

Chapter 1: Introduction and Strategic Context

We especially note the **Strategic Vision** of this Development Plan:

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 both Dáil Éireann and Kildare County Council declared a Biodiversity crisis in 2019.
- The statement “enhancing our natural environment” is a very subjective statement.
- An explicit statement of intent to conserve and protect Kildare’s high nature value habitats and indigenous species **is required in the strategic vision of this Development Plan.**
- **Strategic Vision Amendment:** *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~~ **high quality** community infrastructure, through the provision of a high-quality sustainable transport network, by healthy placemaking and transformational regeneration, by ~~supporting~~ **endeavoring to achieve a swift** the transition to a low carbon climate resilient environment, by embracing inclusiveness and by enhancing our ~~natural and~~ built environment **and ensuring the conservation and protection of Kildare’s high nature value habitats and indigenous species for future generations.***

1.4 Policy Context

We note the following:

A development plan shall, as far as practicable, be consistent with the Planning and Development Act 2000 (as amended), national plans, policies and strategies which relate to the proper planning and sustainable development of land.

We suggest:

- Kildare County Council outline how “as far as is practicable” is defined and what criteria will be used to ascertain what is practicable?
- That the Climate Act and forthcoming Carbon budgets be referenced here.

1.4.1 Contents of Development Plans: Planning and Development Act 2000 (as amended)

We note the following and suggest revision as follows:

- *Existing text: Promotion of compliance with environmental standards and objectives established for bodies of surface waters and groundwater.*

- Suggested revision: ~~Promotion of compliance~~ Compliance with environmental standards and objectives established for bodies of surface waters and groundwater.

1.5 Climate Change

We advise that the CDP plan reference the forthcoming Kildare Climate Action Plan here, and outline how the CDP will be impacted and influenced by the new Climate Action Plan on its completion.

1.6 Sustainable Development Goals

We suggest:

- That the CDP provides more detail on where the UN Sustainable Development Goals (SDGs) align with the National Planning Framework's National Strategic Outcomes (NSOs), and what measurable metrics KCC will use to measure SDG progress as part of the CDP delivery.
- 2 That the CDP ensures that SDGs are applied through the lens of the climate and biodiversity crises, and that SDG8 (Decent Work and Economic Growth) will not be prioritised over others.

1.7.2 Volume 2 Small Towns and Villages Strategy

We note the following sentence:

The Small Towns and Villages Strategy (STVS) provides a coherent planning framework for the small towns, villages, and rural settlements across the county. The Strategy includes land use zonings maps and specific objectives which are underpinned.

- *It is unclear what the specific objectives are underpinned with? Please revise.*

General Comments

We point the Council to the **Draft Development Plans Guidelines for Planning Authorities 2021** (<https://www.gov.ie/en/consultation/ef157-public-consultation-on-the-draft-development-plan-guidelines-for-planning-authorities/#how-to-get-involved>) as follows:

*“Building on the function, context and legislative basis of the development plan as set out at in this Chapter, these ten guiding principles **must be reflected** in the plan preparation process:*

1. **A Vision for the Area** - *the development plan affords an opportunity for the planning authority to strategically examine and consider the economic, social, and **environmental context** of the area and to formulate policy objectives for future growth, renewal and **protection**. At the heart of a development plan should be a **concise and accessible core development strategy** to achieve quality planning outcomes and which enjoys broad community support.*
2. **Stakeholder Engagement** - *For a development plan to be effectively implemented, it needs to be formulated on the basis of strong engagement with the elected members of the local authority and with diverse public and sectoral interests, from the outset. Purposeful engagement by all in the plan preparation process is essential to*

establishing the quality, relevance and robustness of the plan and its subsequent implementation.

3. **A Strategic, Balanced Approach** - *The development plan has a relationship with multiple and complex public policy areas such as **housing, climate change, employment and enterprise, transport, water services, social infrastructure, conservation, heritage, and environmental protection**. The wider national and regional policy context must therefore be assimilated into the local spatial framework of the development plan in a strategic and balanced manner. In seeking to address local considerations, the plan preparation process must formulate policy to achieve objectives without fundamentally departing from wider strategic public policy objectives.*
4. **The Integration of Sustainable Development and Climate Change Priorities** – *The development plan process **must play a significant role in establishing more sustainable patterns of development which tackle the sources of climate change**. The reduction in Ireland’s carbon footprint, creation of less energy and travel-intensive formats of development, facilitation of energy generation from low carbon sources and the adaptation of communities to the effects of climate change are key strategic tasks that a development plan can seek to address.*
5. **The Structured Management of Change** - *Projected economic and population growth trends must be supported by significant new infrastructural development across all sectors. The development plan can ensure that new development is promoted and spatially structured to achieve a high standard of benefit to citizens and quality in design together with an enhanced sense of place, which is a key advantage in attracting talent and investment.*
6. **Renewal: Regenerating Existing Communities and Places** - *The development plan must focus on regeneration to a much greater extent than before in order to achieve more vibrant and sustainable urban and rural communities. As well as identifying opportunities for development that can give new purpose and function to existing places, sites and buildings, there is a need to address the evolving needs of communities, in response demographic change and digitalization, but also to address the legacies of rapid overdevelopment in some instances or decline or relative deprivation in others.*
7. **Protection: Environmental and Heritage Assets** - *The development plan must safeguard cherished and valued assets in the built and **natural environment by setting out clear policies for their protection that are widely understood by all. Plan policies should provide for their long-term protection, rehabilitation, where necessary and sustainable use, where appropriate**. This requires co-ordination with other development objectives, such as compact growth and urban or rural regeneration that can incorporate sufficient flexibility to enable consideration of development proposals with an overall sustainable outcome.*
8. **Alignment of Place and Investment** - *For planned development objectives to be realised, they need to be supported through public capital investment in infrastructure and services. The development plan is the key spatial framework in which local authority spatial development and investment priorities are identified and aligned.*
9. **Delivery and Monitoring** - *Plan objectives must be actively pursued by the local authority through all of its functions and resources, with a dedicated, permanent system of plan monitoring established to measure progress. This means that*

