

Planning Department
Kildare County Council
Devoy Park
Naas
Co. Kildare
W91 X77F

Monday, 23rd May 2022

Dear Sir/Madam

RE: DRAFT KILDARE COUNTY DEVELOPMENT PLAN 2023-2029: SUBMISSION IN RESPECT TO LANDS AT RAILPARK, CELBRIDGE ROAD, MAYNOOTH, CO. KILDARE

1.0 INTRODUCTION

Pirowell Limited¹ have retained Tom Phillips + Associates, Town Planning Consultants², to make this submission to the *Draft Kildare County Development Plan 2023-2029*, which was published on Monday 14th March 2022.

Our clients are the owners of a site located to the southeast of Maynooth Town centre, adjacent to the 'Key Development Area' of Railpark (see Figure 1.0 below).

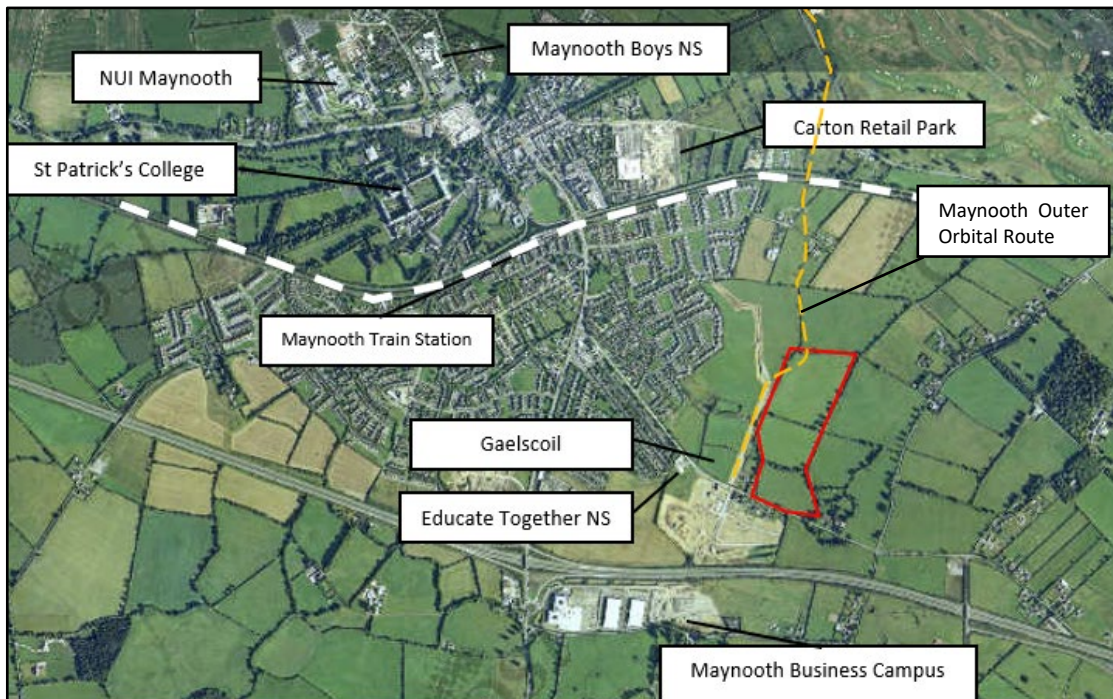


Figure 1.0: Location of our client's lands outlined in red. (source: www.myplan.ie, annotated by TPA, 2022.)

¹ Leinster Lodge, Maynooth, Co. Kildare.

² 80 Harcourt Street, Dublin 2.



1.1 Executive Summary

In summary, this submission seeks the rezoning of the subject site from 'I: Agricultural' to 'C: New Residential', the key arguments for which are outlined in this submission and summarised as follows:

- The subject site (c. 14.3 ha) is within Maynooth Town environs and is strategically located; c. 1km from Maynooth Railway Station; c. 500m from the M4 motorway; and c. 130m of high-quality bus services; and within walking distance of key social and community infrastructure.
- In the wider context, the lands are within the boundary of Maynooth Town, defined as a 'Key Town' in Dublin's Metropolitan Area on the 'North-West Corridor' (as defined in the *Regional Spatial Strategy for the Eastern and Midland Area, 2019-2031* (RSES)) and has a strategic role in delivering significant residential and economic development.
- The 'North-West Corridor' supports the delivery of development on key public transport corridors, and in this instance, residential development in the environs of Maynooth. The RSES also supports the provision of new employment centres on rail corridors, highlighting the importance of ensuring that sufficient lands are subject to residential zoning to facilitate the delivery of a commensurate quantum of housing.
- The lands form part of the *Maynooth Local Area Plan 2013-2019, as amended*, and are bounded by residentially zoned lands to the west and south and educational lands to the southwest.
- This submission seeks that the zoning objective on the subject site is revised from 'I: **Agricultural**' (as per *Maynooth Local Area Plan 2013-2019*) to 'C: **New Residential**' which seeks 'to provide for new residential development'.
- The rezoning of the subject site to 'C: *New Residential*' fully accords with the principles of *achieving 'compact growth'* as identified in the *Project Ireland 2040 National Planning Framework* (NPF) and the RSES, supporting new residential development with sufficient social and community infrastructure, with services within a 10-minute walk or cycle from homes or accessible by public transport services.
- The lands to the southeast of Maynooth are a logical extension of the existing town. The area is sufficiently served by existing social and community services, and planned development in the area includes the Maynooth Eastern Ring Road (MERR) road project and associated infrastructure. As such, the expansion of the settlement boundary will complement current plans for the area and promote compact growth in Maynooth.

We submit to Kildare County Council that the strategic role of Maynooth should be recognised. We also urge the Council to ensure that sufficient residentially zoned land is allocated within the *Draft Maynooth Local Area Plan 2022-2028* to ensure residential dwellings are delivered in a timely manner in order to address housing needs.

2.0 SITE CONTEXT

2.1 Subject Site and Urban Context

The subject site is located at a strategic location on Celbridge Road (R405) c. 1.3km southeast of Maynooth Town centre and Maynooth Train Station and c. 1km northeast of the M4 motorway (see Figure 2.1).

The undeveloped site, measuring some c. 14.31 ha, comprises open farmland paddocks surrounded and dissected by hedging and rubble stone walls. The land is bounded to the south by Celbridge (R405) and typically bounded by lands in agricultural uses to the west, east and north. There are in addition, 2 no. residential properties located on the south-eastern and south-western boundaries of the site, with access from Celbridge Road (R405).



Figure 2.1: Location of the subject site in a wider context (Source: Google Earth. annotated by TPA, 2022.)

In terms of public transport within the immediate vicinity, BusConnects stops are located along Celbridge Road (R405), with the nearest being within a c. 150m of the subject site.

There are no Protected Structures or proposed Protected Structures under the Development Plan or Draft Development Plan located within the subject site. Additionally, there are no Recorded Monuments (SMR) within the subject site.

