

Principal Officer
Forward Planning Department
Kildare County Council
Áras an Chontae
Devoy Park
Naas
Co. Kildare

Monday, 23rd May 2022
(by Consultation Portal)

-: DRAFT COUNTY DEVELOPMENT PLAN SUBMISSION :- KILDARE CDP 2023-2029

Dear Sir / Madam,

RE: LANDS ADJACENT TO THE GRAND CANAL, SALLINS, CO. KILDARE

1.0 INTRODUCTION & CONTEXT

The Planning Partnership, The Bank Building, 52 Oliver Plunkett Street, Mullingar, Co. Westmeath N91 FAA6, are retained by our client, *Mr. Gus Whelan* of [REDACTED] to prepare a submission to the Kildare County Development Plan 2023-2029 in relation to lands in his ownership and located in Sallins, Co. Kildare.

In recent years the approach to planning and development has become more focused in the Greater Dublin Area. This is in response to a long history of inefficient low density development in the region. This new direction is now being advocated on a nationwide basis in the National Planning Framework and the associated capital expenditure programme. The new focus involved permitting a higher density development proximate to public transport links and the development of infill/edge sites that had previously been left vacant. The impact of this new policy direction is not becoming apparent in the four Dublin Planning Authority districts. A case will be made in this submission that this approach now needs to be applied in Co. Kildare.

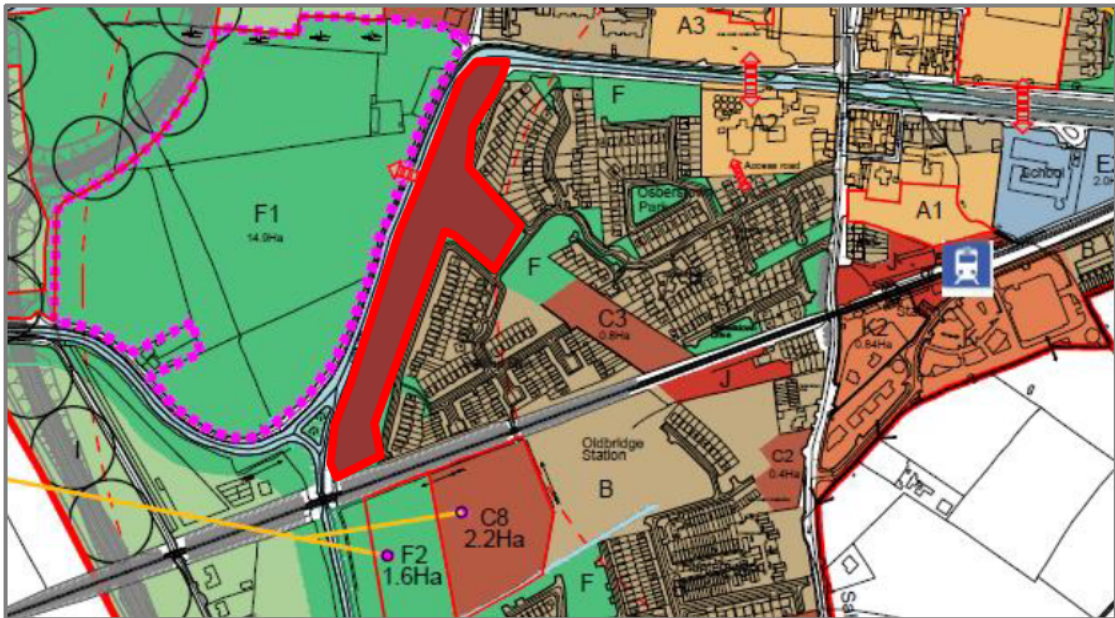
1.1 Executive Summary of Submission

We present the subject lands as a significant opportunity to deliver an appropriate sustainable and consolidated development in accordance with national & regional policy objectives currently misaligned in the allocation of development lands within the Kildare County Development Plan and the respective Hierarchy of Settlements.

The subject lands, their location and their advantage of proximate and available public transport infrastructure and their proximity to Naas present more appropriately as a suburb of Naas to present proximate population growth both aligned to Naas as a 'Key Town' and with the advantages of a commuter rail line into central Dublin.

Sallins is to Naas what Celbridge and Leixlip have become to Dublin, satellite towns (and formerly small villages with restricted main street services) to a larger growth centre with a more significant 'sphere of influence'.

It is essential for the growth and sustainable development of Naas that it harnesses the advantages of Sallins and to maintain and strengthen its role in the Hierarchy as the Dublin satellite towns of Leixlip, Celbridge and Kilcock 'overheat' with a greater reliance on the Dublin economy than the Kildare economy.



