Response

The issues raised in the submission are acknowledged.

The contention that proposed Core Strategy Objective CS O27 is too weak regarding the delivery of schools is not accepted. The wording of the objective is considered appropriate given that it is the remit of the Department of Education and not the

Planning Authority to deliver schools in the county. Notwithstanding this, it should be noted that the Council liaises closely with key service providers, including the Department of Education (with whom it has a Memorandum of Understanding). Regarding the potential impact of densities on the demand for school places within settlements, it is further noted that school place demand will be assessed on an evidence-led basis including *inter alia* a Social Infrastructure Audit. This assessment examines the existing provision and current capacity of schools and analyses projected future demand on the basis of the Core Strategy housing/population allocation to a particular settlement. Furthermore, the Settlement Plans themselves can include site specific objectives relating to delivery of schools. This includes the reservation of specific sites for the construction of schools.

The support in Submission 132 for Amendment 24 is noted.

The concerns outlined and questions raised regarding the provisions of Amendment No. 28 and Amendment No. 29 which relate to public, private and semi-private open space standards for new residential development is acknowledged. It should be noted that these provisions are already contained in the Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities (2024) and their implementation is a mandatory requirement for Planning Authorities. The purpose of Proposed Variation No. 3 is *inter alia* to align the relevant provisions of the Chapter 3 Housing and Chapter 15 Development Management Standards of the CDP with these ministerial guidelines. It is considered that the amendments, whilst fully aligning with the Guidelines, incorporate appropriate safeguards to ensure that the delivery of quality planning outcomes within new developments will remain a priority for the Planning Authority.

The concern outlined in Submission 132 that Amendment No. 31 appears to provide for an increase in car parking from 1 to 1.5 spaces per unit in accessible locations is noted. Such a provision is already a requirement of Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities (2024). The CDP is required to align with the provisions for car parking spaces outlined in these ministerial guidelines.

Chief Executive's Recommendation

No change recommended.

Issues Raised: Public Transport Infrastructure

Sub Ref No:	042
Name:	Kildare Green Party Branch
Issues Raised: <p>The submission by the Kildare Green Party Branch supports the increased housing and population targets proposed in Variation No. 3 in line with the compact growth and sustainable settlement strategy outlined in the CDP. The submission states the public transport infrastructure is already significantly under capacity and inadequate to serve the current population and will be stretched further if they are to meet our sustainable and active transport targets.</p> <p>The submission proposes that the following objective should be added to the CDP as part of Variation No. 3:</p> <p><i>That Kildare County Council works with the National Transport Authority and other relevant national and European agencies take all efforts required to realise the necessary significant improvement in the planned high-capacity public transport corridors required, together with local connector and feeder services to support the population targets and sustainable transport objectives of this County Development Plan.</i></p>	

Chief Executive's Response

It is a policy of the Kildare County Development Plan 2023-2029 to support national agencies in delivering major improvements to the public transport network (TM P3). It is also already an objective of the Plan to facilitate and secure the delivery/ implementation of public transport projects including the DART+ West and Southwest projects, BusConnects and light rail investments (TM O10), to strengthen development around existing and planned high-capacity transport routes and interchanges (TM O41) and to facilitate development of local bus services (TM O42). It is an Action of the Plan to work with the NTA to identify best route options to serve the county in line with *inter alia* the GDA Transport Strategy (TM A4).

It is therefore considered that the spirit of the suggested objective is already satisfied by policies, objectives and actions in the Plan.

Chief Executive's Recommendation

No change recommended.

Issues Raised: Houseboat Policy and Servicing Infrastructure

Sub Ref No:	076
Name:	Irish Residential Boat Owners Association
<p>Issues Raised: The submission raises a number of issues with regard to Proposed Variation No. 3, as follows:</p> <ul style="list-style-type: none"> • Submits that the Variation states 'the mix of housing types and sizes required needs to become more diverse'. Proposes that the definition of '<i>housing types</i>' need to be expanded to include homes other than house/apartment. States that houseboats are considered as a viable housing alternative across Europe. Notes that the Royal Canal, Grand Canal and River Barrow provide opportunities to develop houseboat communities and expand existing ones, if facilities including marinas are provided. • Describes house boats as low-impact, low-cost, and sustainable, with very low water/energy consumption. Notes they already accommodate a diverse range of household types • Contends that Maynooth could employ houseboats as an affordable alternative for student housing and proposes a pilot project. • Notes that increasing number of people also live in camper vans and require similar facilities to boat dwellers. Submits that examples like Lowtown show that shared facilities can successfully serve both communities, including tourists. • Requests the Council to support and develop infrastructure for alternative housing communities as this should be seen as an opportunity for leadership in affordable alternative housing. Expresses the willingness of the organisation to share knowledge and assist in planning for water-based housing. 	