The site is not located within a Natural Heritage Area (NHA) or European Site (Natura 2000 site) as designated under the Habitats Directive (92/43/EEC), Birds Directive (2009/1477/EC), and the *Planning and Development Acts, 2000 - 2022*. The closest European sites are the Rye Water Valley /Carton SAC (Site Code 001398), c. 1.5 km to the north and Ballynafagh Bog SAC (Site Code 00391) some c. 15km to the southwest.

2.2 Surrounding Context

The wider environs of the subject site is characterised by a mix of rural uses with lands in agricultural use to the immediate north, east and west of the site. Lands directly south on the opposite side of Celbridge Road (R405) comprise established residential developments, nameingly Griffin Rath Manor and Griffith Rath Hill.

As noted previously, the lands form part of the *Maynooth Local Area Plan 2013-2019, as amended*, (Section 4.2 of this Submission refers) and are located within the LAP boundary on its most eastern edge.

In the wider urban context, the subject site is within c. 1.3 km from the centre of Maynooth Town. Maynooth, alongside Naas, is designated a 'Key Town' in the Dublin Metropolitan Area on the North-West Corridor and is included in the Metropolitan Area Strategic Plan (MASP), as defined in the RSES, the Development Plan and Draft Plan.

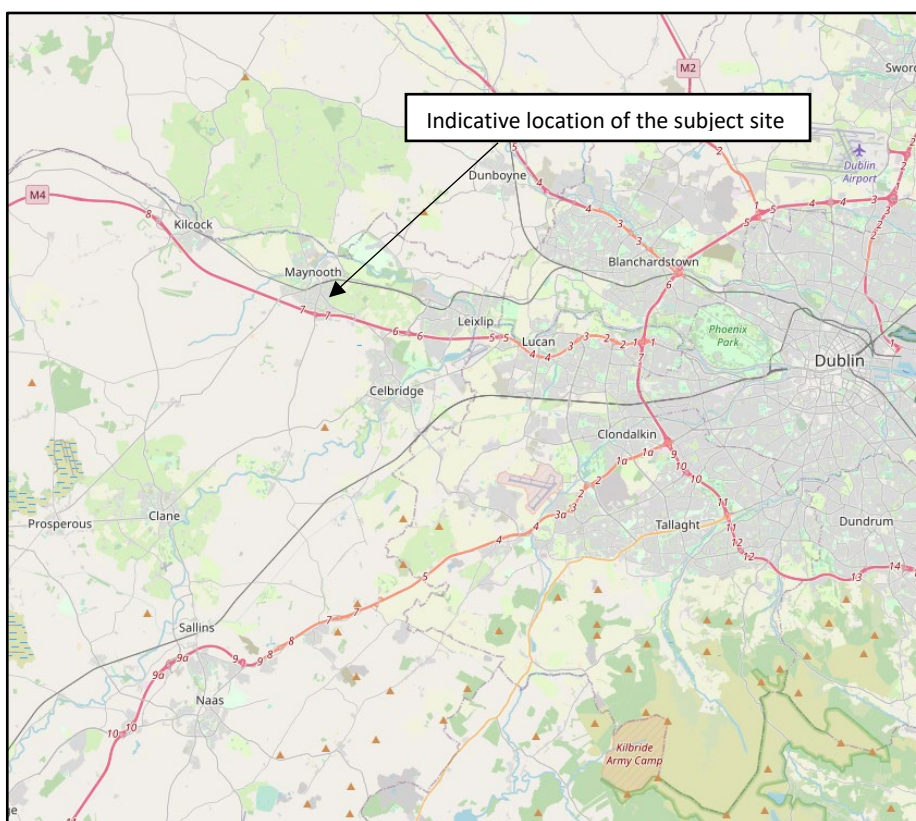


Figure 2.2: The subject site in the context of neighbouring settlements in Kildare and the Dublin Metropolitan Areas (Source: ESRI Maps, Cropped and annotated by TPA, 2022.)

2.3 Planning History

Tom Phillips + Associates conducted a planning history search using online search facilities of Kildare County Council and An Bord Pleanála websites in order to establish the planning history of the subject site and relevant planning history in the immediate environs. There were no planning applications found which related to the subject lands. With the exception of Part 8 Maynooth Eastern Ring Road (MERR) planning application, other applications within the vicinity are minor in nature and primarily relate to ancillary dwelling works and agriculture.



3.0 NATIONAL AND REGIONAL POLICY GUIDANCE

3.1 *Project Ireland 2040 National Planning Framework (NPF)*

The National Planning Framework (NPF) is the Government's plan to cater for the extra one million people that will be living in Ireland, the additional two thirds of a million people working in Ireland and the half a million extra homes needed in Ireland by 2040.

The Framework focuses on:

- Growing regions, their cities, towns and villages and rural fabric;
- Building more accessible urban centres of scale and
- Better outcomes for communities and the environment, through more effective and coordinated planning, investment and delivery.

The NPF states that in Ireland, the location of housing has taken on a dispersed and fragmented character, which has led to people living further away from their jobs and often being at a sizeable remove from important services such as education and healthcare.

Under the concept of '*Compact Growth*', which underpins much of the Strategy, the NPF is:

'A major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages. The target is for at least 40% of all new housing to be delivered within the existing built up areas of cities, towns and villages on infill and/or brownfield sites. The rest of our homes will continue to be delivered at the edge of settlements and in rural areas.' (our emphasis.)

Some of the key National Policy Objective's (NPO) included in the NPF in terms of the need for additional housing are as follows:

- NPO 3a: *'Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.'*
- NPO 3b: *'Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.'*
- NPO 3c: *'Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints'*

It is submitted that the subject site is located within the boundary of Maynooth, alongside adjacent residentially zoned lands; within c. 1km of Maynooth Station (within a 20-minute walking distance/6-minute cycle distance); within c. 150m of frequent bus services; and immediately adjacent to planned high quality infrastructure. In this context, it is considered that the rezoning of this subject site to residential use ('C: New Residential') is consistent with the objectives of the NPF in seeking to consolidate development served by existing community/social infrastructure and public transport infrastructure. The scale and configuration of the site will also fully accord with the principles of 'compact growth'.



3.2 **Regional Spatial Economic Strategy (RSES) - Eastern and Midland Regional Assembly, 2019-2031**

The purpose of the RSES is to support the implementation of *Project Ireland 2040* by providing a long-term strategic planning and economic framework for the development of the Regions. The RSES defines Maynooth, alongside Bray and Swords, as a 'Metropolitan Key Town', which is described as:

*'large economically active service towns located **within the Dublin Metropolitan Area, with high quality transport links and capacity for increased residential and employment densities at strategic transport nodes.**' (our emphasis)*

Concerning residential development within Maynooth, the RSES provides the following:

*'Maynooth has seen significant population growth along the Moyglare, Dunboyne and Dublin Roads with further land designated for residential development to the south east of the town at Greenfield and at Railpark. **The Railpark lands are subject to a new relief road and bridge over the railway line together with the provision of linkages to the Royal Canal towpath and town centre. There is further potential for the consolidation of the built form of Maynooth to the northwest and southwest of the town to provide for significant residential development.**' (our emphasis)*

A number of key infrastructural projects are planned within the Region including the DART expansion (Dart+), road upgrades, bridge, Maynooth Outer Orbital Route, wastewater and local water network upgrades, as identified in the North-West Corridor of the RSES:

*'Planned infrastructure upgrades include the M4 from Maynooth to Leixlip and for a bridge and relief road to the south east of the town. **The DART Expansion project and proposed electrification of the rail line to Maynooth represents a significant opportunity for sequential growth in Maynooth. A new sewer connection for the Railpark lands, in association with the relief road will also unlock significant development potential, along with the development of an Outer Orbital Route connecting the east of the town and lands within the Maynooth Environs of Meath and to the west of the town with the provision of new roads connecting the Moyglare Road to the Kilcock Road. The provision of additional road capacity around the town offers an opportunity for improved public transport walking and cycling networks, through relocation of road space within the town.**' (our emphasis)*

An extract from Table 5.1 (Strategic Development Areas and Corridors, Capacity Infrastructure and Phasing) of the RSES is shown in Figure 3.1.



