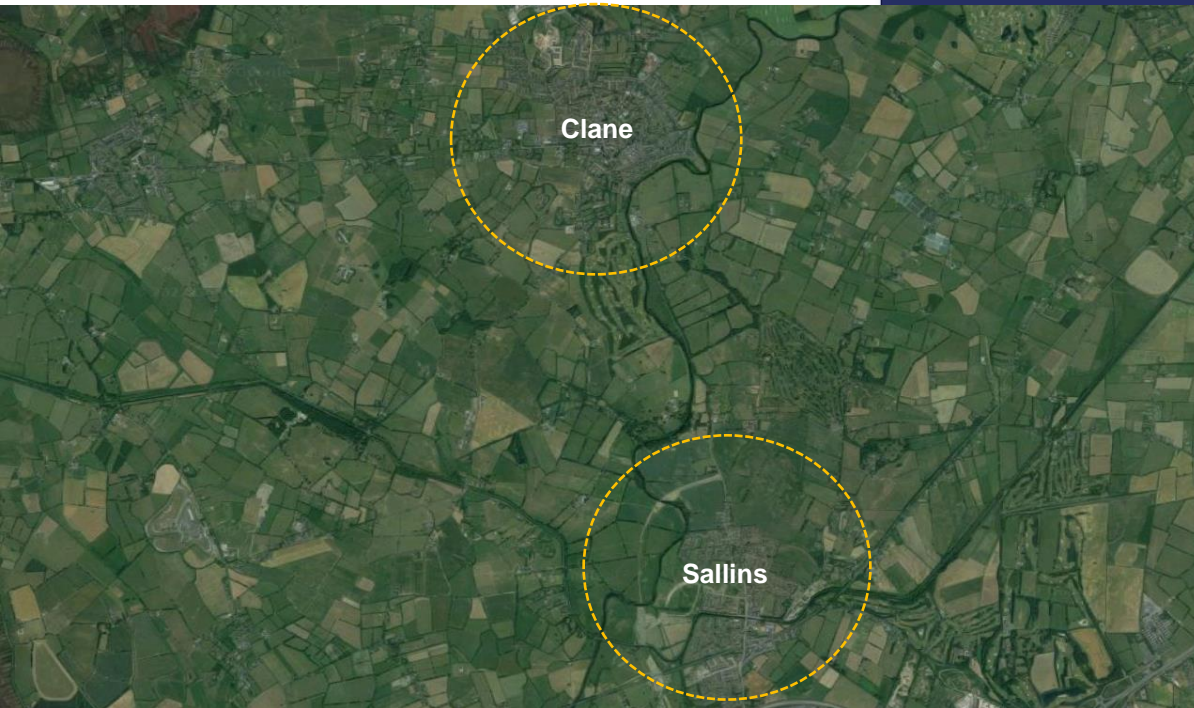


TOWN PLANNING SUBMISSION



DRAFT KILDARE COUNTY
DEVELOPMENT PLAN 2023-2029

**Submitted in respect of lands at
Clane and Sallins
Co. Kildare**

May 2022

Submitted on behalf of: Westar Group.

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Executive Summary

- This submission is made by Hughes Planning and Development Consultants, on behalf of our client, Westar Group, and is submitted to Kildare County Council in respect of the Draft Kildare County Development Plan 2023-2029, which is currently on public display, up until 24th May 2022.
- The contents of this submission relate to the policy content included within the Draft Plan pertaining primarily to Clane, but also includes recommendations in respect of the Housing and Population Targets for the County projected over the plan period, as well as recommendations in respect of the neighbouring town of Sallins and the enhanced connectivity between both areas.
- Our client fully welcomes the designation of Clane as a *Self-Sustaining Town* within the Draft Plan which accords with its status as part of the Regional Spatial and Economic Strategy for the Eastern and Midland Regions (RSES), however whilst the status of Clane has been upgraded by name, a related upgrading of population targets and associated metrics for the Town has not been completed. The percentage of Housing and Population Growth allocated to the town over the plan period has not been increased from its current allocation of **2.4%** as per the provisions of the current Kildare County Development Plan 2017-2023. In this context the Regional Spatial and Economic Strategy for the Eastern and Midland Regions (RSES) clearly sets out that '*Local Authorities, in the preparation of their core strategies should have due regard to the settlement typology of towns in the Region and carefully consider the phasing of development lands to ensure that towns grow at a sustainable level appropriate to their position in the hierarchy*'. It is therefore strongly considered that the growth percentage allocation for Clane should be significantly increased in accordance with its upgraded designation.
- On the basis of the foregoing, we respectfully request that the Planning Authority review the Settlement Hierarchy projections for Kildare and more specifically Clane, and see fit to allocate an increased proportion of population and housing growth to the town over the plan period.
- Referring to Table 2.8 of the Draft Plan, the 2021 Population estimate as provided within the table has been used as the baseline for the population targets from 2023-2028. However it must be acknowledged that this is an estimate based on the percentage of growth experienced for the County over the last census period i.e. from 2011-2016 and the methodology used for calculating housing targets appears to be based upon a 'worked example' from the Draft '*Development Plans: Guidelines for Planning Authorities*', which uses outdated 2016 figures as its basis. This is not considered to be the most effective means of calculating estimated figures given that the percentage population growth percentage has widely fluctuated for Kildare over the previous census periods. This aspect should be clarified as part of the forthcoming Development Plan. In this context, it is noted that the preliminary results for the 2022 Census are set to become available in mid to late June 2022. It would be prudent for these figures to be availed of by the Planning Authority in their review of the Core Strategy and Settlement Hierarchy for the forthcoming Development Plan.
- With regards to social housing provision, Appendix 1 of the Draft Plan specifies that 2,040 social housing units are in the pipeline for Kildare, however this figure appears to be significantly lower than the indicated number of social housing units required for Kildare of 3,104 no. units as outlined within the Government's recent publication '*Summary of Social Housing Assessments 2021*'. As such, we consider that the Social Housing projections provided on page 94 of Appendix A need to be reviewed ahead of the adoption of the new plan.
- This submission also requests that the Planning Authority consider the Status of Sallins as part of their review of the Settlement Strategy. Given the current and projected population of this town as well as its designation within the RSES that Sallins should be upgraded to a *Self-Sustaining town* as part of the Kildare County Development Plan 2023-2029. Given the close proximity between Clane and Sallins, it is recommended that a feasibility study be undertaken by the Planning Authority which investigates options for a proposed cycle-way connecting both towns, facilitating additional sustainable travel options between Clane and the Sallins/Naas Train Station.
- With regards to infrastructure provision and connectivity, this submission recommends that Kildare County Council in their examination of options for a link road from the R407 to the R404 including a new Liffey Crossing east of Clane, also include for the provision of pedestrian and cycle infrastructure along this proposed link. We also refer to action **TM A18** included within the Draft Plan which relates to a new pedestrian bridge crossing in Clane, and request that Kildare County Council designate this as a key objective as opposed to an action to expedite its delivery over the short term. Finally, we also recommend the inclusion of a new objective as part of the Draft Plan which examines the feasibility of providing a cycle-way from Clane to Sallins along the R407 road, to facilitate additional sustainable travel options between Clane and Sallins.

1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2, have prepared this Development Plan Submission on behalf of our clients Westar Group, whom we note have multiple property interests and local employment interests in County Kildare and are committed to their continued contribution to sustainable development opportunities within the County and the Leinster region more broadly. This submission has been prepared in response to a public notice dated 14th March 2022 inviting submissions from third parties and interested parties on the Kildare County Development Plan review in accordance with section 12(2)(b) of the Planning and Development Act 2000 (as amended).

Our client welcomes both the publication of the Draft Kildare County Development Plan 2023-2029 and the opportunity to participate in the plan making process which will inform and guide the future development of the County, including the delivery of much needed homes over the plan period and beyond.

This submission relates more specifically to the *Core Strategy* of the Draft Kildare County Development Plan 2023-2029, together with the accompanying *Housing Need and Demand Assessment & Housing Strategy*, as contained within Appendix 1 of the Draft Plan. Moreover, this submission has been prepared with specific reference to the Self-Sustaining Town of Clane and the draft policy content associated with same. We also refer to the nearby town of Sallins and its designation within the Kildare Settlement Hierarchy.

Whilst our client welcomes the designation of Clane as a *Self-Sustaining Town* as part of the Draft Plan and commends the Planning Authority on this inclusion, we strongly consider that an additional proportion of population growth be allocated to Clane, in line with its designation as a *Self-Sustaining Town*. Furthermore, upon review of the plan and the recent and projected population trends our clients are of the strong view that the existing town of Sallins should be identified as a *Self-Sustaining Town*, in line with its designation within the Regional Spatial and Economic Strategy for the Eastern and Midland Regions. A summary of these requests are set out in turn below:

- *We request that Kildare County Council review the Housing and Population Targets for Clane included as part of the Draft Kildare County Development Plan 2023-2029 and provide for an increased allocation of population and housing for the town over plan period, in accordance with its designation as a Self-Sustaining Town.*
- *We request that Kildare County Council upgrade the status of Sallins from a 'Town' to a 'Self-Sustaining Town' as part of the final iteration of the Kildare County Development Plan 2023-2029, in accordance with its identification within the Regional Spatial and Economic Strategy for the Eastern and Midland Regions (RSES). In line with this request, it is considered necessary to designate and increased Housing and Population Targets for the town over the plan period.*

In addition to the above, this submission also makes some suggested policy amendments and inclusions relating to road and sustainable transport infrastructure including:

- *We request that the scope of Item No. 17 as included within Table 5.4 'Priority Road and Bridge Projects' of the Draft Kildare County Development Plan 2023-2029, which indicates that it is the intent of the Planning Authority to 'examine options for a link road from the R407 to the R403 including a new Liffey Crossing east of Clane', be broadened to also include for the associated provision of pedestrian and cycle infrastructure along this link and crossing.*
- *We request that Kildare County Council designate Action **TM A18** as listed within the Draft Plan, which relates to a feasibility study in respect of a 'new pedestrian bridge crossing the River Liffey in the vicinity of Alexandra Bridge in Clane', be designated as a development plan objective as opposed to an action to expedite this assessment in the shorter term.*
- *We request the inclusion of a new objective as part of the Draft Plan which provides for the undertaking of a feasibility study regarding the provision of a cycle-way from Clane to Sallins*

along the R407 road, in line with the recently published Draft Greater Dublin Area Cycle Network strategy, to facilitate additional sustainable travel options between Clane and Sallins.

A detailed rationale for the afore referenced requests will be set out in detail in the following sections of this report. However, from the outset, the following points are considered to be of particular note and form the basis of this submission.

Notwithstanding Clane's designation within the Draft Plan as a *Self-Sustaining Town*, the allocated population and housing growth does not accord with this ranking, for instance Variation No. 1 of the Kildare County Development Plan 2017-2023, indicates that the allocated growth for Clane from **2020-2023** is **2.4%**, with a projected population growth to **945 no. persons** in **2026** and a housing growth of **337 no. units** to **2026**, **note that this Variation was prepared prior to the status upgrade for Clane from a Town to a Self-Sustaining Town. In contrast, the recently published Draft Plan indicates that the estimated population growth for Clane to 2021 is 7,702 no. persons, with an additional Population Target over the plan period from 2023-2029 of 604 no. persons, and a Housing Target of 219 no. additional dwellings over the same period.**

Interestingly, as part of the Draft Plan the housing and population growth allocation for Clane remains at 2.4% of the overall growth for the County, which simply does not accord with its designation as a Self-Sustaining Town. It is not considered that this level of growth is appropriate to the towns ranking and should be revised and increased accordingly. This will be discussed in further detail in Section 4.0 and 5.0 of this report. In order to realise the ambitious growth targets set forth within the NPF of delivering at least **40%** of all new homes nationally, **within the built-up footprint of existing settlements**, it is contended that a greater proportion of growth needs to be allocated to Clane over the plan period.

Referring to the table 2.8 of the Draft Plan, Clane has an anticipated 2021 population of **7,720 people**. **We highlight that this figure is just 35 no. persons short of the projected population growth to 2023 as outlined in variation no. 1 to the current plan of 7,685 no. persons.** The table further provides that the Housing and Population Target for Clane accounts for just 2.4% of the overall growth of the County. Despite the town being upgraded to a Self-Sustaining Town as part of the Draft Plan it is suggested that the percentage of allocated growth target remains the same as the previous plan (2.4%), whereby Clane was categorised as a *Small Town*. On this basis we strongly contend that the growth allocation needs to be reconsidered in light of this new designation.

