

Chapter 2: Core Strategy and Settlement Strategy

The title of this chapter (and the content which follows) is confusing.

- Is there a “Core Strategy” for the Development plan and a separate “Settlement Strategy”?
- Is the “2.1 Overall Aim” the core strategy of the Development Plan?
- If this is the case, then the title of this chapter should be something along the lines of “**Overall Core Strategy of Kildare Development Plan**”
- If this is the case, we respectfully insist that acknowledgement of the Biodiversity Crisis must be inserted into the **overall aim**.

2.1 Overall Aim:

We suggest insertion of the following:

To provide for the delivery of an additional 9,144 housing units to accommodate an additional 25,146 people by the end of the Plan period, through the delivery of sustainable, compact settlements supported by a commensurate level of physical, and green infrastructure to mitigate against climate change, and to endeavour to prevent any further loss of Kildare’s biodiversity.

- Can the CDP provide a definition for what *sustainable* means here?

2.5.1. Kildare’s Population Growth Trends:

No further comment here except to draw attention to the following:

approximately 72% of the county’s population live on 5% of the county’s total land area, with the northeast of the county having by far the highest population densities.

- This further reinforces the importance of maintaining open spaces in Kildare for human wellbeing and as a counterbalance to development and habitation pressures on nature and on our environment.

2.5.4 Housing Targets

We draw your attention to Tables 2.3 and 2.4 (and Appendix 9).

- In particular to Step 4 Housing completion estimates for 2021 and 2022 = 3,048 units.
- Please revise this to include units completed in 2021 (2027 units) and provide a more up to date estimate for 2023.

2.6 Compact Growth and Climate Action

- The Development Plan should outline how the embodied carbon of new planned developments have been accounted for and what steps will be taken to reduce the impact of emission from new developments.
- How will the plan ensure a ‘climate and biodiversity first’ lens to planning decisions?

For example:

- Mandating the use of more sustainable building materials.
- Promoting the redevelopment of brownfield and derelict sites ahead of greenfield sites.
- Mandating a percentage C&D waste recovery on sites.

2.7 Town and Village Renewal

- The CDP should outline how derelict properties will play a role in Town and Village Renewal and contribute to growth outcomes.
- The CDP should state a preference for bringing derelict sites back into use ahead of building new developments.

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

In Table 2.8, the projected Kildare population for 2021 is 235,387 (an increase of 5.75 % on 2016 census figures). It then appears that this percentage increase is blanketly applied across all towns.

- What is the rationale for this? For example, see the following:
 - **Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031.**(https://emra.ie/dubh/wp-content/uploads/2020/05/EMRA_RSES_1.4.5web.p)
 - *“Towns recording the highest growth rates in the country over the last ten years (>32%), and which have lower levels of employment provision include; Ashbourne, Balbriggan, Blessington, **Clane**, Kinsealy-Drinan, Lusk, Laytown-Bettystown, Ratoath, and **Sallins**.”*

and

- **Housing Need and Demand Assessment (HNDA) & Housing Strategy** (<https://consult.kildarecoco.ie/sites/default/files/FINAL%20Appendix%201%20HNDA.pdf>)
- *“At Electoral Division level, between 2006 and 2016, only 6 of the 89 EDs in Kildare witnessed population decline– most notable of these has been the decrease in Newbridge Urban by -2.6% (-206) - in sharp contrast to the high growth in the town’s environs. As represented on the map in Figure 3, highest increases have all been in the environs of urban areas and in general the central and northeast of the county, with the majority of this growth taking place between 2000 and 2011, influenced primarily by growth designations under the 1999 Strategic Planning Guidelines for the Greater Dublin Area, extensive residential zoning of land and celtic tiger era construction levels. **Increases in excess of 45% were recorded in the EDs of Newbridge Rural (+46.3%), Donaghcumper (+46.5%), Kilcock (+47.5%), Athy Rural (+53.1%), Naas Rural (+59.3%), Rathangan (+68.5%) and Newtown (+95%).**”*

2.10 Target Residential Density

We draw your attention to the following paragraph:

The Sustainable Residential Development Guidelines encourage net densities of between 35-50 dwellings per hectare within larger towns with net densities of between 30-35 dwellings per hectare considered acceptable in certain large town contexts and net densities of less than 30 dwellings per hectare.