Corridor	Residential	Employment/ Mixed Use	Phasing/Enabling infrastructure
North-West corridor (Maynooth/ Dunboyne commuter line /DART) Population capacity Short 24,000 Medium 10,000 Long 3,000 Total 37,000	Dublin 15 lands - continued development of Hansfield linked to the future development of Barnhill and Kellytown landbanks to the south and east	Further development of large-scale employment in Dublin Enterprise Zone** and synergies with Blanchardstown IT	Short term Public transport, Clonsilla Station, water network and waste water upgrades.
	Leixlip - strategic greenfield lands near Confeys station with capacity for phased development, improve links to Leixlip and adjoining Dublin/Meath lands	Large scale former Hewlett Packard site and Collinstown site to strengthen employment base for North Kildare	Short to Medium term LUAS extension to Maynooth, roads upgrades, community and social infrastructure, waste water and local water network upgrades
	Maynooth - Significant strategic residential capacity at Railpark lands and to the north and west of the town near Maynooth University	New Research & technology Park adjoining Maynooth University	Short to Medium term DART expansion, road upgrades, bridge, Maynooth Outer Orbital Route, waste water and local water network upgrades
	Dunboyne - Sequential development prioritising zoned and serviced lands near the railway station and town centre and at Dunboyne North / M3 Parkway station	Space intensive 'big box' employment at Portan. Mixed use 'live - work' development at Dunboyne North	Medium to Long term Outer Orbital road, distributor road, additional water mains and waste water upgrades

Figure 3.1: Extract from Table 5.1 of the RSES which shows the North West Corridor and major infrastructural works to be delivered in the short, medium and long term to support future residential development (cropped and annotated by TPA, 2022.)

As can be seen above, the RSES sets a population target of 37,000 (high range figure) for the 'North West Corridor' which comprises lands in Dublin 15, Leixlip, Maynooth and Dunboyne.

As the subject site will inherently benefit from the future enabling infrastructural projects, it is submitted that the rezoning of the subject site to support the delivery of residential use is fully consistent with the policy objectives of the RSES, supporting the delivery of housing in this part of the Region.

3.3 Draft Transport Strategy for the Greater Dublin Area 2022-2042

The Draft Transport Strategy for the Greater Dublin Area 2022-2042 (hereinafter referred to as the Draft *Transport Strategy*) provides the transportation framework, consistent with the spatial planning policies and objectives of the RSES, the NPF and *National Development Plan (NDP)*, as set out in *Project Ireland 2040*. The Draft Strategy also takes account of the *Climate Action and Low Carbon Development (Amendment) Act 2021*, and the impact of Covid-19.

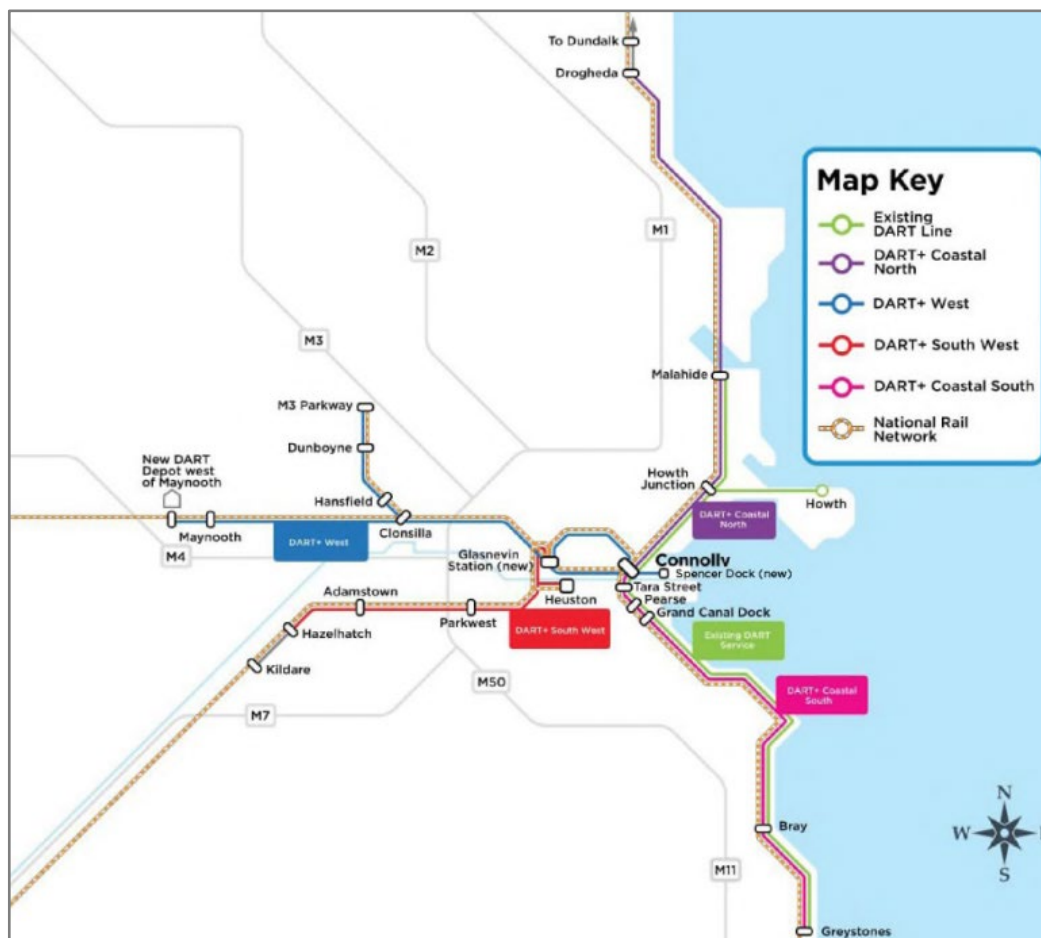


Figure 3.2: Map showing expansion the extent of DART+, cropped by TPA, 2022.