The subject lands (edged red, above and below) provide and promote the Compact Growth model (CSO 1.5) through the development of available underutilised lands more closely aligned with services and infrastructure already invested and available.



Whilst we are aware that the *Local Area Plans*, as includes Sallins will be reviewed on an ongoing basis, we wish to highlight a potential fundamental 'mis-alignment' with the overarching 'Settlement Hierarchy' as relegates Sallins to a 'Town', where it fundamentally and more appropriately aligns both physically and economically with 'Naas' Key Town.

It has become an 'urban conglomeration' rather than a standalone settlement and this interdependence should be expressed through appropriate changes to the Hierarchy of Settlements.

This approach is more readily expressed for example where cross-county boundary towns are considered, i.e. Drogheda, Athlone, Carlow & Maynooth are good examples. In this regard the established practice is to normally refer to 'the Town plus Environs'.

In this regard we respectfully suggest the ***Naas and Environs Town Plan*** should fundamentally envelop the 'suburb of Sallins' and afford its recognition of the current and potential interdependence they currently provide and should continue to do so, in the interests of logical and sustainable development.

2.0 SITE LOCATION

The lands are located to the west of Sallins Town Centre. They are approximately 350m from the town centre. The lands are regular in shape and are situated between two existing estates, namely Sallins Wharf and Sallins Pier. The Grand Canal is adjacent to the lands to the north and west while the existing estate Sallins Pier to the south and west and Sallins Wharf to the south and east.

The lands outlined in blue in Figure 2.1 below are the lands that are the subject of this submission. The lands outlined in red are the subject of a current residential development proposal ***KCC Reg. Ref. 21/1276*** which is under consideration by the Planning Authority.

Figure 2.1: Aerial View of Existing Site



Source: ESRI ArcGIS Mapping under Licence to The Planning Partnership, April 2022

3.0 PLANNING HISTORY

The subject lands and the locality have been the subject of a number of planning applications:

Reg. Ref. 98/1446 – development of lands comprising site dev works & construction of 74 two storey 4 bedroom semi detached houses & 10 two storey 4 bed detached houses including 61 houses with optional single storey rear extension

Decision : Refused Permission 06/02/1999

Appealed to ABP: Granted Permission 16/08/1999

Reg. Ref. 01/887 – phase 3 housing development (adjoining lands the subject of pl.ref. no. 98/1446) comprising site development works & con. of 20 two-storey 3 bed terraced houses & 24 two storey 2 bedroom terraced houses in 10 blocks etc.

Decision: Granted Permission 23/03/2002

Appealed to ABP: Granted Permission 26/03/2002

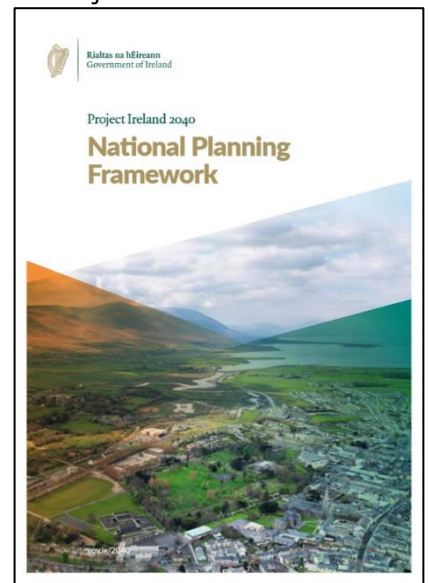
There is no further recent recorded planning history associated with the subject lands.

4.0 POLICY CONTEXT AND COMMENTARY

4.1 National Planning Policy Context - National Planning Framework

Project Ireland 2040 – National Planning Framework was published in February 2018. The *National Strategic Outcomes* are herein identified, and where a number of the outcomes are particularly relevant to the subject lands and to assist in delivering:

1. Compact Growth,
2. Strengthened Rural Economies and Communities,
3. Sustainable mobility, and
4. A strong economy supported by enterprise innovation and skills.



The Submission is Consistent with the NPF

The NPF is centred around ten National Strategic Outcomes (NSOs) which are supported by ten Strategic Investment Priorities. The first NSP relates to Compact Growth.

In terms of housing, the NPF outlines that at least 30% of all new homes that are targeted in the settlements (outside of the cities) are within their existing built-up footprints. Urban regeneration and infill sites can contribute to sustainable compact growth and the revitalisation of existing settlements at all scales.

It is submitted that the strategic characteristics of the subject lands and the wider lands around the Grand Canal in Sallins demonstrate the key criteria outlined above and in particular the compact growth and sustainable mobility.