Chief Executive' Response

The issues raised in the submission are not considered to relate to the provisions of Proposed Variation No. 3, the primary purpose of which is to align the Kildare County Development Plan with the NPF Implementation: Housing Growth Requirements Guidelines (2025) and the Sustainable Residential Development and Compact Settlements Guidelines (2024). The Proposed Variation does not seek to amend the definition of housing types as outlined in the Kildare County Development Plan (CDP). Furthermore, Kildare County Council does not have jurisdiction over the provision of berthing facilities along the Royal Canal, the Grand Canal and the Barrow Navigation system. These waterbodies are managed and maintained by Waterways Ireland. It is noted however, Objective LR O42 of the CDP already supports and facilitates Waterways Ireland and other relevant stakeholders in the provision of additional mooring and berthing facilities at appropriate locations throughout the county. Provisions to support the development of camper vans and associated servicing infrastructure, in addition to potential share facilities, at appropriate locations may be considered as part of the wider review of the County Development Plan which will formally commence in August 2026.

Chief Executive's Recommendation

No change recommended.

Issues Raised: Safeguarding Built Heritage and the Promotion of Traditional Vernacular Architecture

Sub Ref No:	034
Name:	David Barton
Issues Raised: <ul style="list-style-type: none"> • The submitter outlines his role as a community campaigner promoting both the existing Built Historic Environment and Traditional Vernacular Architecture (TVA) / Traditional Architecture as a key feature across UK-wide local authorities. States that the submission an ‘umbrella representation.’ • Submission outlines the background of the submitter including successful campaigns in the UK to promote and protect historic buildings. • States that the submission is supported by 32 Appendices. It is noted that these have not been included with the submission. However, hyperlinks to websites have been provided for the majority. • Submission calls for the establishment of design codes based on TVA principles and that local authorities should partner with key stakeholder organisations. Outlines a range of suggestions about to policy in this regard, including the non-demolition of pre-1950s buildings. • Regarding conservation areas, the submission outlines the need for enhanced conservation efforts in designated areas. Outlines a range of suggested actions including a streamlined process for listed building consent, the preservation of historic street furniture and financial incentives for maintaining/restoring buildings. • Highlights role of historic buildings in combatting climate change and suggests a range of actions, including a focus on increasing the stock of carbon-rich old buildings, retrofitting historic buildings and financial incentives for the demolition of carbon poor contemporary buildings. • Outlines actions that could be taken on historic buildings including the creation of a Designated and a Non-Designated Heritage Asset List and a scheme to rebuild long lost buildings. • Suggests a range of actions that can be taken to promote traditional value architecture. • Regarding the planning system, the submission emphasises the need to identify applicants which have a history of harming civic heritage and states that this should be a consideration in the granting of permission. Requests Local Authorities to collaborate with the community and heritage bodies to give these people a voice. • Submission concludes by identifying a range of miscellaneous issues which are aimed at supporting the historic built environment. These include support for well-designed car parking, the utilisation of specialist skills and the creation of a Top 10 Buildings at Risk Register. 	

Chief Executive' Response

The issues raised in the submission do not relate to the provisions of Proposed Variation No. 3, the primary purpose of which is to align the Kildare County Development Plan with the NPF Implementation: Housing Growth Requirements Guidelines (2025) and the Sustainable Residential Development and Compact

Settlements Guidelines (2024). Chapter 11: Built and Cultural Heritage of the County Development Plan contains a range of objectives and provisions which seek to safeguard the built heritage of County Kildare (AH O20, AH O21 and AH O22), including vernacular structures which are not on the Record of Protected Structures (AH O39, AH O54 and AH O55). Furthermore, as part of the preparation of the next CDP and the move to 10-year development plans, all provisions in the Plan relating to the built heritage of the county will be reviewed. This process will formally commence in August 2026.

Chief Executive's Recommendation

No change recommended.

Issues Raised: Public Consultation and Equality

Sub Ref No:	132
Name:	Vanessa Liston
Issues Raised: The submission raises a number of issues with regard to Proposed Variation No. 3, as follows: <ul style="list-style-type: none">• Notes the significant changes being proposed to the County Development Plan. States that they are unaware the holding of any public meetings to explain the changes to the public. Outlines concern about this and submits that such a lack of public participation undermines the democratic process of plan-making.• Submits that the Proposed Variation does not appear to have been equality-assessed, even though changes in densities and land-use patterns could have unequal impacts across groups, especially regarding childcare, education, facilities and services. Requests a response to this in the Chief Executive's Report.	