With respect to the subject site at Railpark, the DART+ West project (approved in December 2021) is identified as part of the DART Expansion Programme in the *Draft Transport Strategy* and includes, *inter alia*:

- “electrification of the Maynooth and M3 Parkway lines from Connolly and a proposed new Spencer Dock Station to Maynooth;
- construction of a new DART facility west of Maynooth Station;
- integration with a combined metro / rail station to be developed at Glasnevin under the MetroLink project to serve both the Maynooth and Kildare Lines.
- elimination of level crossings;
- New grade-separated pedestrian, cycle and vehicle crossings as required.”

The upgrade is anticipated to result in an increase in passenger capacity from 5,000 in 2019 to 13,200 in 2025.³ Iarnród Éireann intends to make an application for a Railway Order to An Bord Pleanála in 2022.

The completion of these works will provide enhanced sustainable public transport service in proximity to the subject site, fully supporting the delivery of new residential communities within the Maynooth.

Source: <https://www.dartplus.ie/en-ie/projects/dart-west>



4.0 LOCAL POLICY GUIDANCE

4.1 *Kildare County Development Plan 2017-2023 (Current Plan)*

The current *Kildare County Development Plan 2017-2023* ('Development Plan') recognises that Kildare is one of the fastest growing counties in the state, by virtue of its location within the Greater Dublin Area and existing level of services.

As discussed previously, Maynooth is identified as a 'Key Town' and forms part of the *Metropolitan Area Strategic Plan* (MASP) due to its proximity and relationship with Dublin and its high quality transport connections.

Variation No. 1 of the Development Plan provides that:

'The population of the town in 2016 was 14,585 with a housing stock of 5,171 units.

The town has experienced significant levels of new residential development both in private housing and student accommodation over the past 5 years and with extant permissions and pipeline developments, will see these levels continue for the next 3 years. New housing development on the Dunboyne, Celbridge and Dublin Roads provide for an additional 1,400 units and the proposed new neighbourhood at Railpark which will be facilitated by the LIHAF (Local Infrastructure Housing Activation Fund) funded Maynooth Eastern Relief Road will deliver between 800 and 900 units. There is further potential for the consolidation of the town through the redevelopment of a number of town centre sites.

The delivery of these additional 2000+ units will result in a 38.6% increase in housing stock over a relatively short period of time. In order to allow these developments to be realised and for the town to continue to develop at a sustainable rate it is proposed that Maynooth will retain its current county allocation of 10.9%. Such a provision over the short-term (for the duration of this CDP up to 2023) will provide an opportunity for the town to absorb recent and pipeline developments.

In allowing this 'absorption period', the Council will also be in a position to identify other social and physical infrastructure needs (through the preparation of an infrastructural assessment in accordance with Appendix 3 of the NPF) which will inform the sustainable development of the town into the future.

***This Plan also acknowledges Regional Policy Objective 4.35 of the RSES which requires Kildare County Council to prepare a Joint LAP for Maynooth with Meath County Council in order to deliver a coordinated planning framework for the town.'* (our emphasis)**

We submit that any future development of Maynooth must ensure the sustainable use of existing and committed infrastructure and that on this basis the south-eastern part of the town will play an essential role in its ongoing development.

4.2 Maynooth Local Area Plan 2013-2019

The *Maynooth Local Area Plan 2013-2019*, as amended, is the statutory plan governing Maynooth and the subject lands. The subject site is zoned 'I: Agricultural' with the objective 'to retain and protect agricultural uses.'

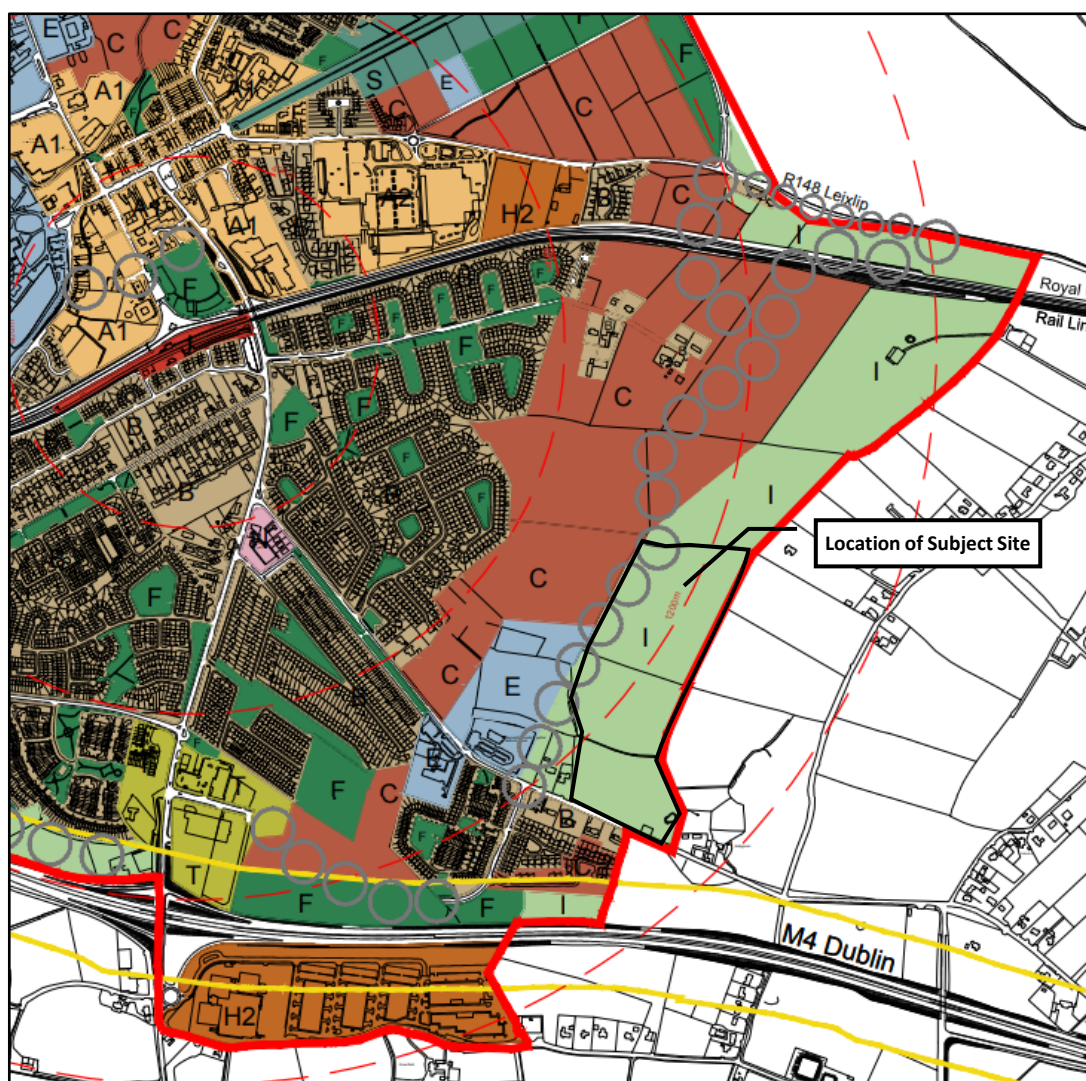


Figure 4.1: Extract from the Maynooth Local Area Plan 2013-2019 (Incorporating Amendment No. 1) land use zoning map which shows the location of the subject site outlined in black (cropped and annotated by TPA, 2022.)