The subject lands offer the opportunity to achieve the national planning objectives of delivering compact growth as the subject site is close to (or on the edge of) an existing settlement, Sallins in the first instance, but Naas in the context of the Environs. The proposed submission to re-align Sallins in the context of Naas and identify the lands as appropriate for sustainable development would reduce unsustainable levels of commuter driven car vehicle movements.

4.2 Regional Spatial & Economic Strategy (RSES) - Eastern Midland Regional Assembly (EMRA)

Naas is identified as a Hinterland Region Key Town, within the EMRA where:

Naas is the county town of Kildare and acts as a strong employment base which is evident from its high ratio of jobs to resident workers of 1.22.

It is recognised that there are strong links between Naas and the nearby settlements of Sallins and Newbridge with a strong interrelationship of services, employment and education between Naas and Newbridge. The draft RSES supports enhance links to Sallins train station to provide for more sustainable transport choices by those living and working in Naas.

Consolidation and regeneration shall be a key priority and objective for the development of Naas town with at least 30% of all development to be delivered on Brownfield and infill lands with a focus on the regeneration of the town centre.

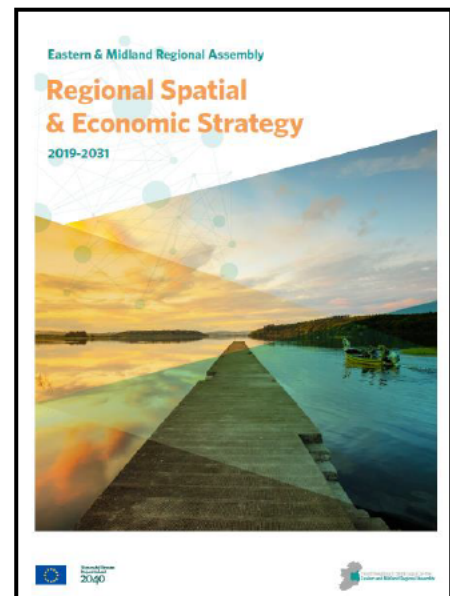
Regional Policy Objectives - Naas Key Town

RPO 4.33: *Promote the improvement of the transport network within and serving Naas town, including delivery of a robust and efficient walking, cycling and bus network with strong links to Sallins Railway Station, key destinations within the town and to the North West Quadrant and town centre area.*

RPO 4.34 *Support the use of the Grand Canal for amenity, recreation and sustainable transport purposes.*

The Submission is Consistent with the EMRA RSES

The regional spatial policy long term plan has identified the key issues for Naas as a Key Town. Sallins is undisputedly part of this because of the location of the train station. The analysis of the



proposed local policy set out in the *Draft Kildare County Development Plan 2023-2029* is reviewed through this context.

It is submitted that the improvement in transport network and links to Sallins Train Station from Naas will effectively make it part of Naas. It is further submitted that these works would not be enabled promptly if the Planning Authority continues to view the two settlements as being in two different tiers or categories. It is therefore submitted that Sallins should be considered as part of Naas Key Town.

4.3 Local Policy Context – Draft Kildare County Development Plan 2023-2029

Figure 4.1: Proposed Settlement Hierarchy

Hierarchy	Description	Locations
Key Towns	Large towns which are economically active that provide employment for their surrounding areas. High quality transport links and the capacity to act as regional drivers to complement the Regional Growth Centres.	Naas Maynooth
Self-Sustaining Growth Towns	Moderate level of jobs and services.	Newbridge Leixlip Kildare Town Athy
Self-Sustaining Towns	High levels of population growth and a weak employment base.	Celbridge Kilcock Monasterevin Clane
Towns	Local service and employment functions in close proximity to higher order urban areas.	Sallins Kilcullen Kill Prosperous Rathangan Castledermot Derrinturn

Table 2.7 - Settlement Hierarchy and Typology County Kildare

Source: Draft Kildare County Development Plan 2023-2029

The *Draft Kildare County Development Plan* continues to rank/designate **Sallins** as a lower order settlement in comparison to **Naas**. Traditionally and up until now they have been seen as two separate settlements. The change in national planning policy to promote compact growth and actions to mitigate against climate change warrant a change in the Settlement Strategy outlook.