We also refer to the *Housing Need and Demand Assessment & Housing Strategy* as included within Appendix 1 of the Plan. In considering the methodology used to calculate the housing targets for the County, as indicated by the HNDA, it is noted that the draft plan utilises a 'worked example' as outlined in the Draft document '*Development Plans: Guidelines for Planning Authorities*', published in August 2021. This worked example uses 2016 census figures as its basis, however the Guidelines suggest that this is a worked example only and that latest data should be availed of. This latest data should take account of the current housing need, including those on housing lists and people in need of social housing support, homelessness figures, unmet housing demand from the previous plan period, housing for elderly, housing catered for those with disabilities and housing for refugees. This final aspect is now more pertinent given the anticipation that over 40,000 Ukrainian Nationals will require housing in Ireland in the months to come.

In respect of the overall housing targets for the County, Table 2.8 of the Draft Plan, provides that the population of Kildare is expected to grow by approximately 38,029 no. persons from **222,504** (CSO, 2016) to **260,533** (CSO, 2016). The plan provides for an estimated population growth to 2021 of **235,387** (based on % growth from 2011-2016 of approximately 5.8%). **Taking this estimated 2021 population figure and dividing it by the average national household size of 2.75% (CSO, 2016) equates to a housing requirement of 9,144 no. dwellings, as per the contents of Table 2.8. Whilst it would appear that this is a sufficient level of housing growth to accommodate the anticipated population growth for Kildare over the plan period, it must be emphasised that the anticipated population growth to 2021 is relatively conservative.**

As evident from the above, the 2021 Population estimate as provided within the Settlement Hierarchy (Table 2.8, Draft Plan) has been used as the baseline for the population targets from 2023-2028. However it must be acknowledged that this is an estimate based on the percentage of growth

experienced for the town over the last census period i.e. from 2011-2016. This is not considered to be the optimal means of calculating estimated population figures given that the percentage population growth percentage has wavered significantly for Kildare over the previous census periods. Furthermore, the population growth between the period from 2011-2016 is also skewed by the recession from 2008-2015 and as such it may be reasonably considered that much of the growth over this Census period occurred in the 2-year period between 2016 and 2016 when the country was entering recovery. As such, it is considered that the population projections should be revised on the basis of the preliminary census data which is due to be published by The CSO on June 24th 2022. Availing of this data would provide a much more accurate depiction of the required housing allocation and projected population over the plan period.

On the above point we note that the CSO results demonstrate that Kildare in fact recoded the lowest percentage of population growth between 2011-2016 at 5.8% in comparison to previous census periods. This growth percentage was significantly higher between the years of 2002-2006 recording a growth of 13.6% and similarly between 1996-2002 a population growth of 21.24%. As such it is reasonable to consider that the census population results for 2021 will in fact be greater than that which is indicated in the Draft Plan, necessitating the requirement for an increased output of homes. This is acknowledged by the Planning Authority as part of Policy Objective CSO 1.18 (Draft Kildare County Development Plan 2023-2029) which states that the council will '*consider aligning the Kildare County Development Plan 2023-2029, with the up-to-date population from the forthcoming Census...*' As above indicated, the preliminary 2022 Census Data will be available in June 2022, and as such it is considered more accurate to avail of this much more up-to-date data in determining the 2021 population for Clane. Moreover, in considering the targets set out within the *Housing For All* document which requires the provision of 33,000 new homes per year and the policy shift towards compacted and consolidated growth in urban areas, it is our view that a greater proportion of housing growth should be delivered over the plan period from 2023-2029, to ensure consistency with these key national goals.

We respectfully request that the recommendations outlined above and detailed in the following sections of this submission be given full consideration in the preparation of the forthcoming Kildare County Development Plan 2023-2029.

2.0 Self-Sustaining Towns

2.1 Clane

As detailed from the outset, this submission is primarily focused on the existing town of Clane and requests that its sustainable and compact growth be further considered as part of the forthcoming Kildare County Development Plan 2023-2029. Clane is a medium sized town located in north County Kildare between the larger towns of Naas and Maynooth.



Figure 2.0 Aerial photograph illustrating Clane (red star) and the wider contextual area

The town is approximately the 8th largest in Kildare and is situated approximately 35km south-west of Dublin City. According to the 2016 census population data Clane recorded a population of **7,280** persons an increase of c. 8.62% from 2011 (6,702 persons, Census, 2011). In addition to this, it must be highlighted that Clane has grown exponentially over the past years, upon review of the historical census information from 2006, it is evident that the population of the town grew by approximately **47%** over the 10 year period from 2006 (**4,968 persons**) to 2016 (**7,280 persons**), inevitably indicating that there is a high demand for housing within the town and it is of critical importance that its delivery is facilitated through local planning policy in order to accommodate the increasing incoming population. When considered comparatively, the County of Kildare as a whole grew by approximately **19%** over the same period from 2006 (**186,335**) to 2016 (**222,504**), clearly indicating that Clane is growing at a rate in excess of the average growth of the County, and this must be recognised in growth allocation for the county. In this context, the Regional Spatial and Economic Strategy for the Eastern and Midland Regions (RSES) identifies Clane as one of the towns recording the highest growth rates in the county over the past ten years and further categorises Clane as a *Self-Sustaining Town* due to its population but also its other features. In this context, the RSES stipulates that Self-Sustaining Towns act as:

'regionally important local drivers providing a range of functions for their resident population and their surrounding catchment including housing, local employment, services, retail and leisure opportunities.'



Figure 3.0 Aerial image indicating the more immediate context of Clane. The orange dashed line indicates the approximate area of the Clane Local Area Plan boundary

On account of the above, it is very much welcomed that Kildare County Council, as part of the recently published Draft Development Plan have upgraded the Status of Clane from a 'Small Town' to a 'Self-Sustaining Town', within the Settlement Hierarchy for the County. Notwithstanding this the Population and Housing Growth Targets have not been reviewed nor increased sufficiently in accordance with its upgraded designation. As a 'Self-Sustaining Town' the RSES directs that a greater allocation of growth be given to towns with a higher ranking, more specifically Section 4.3 of the RSES states that '**Local authorities, in the preparation of their core strategies should have due regard to the settlement typology of towns in the Region and carefully consider the phasing of development lands to ensure that towns grow at a sustainable level appropriate to their position in the hierarchy.**' Clane is deserving of a greater allocation of growth in line with its status. In this regard the RSES outlines that development must be planned in line with the delivery of infrastructure, we specifically refer to RPO 4.2 which states the following:

RPO 4.2 *Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.*

In support of the sustainable growth of Clane, we note that the Upper Liffey Valley Sewerage Scheme is very near completion bringing significant wastewater capacity to Clane and Sallins. In addition it is noted that there is no water supply issues in Clane, no broadband issues and the town is well serviced by public transport.

With regards to retail, the RSES recognises Clane as a Level 3 (Key Service Centre) in the Retail Hierarchy for the Region alongside other Kildare towns including Celbridge, Kilcock and Kildare.

Level 3	Town And/Or District Centres & Sub-County Town Centres (Key Service Centres)
	Dublin City: Finglas, Northside Shopping Centre, Ballyfermot, Rathmines, Crumlin Shopping Centre, Donaghmede Shopping Centre, Omni, Ballymun, Point Village and Poolbeg, Clongriffin / Belmayne, Phibsborough, Naas Road
	Fingal: Malahide, Balbriggan, Skerries, Charlestown
	South Dublin: Adamstown, Crumlin (Ashleaf), Clonburris, Clondalkin, Citywest, Kilnamanagh, Lucan, Rathfarnham
	Dún Laoghaire–Rathdown: Stillorgan, Blackrock, Cornelscourt, Nutgrove, Cherrywood
	Wicklow: Greystones, Arklow, Blessington (Baltinglass, Rathdrum, Newtownmountkennedy)
	Meath: Ashbourne, Dunshaughlin, Kells, Trim (Laytown/Bettystown)
	Kildare: Celbridge, Kilcock, Kilcullen, Athy, Kildare, Monasterevin, Clane, Leixlip

Figure 4.0 Excerpt from RSES showing Table 6.1 Retail Hierarchy for the Region which classifies Clane and Kilcock as Level 3 (Key Service Centres)

At present, Clane supports a number of local businesses and employment centres including inter alia UMPC Kildare Private Hospital, The National Mobility Centre, Clane Industrial Park, and Hazel Hall Nursing Home, together with a range of retail services, engineering services and hospitality jobs, which is fitting for a *'Self Sustaining Town*. We also note a number of additional businesses and services located on Main Street Clane, including shops, pharmacies, restaurants and beauty and health services.

Other establishments include the Abbeylands Centre, First IVF Fertility Clinic, Clane Industrial Park, Clane Primary Care Centre, HSE Disabled Network Team Accommodation, the Westgrove Hotel, Supervalu, Aldi, Lidl, Choice, Circle K and Maxol among others. The town is also served by 3 no. primary level schools including Scoil Phádraig Claonadh, Scoil Bhríde and Hewetson National School, and 1 no. post-primary school Scoil Mhuire Community School. There are 7 no. childcare facilities, 5 no. GP surgeries, 4 no. pharmacies, 3 no. Dental practices, HSE Primary Care Centre, and numerous Physio practices. In terms of financial institutions, there is an AIB branch on main street as well as a Credit Union on the college road. Several Solicitors and Accountancy practices also operate within the town.

Clane also has an established and wide range of amenities including its various sport clubs, the local drama society, choir and scout groups, a local library, Clane men's shed, the evergreens and numerous other groups and associations which support the residential catchment of Clane and its surrounds. There are 6 no. grocery/retail located within Clane, which serve the town and its wider environs. Various other stores and services in and around the main street and also at the Abbeylands Centre offer a wide range of services to the town.

In terms of public transport, the town is well served by public transport with daily bus connections to Dublin City Centre and University College Dublin, as well as bus connections to nearby local towns including Naas and Maynooth. We also note a number supermarket facilities including a Tesco Metro and Lidl on Regional Road R403. The 120 bus route operates 35 services daily to Dublin and 34 services returning from Dublin to Clane with a condensed service of 24 buses operating on a Saturday and 13 on Sunday in either direction.

TFI bus route no. 120 service operates 7 no. days a week from 5:53am to 22:23pm Monday to Friday from 07:23am to 22:23pm on Saturdays and from 08:23am to 21:53pm on Sunday's and Public

Holiday's, running, on average, 1 no. bus per half hour Monday to Saturday and 1 no. bus per hour on Sundays. Route 846 which is operated by JJ Kavanagh & Sons provides regular access to Connolly and Heuston Stations, University College Dublin, Dublin City Centre, Liffey Valley, Naas, Celbridge and more. This route also offers an hourly service and takes less than 15 minutes to the Sallins/Naas train station The 139 bus route also operates along Main Street Clane and will provide direct access to the forthcoming Maynooth DART line which will run 9 daily return trips and onwards towards Blanchardstown. TFI route 139 is a daily service, which runs one bus an hour between 7:20am to 23:30pm. The bus services outlined above provide regular access to Connolly and Heuston Stations, University College Dublin, Dublin City Centre, Liffey Valley, Naas, Celbridge and more.

The above infrastructure, while in need of continued investment and local policy support, is evolved and has the capacity to support additional population growth.