- Please revise this sentence – it is unclear.

2.11 Rural Settlements in the Countryside

We note the following:

There is continued and considerable development pressure for single homes in the rural area across County Kildare from

Additionally, we note that during the period 2016 to end of year 2020, the number of residential units in County Kildare increased by 6,176, of which rural one-off houses (892) accounted for 14.4% (averaging to 178 houses per annum). And in 2020, 162 permitted dwellings were rural one-off houses.

- **Housing Need and Demand Assessment & Housing Strategy**
- <https://consult.kildarecoco.ie/sites/default/files/FINAL%20Appendix%201%20HNDA.pdf>

and that:

“The Kildare County Council internal planning application operating system does not have the facility to filter down to a level which differentiates between urban one-off and rural one-off houses. This deficiency has been flagged with the development management team as an item for potential upgrade in the future.”

- **Housing Need and Demand Assessment & Housing Strategy**
- <https://consult.kildarecoco.ie/sites/default/files/FINAL%20Appendix%201%20HNDA.pdf>

We also note **National Policy Objective 20** and the requirement to:

“Project the need for **single housing in the countryside** through the local authority’s overall **Housing Need Demand Assessment (HNDA) tool** and county development plan core strategy processes.”

Project Ireland 2040 National Planning Framework

<https://npf.ie/wp-content/uploads/Project-Ireland-2040-NPF.pdf>

As Chapter 2 makes no specific reference to the **Kildare HNDA tool**, we feel that this should be addressed in this chapter in the interest of clarity.

- Has the Housing Need Demand Assessment (HNDA) tool been developed for Kildare?
 - If not, then a specific action needs to be stated.

- What is the projected need for single housing in the countryside?
- How do the number of units in Table 2.8 – 137 (Rural Settlement), 732 (Rural Dwellers), 92 (Blessington Environs) break down to single housing stock?

Core Strategy Statement

We draw your attention to the following paragraph:

Section 2.13 above sets out the preferred development strategy for Kildare, including the Key Towns, Self-Sustaining Growth Towns, Self-Sustaining Towns and Towns throughout the county. With respect to all other settlements, Section 2.10 above justifies the placing of the remaining settlements in the hierarchy having regard to the availability of physical, social and community services which are detailed in Volume 2 of this Plan.

- Please note that there is no “Section 2.13” above this paragraph. Please correct this.

2.14 Employment in Kildare

In developing employment opportunities throughout the county, we suggest:

- Planning decisions that enhance local employment must be screened for biodiversity and climate impacts. For example, if a distribution depot is to be built in Kildare, how is the impact of the increased necessary logistics accounted for?
- The CDP should identify measures to be taken to attract climate positive employment in the county.
- The CDP should outline criteria for defining ‘sustainability’ in terms of employment that considers climate and biodiversity outcomes, and not simply job numbers.

Core Strategy and Settlement Strategy Objectives

We note the **18 Core Strategy objectives** outlined at the end of this chapter and stakeholder involvement/responsibility listed in Appendix 12.

While we welcome a number of inclusions in these objectives, and particularly those objectives that are linked with adapting to and mitigating against the impacts of Climate Change, **we are extremely concerned that the Biodiversity Crisis has not been acknowledged in these core objectives.**

Additionally, we note that aside from the 18 Cores Strategy objectives, there are 1930 additional objectives of the Development Plan. Of these 1930 additional objectives:

- The National Park and Wildlife Service (NPWS) is only listed once as a stakeholder and
- Planning (Heritage) is listed only 13 times.
- Please refer to our further comments on Chapter 16 Monitoring and Implementation.