2.6 Compact Growth and Climate Action

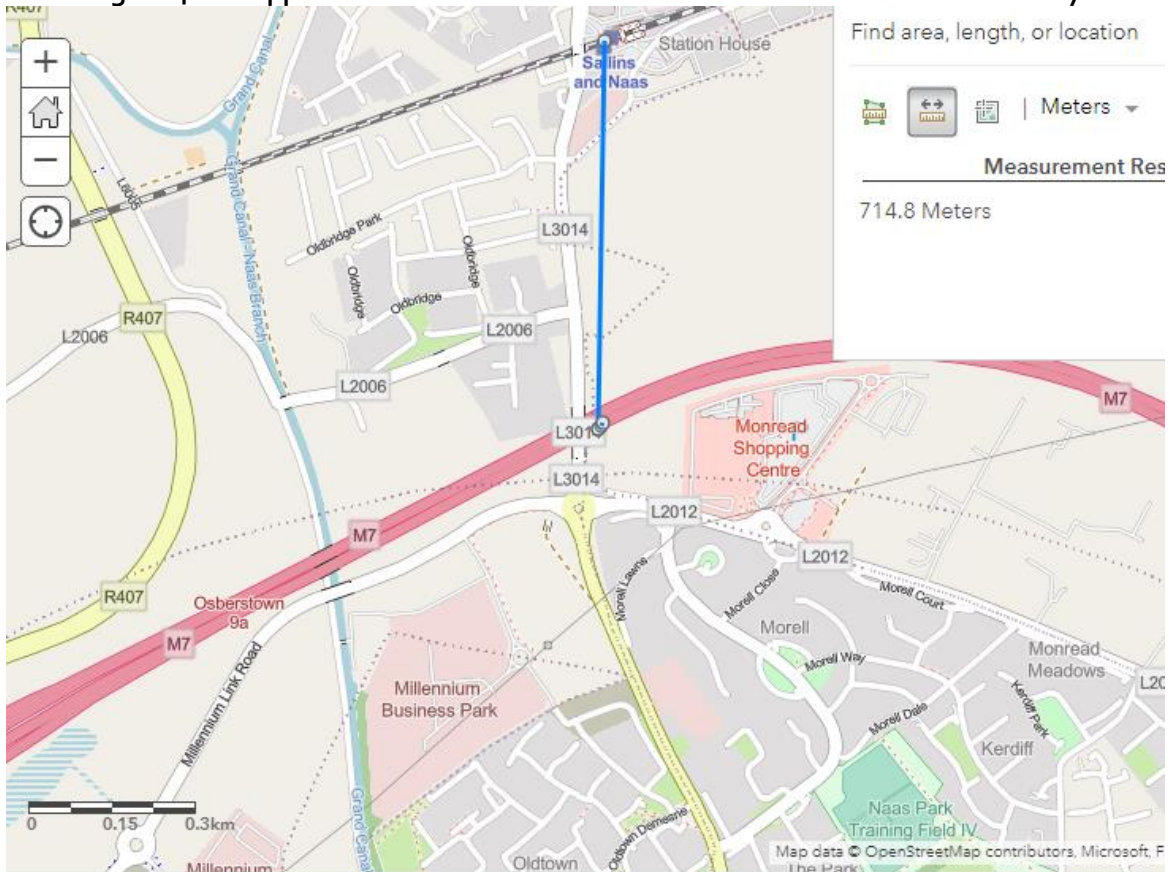
The promotion of a compact urban form of development is a central part of mitigating climate change. The policies and objectives of this Core Strategy seek to provide for a consolidated urban form within existing settlements. In applying this approach alongside the various other components in the Development Plan, the aim is to strive toward the delivery of connected neighbourhoods and the 10-minute settlement concept within the urban settlements.

The central idea of 10-minute settlements is to create integrated communities that provide high quality and safe links to public transport, local shops and services, amenity areas, places of employment and to other neighbourhoods. Essentially, the concept

provides for settlements to be designed to reduce the overall need to travel while also allowing for sustainable transport options (walking and cycling) to become realistic and convenient alternatives to the car for short trips, therefore reducing carbon emissions. While the concept of the 10-minute settlement can be applied to towns and villages of all sizes, the results may not be as effective in smaller towns and villages due to their lack of critical mass to support local services and employment centres. In such instances it is acknowledged that there is a degree of inter-dependency between nearby settlements with regard to the provision of local services, facilities and amenities.
 (Draft Kildare County Development Plan 2023-2029)

The route of the M7 encircling Naas forms a firm boundary which naturally would lead Town Planners to think of it as the boundary limit for the town. However, the fact is that the railway line which serves as a strategic link to the largest employment City in the region runs through Sallins. Sallins Train Station is approximately 700m from the Naas settlement boundary. The route from Naas to Sallins via the R407 involves passage through a large busy roundabout and crossing the M7 onto the L3014. This roads infrastructure is dominated by cars and is very busy and would not entice residents to travel by bike or scooter to the train station. In view of this it is estimated that many of the rail users who live in Naas drive to the train station in Sallins.