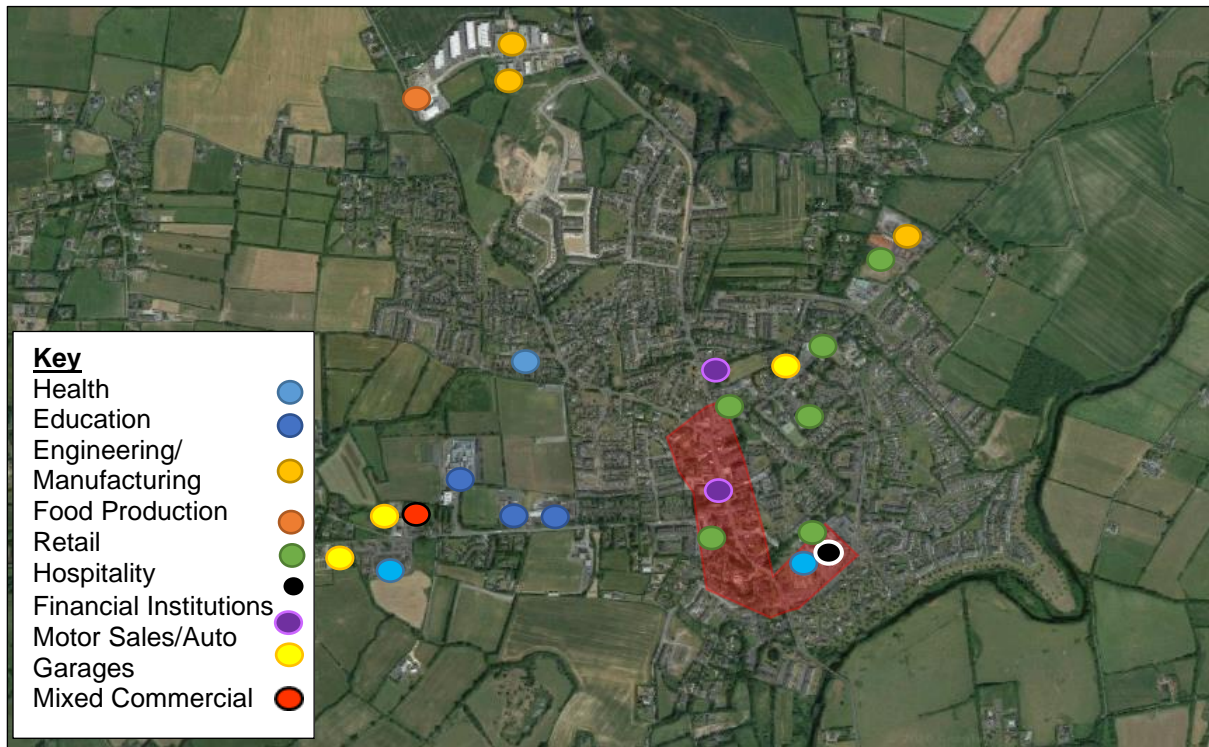


Figure 5.0 Aerial image showing major employers in Clane in addition to retails and services located in the town centre (red area)

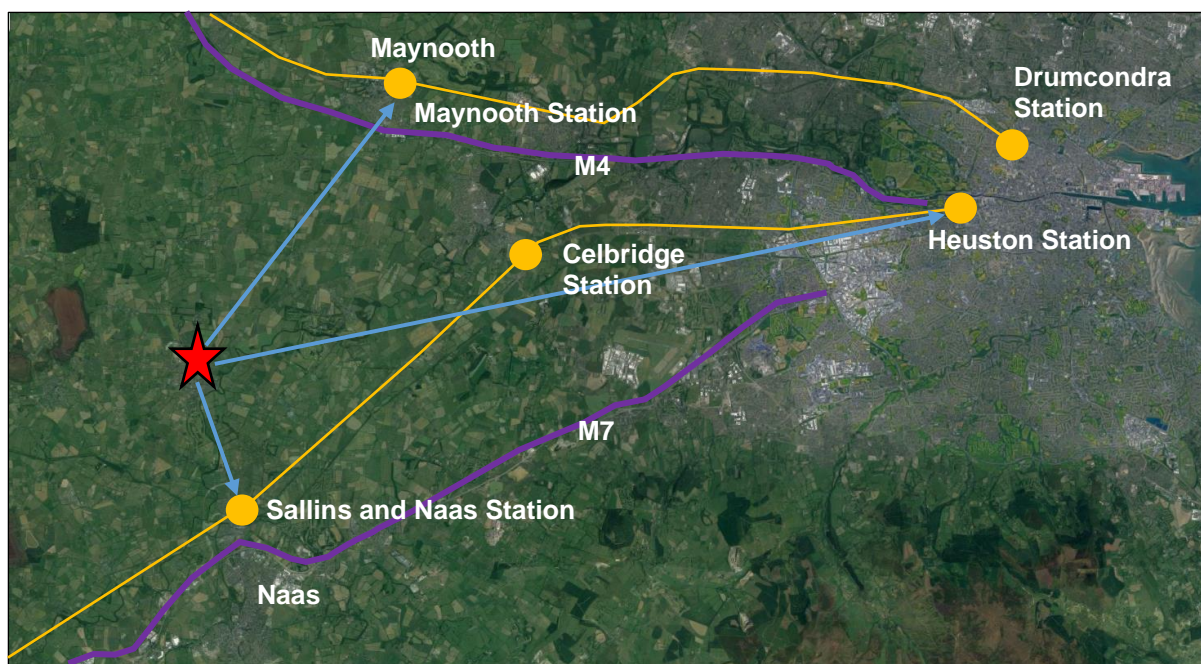


Figure 6.0 Aerial image showing proximity of Clane (red star) to rail and motorway connections to Dublin as well as bus routes (blue arrows) connecting Clane to other towns and cities

As a growing town, Clane has established many of the necessary facilities, community services, employment base, public transport links etc. to support continued employment and balanced population growth. To recognise its position and reinforce/support growth which has taken place over the past decade, Clane should be afforded the appropriate quantum of population and housing growth that is required for a *Self-Sustaining Town*.

2.2 Sallins

As referenced in the preceding section, this submission also has regard to the town of Sallins and the second aspect of our request encourages the Planning Authority to review the settlement hierarchy for the County as a whole, in accordance with the policy content as included within the Regional Spatial and Economic Strategy (RSES). In this regard it is noted that the RSES discusses Sallins under the category of *Self-Sustaining Town*, including Sallins as one of the towns which have recorded the highest growth rates in the country over the past 10 years. Referring to the available Census population data, it is evident that the population of Sallins has grown by approximately **54%** between the years 2006 (3,806) and 2016 (5,849), a substantial increase over this 10 year period.

In considering current and growing population of Sallins, its proximity to the national and regional road network together with its serviceability via public transport, particularly via the Sallins and Naas Train Station which services the following routes, Dublin Heuston – Cork, Dublin Heuston – Galway, Dublin Heuston – Limerick and Ennis, Dublin Heuston – Waterford, Galway – Limerick, and Grand Canal Dock and Dublin Heuston – Portlaoise, it is contended that Sallins should be afforded the designation of a *Self-Sustaining Town*. This designation will allow for direct Local Authority policy to provide the required balancing effect, seeking consolidation and inclusion of policies in relation to improvements in services and employment provision – as set out in the RSES. The proposed upgrade of Sallins would also further justify the earmarked future investment in the delivery of DART services to Sallins which is both an objective of Kildare County Council and the National Transport Authority.

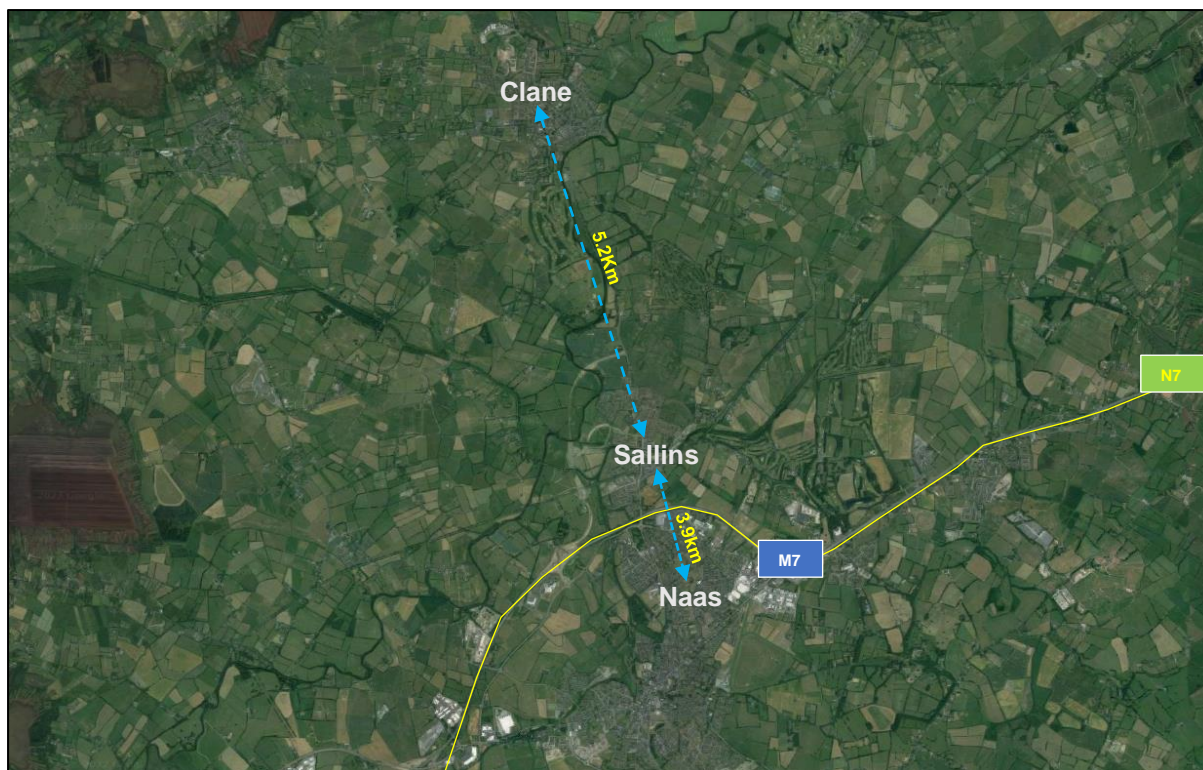


Figure 7.0 Aerial image showing the location of Sallins in respect of the neighbouring towns of Clane and Naas

3.0 Relevant National and Regional Policy Context

This section of the submission will examine the regional and national planning frameworks that inform the recently published Draft Kildare County Development Plan. The Core Strategy of the Draft Plan and the associated housing strategy should demonstrate consistency with the contents of the National Planning Framework, the Regional Spatial and Economic Strategy and the Specific Policy Requirements (SPPRs) specified in the Section 28 Guidelines.

Documents of note to this submission include the Regional and Economic Spatial Strategy for the Eastern and Midland Regions 2019-2031, the National Planning Framework (NPF) and the more recently published Housing for All – A New Housing Plan for Ireland. Each of the afore referenced documents will be discussed in turn in the following sections of this report.

3.1 Project Ireland 2040 – National Planning Framework

Published in 2018, Project Ireland 2040 – The National Planning Framework is the Irish government's overarching policy initiative which sets a vision and a credible development strategy to shape the country's national, regional and local spatial development in economic, environmental and social terms to 2040. The plan sets out ten National Strategic Outcomes (NSO's) which underpin the overarching vision for the country and serve as shared goals, as depicted in the below extract.



Figure 8.0 National Planning Framework and its National Strategic Outcomes of the National Development Plan.

The National Planning Framework is focused on the compact development of existing urban areas to promote sustainable growth and allow for the increased viability of central services, shops and public transport in conjunction with the regeneration of existing built-up areas as opposed to the continual expansion and sprawl of cities and towns into the countryside at the expense of smaller villages. The NPF seeks to manage growth within the three regions of Ireland, which include the Northern and Western, Southern, and Eastern and Midland Regional Assembly areas, to allow for balanced growth and guided development. The following target is outlined in relation to national growth:

‘We have five cities in Ireland today in terms of population size (>50,000 people): Dublin, Cork, Limerick, Galway and Waterford. In our plan we are targeting these five cities for 50% of overall national growth between them, with Ireland’s large and smaller towns, villages and rural areas accommodating the other 50% of growth.’