The first objective of the current National Biodiversity Action Plan 2017-2021 is to mainstream biodiversity into decision-making across all sectors. Under this objective, the following is stated:

“Under this Plan further action will be taken to raise awareness within the public sector of the implications of policy and decisions on biodiversity, through for example, the articulation of no net loss biodiversity targets in plans/policies and the appropriate utilisation of ecological expertise”.

<https://www.npws.ie/sites/default/files/publications/pdf/National%20Biodiversity%20Action%20Plan%20English.pdf>

In February 2020, the Interim Review of the Implementation of the National Biodiversity Action Plan 2017-2021 published its findings.

<https://www.npws.ie/sites/default/files/publications/pdf/Interim%20Review%20of%20the%20Implementation%20of%20the%20National%20Biodiversity%20Action%20Plan%202017%20-%202021%20.pdf>

The audit of that report by the National Biodiversity forum states that mainstreaming is *“wholly insufficient for the scale of the challenge”* and that

“Ireland lags behind its neighbours in incorporating biodiversity into the planning process. Investment in Biodiversity Officers across all local planning authorities is vital, and the Government must consider requiring plans and projects to achieve Biodiversity Net Gain, not just No Net Loss.” (<https://www.biodiversityimpactplan.ie/1-governance>)

Additionally, Ireland’s 6th National Report to the UN Convention on Biological Diversity (2019) called for a transformational change to conserve and restore biodiversity nationally and at EU and a global level. (<https://www.npws.ie/news/ireland%E2%80%99s-6th-national-report-un-convention-biological-diversity-released#:~:text=The%206th%20National%20Report%20reviews,is%20at%20an%20insufficient%20rate>)

We urgently call on Kildare County Council to be part of the transformational change necessary to halt any further degradation of Kildare’s habitats and dependant species and to begin meaningful action on restoring Kildare’s habits for future generations and to take account of the following considerations:

- **Resourcing:** As part of this transformational change, it would be inconceivable that a single person should be required to cover the huge remit of built and natural heritage, along with the increasing demands of liaising with other departments (Planning, Roads, Environmental Services etc.) on statutory obligations of Environmental Assessment and Appropriate assessment, along with the increasing necessity to liaise with relevant stakeholders in restoring degraded habitats to function in mitigating against Climate Change; when for example, planning and other departments have extensive staffing. This must be urgently addressed.
- **Public Education:** Additionally, if we are to be serious about engaging local communities in meaningful biodiversity actions, then this should be well informed action. At best ill-informed action is a waste of public funding and at its worst it may lead to harm (please refer to our comments on Chapter 12).
- **Inventory of Protected Sites:** Requisite to this is the need for a publicly accessible inventory of protected sites, high nature value sites and sites for protected flora and fauna

in Kildare. It is important that these sites are distinguished and not lost under the poorly understood term “green infrastructure”. Along with helping to inform and educate local communities, this inventory will help to guide and inform Planning and other departments in decision making.

- **Aarhus Convention:** Additionally, we draw your attention to the three main pillars of the Aarhus Convention. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective. The Convention provides for:
 - the right of everyone to receive environmental information that is held by public authorities ("**access to environmental information**"). This can include information on the state of the environment, but also on policies or measures taken, or on the state of human health and safety where this can be affected by the state of the environment. Applicants are entitled to obtain this information within one month of the request and without having to say why they require it. In addition, public authorities are obliged, under the Convention, to actively disseminate environmental information in their possession;
 - the right to participate in environmental decision-making. Arrangements are to be made by public authorities to enable the public affected and environmental non-governmental organisations to comment on, for example, proposals for projects affecting the environment, or plans and programmes relating to the environment, these comments to be taken into due account in decision-making, and information to be provided on the final decisions and the reasons for it ("**public participation in environmental decision-making**");
 - the right to review procedures to challenge public decisions that have been made without respecting the two aforementioned rights or environmental law in general ("**access to justice**").
 - <https://ec.europa.eu/environment/aarhus/>

In light of the above, and continuing negative impacts on Kildare’s habitats and species, we **respectively insist** that this necessitates that an additional objective is inserted into the Core Strategic Objectives

