

Chapter 16: Monitoring and Implementation

We note that the County Council has a statutory obligation under section 15(1) of the Planning and Development Act 2000 to take all steps within its powers to secure the objectives of the Development Plan.

Under section 15(1) of the Planning and Development Act 2000, as amended (hereafter referred to as 'the Act') Kildare County Council is statutorily obliged to take such steps within its powers to secure the objectives of the Development Plan. Furthermore, the draft Ministerial Guidelines for Planning Authorities on Development Plans issued under Section 28 of the Act, outline specific measures which the Council is required to undertake with regards to the implementation and monitoring of the provisions of the Development Plan.

We also note the following:

The Council's key priorities over the life of the Development Plan will be to secure the full quantum of new housing provision for the county as set out in the Core Strategy, accompanied by the timely delivery of servicing and community infrastructure, along with transitioning the county to a model of low carbon society.

And wonder, given the Biodiversity Crisis that was declared by Dáil Éireann and Kildare County Council in 2019, why meaningfully tackling Biodiversity loss is not a key priority for the Council in this Development plan?

16.2.3 Implementation and Monitoring

We note the following:

*When formulating various policies and objectives the Council was conscious of its capacity to be effectively monitored and evaluated over the life of the Plan. **It therefore sought to maximise the number of quantitative objectives which are more easily measurable using a simple metric.** Where possible, this was achieved through the setting out of a specific supporting action or target. However, in many cases this was not possible with the result that **many objectives are qualitative in nature.***

The key performance indicators are aligned to the Strategic Vision of the County Development Plan and the Overarching Guiding Principles that underpin its delivery, as identified in Chapter 1 of this Plan.

We note the Strategic Vision of the plan here:

Strategic Vision: *To build on the strengths of the county in order to improve the quality of life of all residents, through the creation of high-quality job opportunities, by the provision of high-quality residential development supported by adequate community infrastructure, through the provision of a high quality sustainable transport network, by healthy placemaking and transformational regeneration,*

by supporting the transition to a low carbon climate resilient environment, by embracing inclusiveness and by enhancing our natural and built environment for future generations

- Please note that **Dáil Éireann** and Kildare Co. Co. Council declared a Biodiversity crisis in 2019. **Both of these crises must be acknowledged in the strategic vision of this Development Plan** with an explicit statement of intent to conserve and protect our native biodiversity.
- Please note that **Dáil Éireann** and Kildare Co. Co. Council declared a Biodiversity crisis in 2019. **A commitment to halt this crisis must be acknowledged as a key priority over the life of the Development plan.**

Additionally, **protecting existing biodiversity is well recognised as key to resilience under future climate change scenarios.**

16.2 Monitoring and Evaluation

We note the following:

The objectives of the Plan are measured and targeted in nature and have been designed, as far as practical, to be **SMART (Specific, Measurable, Assignable, Realistic and Time-Related)**. Many of the most important objectives are supported **by specific actions and in some cases explicit targets** where there has been a clear direction for same having regard to recent national publications in particular (e.g., transport and climate change). It is intended that these actions and targets will provide further assistance in providing measurable indicators when evaluating aspects relating to the overall effectiveness and delivery of the Plan throughout its six-year life cycle.

We must challenge the claim that the objectives of the plan have SMART goals or targets. Aside from a handful of objectives and actions, where is it illustrated in the various chapters that the objectives are measurable and time-related?

Monitoring and reporting are an essential element of management, ensuring that development is in accordance with what is intended.

Our opinion of Appendix 12, which runs to 122 pages and was surely of considerable financial cost to produce, is that:

- it fails to measure the key metrics and
- fails to inform the general public of what the Council is trying to achieve and why, and
- is not in a format which the general public can read and understand.

The Council **MUST** radically reorder this Appendix starting with items to be reported annually, through to items which have to be reported after 6 years i.e., at the end of the Plan's life.