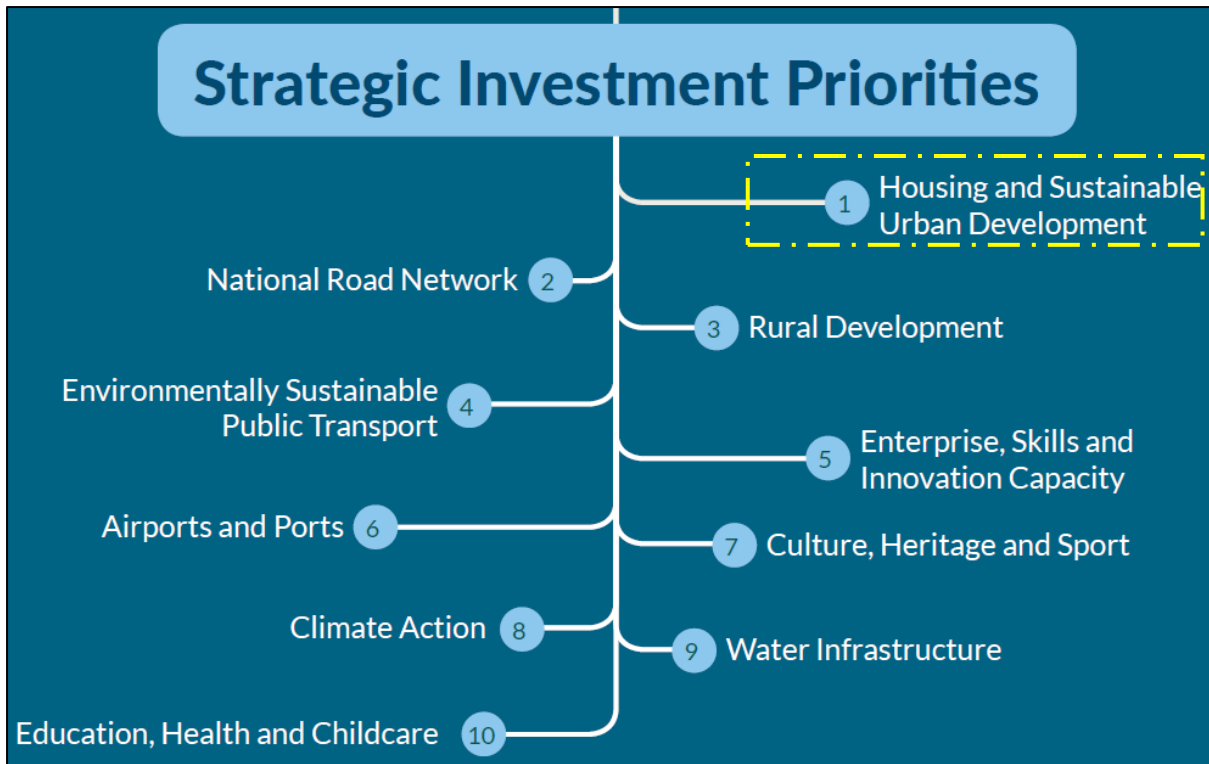


Figure 9.0 National Planning Framework and its National Strategic Investment Priorities of the National Development Plan. Culture, Heritage and Sport is included therein

National Policy Objective	Eastern and Midland	Southern	Northern and Western
1. Growing Our Regions	+ 490,000 - 540,000 people (2.85m total) +320,000 in employment (1.34m total)	+ 340,000 - 380,000 people (2m total) +225,000 in employment (880,000 total)	+160,000 - 180,000 people (1m total) +115,000 in employment (450,000 total)
2. Building Stronger Regions: Accessible Centres of Scale ²⁰	Dublin City and Suburbs: +235,000 - 290,000 people (at least 1.41 million total) Regional Spatial and Economic Strategy to set out a strategic development framework for the Region, leading with the key role of Athlone in the Midlands and the Drogheda-Dundalk-Newry cross-border network	Cork City and Suburbs: +105,000 - 125,000 people (at least 315,000 total) Limerick City and Suburbs: +50,000 - 55,000 people (at least 145,000 total) Waterford City and Suburbs: +30,000 - 35,000 people (at least 85,000 total) Regional Spatial and Economic Strategy to set out a strategic development framework for the Region	Galway City and Suburbs: +40,000 - 45,000 people (at least 120,000 total) RSES to set out a strategic development framework for the Region, leading with the key role of Sligo in the North-West, Athlone in the Midlands and the Letterkenny-Derry cross-border network
3. Compact, Smart, Sustainable Growth	50% of new city housing within existing Dublin City and suburbs footprint 30% all new housing elsewhere, within existing urban footprints	50% new city housing on within existing Cork, Limerick and Waterford Cities and Suburbs footprints 30% all new housing elsewhere, within existing urban footprints	50% of new city housing within existing Galway City and suburbs footprint 30% all new housing elsewhere, within existing urban footprints

Figure 10.0 National Planning Framework Targeted Pattern of Growth, 2040.

The above table provides a summary of the key national targets for structuring the overall national growth anticipated, promoting regional parity, creating accessible centres of scale and securing compact and sustainable growth. The clear policy direction at a national scale is to grow our regions and accommodate new housing within or adjacent to existing built-up areas. It must be acknowledged that in order to accommodate the population growth envisaged by the National Planning Framework, that there is a requirement for an increased output of a mix of residential units over the coming years, up to 2040 to meet a growing demand.

With regards to managing growth, Section 1.2 of the National Planning Framework sets out that more balanced growth also means more concentrated growth and that the key five cities of **Dublin**, Cork, Limerick, Galway and Waterford are targeted for **50% of overall national growth** between them, with **Ireland's large and smaller towns, villages and rural areas accommodating the other 50% of growth**. In addition, National Strategic Outcome No. 1 '*Compact Growth*', provides that the NPF is focused on the careful management of the sustainable growth of compact cities, **towns** and villages in order to add value and create more attractive places in which people can live and work. To achieve this outcome, there must be an increase in the proportion of more compact forms of growth in the development of settlements of all sizes, from the largest city to the smallest village.

More specifically, strategies included in Chapter 2.2 of the Planning Framework seeks to target a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas. This target is to be achieved by making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport. A key element of national growth is the more efficient use of underutilized sites within existing built-up areas, such as Clane as per the following commentary from Project Ireland 2040 document:

'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.'

A number of objectives outlined in Appendix 1 of the National Planning Framework have been identified to ensure proper planning and sustainable development. We consider that the following national policy objectives to be of relevance. These objectives reflect the type of growth that is sought in line with the goals of the NPF:

- National Policy Objective 3a** *Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.*
- National Policy Objective 4** *Ensure the creation of attractive, liveable, well designed, high-quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.*
- National Policy Objective 5** *Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.*
- National Policy Objective 6** *Regenerate and rejuvenate cities, towns and villages of all types and scales as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.*
- National Policy Objective 11** *In meeting urban development requirements there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing*

cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

National Policy Objective 33 *Prioritise the provision of new homes at locations **that can support sustainable development and at an appropriate scale** of provision relative to location*

National Policy Objective 35 *Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.*

Clane is medium sized and compact town which provides a range of services and amenities within walking distance of most residential areas within the town. The town is also situated close to job centres in Dublin as well as local towns including Naas and Maynooth with daily bus connections providing easy access to these places. Furthermore, the town is within 6 km of Sallins and Naas Train Station, 13km from Maynooth Train Station, 14 km from Hazelhatch and Celbridge Train Station and 13.8km from Kilcock Train Station, all providing rail connections to Dublin and the south-west of the country.

Notwithstanding the towns designation within the Draft Plan as a *Self-Sustaining Town*, the allocated population and housing growth does not accord with this ranking, for instance Variation No. 1 of the Kildare County Development Plan 2017-2023, indicates that the allocated growth for Clane from **2020-2023** is **2.4%**, with a projected population growth to **945 no. persons** in **2026** and a housing growth of **337 no. units** to **2026**, **note that this Variation was prepared prior to the status upgrade for Clane from a Town to a Self-Sustaining Town. In contrast, the recently published Draft Plan indicates that the estimated population growth for Clane to 2021 is 7,702 no. persons, with an additional Population Target over the plan period from 2023-2029 of 604 no. persons, and a Housing Target of 219 no. additional dwellings over the same period. Interestingly, as part of the Draft Plan the housing and population growth allocation for Clane remains at 2.4% of the overall growth for the County, which simply does not accord with its ranking as a Self-Sustaining Town.** This will be discussed in further detail in Sections 5.0 and 6.0 of this report. In order to realise the ambitious growth targets set forth within the NPF of delivering at least **40%** of all new homes nationally, **within the built-up footprint of existing settlements**, it is contended that a greater proportion of growth needs to be allocated to Clane over the plan period.

3.2 National Development Plan

The National Development Plan 2018—2027 sets out the investment priorities that will underpin the successful implementation of the National Planning Framework, including the development of the necessary housing stock set out therein. The plan was subsequently updated for the 2021-2030 period. The National Development Plan demonstrates the Government's commitment to meeting Ireland's infrastructure and investment needs over the next ten years, through a total investment estimated at €116 billion over the period, in high quality integrated public and sustainable transport systems. This includes investment in high quality integrated public and sustainable transport systems as well as health and education.

Identified in section 1.6 '*Housing Challenge*' the National Development Plan outlines that need for housing developments to ensure adequate housing stock for the country's predicted population growth which is expected to be nearly 6 million by 2040 requiring an additional 550,000 homes.

'The need to provide in excess of half-a-million more homes over the period to 2040 corresponds to a long-term trend of 25,000 new homes every year.'

One investment priority of the plan is to extend DART services to Maynooth, Sallins/Naas and Hazelhatch and Celbridge train stations, all of which are located within a 15 minute drive of Clane. Population growth in Clane can be serviced by the availability of further sustainable transport options in the area.

3.3 Housing for All – A New Housing Plan for Ireland

The 'Housing for All - A new Housing Plan for Ireland' was published in September 2021 as part of the Irish Government's 'Our Shared Future' programme which, in turn, sets out the Government's mission to tackle the housing crisis. The objective of the plan is to ensure that everybody has 'access to sustainable, good quality housing to purchase or rent at an affordable price, built to a high standard, and located close to essential services, offering high quality of life.' The plan seeks to increase new housing supply to an average of at least **33,000 new units per year** with specific pathways outlined to achieve the four overarching objectives of the plan which are:

- *Supporting Homeownership and Increasing Affordability;*
- *Eradicating Homelessness, **Increasing Social Housing Delivery** and Supporting Social Inclusion;*
- *Increasing New Housing Supply; and*
- *Addressing Vacancy and Efficient Use of Existing Stock.*

Each of the pathways comprises a comprehensive suite of actions to achieve the above referenced Housing Policy Objectives. These pathways are illustrated in the following extract.



Figure 11.0 Figure indicating the four pathways to Housing for All.

Pathway No. 3 'Increasing New Housing Supply' stipulates a number of key aspects to providing for new homes, each of which are depicted in the extract overleaf. It is also noted within that by 2040, an additional one million people will be residing in Ireland. The state is acting decisively to activate supply across both public and private lands, which is critical to ensuring that new homes to be built over the

next decade are located where housing demand is greatest and where there is good accessibility to employment, education, public transport, and other services and amenities. In this context Section 3.1 of the Plan ‘Increase Land Availability for Residential Development’ states that ‘a steady supply of suitable and serviced zoned land is needed’ further providing that ‘Local Authorities and elected members play a key role in zoning enough land to meet residential housing requirements, while also respecting the requirements for balanced regional development and the need to prevent urban sprawl.’

It is noteworthy, that the plan also goes on to note that ‘It may be necessary for a Local Authority to zone more serviced land in a development plan than would equate to meeting precisely the projected housing demand for that settlement, to provide choice in sites locally and to avoid restricting the supply of new housing development through inactivity on a particular landholding.’ In this context, it is considered that both population and housing growth should be directed to our towns and villages in order to meet the residential output requirements as set out within the new *Housing for All* plan.



Figure 12.0 Pathway to Increasing New Housing Supply, as contained within the Housing for All plan.

At this juncture, it is worth noting that the Settlement Hierarchy of the Draft Plan, specifically table 2.8, indicates that the population of Kildare is expected to grow by approximately 38,029 no. persons from **222,504** (CSO, 2016) to **260,533** (CSO, 2016). The plan provides for an estimated population growth to 2021 of **235,387** (based on % growth from 2011-2016 of approximately 5.8%). Taking this estimated 2021 population figure and dividing it by the average national household size of 2.75% (CSO, 2016) equates to a housing requirement of 9,144 no. dwellings, as per the contents of Table 2.8. Whilst it would appear that this is a sufficient level of housing growth to accommodate

the anticipated population growth for Kildare, it must be emphasised that the anticipated population growth to 2021 is relatively conservative. On this point we note that the CSO results demonstrate that Kildare in fact recorded the lowest percentage of population growth between 2011-2016 at 5.8%. This growth percentage was significantly higher between the years of 2002-2006 recording a growth of 13.6% and similarly between 1996-2002 a population growth of 21.24%. As such it is reasonably considered that the census population results for 2021 will in fact be greater than that which is indicated in the Draft Plan, necessitating the requirement for an increased output of homes. Moreover, in considering the targets set out within the *Housing For All* document which requires the provision of 33,000 new homes per year and the policy shift towards compacted and consolidated growth in urban areas, it is our view that a greater proportion of housing growth should be delivered over the plan period from 2023-2029, to ensure consistency with these key national goals.

The provision of residential units in Clane also supports homeownership and affordability, will result in increased social housing provision and will provide for the efficient use of well-located lands, which have capacity to comfortably absorb additional development. The allocation of an increased proportion of growth for the town responds to a recognised need, at national level, for residential accommodation and for the growth of our smaller towns and villages in a compact and sustainable manner. The proposal is consistent with policy in this regard.

3.4 Regional Spatial and Economic Strategy (2019-2031)

The Regional Spatial and Economic Strategy for the Eastern and Midland Region (RSES) was published in 2019. A Regional Spatial & Economic Strategy (RSES) is a strategic plan which identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. At this strategic level it provides a framework for investment to better manage spatial planning and economic development throughout the Region. The principal statutory purpose of the RSES is to support the implementation of Project Ireland 2040 and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the Regions.