The subject lands lie directly adjacent to lands which form part of a 'Key Development Area' (KDA) known as 'Railpark'. These lands are identified to deliver c. 720 no. additional new housing units which are to be facilitated by the delivery of the MERR.

The vision for the 'Key Development Area' of Railpark is described in the LAP:

"The new neighbourhood will be an exemplar of urban housing expansion, outward looking and integrating itself into the surrounding context, prioritising sustainable modes of travel, encouraging innovative design and technologies and driving towards a low carbon and climate resilient place."

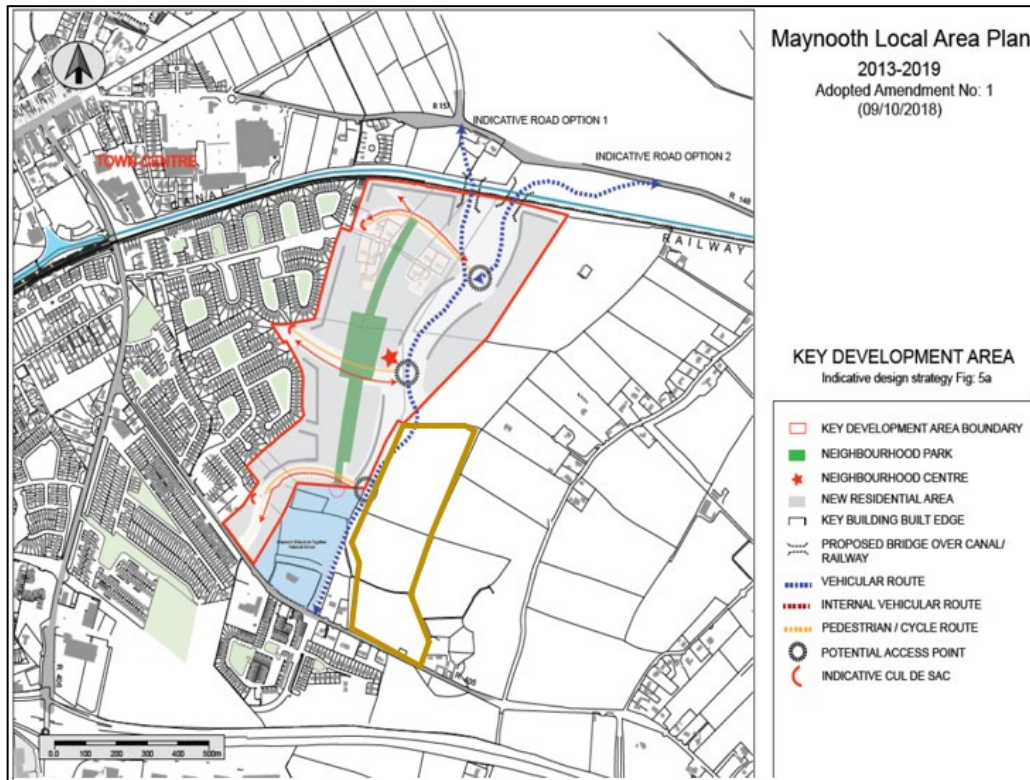


Figure 4.1: 'Railpark' Key Development Area Indicative Development Plan, with the subject site outlined in yellow (Source: Maynooth LAP, cropped and annotated by TPA, 2022.)

Plans for the MERR were adopted by the Council under Part 8 process in 2019 and funding has been secured for the road project under the Local Infrastructure Housing Activation Fund (LIHAF) to complete the project. Consultation between Kildare County Council and various landowners is ongoing.

The MERR will unlock the potential for development in the southeast of the town (further discussed in Section 6.0 below). The expansion of the settlement to the southeast of the town (and also encompassing the subject site) would ensure the future rapid delivery of more dwellings in proximity to the town centre and railway station.



5.0 DRAFT KILDARE DEVELOPMENT PLAN 2023 – 2029

Kildare County Council published the *Draft Kildare County Development Plan 2023–2029* ('Draft Plan') in March 2022. The Draft Plan outlines a vision for the future growth of the County over the six-year period from 2023–2029 and beyond. The Draft Plan is on public display until Friday 24th May 2022.

5.1 Core Strategy

The purpose of the Draft Plan, as stated in the Core Strategy, is to:

'...set out an overarching growth strategy for the development of the county to 2029 and translate the strategic planning framework of the National Planning Framework (NPF), the Regional Spatial and Economic Strategy for the Eastern and Midlands Region (RSES) and the Specific Planning Policy Requirements specified in the Ministerial Guidelines under Section 28 of the Planning & Development Act 2000 (as amended), to county level.'

Section 2.5 of the Draft Plan's Core Strategy states:

'the main considerations and evidence-based analysis which has informed the Core Strategy, are as follows:

- *Trends in Population Growth*
- *Population Projections for Kildare*
- *Evaluation of Housing Demand*
- *Housing Targets.*

Section 2.5.1 notes that:

*"the total population within Kildare in 2016 was 222,504, which was the fifth highest population in the State. Over a 20-year period (1996 to 2016), Kildare experienced a **64.8% (+87,512) increase in its population base, the second highest rate in the State.** The growth rate from 2006 to 2016 of 19.4% is the fourth highest in the State." (our emphasis)*

The population projections for Kildare County up to 2026 are forecasted to be between 249,000 - 254,000 and between 259,000 - 266,500 up until 2031 according to Table 2.2 of the Draft Plan. Section 2.5.4 further outlines that the housing target for County Kildare to the end of the Plan period is 9,144 housing units, which translates to an additional 25,146 persons.

With respect to Maynooth's ever growing population, Section 2.4.1 of the Draft Plan makes reference to NPO 68 of the NPF and provides the following:

*"NPO 68 allows for a further allowance by way of up to 20% of targeted growth in the city being transferred to other settlements in the MASP, such as Maynooth. **This has been agreed with the MASP Implementation Group and Maynooth is to receive an additional population of 10,000 on top of its Core Strategy allocation.**" (our emphasis)*



Table 2.8 of the Draft Plan’s Core Strategy includes the settlement hierarchy and population and housing unit targets Q1-2023 to Q2-2028 (see Figure 6.1).

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*		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

Figure 6.1: Extract from Table 2.8 of the Draft Plan (Settlement Hierarchy - Population and Housing Unit Targets Q1-2023 to Q2-2028 (cropped and annotated by TPA, 2022).

Table 2.8 does not specify a requirement to zone any additional land for residential use in Maynooth, however, the following note is included:

‘Additional population allocation for Maynooth of up to 10,000 persons from redistribution of NPF City and Suburbs allocation (EMRA, July 2020). The precise allocation that will be attributed to Maynooth however will be determined at LAP stage on foot of detailed assessments and audits of available social and physical infrastructure.’ (our emphasis)

Based on CSO census figures of 2016, the population of Maynooth stood at c. 14,585 and this is expected to increase by c. 10,000 (a population increase of c. 68%). It is clear that there is a strong need for additional new residentially zoned and in Maynooth to accommodate the future population increase.