Figure 4.2: Mapped distance from Sallins Station to Naas Settlement Boundary



Source: ArcGIS

It is therefore submitted that Kildare County Council need to review the manner in which they treat Sallins from a spatial planning perspective. It is respectfully submitted that this settlement should be subsumed to be part of Naas and consequently treated as part of the 'Key Town' of Naas in the settlement hierarchy.

It is further submitted that the subject lands and other lands in Sallins adjacent to the Canal are capable of catering for increased residential density. All of these proposed Residential Units would be within walking distance of Sallins Train Station. It is also submitted that a segregated cycle/pedestrian route should be created between Naas and Sallins Train Station.

A change in the settlement strategy to this effect would allow for a significant increase in population for Sallins in accordance with Section 2.6 of the Draft Plan and with substantially more than the 174 additional units projected for the period 2023-2028 in the *Table 2.8* at Figure 4.3 below.

Figure 4.3: Settlement Hierarchy-Population Targets

Table 2.8 – Settlement Hierarchy – Population and Housing Unit Targets Q1-2023 to Q2-2028

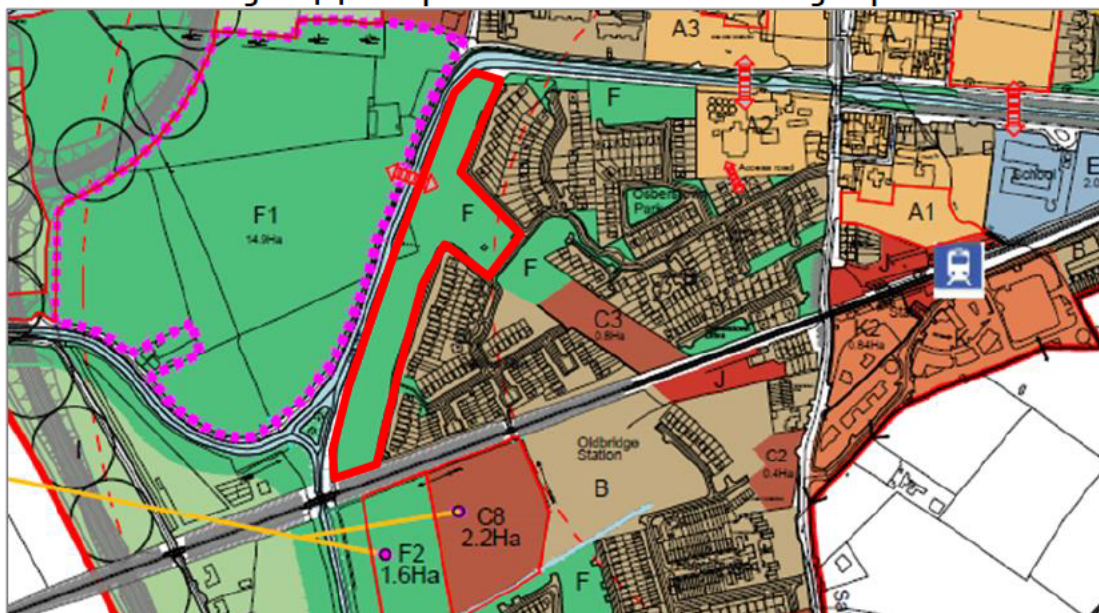
Settlement Type	Settlement Name	Census 2016 Population	Settlements percentage per total County population	2021 Population Estimate (based on % growth from 2011-2016)	Housing & Population Target %	Population Target 2023 to 2028 (end of Q4) (persons)	Housing Target 2023 to 2028 (end of Q4) (units) in accordance with HSTGs	Residential Zoned Land Requirement (ha)	Target Residential Density (UPH)
County	Kildare	222,504		235387		260533	9144		
Key Town	Naas	21,393	9.60%	22632	14.9%	3747	1362	40	35-50
	Maynooth (MASP)	14,585	6.60%	15429	10.90%	2741	997 ^a		35-50
Self-Sustaining Growth Towns	Newbridge	22,742	10.20%	24059	11.60%	2917	1061	35	35-50
	Leixlip	15,504	7%	16402	10.20%	2565	933	31	35-50
	Kildare Town	8,634	3.90%	9134	4.70%	1182	430	14	35-40
	Athy	9,677	4.30%	10237	4.80%	1207	439	15	35-40
Self-Sustaining Towns	Celbridge	20,288	9.10%	21463	10.00%	2515	914	30	35-40
	Kilcock	6,093	2.70%	6446	4.00%	1006	366	12	35-40
	Monasterevin	4,246	1.90%	4492	2.60%	654	238	8	35-40
	Clane	7,280	3.27%	7702	2.40%	604	219	7	35-40
Towns	Sallins	5,849	2.62%	6188	1.90%	478	174	6	35-40
	Kilcullen	3,710	1.70%	3925	2.50%	629	229	8	35-40
	Kill	3,348	1.50%	3542	1.30%	327	119	4	35-40
	Prosperous	2,333	1.04%	2468	1.00%	251	91	3	30-35
	Rathangan	2,611	1.20%	2762	0.90%	226	82	3	30-35
	Castledermot	1,475	0.70%	1560	0.50%	126	46	2	30-35
	Derrinturn	1,602	0.70%	1695	0.60%	151	55	2	30-35