At the core of the RSES is the consideration of a settlement hierarchy for the Region, which outlines the key locations for population and employment growth, coupled with investment in infrastructure and services to meet those growth needs. The RSES build on the foundations of Government policy in Project Ireland 2040 and replaces the current Regional Planning Guidelines (RPGs).

As indicated in the map extract overleaf, both Clane and Sallins are located within the 'Core Region' which includes the peri-urban hinterlands in the commuter catchment around Dublin, which covers the Mid-East counties of Louth, Meath, Kildare and Wicklow. The Core Region enjoys access to a high-quality environment, rich heritage and key tourism assets and attractions such as the coastline, the Royal and Grand Canals, the Boyne and Barrow Blueways, Tayto Park, UNESCO site and Bru na Bonnie and Wicklow Mountains National Park.



Figure 13.0 Map extract from the RSES indicating the location of Clane (Yellow dot) and Sallins (purple dot) within the Core Region.

It is highlighted within the RSES that in excess of **550,000** people resided in the Core Region in 2016, it is expected that this figure has subsequently increased. It is also indicated that the Core Region contains some of the youngest and fastest growing towns in the state.

The key growth enablers for the Core Region as per the RSES, include the following:

- *To promote continued growth at more sustainable rates, while providing for increased employment and improved local economies, services and functions to allow towns become more self-sustaining and to create the quality of life to attract investment.*
- *Commensurate population and employment growth in Key towns, coupled with investment in enabling transport, infrastructure and services to facilitate the achievement of compact growth targets of at least 30% of all new homes to be within the existing built up area of settlements.*

In addition to the above, the following Regional Policy Objectives (RPO's) are considered to be of relevance:

RPO 3.2 *Local authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built up area of Dublin city and suburbs **and a target of at least 30% for other urban areas***

RPO 4.83 *Support the consolidation of the town and village network to ensure that development proceeds sustainably and at an appropriate scale, level and pace in line with the core strategies of the county development plans.*

Upon review of the above it is clear that the policy direction at a regional level is to target at least 30% of all new homes within existing urban areas. On this basis and having regard to the quantum of zoned lands within the Clane area, it is considered that a greater proportion of growth needs to be allocated to the area over the plan period. It is also noted that facilitating housing is critical to ensuring the sustainability, vitality and viability of our towns and villages. Over the past years, the wider area of Clane has been subject to the sprawl of one-off housing within and outside of core areas and more recently introduced policy restricts the supply of one-off dwellings, as such support for additional housing and compact growth within this settlement will aid in acting as a viable alternative to urban generated one-off housing, contributing to the principle of compact growth.

The RSES provides a settlement hierarchy for the purpose of achieving regional strategic outcomes for the region. We note that Self-sustaining Towns are described as towns which have *'high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted 'catch up' investment to become more self-sustaining'*. The RSES recognises Clane and Sallins as examples of a Self-sustaining Towns and notes that towns such as Clane are important employment and service centres. It further notes that Self-Sustaining Towns *'have the potential to strengthen their employment base and develop as important centres of employment due to their strategic location, connectivity with surrounding settlements, and the availability of a skilled workforce'*.

The following commentary from section 4.7 'Self-Sustaining Growth Towns and Self-Sustaining Towns' of the RSES is noted with regards to Clane Town:

*'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**. Nevertheless, it should also be noted that such towns are important employment and service centres. In addition some of these settlements, such as Ashbourne and Ratoath have the potential to strengthen their employment base and develop as important centres of employment due to their strategic location, connectivity with surrounding settlements, and the availability of a skilled workforce.'*

The above commentary regarding Clane is provided under the subsection entitled Self-Sustaining Towns, with the RSES providing the following definition for these urban areas:

'Self-Sustaining Towns are towns that require contained growth, focusing on driving investment in services, employment growth and infrastructure whilst balancing housing delivery.'

The plan further acknowledges the variation of function that exists at the Self-Sustaining Town level, with some towns operating as commuter towns whilst others operate more sustainably. Table 4.3 of the RSES provides a description of the Transport Profile of Self-Sustaining Growth Towns and Self-Sustaining Towns stating that *'Self-sufficient and commuter settlements, with good public transport and regional transport links, some of which may be highly car dependent.'*

In terms of defining a settlement typology, Section 4.3 of the RSES notes that *'local authorities shall apply a similar evidence driven asset-based approach to the consideration of all settlements, some of which may have the potential and ambition to become drivers for growth in the county or play a key role in providing services and employment to their local catchments.'* It is strongly considered that Clane, has the potential and capacity to become a key driver of growth in the Kildare region and the allocation of growth within the Draft Development Plan must be cognisant of this and the designation of Clane as a Self-Sustaining Town as per the provisions of the RSES.

The RSES goes on to provide guidance to Local Authorities regarding the preparation of their core strategies and stipulates that:

'Local authorities, in the preparation of their core strategies should have due regard to the settlement typology of towns in the Region and carefully consider the phasing of development lands to ensure that towns grow at a sustainable level appropriate to their position in the hierarchy.'

In the context of the above, the Draft Kildare County Development Plan retains the same housing growth target for Clane of 2.4% as per the provisions of the current 2017-2023 plan, despite its upgrade to a *Self-Sustaining Town* as part of the Draft Plan. It is not considered that this level of growth is appropriate to the towns ranking and should be revised and increased accordingly.

4.0 Relevant Local Policy Content

This section of the submission will examine the local, regional and national planning frameworks that which guides the future growth and development of Kildare and Clane. Documents of note include the Kildare County Development Plan 2017-2023, the recently published Draft Kildare County Development Plan 2023-2029 and the Clane Local Area Plan 2017. Each of which will be discussed in turn below.

4.1 Kildare County Development Plan 2017-2023

The Kildare County Development Plan 2017-2023 is the relevant statutory development plan for the county. The Development Plan is a guidance document created by the Council to help inform their Planners as well as the public, as to the types of development they would like to see in each area, as well as outlining quantitative standards all developments have to meet.

Chapter 3 of the current Kildare County Development 2017-2023 details the Settlement Strategy for the County and places both Clane and Sallins in the '*Small Towns and Villages*' category noting that they will seek to supply new local employment opportunities. Section 3.4.3 of the Chapter provides that '*Small Towns within the Hinterland area generally comprise populations of between 1,500 – 5,000. Their role is to develop as key local centres for services with levels of growth to cater for local need at an appropriate scale and to support local enterprise to cater for local demand.*'

As identified in the below extract from the Settlement Hierarchy (Table 3.3), it is clear that the 2016 census population results demonstrate that both Clane and Sallins had a population of in excess of 5,000 and as such it is considered that their designation as '*Small Towns*' is no longer fitting.

Settlement Type	Towns/Villages	2011 Pop Census	2016 Pop Est.	2011 Dwellings	2016 Dwellings Est.	Allocated Growth (%) 2016-2023	New Dwellings Target (units) 2016-2023	2023 Dwellings Forecast	2023 Pop Forecast
Small Towns (8)	Clane	6,702	7,077	2,637	2,703	2.4%	780	3,483	7,668
	Prosperous	2,248	2,374	759	778	1%	325	1,103	2,432
	Rathangan	2,374	2,507	928	951	0.9%	292	1,244	2,739
	Sallins	5,283	5,579	1,978	2,027	1.9%	617	2,645	5,824
	Athgarvan	1,016	1,073	337	345	0.7%	227	573	1,267
	Castledermot	1,398	1,476	636	652	0.5%	162	814	1,792

Figure 14.0 Extract of Table 3.3 of the Kildare County Development Plan 2017-2023 outlining the Settlement Hierarchy and associated requirements.

It is also evident from the above table that just **2.4%** of the overall growth for the county over the plan period was designated to Clane, whilst a lower percentage of 1.9% was allocated to Sallins. It is also projected that Clane is set to have a population of **7,668 no. persons** to 2023 with an associated additional housing allocation of **780 no. dwellings**. It must be highlighted that Table 2.8 of the Draft Plan 2023-2029, indicates that an estimated 2021 population for Clane of 7,702, the above table would therefore suggest that the town is only anticipated to grow **by an additional 34 no. persons from 2021-2023**, which is extremely conservative.

In respect of the above it is also prudent to reference the contents of Variation No. 1 of the Kildare County Council which has been effective as of 9th June 2020. This Variation was partly prepared to ensure consistency with the relevant national and regional policies as included within the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy for the Eastern and Midland Regions (RSES). In particular, we reference Table 3.3 of the Variation which details the Population and Housing Unit Allocation 2022-2023, an extract from which is provided overleaf:

Settlement Type	Towns / Villages	2016 Census Pop	2016 Dwellings	Allocated Growth (%) 2020-2023	NPF 2026 Pop Growth in persons	NPF 2026 Pop Growth in housing units	Population Growth 2020 to 2023 (annualised from 2026 NPF Figures) ⁶	Dwellings Target 2020 to 2023
Town	Sallins	5,849	2,071	1.9%	748	267	321	114
	Kilcullen	3,710	1,401	2.5%	984	352	422	151
	Kill	3,348	1,227	1.3%	512	183	219	78
	Clane	7,280	2,741	2.4%	945	337	405	145
	Prosperous	2,333	813	1.0%	394	141	169	60
	Rathangan	2,611	1,009	0.9%	354	127	152	54
	Athgarvan	1,176	373	0.7%	276	98	118	42
	Castledermot	1,475	622	0.5%	197	70	84	30
	Derrinturn	1,602	558	0.6%	214	76	92	33

Figure 15.0 Extract of Table 3.3 of Variation No. 1 to the Kildare County Development Plan 2017-2023 outlining the Settlement Hierarchy and associated requirements.

It is of note that the figures for Clane presented in the table above suggests a population growth of **405 no.** persons between the period of 2020 to 2023, with an associated housing growth of **145 no.** dwellings over the same period, a reduction of over 80% on the 780 no. units in the County Development Plan and Local Area Plan. There is a clear disparity here between the proportion of housing growth allocated to Clane as part of Variation No. 1 and the capacity of residentially zoned lands within the Clane Area, rather than precluding development due to an exceedance of the core strategy figures, there is a pressing need to facilitate the compact development of this town and increase the allocation of growth proposed. This will be discussed in further detail in Section 5.0 and 6.0 of this report.

The Core Strategy for the overall county is set out under Chapter 2 of the development plan. The following is the aim of the Core Strategy as per the Kildare County Development Plan 2017-2023:

‘To respond in a coherent sustainable, spatial fashion to the challenges facing the county, while building on its strengths and providing a more focused approach to planning for future growth. The Core Strategy facilitates a more consolidated compact urban form, maintenance and improvement of a sustainable economic base, and the creation of sustainable and integrated communities, together with the balancing of our natural and built environment with sustainable and appropriate development.’

The Development Plan seeks to encourage the focus of new development on various factors including:

- **Consolidation within the existing urban footprint with particular focus on the Metropolitan and Hinterland towns;**
- **Supporting the achievement of more sustainable towns and villages through residential and employment opportunities together with supporting social and community facilities;**
- **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**

4.2 Clane Local Area Plan 2017-2023

The Clane Local Area Plan 2017-2023 was adopted by Members of the Maynooth Municipal District on 10th May 2017. It has effect from 6th June 2017 and will remain in force for a period of 6 years.

4.2.1 Strategic Vision

The ‘*Vision for Clane*’ included in the Clane Local Area Plan 2017-2023, states that the future development of Clane is based on its role as a ‘*Small Town*’ in the context of the Kildare Settlement Hierarchy. The Vision Statement for Clane is as follows:

‘To promote the sustainable growth of Clane, building on its established character and supporting its role as a small town and a local services centre. In this context, the plan

will provide for growth to cater for local need; will support economic development and job creation based on local strengths; will promote sustainable movement and identify opportunities to enhance connectivity within the built environment; will identify opportunities for the delivery of supporting infrastructure, facilities and amenities to support the growing community and will seek to protect and enhance built and natural heritage and the environment.'

Whilst it is appreciated that the Clane Local Area Plan was prepared 5 years ago, it is considered the definition of Clane as a 'Small Town' is now redundant given the more recent direction provided by the RSES which categorises Clane as a *Self-Sustaining Town*. It is therefore considered that the upgraded designation for Clane as a *Self-Sustaining Town* must be carried forward as part of the next Local Area Plan.