The following Draft Plan policy objectives inherently support the need for additional residentially zoned lands:

Objective CSO 1.1:

‘Ensure that the future growth and spatial development of County Kildare is in accordance with the population and housing allocations contained in the Core Strategy which aligns with the regional growth strategy as set out in the National Planning Framework and Regional Spatial and Economic Strategy for the Eastern and Midland Region and further specified in the ‘Housing Supply Target Methodology for Development Planning’. (our emphasis)

Objective CSO 1.4:

‘Ensure that sufficient zoned and adequately serviced lands are available to meet the planned population and housing growth of settlements throughout the county in line with the Core Strategy and the Settlement Hierarchy.’



Objective HO O3 is to:

‘Co-operate with the Eastern and Midland Regional Assembly in planning for new homes and meeting housing needs for the Dublin Metropolitan Area (which includes Maynooth, Leixlip, Celbridge, and Kilcock) through the implementation of the Dublin Metropolitan Area Strategic Plan.’

HO P4 states it is a policy of the Council to:

‘Ensure that sufficient zoned land continues to be available at appropriate locations to fulfil the housing requirements of the county.’

It is evidentially clear the Draft Plan supports a long-term vision for sustainable development, recognising the strategic importance of the Maynooth and we urge the Planning Authority to plan accordingly for the development of southeast of the town, in conjunction with major planned infrastructure.

5.2 Current Land Use Zoning

The Draft Plan does not include any land use zoning objectives map or specific policy objectives for Maynooth or other larger towns within the County. As discussed above, the subject site is zoned ‘1: Agricultural’ in the *Maynooth Local Area Plan 2013-2019, as amended*. This LAP remains the statutory plan for the settlement until such time the new Local Area Plan is adopted.

It is a policy of the Draft Plan to ensure an LAP is prepared for Maynooth, along with other larger towns within Kildare County:

Objective CSO 1.9:

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

Section 2.8 further states:

‘Individual Local Area Plans will be prepared for higher order settlements, where individual Infrastructural Assessments will be carried out to apply the tiered approach to the zoning provisions associated with their respective housing allocations.’

It is our understanding that the *Draft Maynooth Local Area Plan 2022-2028* is currently being prepared by Kildare County Council (in conjunction with Meath County Council) and this is expected to go on public consultation later this year (Q4 2022.). It is clear for the reasons outlined in Section 7.0 below, that the subject site is served by existing and future, high quality, infrastructure and should be zoned for residential use accordingly.

The purpose of this submission is therefore to earmark the subject lands as ‘C: New Residential’ in anticipation of the *Draft Maynooth Local Area Plan 2022-2028* being published.



6.0 DEVELOPMENT PLAN GUIDELINES

There are currently two sets of National Guidelines governing the preparation of Development Plans at present in Ireland viz, the *Development Plan Guidelines for Planning Authorities 2007* and the recently published *Development Plan - Guidelines for Planning Authorities Draft for Consultation August 2021*.

Both documents set out detailed best practice in the making and implementation of Development Plans and, of particular relevance to this case, the appropriate process for the zoning of lands including for Residential use. This is considered in further detail below.

Development Plan Guidelines for Planning Authorities 2007

Regarding the zoning of land, the 2007 Guidelines state:

*'Land-use zoning is therefore about identifying the quantity of land needed over the plan period, the best locations for such land, the acceptability or otherwise of the various classes of land use within any particular zone, and in the case of relevant land uses, the intensity of development to be permitted. Zoning gives a degree of certainty to residents, developers etc. The use of non-specific zoning designations should be avoided. **Following the approach set out, a development plan should ensure that enough land will be available to meet anticipated development requirements and will be developed in a sequential and co-ordinated manner. This will avoid, for example, a situation where housing estates are built beyond the outer edges of existing built-up areas while intervening lands lie undeveloped resulting in deficiencies in terms of footpaths, lighting, drainage or adequate roads infrastructure.**' (our emphasis)*

Section 4.12 of the Guidelines states that:

'...when considering the suitability of specific lands for development, within the process of preparing zoning objectives in making a development plan, the members are restricted to considering the proper planning and sustainable development of the area to which the development plan relates, statutory obligations and Government policy. Matters typically relevant to the proper planning and sustainable development of areas, inter alia, include:

- *Need*
- *Policy Context*
- *Capacity of Water, Drainage and Roads Infrastructure*
- *Supporting Infrastructure and Facilities*
- *Physical Suitability*
- *Sequential Approach*
- *Environmental and Heritage policy, including conservation of habitats and other sensitive areas.*

Based on the above criteria, we outline the suitability of the subject lands for residential zoning below.



Need:

In terms of residential zoning at subject lands, there is a clear need for additional residential development to cater to an anticipated population increase of 10,000 persons in appropriate locations in Maynooth as quantified in the RSES and Draft Plan and arising from significant projected population growth.

Policy Context:

Maynooth is a 'Key Town' in Dublin's Metropolitan Area. As described above, the Draft Plan itself, the planning policy context at National and Regional levels fully and unequivocally support the zoning of residential lands in this location, for reasons which now be expanded upon.

Capacity of Water, Drainage and Roads Infrastructure:

In terms of existing water and drainage infrastructure, based on information available on Kildare County Council's website, Irish Water records and information from our client, the following is within the vicinity of the subject site.

- 600mm surface water and 900mm foul pipe directly west (which feeds into the subject site);
- 200mm and 400mm watermain along the R405 Celbridge Road;
- 200mm watermain in Griffin Rath Road with 100mm watermains in Griffin Rath Manor and Griffin Rath Hall;
- Surface gravity main to the west of Griffin Rath Road along the R405 Celbridge Road; and
- 300mm concrete foul gravity main pipe on adjoining site to the west.

A new sewer connection for the Railpark lands, in association with the MERR, will also unlock significant development potential of the subject lands in the short term.

Irish Water is responsible for the treatment and disposal of wastewater for public mains. Wastewater from Maynooth and the surrounding area is discharged to the Leixlip Wastewater Treatment Plant which was recently upgraded from 80,000 population equivalent (PE) to 150,000 (PE), indicating that wastewater capacity for Maynooth is sufficient.

In terms of road infrastructure, at present, the land can be accessed by Celbridge (R405) which bounds the southern site boundary for an extent of c. 190m. The site is also c. 1km northeast of the M4 motorway (Junction 7) which connects Dublin to Sligo and beyond.

In the future, the urban expansion of Maynooth to the southeast will be facilitated by the future delivery of the Maynooth Eastern Relief Road (MERR). As demonstrated in Figure 7.1, the MERR includes a link from Leixlip Road (R148) to Celbridge Road (R405) which will directly adjoin the subject site for the extent of its western boundary and will significantly improve access to the lands and the wider settlement. It will also include a bridge crossing over the Dublin-Sligo railway line and the Royal Canal thereby enhancing connections and permeability in the area. These improved connections will also include cycle and pedestrian routes along the canal. The new Royal Canal Greenway which is currently progressing towards completion will provide a high quality cycle link to Dublin City in the coming years.