Source: Draft Kildare County Development Plan 2023-2029

4.4 Local Policy Context – Sallins Local Area Plan 2016-2022

4.4.1 Land Use Zoning Objectives

Figure 4.4 Excerpt from Sallins Land Use Zoning Map



Source: Sallins Local Area Plan 2016-2022

Submission is Consistent with the Sustainable Development of Sallins LAP

It can be seen from the above zoning map that there is a significant proportion of lands zoned 'F-Open Space' in the centre of Sallins as proximate to the Grand Canal. It is respectfully submitted that these lands can be more efficiently utilised in the context of 'the better use of urban lands'.

It is submitted that an improved level of amenity and recreation could be achieved if this wide swathe of unmaintained 'edge lands' is developed and redesigned as functioning urban space, incorporating both hard and soft landscaping.

We are aware that extensive work has taken place on the other side of the Grand Canal to create a public park and that a bridge link is proposed to cross the Canal.

It is submitted that it does not represent efficient use of urban land and public resources to have potentially excessive open space across from a new park. It is respectfully submitted that by developing the subject lands and redesigning the urban space the new park would be available to a larger population and the increased permeability at this location would result in improved integration in the settlement.

It is acknowledged that the lands zoned 'F1' are reserved for a park and recreational facility.

Figure 4.5: Draft Proposal for Public Recreation facility/Park on opposite side of Grand Canal



Source: Sallins Community Council Facebook Page

Proposal

It is proposed that all lands adjacent to the Grand Canal, currently zoned 'F- Open Space' should be rezoned for a new urban quarter incorporating appropriate higher density of *circa.* 35-50 units per hectare, or even greater.

5.0 SALLINS-STRATEGIC LOCATION

Sallins is strategically located next to the M7 to the south and a new motorway/ring road which links north and south of the Region.