Chief Executive' Response

The contents of the submission are acknowledged.

There is no legislative provision under the Planning and Development Act 2000 (as amended) that requires a Planning Authority to hold public meetings or any other in-person consultation events as part of the process to vary the County Development Plan. Likewise, there is presently no statutory requirement for any variation or draft plan to be subject to an equality assessment.

It should be noted the NPF Implementation: Housing Growth Requirements - Guidelines for Planning Authorities (published in July 2025) provides that the housing growth requirements contained therein should be incorporated into existing Development Plans by variation as quickly as possible (Policy and Objective No. 3 of the Guidelines refers). Accordingly, in view of the acute nature of the housing crisis and in order to comply with stated Government policy, Kildare County Council sought to move as expeditiously as possible to publish the Draft Variation. The rollout of a highly resource-intensive public consultation exercise across the county would have considerably delayed the publication date of Draft Variation No. 3 in this regard. The concerns as to the potential impacts on certain groups on foot of changes in densities and land use patterns are noted. However, it is considered that the Proposed Variation, whilst fully aligning with all relevant ministerial guidelines, incorporate appropriate safeguards to ensure that delivering quality planning outcomes within new developments will remain a priority for the Planning Authority.

Chief Executive's Recommendation

No change recommended.

7.0 Composite List of Chief Executive's Recommended Alterations

The recommended alterations are presented as they appear in the sequence of proposed amendments to the Kildare County Development Plan 2023-2029 (as varied) in Proposed Variation No. 3.

Update Amendment No. 2 [Aim of Chapter 2 – Core Strategy & Settlement Strategy] as follows:

Aim: To provide for the delivery of an additional 9,144 16,970 housing units to accommodate an additional 25,146 46,498 – 50,400 ^[insert footnote] people ~~by the end of the Plan period~~, and to continue to create the environment to retain existing and attract new employers to locate in County Kildare through the delivery of sustainable, compact settlements supported by a commensurate level of physical, social and green infrastructure to mitigate against climate change and enhance the quality of life for residents.

New footnote: Calculated using household sizes of 2.75 people (national average) and 2.97 people (county average)

Update Amendment No. 12 [Preferred Development Strategy] as follows:

Kildare County Council's Approach to New Housing Growth Requirements (2025)

It is proposed to accommodate the Government's revised housing targets for County Kildare in a targeted, plan-led approach so that additional housing may be delivered in the short, medium and long term in accordance with the provisions of the Ministerial Guidelines.

The updated housing growth requirements for County Kildare are presented in two tables, which are separate and in addition to Table 2.8 Core Strategy Table, as follows:

- (v) Table 2.8A Core Strategy Supplementary Table for revised National Housing Growth Requirements 2025: Short and Medium Term*
- (vi) Table 2.8B Core Strategy Supplementary Table for revised National Housing Growth Requirements 2025: Short to Long term Strategic Development Sites.*

Where specific sites are identified in Tables 2.8A and 2.8B, accompanying maps are provided for reference purposes (see Maps Vol 1-2-3 V3 2.1 to 2-9 V3 2.6 inclusive). The delivery mechanisms by which additional housing growth will be facilitated are as follows:

- 7. The release of lands zoned Phase 2 in Local Area Plans (LAP) / Settlement Plans for Naas (New Residential Phase 2), Newbridge (New Residential – Phase 2) and Kildare Town (Phase 2 New Residential) by way of a Core Strategy objective to allow planning applications to be considered in the short term.*