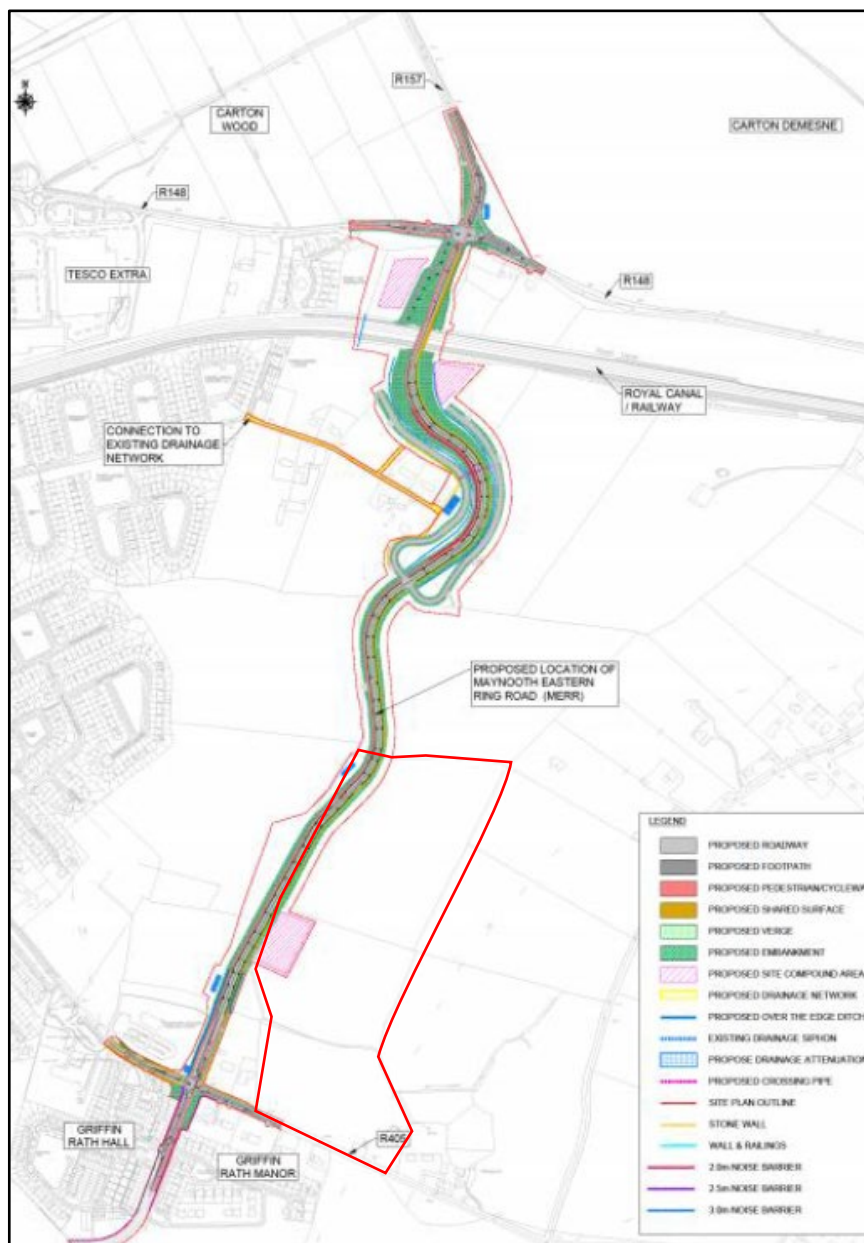


Figure 6.1: MERR Route in the context of the subject site, outlined in red (source: DBFL Consulting Engineers, cropped and annotated by TPA, 2022.)

Supporting Infrastructure and Facilities:

The Guidelines also note that supporting infrastructure, such as community facilities, health-care, schools, public open space, retail and other service provision and public transport is required when allocating land for development. Given the site's location proximate to Maynooth Town Centre and a well-established social infrastructure in the area, there will be good access to the required range of supporting services.

In addition, the subject site is within 150m of BusConnects. Spine C4 (Maynooth - Celbridge - City centre - Ringsend Road) provides services every 30 minutes (7 days a week), with Spine C6 providing night-time services between midnight and 4.00 am. Maynooth Station is also within c. 1km of the subject site (20-minute walking distance/6-minute cycle distance).

The lands also benefit from proximity to a mix of existing residential and community uses, including Gaelscoil Uí Fhiaich and the Maynooth Educate Together both of which have recently been extended and are within walking distance of the site. Additionally, the subject site is within a 30–35-minute walking / 10 minute cycle distance from both the Maynooth University North and South Campuses.

The lands are also proximate to Maynooth Business Campus, which accommodates over 120 no. companies (e.g. Adobe, AOL, Pfizer, SONY, Unilever and Panasonic), located c. 800m southwest.

The development of the lands will further augment these facilities as required.

Physical Suitability:

The development of the subject site would represent a highly sustainable model of development, as it would maximise the efficient use of public transport, roads and services infrastructure and minimise the requirement for costly new infrastructure required to service lands in more peripheral and far less sustainable locations. This section of the Guidelines notes the issue of flood risk. No fluvial or pluvial flood risk areas are identified within or immediately adjacent to the subject site by the Office of Public Works, as shown in Figure 6.2 below.

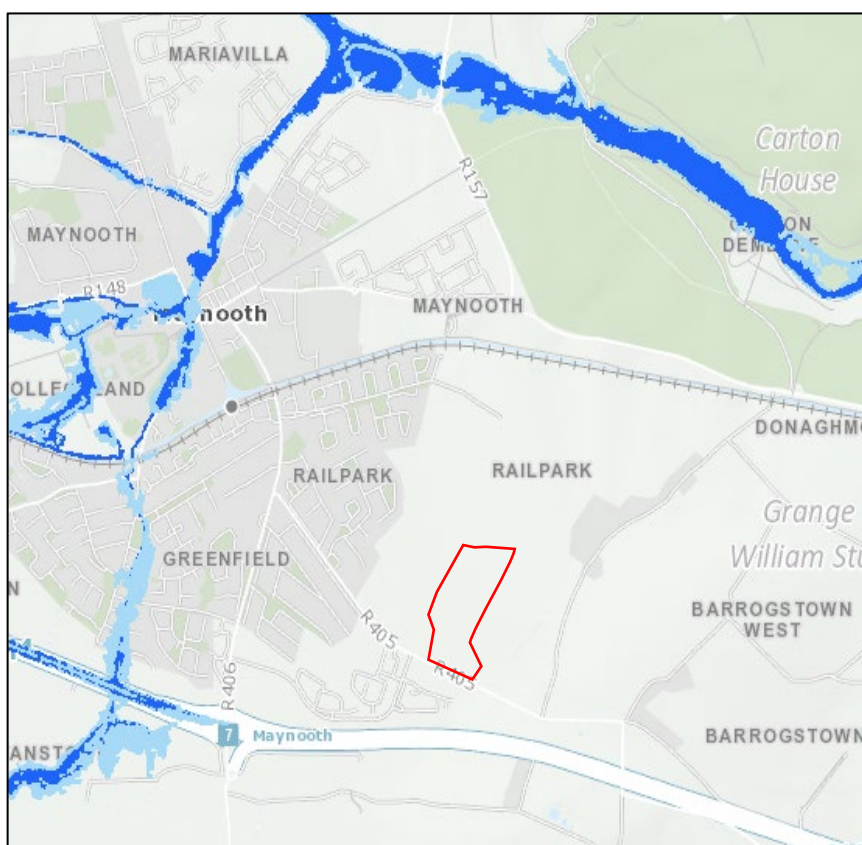


Figure 6.2: Flood zones mapping showing the subject site defined in red (Source: Myplan.ie, as annotated by TPA, 2022.).