development plan policies and objectives must be measurable, with information on progress and outcomes available to inform subsequent plan formulation.

10. **Clarity and Focus** - *The development plan written statement must be in plain English (and Gaelige equivalent) and focus on planning matters relevant to the area of the plan that can principally be addressed within the six-year duration of the plan. It is unnecessary for development plan written statements to be excessively long, multi-volume documents comprising many hundreds of pages. There is no requirement to extensively reiterate national, regional, and local policy, legislation or guidance documentation – background studies and reports, may be appended separately. It should be an overall aim to seek to focus and prioritise policies and objectives where possible.”*

Additionally, in relation to Plan Design and Presentation, the **Draft Development Plans Guidelines for Planning Authorities 2021** also states:

- *“The nature of the development plan as a strategic policy document for an entire county or city area should also mean **that content should focus on key priorities in a legible and user-friendly manner.***
- *There has been a tendency in the preparation of some development plans to include a policy or objective for numerous possible development scenarios, leading to extremely lengthy written statement documents. **Documents of this scale can be very difficult to use for the public and can lack a strategic focus,** often getting lost in a level of detail more suited to local area plans or restating, at length, material from other guidance or policy documents.*
- ***Planning authorities should be aware of this tendency and strive to keep their development plan strategically focused and concise in nature.***
- *The function of the written statement is to state policies and objectives clearly and provide supporting information and explanation. The material should:*
 - *Be presented in **a coherent, well-structured manner** and written in a simple, jargon free style;*
 - *Be easy for readers to **grasp the meaning and content quickly and find the relevant parts without difficulty;***
 - *Include a **comprehensive index and glossary of any legal and technical terms used;** and,*
 - *Provide details of topics covered - a short list of chapter headings, while useful in providing a general overview, is not sufficient in this regard.*
- *It is recommended that the **Written Statement is accompanied by an ‘Executive Summary’.** Including a **Glossary of Terms in the Draft Plan** can assist the general public in understanding the terms used in the plan and its accompanying strategies.”*

We also direct you to the following from the same document:

- *Many local authorities make their statutory plan maps available online as interactive webmaps* and **this should be the standard that all local authorities meet.** Web-based GIS software allows for the inclusion of multiple layers of mapping to be presented to the end-user (such as flood maps, heritage designations, architectural*

*and archaeological designations etc.) which can be blended with the core development plan layers. This software also **allows for a very clear visual representation of what the development plan comprises and in particular for assisting the understanding of its spatial impact.** Once the development plan is made by the elected members, **the planning authority must provide digital mapping to the Department as soon as is practicable, to align with the plan coming into force 6 weeks after it is made.***

- ***<https://dlrcocouncil.maps.arcgis.com/apps/webappviewer/index.html?id=af21eeb123224c4c877f410139ed1e69>**

With reference to the above, we argue that this Development plan:

- Is an **excessively long, multi-volume document comprising many hundreds of pages.**
- Does not have **concise and accessible core development strategy.**
- Does not set out **clear policies for the protection of the natural environment that are widely understood by all.**
- Does not provide for **the long-term protection, rehabilitation, and where necessary sustainable use of natural resources.**
- Will not play a **significant role in establishing more sustainable patterns of development which tackle the sources of climate change.**
- Does not have **policies and objectives which are measurable**, with information on progress and outcomes available to inform subsequent plan formulation.
- Does not **focus and prioritise policies and objectives** (please refer to our comments on Chapter 16 and Appendix 12)

With Plan **objectives** spread over the Development Plan documentation, for example:

- Volume 1 and Appendix 12:
 - 18 Core objectives (chapters 2)
 - 1930 additional objectives (chapters 1-14)
- Volume 2:
 - 34 **Overarching** objectives for the Small Towns, Environs, Villages and Settlements

How can the citizens of Kildare possibly discern the true focus and targets of this Plan?

Additionally, we ask, will the listing of all these objectives, result in diversion of funding into a plethora of reporting, with very little meaningful action?

The Council **MUST** radically reorder this Plan, clearly outlining core strategic objectives and detailing any achievable other objectives over the lifetime of this plan **in a concise and focused way.**

Aspirational statements must be distinguished as such and **not listed as 'objectives'.**

Reporting details must be focused, 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.

- Please see our additional comments on Chapter 16.