8. *The allocation of additional housing growth to the settlements of Monasterevin, Kilcock and Sallins to inform the preparation of new Settlement Plans in 2026 for inclusion in Volume 2 of the County Development Plan.*
9. *The identification of strategic sites in Athy and Celbridge for future housing delivery to be integrated into new settlement plans in 2026/2027, the zoning for which will be determined during the plan making process having regard to strategic flood risk assessment and other environmental assessments.*
10. *The progression of strategic sites in the short term to medium, which given their scale, also form long-term Urban Development Zones (UDZ), as provided for in the Planning and Development Act 2024, at two locations as follows:*
 - *Northwest Quadrant, Naas. A variation to integrate the completed Masterplan (in progress) and related zoning provisions and objectives into the County Development Plan will be published in 2026, prior to the commencement of the UDZ process.*
 - *Confey, Leixlip. A variation to integrate the Masterplan and related zoning provisions and objectives into the County Development Plan will be published in 2026, prior to the commencement of the UDZ process.*
11. *To provide for and drive equitable, balanced and proportionate delivery and growth across the county, and given the extent of undeveloped zoned lands in the Villages of approximately 35 ha and Settlement Expansion areas in Rural Settlements it is proposed to amend Table 2.8 to remove the 2023-2028 housing target of 366 and 137 units respectively. This mechanism will release capacity for over 1,000 units (estimated delivery capacity) on undeveloped lands in Villages and Rural Settlement and will assist in revitalising and reenergising rural communities across County Kildare. The development of these lands will be subject to the objectives of the County Development Plan (SC O16, SC O17 and SC O18) as they relate to the delivery of commensurate social infrastructure and design and density parameters as outlined in Table 3.1.*
12. *Include additional Core Strategy objectives in Chapter 2 to address continuity in housing supply across all settlements. In this regard, the objectives will, notwithstanding the housing growth allocated to that settlement, make provision for the release of any lands which have the benefit of a residential zoning ("B" or "C" in relevant land use zoning maps), where it can be demonstrated to the satisfaction of the Planning Authority that the lands are readily serviced or serviceable through upgrades to infrastructure as part of any application on the lands and where the proposal addresses any identified social infrastructure deficit in the respective settlement.*

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

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

Update Amendment No. 13 [Chapter 2, Table 2.8 – Core Strategy Table] to remove the Housing Target for Villages (366) and Rural Settlements (137) as follows:

Villages ¹²	Athgarvan (1176 1,193), Allenwood (981 1,685), Ballitore (793 667), Ballymore Eustace (873 689), Caragh (966 1,006), Coill Dubh (746), and Coolearagh (377 1,476), Crookstown (105 122), Johnstown (1,005 1,320), Johnstownbridge (683 677), Kildangan (317 546), Kilmeague (1082 1054), Moone (127 137), Narraghmore (378 375), Robertstown (707 771), Straffan (853 1,158), Suncroft (746 491),								
		9,984 13,521		4.80% 5.46%	10562	4.70%	1006	366	

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	Timolin (136 154)									
Rural Settlement ¹²	Allen (94 149), Ardclough (220 285), Ballyshannon (111 107), Brannockstown (217 235), Broadford (50), Brownstown (883 817), Calverstown (699 652), Clogherinkoe (196 214), Cutbush (278 297), Kilberry (400 361), Kilkea (105 122), Kilmead (309 372), Kilteel (214 262), Lackagh/ Mountrice (99 98), Maganey/ Levitstown (88 95), Milltown (344 372), Nurney (497 497), Rathcoffey (274 371),	3,310 5,958		1.40% 2.40%	3502	1.50%	377	137		

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	Staplestown (116 128), Two Mile House (460 474)									
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Update Amendment No. 13 [Chapter 2, Table 2.8 – Core Strategy Table] to amend footnote 10 as follows:

~~Objective V GO 4 (Volume 2) is to generally control the scale of individual development proposals to 10–15% of the existing housing stock of any village or rural settlement over the lifetime of the Plan in accordance with the Sustainable Residential Development in Urban Areas Guidelines (2009). Furthermore, Objective V GO 9 (Volume 2) is to restrict growth in a village/rural settlement where necessary physical and social infrastructure cannot be delivered. In the absence of the necessary physical or social infrastructure, the projected growth for that development centre may be allocated to other serviced settlements within the same Municipal District or adjoining Municipal District or to serviced towns within the upper range of the settlement hierarchy. Kildare County Council's delivery mechanisms to facilitate additional housing growth in Section 2.11 regarding Villages and Rural Settlements, together with the Core Strategy Objectives in this Chapter, supersede Objectives V GO 1, V GO 4 and VG O 9 of Volume 2 of the Kildare County Development Plan 2023-2029. Regard shall be given to the density guidance contained in Section 3.7 of this Plan. Given Kildare County Councils continued focus on balanced housing delivery across the entire county of Kildare, activity and delivery across residential lands in all settlements will be actively monitored over the remaining period of this County Development Plan. Where equitable housing delivery is not realised in these Village and Rural Settlements, alternative lands will be identified and considered in the forthcoming County Development Plan review.~~

Update Amendment No. 14 [Table 2.8A and Table 2.8B] as follows:

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

Settlement Type	Settlement Name	Location / Site Name	Within Built Up Area (BUA)	Zoning Status	Tier 1 / 2	Approx. Gross Residential Area in hectares	Potential Additional Dwellings	Approx. Net Dwelling Density per Hectare	Delivery Mechanism