The subject lands do not suffer from any physical limitations that may prevent their development for residential accommodation, subject to the usual development management provisions.



Sequential approach:

Section 4.19 of the Guidelines state:

'In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach should be taken to the zoning of land for development:

- (i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided);*
- (ii) A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and*
- (iii) Areas to be zoned should be contiguous to existing zoned development lands. Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved such as a lake close to a town. Any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan'.*

The subject lands fully adhere to the sequential approach described above regarding the zoning of lands for residential purposes. The site is within c. 1km of the town centre and is contiguous to existing residential zoned lands/housing areas. Its zoning and consequent development clearly follows a logical sequential approach and would avoid 'leapfrogging' or the zoning of more remote lands further from the town centre. In addition, the site comprises a major opportunity and comprises a large landbank on the east edge of the settlement.

Environmental and Heritage policy, including conservation of habitats and other sensitive areas:

As discussed previously in Section 2.1 of this Submission, no existing site constraints have been identified on the lands regarding the conservation of environmental or heritage features. The site is not within or directly adjoining any Natura 2000 site. The nearest SAC is that of Rye Water Valley/Carton which lies c. 1.5 km north of the subject site.

No protected structures or monuments are recognised within the boundary or immediately adjacent to the subject site. Therefore, it can be inferred that the subject site is not of specific amenity, visual or environmental value, *per se*, that would mitigate against its development for residential purposes.

In summary, therefore, the zoning of the lands accords with the criteria noted in the above-referenced Guidelines and the subject site at Railpark would have an important role in meeting the predicted residential housing requirements necessary to accommodate a growing urban population.



Development Plan - Guidelines for Planning Authorities Draft for Consultation August 2021

These Draft Guidelines are designed to ultimately replace and update the 2007 Guidance and will reflect the changes in the policy, institutional and regulatory framework that have occurred since 2007.

The Draft Guidelines advocates for a sequential approach to zoning of land for residential use which reflects the compact growth, utilisation of existing infrastructure and town regeneration national policy objectives of the NPF and the 'Tier Approach' to land zonings.

The NPF two-tiered approach to land zoning, as outlined in Appendix 3, comprises:

Tier 1: Serviced Zoned Land:

'This zoning comprises 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, for which there is service capacity available, and can therefore accommodate new development

These lands will generally be positioned within the existing built-up footprint of a settlement or contiguous to existing developed lands...'

Tier 2: Serviceable Zoned Land:

'This zoning comprises lands that are not currently sufficiently serviced to support new development but have potential to become fully serviced within the life of the plan i.e. the lands are currently constrained due to the need to deliver some or all development services required to support new development, i.e. road or footpath access including lighting, foul sewer drainage, surface water drainage, water supply and/or additional service capacity.

These lands may be positioned within the existing built-up footprint of a settlement, or contiguous to existing developed lands or to tier 1 zoned lands, where required to fulfil the spatially sequential approach to the location of the new development within the identified settlement...'

Based on the above definitions, it is our opinion that the subject lands fall within the 'Tier 2' category.

Section 6.2.3 of the Draft Guidelines outlines a 'Sequential Test for Residential Zoning in Settlements' consisting of four key steps. The sequential test encourages the zoning of 'Tier 1' lands to residential use in the first instance, however, it is further describing scenarios whereby zoning 'Tier 2' lands is appropriate:

'Step 3: Where it is necessary to zone serviced, but spatially less central lands (i.e. 'Tier 1' lands) to meet core strategy requirements, these shall be identified and prioritised on a spatially sequential basis (i.e. with those most proximate to the core, given preference, and first zoned for development). As part of this process, estimates of housing yield from such zonings must be considered against Core Strategy requirements.



'Step 4: Subsequently, where it is also necessary to zone unserviced, but serviceable, spatially less central lands (i.e. 'Tier 2' lands) in order to meet core strategy requirements, these shall be identified and prioritised on a spatially sequential basis (i.e. with those most proximate to the core, given preference and first zoned for development). Clear estimates of housing yield from such zonings must be considered against Core Strategy requirements.'

As identified previously in Section 6.1 of this submission, the Core Strategy identifies that Maynooth's population is expected to grow significantly over the Plan period, however, it is not identified how much additionally residentially zoned land is required to accommodate this projected increase and this is to be determined at LAP stage.

For reasons outlined in this submission, the east of Maynooth is set to play a key role in the future development of the town and this role can be increased. As such, we urge the Planning Authority to ensure that the residential zonings extend to capture a sufficient area to the southeast of the town. This will ensure there is an adequate supply of zoned lands within the town and supports compact growth within the town, which may rely on committed infrastructure such as MERR.

We urge Planning Authority to ensure that appropriate policies are included in the *Draft Maynooth Local Area Plan 2022-2028* in order to safeguard development in the town and ensure Maynooth Town has the capacity to grow in line with the settlement strategy.

7.0 CONCLUSION

The purpose of the new *Kildare County Development Plan 2023-2029* is to set out the medium to long term vision for development in Kildare, that is aligned with both national (NPF) and regional (RSES) policies for the county to promote sustainable development goals. In this context, Maynooth is recognised as a 'Key Town' and will be a major driver for new residential and economic development in Kildare County and the Greater Dublin Area.

Future development in the town should be plan-led, seeking to integrate with existing land uses, services and infrastructure in the town and should consolidate urban growth.

As such, it will be necessary to provide additional, suitably located, zoned lands to facilitate future planned growth within the metropolitan area. In this context, we submit to the Planning Authority that additional lands are identified in the *Draft Maynooth Local Area Plan 2022-2028* for residential development in a sequential manner and that the zoning of the subject site is amended from 'I: Agricultural' to 'C: New Residential'.

The southeast of Maynooth presents a key opportunity to deliver much needed residential development in the town. The lands adjoining 'Railpark' key development area already benefit from good access to existing social infrastructure and will also benefit from planned transport and access improvements.

Therefore, we ask the Council to take this opportunity to build on the existing planned vision for Kildare and to ensure that the full development potential of Maynooth can be realised over the plan period.

Should you require any further information concerning to this submission, please don't hesitate to contact the undersigned.

Yours faithfully,



John Gannon
Director
Tom Phillips + Associates