- **Proposed Additional Core Strategic Objective:** Ensure that the future growth and spatial development of County Kildare does not further undermine Kildare’s protected habitats and species. Engage with NPWS and other relevant stakeholders to urgently progress management plans for Natura 2000 sites and other protected sites in the County. Engage with all relevant stakeholders, including NPWS and national experts in flora and fauna, including the NGO sectors (for example, BSBI County Recorders) to identify and protect high nature value habitats and sites for threatened species in County Kildare. Tangibly commit to meaningfully tackling Biodiversity Loss in County Kildare by providing additional resources for the employment of an additional suitably qualified staff member dedicated to the conservation and protection of Kildare’s habitats and species, compiling an inventory of High Nature Value sites and protected species, community education and engagement on meaningful biodiversity actions, and ensuring that funding for biodiversity is directed to meaningful outcomes.

Additionally, we suggest additions to **CSO 1.13** as follows:

- **CSO 1.13** - Engage with public infrastructure providers including Irish Water, the Local Authority Waters Programme (LAWPRO), and local communities to provide serviced sites with appropriate infrastructure for people to build their own homes in designated towns and villages, subject to all relevant planning and environmental criteria as a sustainable alternative to one off housing. Develop Housing Need Demand Assessment (HNDA) tool for Kildare and project the need for single housing in the countryside by the end of 2023 in line with National Policy Objective 20, Planning Framework 2040

We also suggest an addition to **CSO 1.17** as follows:

- **CSO 1.17** - Continue to work with the educational institutions throughout the county and Solas, in order to further enhance the already existing highly skilled labour force in Kildare and to encourage improvements in the labour force to include the development of specific apprenticeships in the technology, renewable technologies and retrofitting apprenticeships, tourism, youth and childcare sectors during the lifetime of the plan to enhance and develop the agility of the workforces in those sectors.

CSO 1.18 in its current form does not translate to an impactful objective. We recommend this should be amended to:

- **CSO 1.18** - ~~To consider aligning~~ Align the Kildare County Development Plan 2023-2029, with the up-to-date population from the forthcoming Census, where there are verified material population differentials to those in Table 2.8 of the Plan, by way of a statutory variation pursuant to Section 13 of the Planning and Development Act 2000 (as amended).

Appendix 9 – Core Strategy Methodology

Additionally, we note the following in Appendix 9 which relates to this chapter.

*Of significance to note is the annual average for County Kildare as 882 units/year over the 9-year period between 2011 and 2020, which is well below the annual average of 1,535 provided for in the Housing Supply Targets issued by the Department. In this regard, it is considered that there is more than adequate housing supply provision for County Kildare for this plan period and beyond.**

**Additional headroom may be applied to 2024*

- What is the rationale for choosing a historical annual average between 2011 and 2020?
- We would like to point out here that for 2019, 2020 and 2020, the annual units completed have been **above the Housing Supply Targets** (at 1871, 1661 and 2027 respectively) – see Table from Appendix 9 below.
- What does the footnote “**Additional headroom may be applied to 2024**” mean? Please qualify this in language accessible to the General Public.
 - Does this indicate that housing demand will be revised again in 2024?