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Key Town	Naas Map V3-2.1	Kilcullen Road.	No	'New Residential Phase 2' in Naas LAP 2021-2027	Tier 1	5.2 ha	Total 16.0 ha	455	35	Objective CS O29
		Blessington / Tipper Road	Yes		Tier 2	10.8 ha				
Self-Sustaining Growth Town	Newbridge	TBD*	TBD*	'New Residential – Phase 2' in Newbridge Settlement Plan	Tier 1 / 2*	TBD*		850	TBD*	Objective CS O29 ¹⁴
	Kildare Town Map V3-2.2	Ruanbeg	No	'Phase 2 New Residential' in Kildare Town LAP 2023-2029	Tier 2 ¹⁵	16.9 ha	Total 26.5 ha	886	37	Objective CS O29
		Southgreen	Partial		Tier 2	5.16 ha				
		Dunmurry Road	No		Tier 2	1.8 ha				
		Green Road South	No		Tier 2	1.14 ha				
		An Talamh Bán	No		Tier 2	1.5 ha				
	Leixlip Map V3-2.6	Phase 1a as per Confey Masterplan - Leixlip LAP 2020-2023 (as extended)	No	'New Residential' and 'Mixed Use' in Leixlip LAP 2020-2023 (as extended)	Tier 2	46.5 ha		450	As per the Confey Masterplan - Leixlip LAP 2020-2023 (as extended)	Leixlip LAP, County Development Plan Variation and Urban Development Zone

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	Athy Map V3-2.3	Chanterlands	Partial	'Strategic Reserve' in Athy LAP 2021-2027	Tier 2¹⁵	18.25 ha	480	31	Objective CS O30
Self-Sustaining Town	Celbridge Map V3-2.4	Celbridge including Simmonstown and Ballyoulster	No	'New Residential' in Celbridge LAP 2017-2023	Tier 2¹⁵	73 ha approx. – to be confirmed at Settlement Plan level.	2,000	37	Objective CS O30
	Kilcock	TBD*	TBD*	TBD*	Tier 1 / 2*	TBD*	250 500	As per Compact Settlement Guidelines (2024)	Objective CS O31
	Monasterevin	TBD*	TBD*	TBD*	Tier 1 / 2*	TBD*	250	As per Compact Settlement Guidelines (2024)	Objective CS O31
	Clane	Lands zoned 'C: New Residential / Infill' in the Clane LAP 2017 – 2023.	Varies	'New Residential / Infill' in the Clane LAP 2017 – 2023.	Tier1 / Tier 2	As per the Clane LAP 2017 – 2023.	251 (to be delivered in tandem with the phased development of the town park (Zoning Map 13.1 and footnote 2	As per Compact Settlement Guidelines (2024)	Allocation to be read in conjunction with Table 2.8

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							page 73 of the Clane LAP refers).		
Towns	Sallins	TBD*	TBD*	TBD*	Tier 1 / 2*	TBD*	250-500	As per Compact Settlement Guidelines (2024)	Objective CS O31
	Bless- ington Environs	Lands zoned 'C: New Residential	No	'C: New Residential'	Tier1 / Tier 2	As per Volume 2 of County Development Plan.	100	As per Compact Settlement Guidelines (2024)	Allocation to be read in conjunction with Table 2.8
Total							5,421 6,722		

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

Table 2.8B: Core Strategy Supplementary Table for revised National Housing Growth Requirements (2025) *Short to Long Term Strategic and Sustainable Development Sites Additional Provision [to be read in conjunction with Table 2.8 and Table 2.8BA]*

Settlement Type	Settlement Name	Location	Zoning Status	Tier 1 / Tier 2	Gross Residential Area in hectares	Potential Additional Dwelling	Net Density Dwellings per Hectare	Delivery Mechanism
Key Town	Naas Map V3-2.5	Northwest Quadrant	'Strategic Reserve' in Naas LAP 2021-2027¹⁶	Tier 2	112 ha (not yet zoned)	1,294 543¹⁷	Approx. 40 – to be confirmed at Masterplan level	Northwest Quadrant Masterplan / County Development Plan Variation and Urban Development Zone
Self-Sustaining Growth Town	Leixlip Map V3-2.6	Confey	'New Residential' and 'Mixed Use' in Leixlip LAP	Tier 2	46.5 ha	1,111 661¹⁸	As per the Confey Masterplan - Leixlip LAP	County Development Plan Variation and Urban Development Zone

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			2020-2023 (as extended) ¹⁶				2020-2023 (as extended)	
Total						2,405 1,204		

Amend footnote nos. 16, 17 and 18 for Table 2.8B in Amendment No. 14 to state, as follows:

¹⁶ The lands identified in these maps (i.e. for Northwest Quadrant, Naas and Confey, Leixlip) will include a range of land use zonings, not just residential, and will be brought forward through. The Confey masterplan and existing related zoning provisions and objectives will be incorporated into the County Development Plan by Variation in 2026. The masterplan for the Northwest Quadrant in Naas (currently being prepared), together with associated land use zoning provisions and objectives will be incorporated into the County Development Plan by Variation in 2026. These lands will also be subject to the UDZ process in due course.