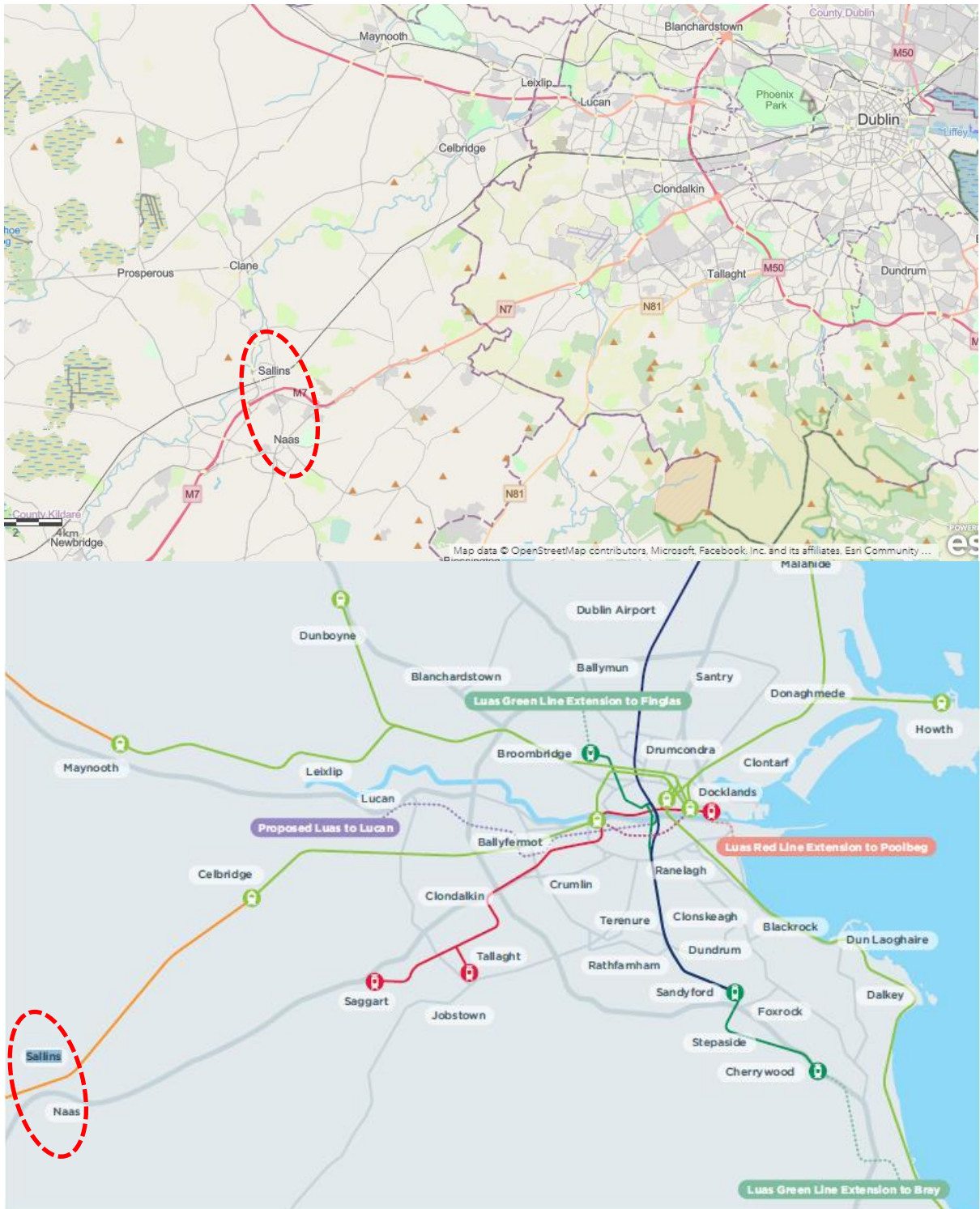


Figure 5.4 Greater Dublin Area Public Transport Network 2027. Source: National Development Plan 2018-2027

The Draft Kildare Development Plan sets out the following definitions and purpose of the Core Strategy and the associated Settlement Strategy and Settlement Hierarchy:

*The draft Core and Settlement Strategy seeks to support the implementation of the Metropolitan Area Strategic Plan (MASP) which includes the towns of Maynooth, Leixlip, Celbridge and Kilcock; seeks to **deliver sustainable regional development** through the*

Key Towns of Naas and Maynooth; seeks to support rural areas with a network of towns and villages ; and seeks to support the transition to low carbon, climate resilient communities ana a healthy environment with high quality air and water.

It is submitted that a valid case has been made for Sallins to be considered part of the settlement of Naas and therefore a Key Town within the Core Strategy. The intention of this policy change is to improve the scope of the combined settlement to support the transition to low carbon resilient communities.

*The Core Strategy is a critical component of the Draft Plan with the purpose of articulating a medium-longer term **quantitatively based strategy for the spatial development** of the area of the Planning Authority. The central focus of the Core Strategy is on **residential development** and in ensuring that there is a suitable supply of zoned serviced land for the projected demand for new housing over the lifetime of the Plan. **The Core Strategy is centred on a number of key principles including compact growth urban regeneration and placemaking.***

It is submitted that the increased population projection of 25,000 over the next 6 year plan period, coupled with the increasing costs of car transport from both a user and a local authority viewpoint warrant the facilitation of additional higher density residential zonings around rail transport hubs with a view to achieving **compact growth, urban regeneration and placemaking opportunities.**

*The draft **Settlement Strategy** identifies the settlement hierarchy; for the county, being **the targeted distribution of housing and population** within the development plan. The **settlement hierarchy** is the defining vision for how the county is likely to grow and develop over the lifetime of the development plan, with a clear set **of spatial priorities** identified. The settlement strategy of the plan is the means by which spatial choices are made and priorities expressed.*

It is submitted that the proposed change in spatial planning approach set out in this submission needs to become one of the 'clear spatial priorities' referred to above in the context of the Settlement Strategy with the objective of achieving increase population levels in close proximity to rail transport hubs. This increase in population will in turn support the viability of increase services and employment opportunities to support the increasing residential densities at this location.

Sallins- Strengths

- Large amounts of undeveloped lands within 1km of Train Station
- Proximity to the Grand Canal
- Adjacent to the M7
- 1km from Monread Shopping Centre
- Bypass removes HGVs from Town Centre

The opportunities presented by the subject lands and their associated delivery of compact growth will benefit the existing residential community in terms of infrastructural advantages associated with taking in charge of infrastructure, the local road network and open spaces and all relevant services.