| | Quarter | Unit No. | Total for year |
|-------------------------|---------|----------|----------------|
| New Dwelling Completion | 2011 Q1 | 126 | |
| New Dwelling Completion | 2011 Q2 | 42 | |
| New Dwelling Completion | 2011 Q3 | 42 | |
| New Dwelling Completion | 2011 Q4 | 76 | 286 |
| New Dwelling Completion | 2012 Q1 | 51 | |
| New Dwelling Completion | 2012 Q2 | 44 | |
| New Dwelling Completion | 2012 Q3 | 42 | |
| New Dwelling Completion | 2012 Q4 | 70 | 207 |
| New Dwelling Completion | 2013 Q1 | 34 | |
| New Dwelling Completion | 2013 Q2 | 52 | |
| New Dwelling Completion | 2013 Q3 | 51 | |
| New Dwelling Completion | 2013 Q4 | 57 | 194 |
| New Dwelling Completion | 2014 Q1 | 58 | |
| New Dwelling Completion | 2014 Q2 | 65 | |
| New Dwelling Completion | 2014 Q3 | 75 | |
| New Dwelling Completion | 2014 Q4 | 102 | 300 |
| New Dwelling Completion | 2015 Q1 | 107 | |
| New Dwelling Completion | 2015 Q2 | 145 | |
| New Dwelling Completion | 2015 Q3 | 163 | |
| New Dwelling Completion | 2015 Q4 | 162 | 577 |
| New Dwelling Completion | 2016 Q1 | 122 | |
| New Dwelling Completion | 2016 Q2 | 154 | |
| New Dwelling Completion | 2016 Q3 | 142 | |
| New Dwelling Completion | 2016 Q4 | 220 | 638 |
| New Dwelling Completion | 2017 Q1 | 195 | |
| New Dwelling Completion | 2017 Q2 | 215 | |
| New Dwelling Completion | 2017 Q3 | 259 | |
| New Dwelling Completion | 2017 Q4 | 316 | 985 |
| New Dwelling Completion | 2018 Q1 | 244 | |
| New Dwelling Completion | 2018 Q2 | 270 | |
| New Dwelling Completion | 2018 Q3 | 326 | |
| New Dwelling Completion | 2018 Q4 | 381 | 1221 |
| New Dwelling Completion | 2019 Q1 | 396 | |
| New Dwelling Completion | 2019 Q2 | 392 | |
| New Dwelling Completion | 2019 Q3 | 487 | |
| New Dwelling Completion | 2019 Q4 | 623 | 1871 |
| New Dwelling Completion | 2020 Q1 | 331 | |
| New Dwelling Completion | 2020 Q2 | 278 | |
| New Dwelling Completion | 2020 Q3 | 492 | |
| New Dwelling Completion | 2020 Q4 | 560 | 1661 |
| New Dwelling Completion | 2021 Q1 | 320 | |
| New Dwelling Completion | 2021 Q2 | 484 | |
| New Dwelling Completion | 2021 Q3 | 541 | |
| New Dwelling Completion | 2021 Q4 | 682 | |
| | | | 2027 |

Additionally in this Appendix, we note the following:

The Draft Development Plan seeks to encourage the focus of new development on:

- i. Consolidation within the existing urban footprint, by ensuring 30% of all new homes are targeted within the existing built-up areas to achieve compact growth of urban settlements;*
- ii. Supporting the achievement of more sustainable climate resilient communities in towns and villages through residential and employment opportunities with a focus on sustainable urban regeneration and compact growth together with supporting social and community facilities.*
- iii. Supporting national investment in public transport services by focusing new development areas in key locations to achieve the integration of land uses and high-quality public transport provision;*
- iv. Achieving economies of scale for services and infrastructure in identified growth towns.*
- v. Promoting economic development and employment opportunities within defined Strategic Employment Development Areas in the North-West corridor of the Metropolitan Area, in line with the overall Growth Strategy.*
- vi. Facilitating development in the smaller towns and villages in line with the ability of local services to cater for growth that responds to local demand.*
- vii. Recognising the role of the rural countryside in supporting the rural economy and its role as a key resource for agriculture, equine, bloodstock, forestry, energy production, tourism, recreation, mineral extraction and rural based enterprises; and in supporting the habitats and species that make up the biodiversity of Kildare.***
- viii. Supporting, facilitating and promoting the sustainable development of renewable energy sources in the county.*
- ix. Protecting local assets by preserving the quality of the landscape, open space, recreational resources, natural, architectural, archaeological and cultural heritage and material assets of the county.***
- x. Promoting social inclusion and facilitating the delivery of objectives contained in the Kildare Local Economic and Community Plan (LECP) 2016-2021 and any succeeding Plan.*

We note that there is nothing listed here about conserving or protecting the high nature value habitats/semi-natural habitats or indigenous species of Kildare (i.e., aiming to halt further decline of Kildare's biodiversity), aside from protecting "local assets".