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

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

Update Amendment No. 15 [Chapter 2, Core Strategy Statement] by incorporating the following new paragraph:

As part of the review of this Plan, and prior to the publication of the Draft new Kildare County Development Plan, the Council will undertake an evidence-based audit of all rural nodes listed in Table 2.6 of this Plan with a view to determining whether any node could be upgraded to rural settlement status in the settlement hierarchy. This review will have regard to the anticipated National Planning Statement on Rural Housing, the publication of which is an Action of the Government's Action Plan on Housing Supply and Targeting Homelessness. The audit will also have regard to infrastructural services in particular the consideration of standalone wastewater treatment solutions in line with the foregoing Action Plan, with a view to preparing a policy for services in this regard.

Update Amendment No. 16 [Chapter 2, Core Strategy Objectives] by amending CS O27, as follows:

Work in close partnership with the Department of Education to support the timely planning and delivery of new schools including Special Education Needs (SEN) provision where additional accommodation is required across the county, so that educational infrastructure meets the needs of a growing population and contributes to the long term social and economic wellbeing of the community. It is a priority of the Council that the triple school campus at Ballyoulster, Celbridge is delivered during the life of this Plan.

Update Amendment No. 16 [Chapter 2, Core Strategy Objectives] by amending CS O31, as follows:

Prepare settlement plans for Monasterevin, Kilcock and Sallins to include the additional housing growth requirement included in Table 2.8 and Table 2.8A on serviced lands to be informed by infrastructural and environmental assessments and publish Draft Settlement Plans for these towns as Variations to the County Development Plan in Q1/Q2 2026. Settlement Plans for Celbridge and Clane will also be prepared and integrated into the County Development Plan by way of a statutory variation.

Update Amendment No. 16 [Chapter 2, Core Strategy Objectives] by amending CS O32, as follows:

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

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

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

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

Update Amendment No. 16 [Chapter 2, Core Strategy Objectives] by including the following objectives:

CS O33: Ensure continuity and facilitate housing delivery across all settlements through the favourable consideration of proposals for housing on lands which have the benefit of a residential zoning ("B" or "C" in relevant land use zoning maps and Settlement Expansion lands), where it can be demonstrated to the satisfaction of the Planning Authority that the lands are readily serviced or serviceable through existing infrastructure or upgrades to infrastructure as part of any application on the lands and where the proposal addresses any identified social infrastructure deficit in the respective settlement in accordance with Objectives SC O15, SC O16 and SC O17 of this Plan.

CS O34: Where planning applications are received for housing developments on appropriately zoned lands and where the development would result in an exceedance of core strategy allocation for that settlement, the Planning Authority may consider granting permission for such developments having regard to the provisions of Section 86(7) of the Planning and Development Act, 2024, and where commensurate social infrastructure is delivered as part of the development scheme, in accordance with Objectives SC O15, SC O16 and SC O17 of this Plan.

Update Amendment No. 22 [Chapter 3, Serviced Sites] by revising proposed Table 3.4(a) as follows:

Applicant Category	Serviced Sites Local Need Criteria
Category C – Rural Resident as part of a Serviced Site development.	On designated 'Serviced Sites' provided for in Volume 2 of the County Development Plan only
A person who has resided in a rural area in County Kildare*	The Applicant must demonstrate: 4. They have resided in a rural area of County Kildare for a period of at least 10 (consecutive) years, and

<p><i>* For the purposes of this category, these persons are defined as those being from outside of the defined boundaries of the Key Towns, Self-Sustaining Growth Towns, Self Sustaining Towns and the Blessington Environs higher order settlements in the County Settlement Hierarchy (i.e. Key Towns, Self-Sustaining Growth Towns and Self-Sustaining Towns) as defined by Kildare County Council in respective Local Area Plans, or Settlement Plans in Volume 2 of the County Development Plan.</i></p> <p><i>For clarity, these persons also include those persons living in the designated Towns, Villages and Rural Settlements in the County Settlement Hierarchy.</i></p>	<p>5. <i>The applicant's home, in which they have resided for 10 years, is within 10km of the designated serviced site, and</i></p> <p>6. <i>That the proposed house will be the principal private residence of the applicant (applications will be subject to a standard occupancy condition).</i></p>
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Update Amendment No. 26 [Chapter 15, Development Management Standards] in relation to SuDS as follows:

- SuDS are ~~not generally acceptable as a form of public open space provision, except where they~~ *recognised for their potential to* contribute in a significant and positive way to the design and quality of open space. Where the Council considers that this is the case, ~~in general a maximum of generally~~ *10% of the open space provision shall be taken up by SuDS, subject to agreement with the planning authority and in consideration of the overall quality, quantum and function of the open space.*

Update Section 5.1 of the Settlement and Site Capacity Audit that accompanied Proposed Variation No. 3 as follows:

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



Appendix A: Copy of the submission received from the Office of the Planning Regulator (OPR)





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

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

27th November 2025

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

Re: Proposed Variation No. 3 to the Kildare County Development Plan 2023-2029

A chara,

Thank you for your authority's work in preparing the Proposed Variation No. 3 (proposed Variation) to the Kildare County Development Plan 2023-2029 (County Development Plan).

As Kildare County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (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 proposed Variation under the provisions of sections 31AM(1) and 31AM(2) of the Planning and Development Act 2000, as amended (Act) and this submission has been prepared accordingly.

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, planning authorities are requested 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. Planning authorities are advised by the Office to action an observation.

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

On adoption of the Variation, the Office will consider whether the Variation has been made in a manner consistent with the recommendations of the Office and whether the Variation sets out an overall strategy for the proper planning and development of the area concerned.

Overview

The Office notes that the proposed Variation includes changes to the County Development Plan to apply section 28 guidelines published by the Department of Housing, Local Government and Heritage, specifically the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines), Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024), and Design Standards for Apartments, Guidelines for Planning Authorities (2025).

The Housing Growth Guidelines require planning authorities to vary their development plans to reflect the housing growth requirements set out in the first appendix to the Housing Growth Guidelines and to provide for additional provision in terms of residential zoned land.

Furthermore, the recently published housing plan, Delivering Homes, Building Communities 2025-2030, emphasises the need for a strong pipeline of zoned and serviced land to support the delivery of 300,000 new homes to 2030, stating:

...Government will ensure that new homes are built in the right locations, with the necessary services and community facilities in place, in keeping with our climate action goals, and the wider spatial growth of the State.

The Office commends your authority on the clarity and quality of information provided as part of the Variation process. It is clear that a transparent and evidence-based approach has been followed. The proposed Variation also appropriately identifies long-term and strategic and sustainable development sites at Confey and Naas Northwest Quadrant. These lands are well-located to facilitate the urban expansion of the existing towns, and in the case of Confey with a particular focus on accessibility to a high-quality rail corridor.

Based on the information provided, the Office notes that the proposed Variation provides for the relevant housing growth requirements, including additional provision at the county level. However, at the level of individual settlements, the Office observes that housing delivery will be constrained in certain settlements in the short-term due to significant site-specific infrastructure constraints. This issue is particularly evident in Leixlip/Confey and Celbridge. While the Office is aware of the efforts of your authority to actively address these issues, this does mean that housing delivery on these lands is unlikely to be completed within the plan period.

Reflecting these circumstances, the Office makes a recommendation to align with the Housing Growth Guidelines, which emphasise the need to focus on the likelihood of lands identified for residential development coming forward for development within the remaining period of the plan. For example, the Office recommends that the Planning Authority consider options to facilitate short-term housing delivery, including zoning additional lands in certain settlements, and making all Phase 2 Residential lands available for development

Additional amendments proposed as part of the proposed Variation include changes to the density ranges, car and cycle parking standards, public and private open space requirements, unit mix, overlooking and overshadowing policies, and separation distances. The Office is satisfied that these development management amendments are consistent with the relevant section 28 guidelines. In addition, the Office welcomes the inclusion of objective CS O25 to ensure that all future settlement plans identify categorised areas for the purposes of identifying appropriate residential density.

The submission below has been prepared to provide a strategic level input to your authority in finalising the proposed Variation. It is within the above context that the submission sets out one (1) recommendation under the following key theme:

Key theme	Recommendation	Observation
Implementation of the housing growth requirements	Recommendation 1	-

1. Implementation of the housing growth requirements

The Office notes table 2.4B of the proposed Variation which sets out a housing growth requirement of 12,398 units to the end of the plan period, including 50% additional provision. This is consistent with the Housing Growth Guidelines and is welcomed by the Office.