Our client has also made a submission to the Government offering lands for the Ukrainian refugee support effort. It is his intention that these lands could provide accommodation in some form. It is submitted that any end users of the subject lands would benefit from close proximity to the public transport network and local available services.

6.0 MASTERPLAN VISION – ARTISTS IMPRESSION

McGrane and Partners Architects have carried out a study of our client’s lands in order to create a vision of the type and nature of development that could be appropriately achieved at the subject location. It is clear from the images that a significant increase in density can be achieved, and it is herein presented that the subject lands have the carrying capacity to cater for this scale of development in areas in close proximity to public transport links and existing services and as aligns with the Council’s own intentions for the *Sallins Harbour Area*.

Figure 6.1: View along the Canal



The Canalside setting presents a significant carrying capacity for higher density housing to front and benefit from the Canal and provide linkages by ‘active transportation’ crossing of the Grand Canal to the proposed new recreational park.

Figure 6.2: View within the proposed development (retained open space to new bridge crossing)



Figure 6.3: View along the Canal (west bank looking north)



Figure 6.4: View within the proposed development (established housing to the right)



6.1 Urban Design - Compact Growth, Urban Regeneration and Placemaking Opportunities

It is submitted that a decision to zone the subject lands for high density residential development would improve access to the canal banks for all of the residents in Sallins and the surrounding areas. It is submitted that the area could cater for not only residential development but local cafes and shops that would cater for the recreational pedestrian traffic that would be attracted to the area.

It is submitted that development of this kind would create a new and unique urban context (a Canal Quarter) for Naas/Sallins. In order to facilitate recreational access, high quality hard landscaping would need to be incorporated together with pocket and linear parks to maximise the amenity of the lands next to the Canal.



7.0 CONCLUDING COMMENTARY

The following key themes have been identified for the planning authority to further consider and integrate into the County Development Plan process:

- Spatial Planning Policy is in a period of transition,
- More focus on infill sites at higher densities particularly adjacent to public transport hubs,
- Compact growth, and
- Better use of urban lands

Recently revised National and Regional Spatial Planning Policy reflects the changing emphasis referred.

We present the subject lands as a significant opportunity to deliver an appropriate sustainable and consolidated development in accordance with national & regional policy objectives, currently misaligned in the allocation of development lands within the Kildare County Development Plan and the respective Hierarchy of Settlements.

The subject lands, their location and their advantage of proximate and available public transport infrastructure and their proximity to Naas present more appropriately as a suburb of Naas to allow population growth both aligned to Naas as a 'Key Town' and with the advantages of a commuter rail line into central Dublin.

Whilst we are aware that the *Local Area Plans*, as includes Sallins, will be reviewed on an ongoing basis, we wish to highlight a potential fundamental 'mis-alignment' with the overarching 'Settlement Hierarchy' as relegates Sallins to a 'Town', where it fundamentally and more appropriately aligns both physically and economically with 'Naas' Key Town.

In this regard we respectfully suggest the **Naas and Environs Town Plan** should fundamentally envelop the 'suburb of Sallins' and afford its recognition of the current and potential

interdependence they currently provide and should continue to do so, in the interests of logical and sustainable development.

Naas-Sallins should be treated as a singular settlement in the context of the new Core Strategy and Settlement Strategy in order to achieve the new spatial planning policy set out in National and Regional documents and to enable achievement of these policies 'on the ground' at local level. This approach is acknowledged in the RSES document quoted in this submission.

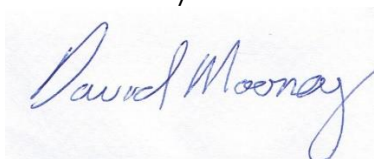
Our clients lands are ideally situated to provide infill development in the form of mixed housing and services in a high amenity location next to the Grand Canal.

The location is within walking distance of the train station and existing and available retail and other service based uses.

The development of these lands as residential will lead to an enhancement of the settlement of Sallins, improved permeability, improved integration of land uses on either side of the canal and particularly the proposed public park.

We look forward to your full consideration of the submission at your earliest convenience and to provide much required accessible and serviceable lands to promote consolidated and compact growth aligned with national and regional policy objectives.

Yours faithfully

A handwritten signature in blue ink that reads "David Mooney". The signature is written in a cursive style with a large, sweeping 'D' and 'M'.

David Mooney
Senior Consultant
The Planning Partnership