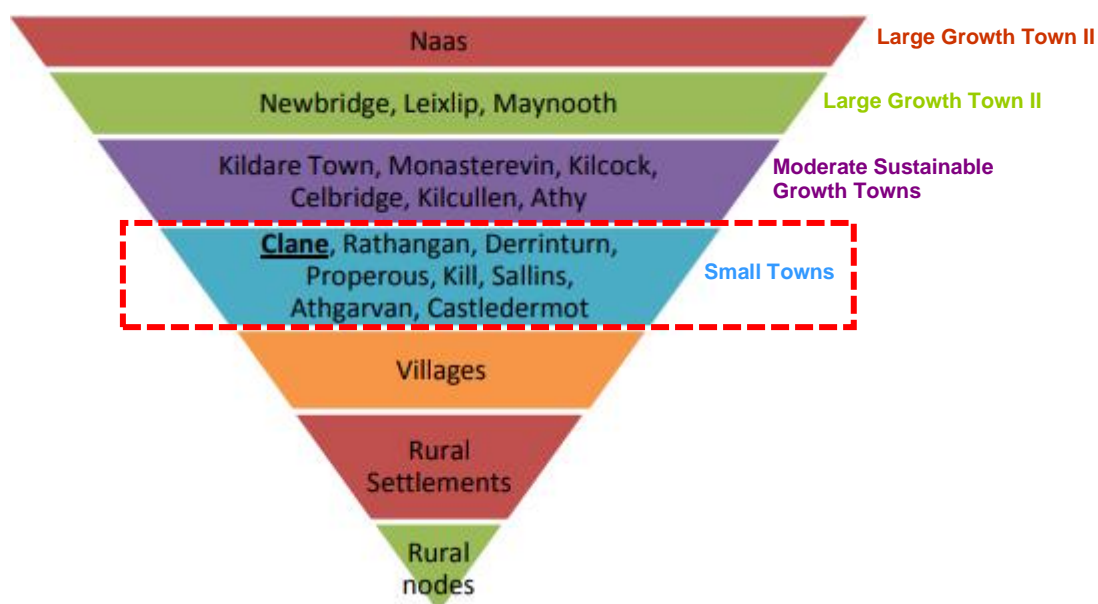


Figure 16.0 Position of Clane in the Kildare Settlement Hierarchy.

The Kildare County Development Plan 2017-2023 acknowledges that the role of a 'Small Town' is 'to develop as a key local centre for services, with levels of growth to cater for local need at an appropriate scale, and to support local enterprise to cater for local demand'. It is noted that the County Development Plan classes small towns as having a population of between 1,500-5,000 residents **whilst Clane, in contrast, has a current population of 7,280 as per the 2016 census. On this basis alone, it is considered imperative that the Draft Kildare County Development Plan retains the newly introduced status for Clane as a *Self-Sustaining Town*, and accordingly, revises the percentage growth allocation for the town as appropriate for a town of this rank.**

4.2.2 Core Strategy

The guided growth of Clane is recognised in the context of the following Policy CS1 'Core Strategy' Objectives which look to support the sustainable long-term growth of Clane:

- CSO1.1** *To support and facilitate sustainable intensification and consolidation in the town centre and in established residential and industrial areas.*
- CSO1.2** *To focus new residential development into the Key Development Areas identified in the Core Strategy map and new enterprise development into areas identified for light industry and warehousing and business and technology development.*
- CSO1.3** *To support and facilitate development on zoned lands based on the policies and objectives of the Kildare County Development Plan 2017-2023 and the Clane Local Area Plan 2017-2023*

The objective of the 'Core Strategy' is to ensure the medium-long term sustainable development of Clane **through focusing residential development within compact urban forms** that allow for the greater use of existing services and increased usage and viability of public transport.

4.2.3 Zoning

As illustrated in Figure 17.0 below, the area falling within the Clane Local Area Plan 2017-2023 boundary, features a mix of zoning objectives which will facilitate continued development, both residential and commercial, within the town. The 'Objective Q – Business & Technology', 'Objective A – Town Centre' and 'Objective H – Light Industry & Warehousing' land use zonings provide employment opportunities for residents within the Town. It is submitted that Clane contains appropriately zoned lands to facilitate growth and development and create a more self-sustaining settlement.

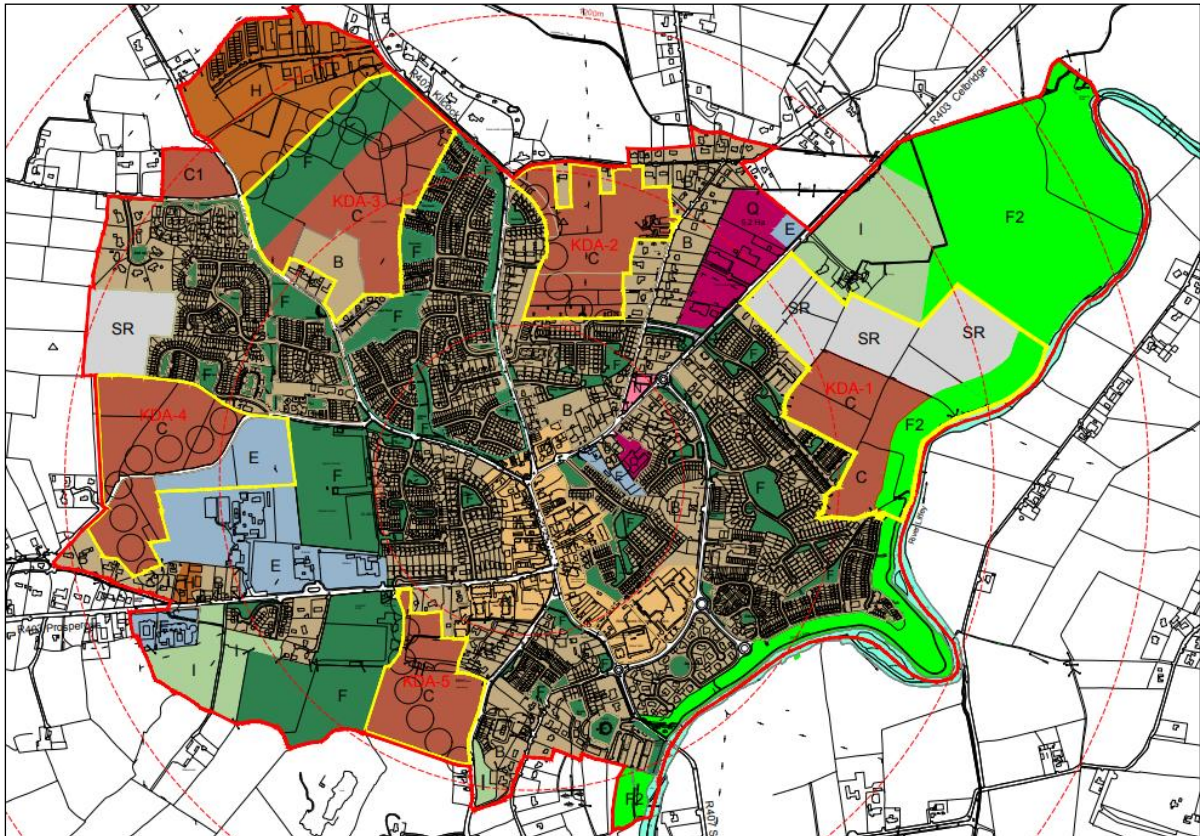


Figure 17.0 Extract from Land Use Zoning Objectives Map of the Clane Local Area Plan 2017-2023 illustrating the array of zoning objectives and Key Development Areas featuring in Clane.

The 'C- New Residential/Infill' zoned lands included as part of the zoning map above, are identified within the plan as 'Key Development Areas'. There are 5 no. KDA's outlined within the LAP, the purpose of which is to promote development within these areas.

5.2.4 Key Development Areas

Further to the identified zoning objectives and as outlined above, the above extract from the Land Use Zoning Objectives Map of the Clane Local Area Plan 2017–2023 illustrates sites designated as a Key Development Areas (KDA). The objective for KDAs is as follows:

'to ensure that best practice urban design principles are applied to all new development, based on the principle that well planned and integrated development enhances the sustainability, attractiveness and quality of an area'.

The location of the 5 no. Key Development Areas (KDA's) are indicated in the map extract below for ease of reference:

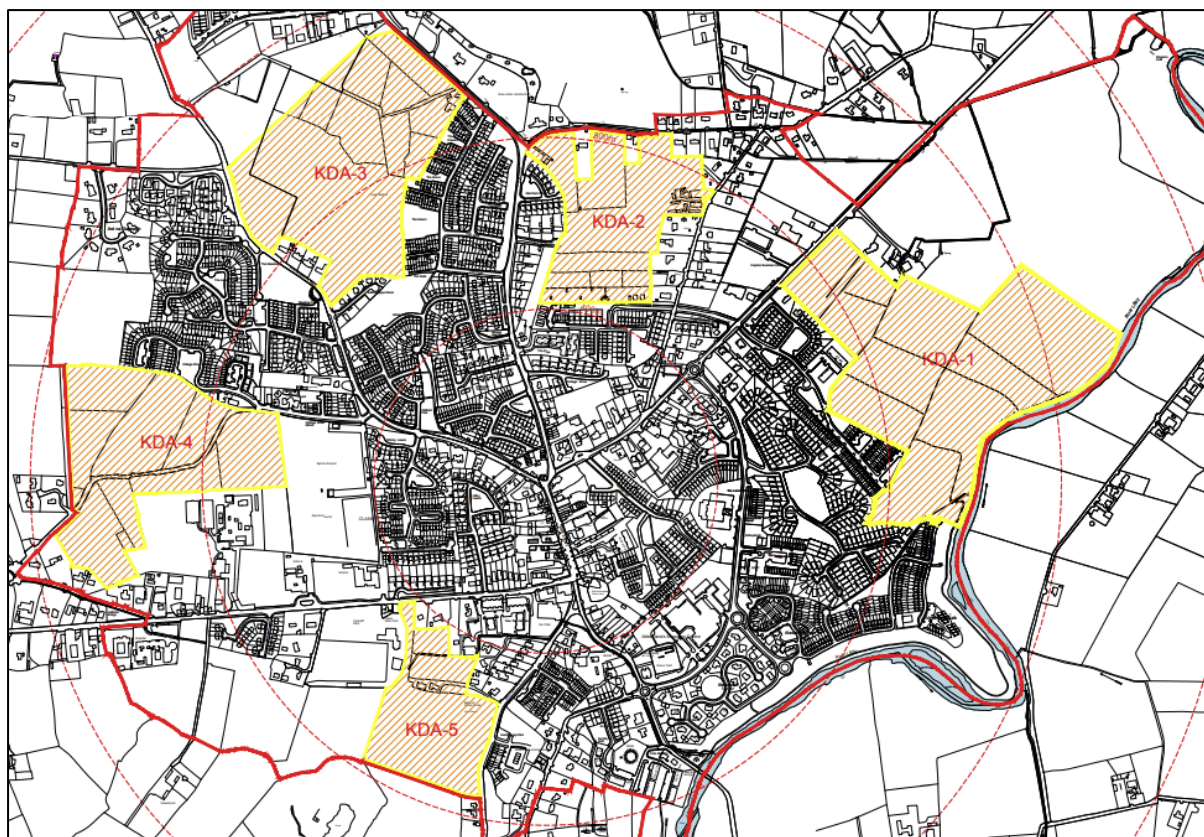


Figure 18.0 Key Development Areas (KDA')hatched in orange (Clane Local Area Plan 2017-2023)

Location of Development	Quantum of Land for Housing (Gross Ha)	Quantum of Land for Housing (Net Ha)*	Estimated Residential Capacity **	Estimated Density / Ha
KDA 1 Dublin Road	7.7	6.2	161	26
KDA 2 Capdoo	10.9	8.7	227	26
KDA 3 Kilcock Road	9.6	7.7	201	26
KDA 4 Nancy's Lane	11.2	9.0	233	26
KDA 5 Millicent	6.6	5.3	158	30
Other Sites	3.1	3.1	46	16
TOTAL	49.1	40	1026	

Table 4.1: Estimated Residential Capacity* The net developable area in Key Development Areas is estimated to be 80% of the total area to take account of strategic infrastructure requirements.

** Figures stated represent an estimate only. The density of development and number of units permissible will be determined at detailed design stage based on a full assessment of site characteristics and local sensitivities.

Figure 19.0 Table indicating the estimated residential capacity of the key development areas as per the provisions of the Clane Local Area Plan 2017-2023

In the first instance we highlight that the above sites are all zoned for new residential development as part of the Clane Local Area Plan 2017-2023, however a grant of planning permission and delivery for any of the referenced KDA's would exceed the associated housing growth of **145 no. dwellings** as indicated in the Settlement Hierarchy Table as part of Variation No. 1 of the Kildare County Development Plan 2023-2029. It is entirely reasonable to expect that residential development would be welcomed on residentially zoned lands over the lifetime of the LAP. However the delivery of development on these lands is in fact militated by the contents of the Settlement Hierarchy of the which allows for a proportion of **145 no. dwellings from the period of 2020-2023**. If taken cumulatively from the figures presented in Figure 19.0 above, the overall capacity of zoned lands within the Clane Area is **c. 1,026 no. dwellings**, based upon density applications of between 16 and 30 dwellings per hectare, significantly exceeding the allocated settlement hierarchy targets. This is a clear indication that the overall population and housing growth allocation for Clane must be increased.