The Chief Executive's Report, prepared prior to publication of the proposed Variation, indicates that sufficient undeveloped New Residential zoned lands exist within the county to accommodate approximately 13,795 units over the remaining plan period, thereby meeting the stated housing growth requirement.

The proposed Variation introduces supplementary core strategy tables (tables 2.8A and 2.8B) which identifies a total of 7,826 units for short, medium, and long-term delivery. However, it would appear that lands at Celbridge (Simmonstown and Ballyoulster) and Leixlip (Confey) have been double-counted and should not form part of the proposed additional capacity figure, and this should be reviewed or clarified.

Regardless, the Office has practical concerns regarding the deliverability of certain lands due to significant transport and access infrastructural constraints in Celbridge (Simmonstown and Ballyoulster), as identified in the Settlement and Site Capacity Audit submitted with the proposed Variation. Similarly, in Leixlip/Confey the Confey lands are identified as long-term strategic and sustainable sites subject to a future designation of an Urban Development Zone (objective CS O32). These circumstances mean that it is unlikely that these lands will come forward within the current plan period. Consequently, there appears to be limited capacity for additional residential development in these settlements in the short- term.

Where the Planning Authority considers that lands may not come forward for development within the remaining period of the plan, the Housing Growth Guidelines (section 3.1) state that it may be necessary to consider the zoning of alternative lands where there is capacity to deliver housing in the short to medium-term.

Accordingly, the Office recommends that the Planning Authority consider options to bridge this delivery gap until these constrained lands become available. This may include zoning additional residential lands that are not so infrastructurally constrained, or specifying opportunities for parts of these landbanks to be brought forward earlier.

The Office welcomes the identification of additional zoned lands as part of the proposed Variation, along with the supporting objectives to release these lands on a phased basis (objectives CS O29, CS O30, and CS O31).

In particular, objective CS O29 provides for the immediate release of Phase 2 Residential lands, which are stated to have capacity for 1,921 units. However, based on the Settlement and Site Capacity Audit accompanying the proposed Variation, the Office has concerns regarding the immediate delivery of lands identified in Kildare Town (Ruanbeg and Southgreen) due to infrastructural constraints, such as access through third party lands, road improvements, and water supply. Furthermore, lands at Blessington/Tipper Road in Naas are already under construction and therefore do not provide additional residential capacity. In this context, the Planning Authority should review opportunities to similarly release Phase 2 Residential lands in other settlements to increase the likelihood of residential development coming forward over the remaining period of the plan.

The Office also notes objectives CS O30 and CS O31, which propose the release of additional lands for residential development in Athy, Monasterevin, Kilcock, and Sallins through the review and preparation of settlement plans. While the Office appreciates the need for resources to prepare these plans, the Planning Authority should set out timeframes for the plans that reflect policy and objective 3 of the Housing Growth Guidelines to ensure that the objectives of these guidelines are incorporated within development plan as quickly as possible.

Recommendation 1 - Implementation of the Housing Growth Requirements

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

- NPO 42 of the NPF to target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2042;
- NPO 43 of the NPF to prioritise the provision of new homes at locations that can support sustainable development; and

- the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines), including policy and objective 3 to incorporate the objectives of the Housing Growth Guidelines within development plans,

the Planning Authority is recommended to:

- (i) revise tables 2.8A and 2.8B to omit or clarify the inclusion of lands at Celbridge (Simmonstown and Ballyoulster) and Leixlip (Confey) in the calculation of the capacity of residential zoned lands;
- (ii) taking account of the likelihood that the lands identified for residential development in Celbridge and Leixlip/Confey will not come forward for development for the remaining period of the Kildare County Development Plan 2023-2029, consider zoning additional residential lands that are not so constrained, or specifying opportunities for parts of these landbanks to be brought forward earlier;
- (iii) revise objective CS O29 to release Phase 2 Residential lands in all settlements viable for development; and
- (iv) revise objective CS O30 and CS O31 to include a timeframe for the timely review of the settlement plans for Athy, Monasterevin, Kilcock and Sallins to ensure residential delivery within the remaining development plan period.

Summary

The Office requests that your authority addresses the recommendations outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 13 of the Act must summarise these recommendations and the manner in which they will be addressed.

At the end of the process, your authority is required to notify this Office within **five working days** of the decision of the Planning Authority in relation to the proposed Variation. Where your authority decides not to comply with the recommendation of the Office or otherwise makes the plan in such a manner as to be inconsistent with the recommendations made by this Office, then the Chief Executive shall inform the Office and give reasons for this decision.

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

Is mise le meas,

A handwritten signature in dark ink, appearing to read 'AM O'Connor'.

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015