Taking a couple of examples (referencing Vol 1: Chapter 12) from this 122- page Appendix to illustrate:

BI 05 - Conservation and enhancement of Natura 2000 sites

Implementation / Stakeholder Responsibility:

- **Development Management and Environment Department**
 - Who are Development Management?
 - What ecological expertise resides with this body/team/department?
 - What stakeholder responsibility has NPWS got for this objective?
 - What input has the Biodiversity/Heritage officer got for this objective?
 - Given that there are no management plans in place for these sites in the County, how is this to be achieved?
 - How does the Council intend to 'enhance' these sites through the actions of the listed stakeholders?

Monitoring and Evaluation

- **Planning consent Standards / KCC**
 - What does Planning Consent Standards / KCC mean in terms of monitoring and evaluating?
 - How does this relate to the status of the individual habitats/species/qualifying interests concerned?

Or:

BI A3 Review the County Kildare Biodiversity Plan

Implementation / Stakeholder Responsibility:

- **Planning Department and Environmental Department**
 - What ecological expertise resides with the Planning Department or Environmental Department to review the County Kildare Biodiversity Plan?
 - Where does the Biodiversity/Heritage officer fit in to this review?
 - What input will the expertise of the NPWS have in this review?
 - What input will local and national experts have in this review?

Monitoring and Evaluation

- **Completion of the County Kildare Biodiversity Plan review**
 - What does this mean?
 - Is a new County Kildare Biodiversity Plan to be reviewed **and updated** on the basis of the new National Biodiversity Action plan which is due to be published in 2022?
 - Is the target for completion of this action to be during the lifetime of this Development Plan? Or by the end of 2022? or 2023?

Additionally, several of the objectives and actions simply list "Progress made" under the heading **Monitoring and Evaluation**. We draw your attention to the fact that **this statement is highly subjective, is not specific and cannot be measured in any time-bound fashion**.

We argue that these objectives and actions are **simply aspirational** and appear to lack an intent to progress with focused and meaningful actions.

Surely, rather than proliferating 122 pages of meaningless statements and objectives (which cannot be evaluated in any meaningful way), **aspirational objectives should be clearly outlined and any targeted objectives given specific actions with specific measurable, time-bound goals.**

In terms of the declared Biodiversity Crisis, it is highly remiss and extremely worrying that the National Parks and Wildlife Service (NPWS) is listed as a stakeholder for only one single objective (out of 1930 objectives). The single objective being - LR O40 - Developing a Midlands Peatlands National Park. Given their responsibilities, **we would reasonably expect that NPWS would be a key stakeholder in the implementation of a number of biodiversity related objectives and actions.**

Additional comments relevant to this chapter

Resourcing and Responsibility - Ecological expertise

Following queries to KCC regarding current resources in place and clarification on which departments will take ownership for the implementation of the Plan, we were disappointed to learn of the ongoing low level of resources in place and the fact there is **no ecologist employed by KCC.**

While we empathise with ongoing resource and retention issues, these must be explicitly identified in the plan, highlighting related risks in the ability to deliver quantified targets and objectives.

Climate Indicators

While acknowledging the forthcoming Kildare Climate Action Plan, **the CDP should clearly acknowledge targets related to emissions reduction for each of Scope 1, 2 and 3 emissions.**

The CDP **should clearly outline where KCC influences Scope 3 emissions** and should not limit its responsibility to Scope 1 and 2 emissions.

Progress, both positive and negative, should be shared publicly each year against the original baseline and on an absolute basis, not on a relative basis to growth.

The climate impact of KCC functions, such as procurement and working practices, should be included in all climate targets, as well as targets to assess and reduce the climate impact of any investments and pensions KCC is involved in.

Transportation

In relation to transportation, there are **two key performance indicators:**

- Travel modal split by kilometres travelled, and
- Reduction in carbon emissions.

If these performance indicators are achieved as intended, much of the transport objectives and actions will be successfully implemented. If they fail to be implemented, then management must redouble efforts to achieve their implementation.

To measure these performances, it is necessary to

1. Measure travel mode split on an annual basis, and
2. Estimate the impact of emission reduction of active travel schemes and the impact of emission increase of non-active travel transport projects at the design and post-construction stage.

Performance indicators which are measured annually, will of course also be reviewed after two years in accordance with the statutory requirements, **but statutory requirements do not preclude them from being measured more often if they are critical.**