4.3 Draft Kildare County Development Plan 2023-2029

As noted in the preceding sections of this report, the new Draft Kildare County Development Plan 2023-2029 was published by Kildare County Council on 14th March 2022. This Draft plan sets out the overall strategy for the proper planning and sustainable development of the functional area of Kildare over a 6-year period between 2023 and 2029.

As demonstrated in the Core Strategy Map extract below, the status of Clane as part of the Settlement Hierarchy has been upgraded from a 'Small Town' to a 'Self-Sustaining Town' this recognition is wholly welcomed by our clients and we respectfully request that this designation be maintained in the final iteration of the Kildare County Development Plan 2023-2029.

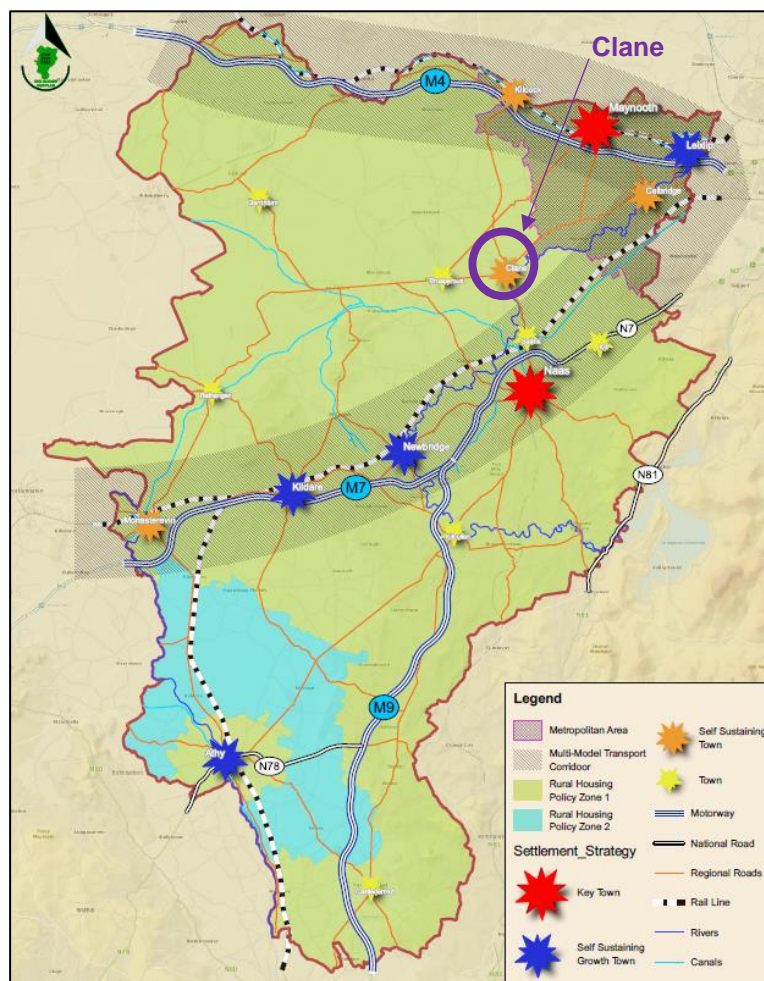


Figure 20.0 Extract from the Core Strategy Map as comprised within the Draft County Development Plan 2023-2029

Table 2.8 of the Draft Plan sets out the Settlement Hierarchy for the County, whilst it is not exclusively indicated, we assume that this table reflects the Core Strategy for Kildare over the Plan Period. As per the Settlement Hierarchy of the Plan, Clane is designated as a 'Self-Sustaining Town', the description of which is those towns 'which have a high level of population growth and a weak employment base and have the potential to improve their employment offering through biotechnology, knowledge based digital enterprises, logistics, tourism and food and beverage products in order to strengthen their overall economic offering.'

From the outset, we note that the 2021 Population estimate as provided within the table below has been used as the baseline for the population targets from 2023-2028. However it must be acknowledged that this is an estimate based on the percentage of growth experienced for the County over the last census period i.e. from 2011-2016. This is not considered to be the most effective means of calculating estimated figures given that the percentage population growth percentage has widely fluctuated for Kildare over the previous census periods. For instance, we note that the CSO results demonstrate that Kildare in fact recoded one of the lowest percentage of population growth between 2011-2016 at **5.8%**. This growth percentage was significantly higher between the years of 2002-2006 recording a growth of **13.6%** and similarly between 1996-2002 a population growth of **21.24%**. As such, it is considered that the population projections should be revised on the basis of the preliminary census data which is due to be published by The CSO on June 24th 2022. Availing of this data would provide a much more accurate depiction of the required housing allocation and projected population over the plan period.

Referring to the table below, Clane has an anticipated 2021 population of **7,720 people**. **We highlight that this figure is just 35 no. persons short of the projected population growth to 2023 as outlined in variation no. 1 to the current plan of 7,685 no. persons.** The table further indicates a targeted population over the plan period from 2023-2028 of an additional **604 no. people**, resulting in a proposed residential requirement of **219 no. dwellings** and a requirement of 7 no. hectares of zoned lands. The table further provides that the Housing and Population Target for Clane accounts for just 2.4% of the overall growth of the County. Despite the town being upgraded to a Self-Sustaining Town as part of the Draft Plan it is suggested that the percentage of allocated growth target remains the same as the previous plan (2.4%), whereby Clane was categorised as a *Small Town*. On this basis we strongly contend that the growth allocation needs to be reconsidered in light of this new designation.

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
Self-Sustaining Towns	Athy	9,677	4.30%	10237	4.80%	1207	439	15	35-40
	Celbridge	20,288	9.10%	21463	10.00%	2515	914	30	35-40
	Kilcock	6,093	2.70%	6446	4.00%	1006	366	12	35-40
	Monasterevin	4,246	1.90%	4492	2.60%	654	238	8	35-40
	Clane	7,280	3.27%	7702	2.40%	604	219	7	35-40
Towns	Sallins	5,849	2.62%	6188	1.90%	478	174	6	35-40
	Kilcullen	3,710	1.70%	3925	2.50%	629	229	8	35-40
	Kill	3,348	1.50%	3542	1.30%	327	119	4	35-40
	Prosperous	2,333	1.04%	2468	1.00%	251	91	3	30-35
	Rathangan	2,611	1.20%	2762	0.90%	226	82	3	30-35
	Castledermot	1,475	0.70%	1560	0.50%	126	46	2	30-35
	Derrinturn	1,602	0.70%	1695	0.60%	151	55	2	30-35

Figure 21.0 Extract of Settlement Hierarchy contained within the Draft Kildare County Development Plan 2023-2029, with Clane outlined in red.

Notwithstanding the above it is not fully clear how the Planning Authority have considered the quantum of existing zoned land currently available in determining the overall housing target for the County and the quantum of zoned land required over the plan period. In this regard we note that the Clane LAP identifies a land capacity of 40 hectares net for housing development, having a potential residential

yield of 1,026 no. dwellings. Using the average national household size as per the 2016 Census, this yield results in a population equivalent of c. 2,821.5 no. persons, a significant uplift on the population growth allocation for Clane over the plan period of 604 no. persons.

Referring to the Settlement Strategy, the following policies are noted and are considered to be of relevance:

- 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’***
- CSO 1.5** ***Promote compact growth** and the renewal of towns and villages through the development of underutilised town centres and brownfield sites, **maintaining a ‘live’ baseline dataset and to monitor the delivery of population growth on existing zoned and serviced lands to achieve the sustainable compact growth targets of 30% of all new housing within the existing urban footprint of settlements.***
- CSO 1.7** *Promote and facilitate the development of sustainable and socially integrated communities through land use planning, by providing for land uses capable of accommodating employment, community, leisure, recreational and cultural facilities having regard to the quality of the environment, landscape character and the archaeological and architectural heritage*
- CSO 1.18** ***To consider aligning 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).***

Notwithstanding the inclusion of the objective CSO 1.18, it is considered that as part of their review of the Draft Development Plan and the potential Material Amendments to come, that the Planning Authority should give due consideration to the preliminary census results which are due to be published in June 2022, in turn allowing for more accurate housing and population projections.

In addition to the above Table 5.4 of the Draft Plan sets out the *Priority Road and Bridge Projects* for Kildare over the Plan period with Item No. 17 noting the intent of the Planning Authority to *Examine options for a link road from the R407 to the R403 including a new Liffey Crossing east of Clane.*

The above is a welcomed inclusion given that Clane is located on the primary route from the M7 (Naas) to the M4 (Maynooth/Kilcock) and will have the effect of increasing connectivity and accessibility between these regional towns. However, it is our client's view that the focus should not solely be on the provision of a vehicular link but rather should be broadened to include pedestrian and cycle infrastructure. This is in keeping with the policy shift towards sustainable mobility and should be encouraged by the Council.

The plan also sets out a series of policies, objectives and actions as part of the Draft Plan. The following are considered to be of relevance:

- TM A18** *Investigate the feasibility for a new pedestrian bridge crossing the River Liffey in the vicinity of Alexandra Bridge in Clane.*

The above action as included within the Draft Plan is acknowledged and welcomed and we consider should form a key objective as part of the upcoming Clane Local Area Plan, however we consider that this should be included as part of the Plan **as an objective as opposed to an action**, ensuring its delivery in the shorter term.

TM 027 Investigate the feasibility of developing a cycle-way at the following locations; - from Milltown to Newbridge along the R416. - from Ballitore to Crookstown. - from Castledermot to the south west, along the R448 to the county boundary. - from Athy along the N78 to the east as far as the M9 Motorway. - from Caragh Village to Naas along the R409 and R445.

Whilst the inclusion of the above objective is noted, we consider that the above should be amended to include the bridge crossing over river Liffey as follows:

TM 027 Investigate the feasibility of developing a cycle-way at the following locations; **crossing the River Liffey in the vicinity of Alexandra Bridge Clane.** - from Milltown to Newbridge along the R416. - from Ballitore to Crookstown. - from Castledermot to the south west, along the R448 to the county boundary. - from Athy along the N78 to the east as far as the M9 Motorway. - from Caragh Village to Naas along the R409 and R445. – **from Clane Village to Sallins along the R407.**

Given the nature and function of the neighbouring towns of Clane and Sallins, both of which have experienced significant growth over the past 10 years and in considering their close proximity of c. 5.2km, we strongly believe that a significant opportunity exists to enhance connectivity and accessibility between these towns through the provision of a cycleway connecting both towns. It is noted that such a cycle route is included as part of the recently published Draft Greater Dublin Area Cycle Network (2022) by the National Transport Authority. It is thus considered justified that this cycleway be included as a key objective of the forthcoming Kildare County Development Plan 2023-2029.

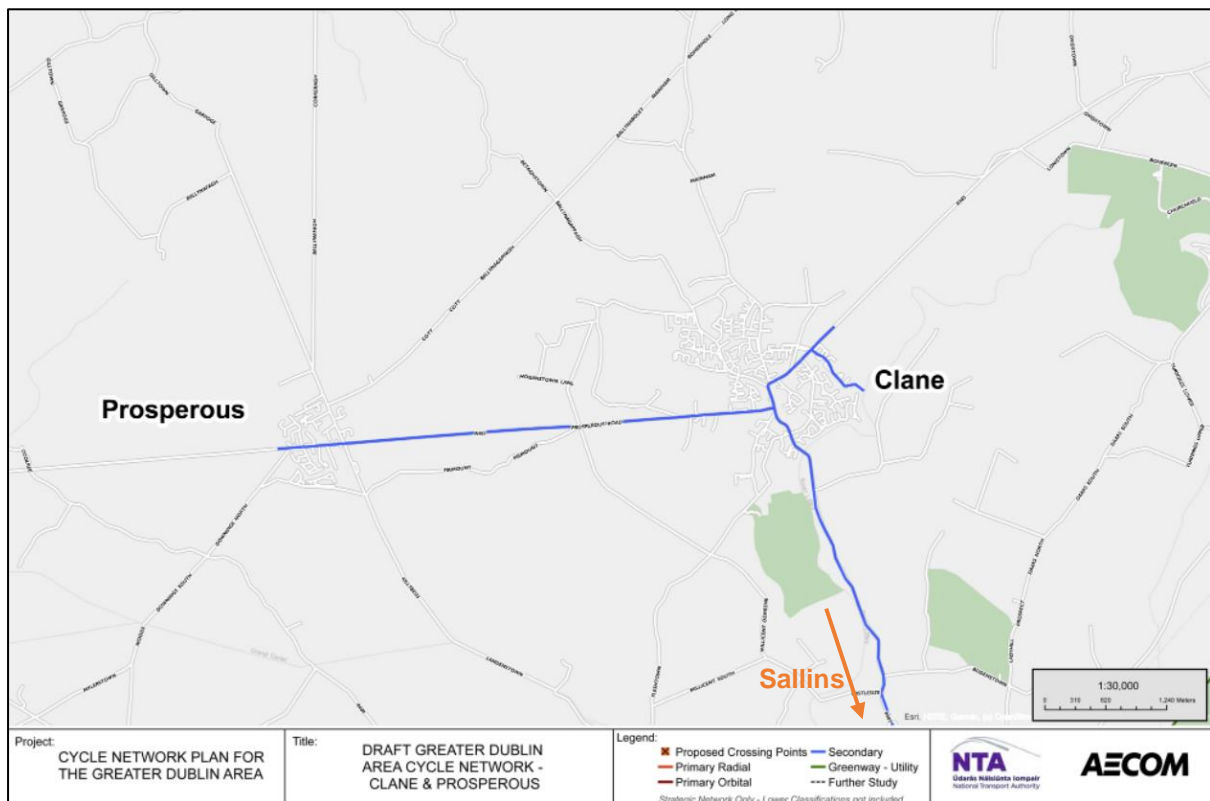


Figure 22.0 Extract from the Draft Greater Dublin Area Cycle Network (2022) showing the proposed secondary cycle route from Clane to Sallins

With regards to the foregoing, we also note the inclusion of objective **TMO 43** of the Draft Plan which seeks the extension of the DART + southwest to Naas/Sallins and Newbridge, stating that it is an objective of the Planning Authority to:

TM 043 Facilitate and support the extension of the DART + line to Kilcock, the extension of the DART + Southwest line to Naas/Sallins and Newbridge and the extension of the LUAS

network, in co-operation with Irish Rail, the Department of Transport and the National Transport Authority.

Whilst our clients are supportive of the above objective, it is considered that the connection of Clane to Sallins through the provision of additional cycle lanes would facilitate further sustainable use of public transport and would provide improved access for the population of Clane to the existing Train Station at Sallins, thus ensuring the critical mass in place to sustain such additional services. This inclusion would also in turn have the effect of reducing car-dependency in Clane in line with the key goals and ambitions of the NPF and RSES. Moreover it must be emphasised that the more recent extension of infrastructure from Sallins to the new roundabout at the M9/Sallins bypass means that the extent of the new path/cycle track would be reduced to less than 2.5km. The overall cycle time from Clane to Sallins Train Station would be c. 15minute. In addition, the roadway from Clane to Sallins (R407) comprises a 60km/hr speed zone, making it already suited to safe cycle and pedestrian infrastructure, and comparable with infrastructure already in place on nearby 60km/hr sections of the R407, e.g. the Naas Sallins Road and image of which is included below:



Figure 23.0 Street view image showing the existing cycle track on the Nass Sallins Road

5.0 Submission Request

The Draft Kildare County Development Plan 2023-2029 seeks to support the proper planning and sustainable development of the county through the provision of adequate housing in strategic locations, within or contiguous to built-up areas, to consolidate the existing urban footprint and to promote compact growth. In light of these objectives, the following request is made to Kildare County Council in respect of the towns of Clane and Sallins:

- *We request that Kildare County Council review the Housing and Population Targets for Clane included as part of the Draft Kildare County Development Plan 2023-2029 and provide for an increased allocation of population and housing for the town over plan period, in accordance with its designation as a Self-Sustaining Town.*
- *We request that Kildare County Council upgrade the status of Sallins from a 'Town' to a 'Self-Sustaining Town' as part of the final iteration of the Kildare County Development Plan 2023-2029, in accordance with its identification within the Regional Spatial and Economic Strategy*

for the Eastern and Midland Regions (RSES). In line with this request, it is considered necessary to designate and increased Housing and Population Targets for the town over the plan period.

In addition to the above, this submission also makes some suggested policy amendments and inclusions relating to road and sustainable transport infrastructure including:

- We request that the scope of Item No. 17 as included within Table 5.4 'Priority Road and Bridge Projects' of the Draft Kildare County Development Plan 2023-2029, which indicates that it is the intent of the Planning Authority to 'examine options for a link road from the R407 to the R403 including a new Liffey Crossing east of Clane', be broadened to also include for the associated provision of pedestrian and cycle infrastructure along this link and crossing.
- We request that Kildare County Council designate Action **TM A18** as listed within the Draft Plan, which relates to a feasibility study in respect of a 'new pedestrian bridge crossing the River Liffey in the vicinity of Alexandra Bridge in Clane', be designated as a development plan objective as opposed to an action to expedite this assessment in the shorter term.
- We request the inclusion of a new objective as part of the Draft Plan which provides for the undertaking of a feasibility study regarding the provision of a cycle-way from Clane to Sallins along the R407 road, in line with the recently published Draft Greater Dublin Area Cycle Network strategy, and in order to facilitate access from Clane to the Sallins/Naas Train Station by way of sustainable modes of travel.

The rationale and justification for the above requests will be further detailed in Section 5.1 of this submission.

5.1 Justification and Grounds for Submission

As stated from the outset, this submission the primary focus of this submission is on the Self-Sustaining Town of Clane and the future sustainable and sequential growth and development of same. Whilst the towns designation as a Self-Sustaining Town as part of the Draft Plan is wholly welcomed, from an evaluation of Table 2.8 'Settlement Hierarchy – Population and Housing Unit Targets Q1 2023 to 2028' of the Draft Plan it is evident that the distribution of population and housing growth for Clane does not provide a strategy that sufficiently reflects the policies and objectives of the NPF and RSES in respect of compact Growth and the role of *Self-Sustaining Towns*. Our clients also have some concerns with regards to the assessment methodology used in deciphering the housing target for Kildare and Clane over the plan period. In this regard we note some disparity between the total quantum of housing requirement outlined in the *Housing Need and Demand Assessment & Housing Strategy as included within Appendix 1 of the Draft Plan* and the total housing target for the County over the plan period as stipulated within the Settlement Hierarchy Table.

In addition, despite Clane's upgrade as part of the Draft Plan from a 'Small Town' to a 'Self Sustaining Town' it is clear that the allocation of population and housing growth has not increased from the 2.4% allocation indicated as part of the current plan. This is considered insufficient given the upgraded status of the town and the quantum of zoned lands within or contiguous to the built-up area of the town.

The second aspect of this submission requests that the status of Sallins is similarly upgraded from a Town as indicated in the Draft Plan to a *Self-Sustaining Town*, in accordance with its current designation as part of the RSES. Further to this, the current plan clearly states that Hinterland towns are generally categorised as towns with a population of between 1,500 – 5,000. The population of Sallins as per the 2016 census results is **5,849**, which exceeds this threshold. Furthermore, the designation of Sallins as a town does not reconcile with its strategic attributes, including the Sallins/Naas Train Station located in the town centre, the recently completed Sallins Bypass and its strong links to the M7 and employment centres at Naas, together with its rapid population growth from 2006-2016 of approximately 54%. It is considered that the designation of Sallins as a *Self-Sustaining Town* would promote catch up investment in local employment services and sustainable transport options and enable Sallins to become more self-sustaining.

On behalf of our clients, we have also made a number of recommendations in respect of providing for enhanced road, pedestrian and cycle infrastructure within Clane as well as enhanced connectivity and accessibility between Sallins and Clane, which contend will further unlock the growth potential of both towns whilst also promoting increased accessibility between key towns.

5.1.1 Housing Targets and Population Projections

We refer to the *Settlement Hierarchy* as included within Table 2.8 of the Draft Kildare County Development Plan as well as the *Housing Need and Demand Assessment & Housing Strategy* as included within Appendix 1 of the Plan. In considering the methodology used to calculate the housing targets for the County, as indicated by the HNDA that the draft plan utilises a 'worked example' as outlined in the Draft document '*Development Plans: Guidelines for Planning Authorities*', published in August 2021. This worked example uses 2016 census figures as its basis, however the Guidelines suggest that this is a worked example only and that latest data should be availed of. This latest data should take account of the current housing need, including those on housing lists and people in need of social housing support, homelessness figures, unmet housing demand from the previous plan period, housing for elderly, housing catered for those with disabilities and housing for refugees. This final aspect is now more prevalent given the anticipation that over 40,000 Ukrainian Nationals will require housing in Ireland in the months to come.

It is noted that the 2021 Population estimate as provided within the Settlement Hierarchy (Table 2.8, Draft Plan) has been used as the baseline for the population targets from 2023-2028. However it must be acknowledged that this is an estimate based on the percentage of growth experienced for the town over the last census period i.e. from 2011-2016. This is not considered to be the optimal means of calculating estimated population figures given that the percentage population growth percentage has wavered significantly for Kildare over the previous census periods. For example, we note that the CSO results demonstrate that Kildare in fact recoded one of the lowest percentage of population growth between 2011-2016 at **5.8%**. This growth percentage was significantly higher between the years of 2002-2006 recording a growth of **13.6%** and similarly between 1996-2002 a population growth of **21.24%**. Moreover, the population growth between the period from 2011-2016 is also skewed by the recession from 2008-2015 and as such it may be reasonably considered that much of the growth over this Census period occurred in the 2-year period between 2016 and 2016 when the country was entering recovery. As such, it is considered that the population projections should be revised on the basis of the preliminary census data which is due to be published by The CSO on June 24th 2022. Availing of this data would provide a much more accurate depiction of the required housing allocation and projected population over the plan period.

Upon review of the HNDA document, the '*Executive Summary*' indicates that the population of Kildare is expected to grow to **266,500** by 2031 with the number of new households expected to increase by 13,840 during the 9-year period between 2023 and 2031. The HNDA *Housing Need Estimate* Section 5.5, provides a breakdown of the forecasted housing need by tenure type to the year 2031. This include new private ownership homes, new private rental homes, new affordable homes and new social housing homes. There is no reference made to any such housing need for refugees, which we strongly consider needs to be accounted for. The results are outlined in the table below:

	2023	2024	2025	2026	2027	2028	2029	2030	2031	Total
New private ownership homes	519	492	469	464	475	491	477	466	471	4324
New private rental homes	439	420	420	420	430	429	417	393	396	3764
New affordable homes (Affordability Constraint)	93	119	146	177	196	249	258	281	299	1818
New Social Housing homes	530	499	458	448	442	424	397	374	362	3934
Total Housing Need	1581	1530	1493	1509	1543	1593	1549	1514	1528	13840

Figure 24.0 Extract from Table 68 '*Forecasted housing need by tenure type*' as included as part of Appendix 1 of the HNDA (Draft Kildare County Development Plan 2023-2029)

When considering the identified total housing need for the County over the plan period from 2023-2029 as highlighted above this results in a cumulative housing need over the plan period of **10,798 no. dwellings**. Contrastingly, the Settlement Hierarchy (Table 2.8) and Table 2.4 of the Draft Plan, the Housing Target to the end of the plan period is **9,144 no.** a shortfall of c. **1,654 units**.

The HNDA also has regard the required quantum of social housing, Table 53 of Appendix 1 indicates the 2040 no. social housing units are in the pipeline for County Kildare. However referring to the Government's recent publication 'Summary of Social Housing Assessments 2021' Table 1.1 Number of Households Qualified for Social Housing Support by Local Authority' stipulates that the total number of social housing units required for Kildare is 3,104 no. units as of November 2020, this is also recognised in Table 54 of the HNDA. Further to this point, Section 4.6.4 'Social Housing Need and Supply' provides that in order to 'fully address social housing demand (at current estimates) in Kildare by 2031, it would be necessary to provide 3,471 social housing units or 340 units a year over the period 2022-2031'. This document proceeds to state that this figure does not account for economic fluctuations, such as the impact of the pandemic on the economy affecting critical aspects such as housing supply, jobs, interests rates, average incomes, house prices etc. Therefore it is highly likely that this figure will increase. On the basis of the foregoing, it is strongly considered that the Social Housing projections indicated on table 94 of the HNDA need to be reviewed in advance of the adoption of the Kildare County Development Plan 2023-2029.

Referring back to the population and housing targets for Clane included in the Settlement Hierarchy Table (Table 2.8) of the Draft Kildare County Development Plan 2023-2029, we reiterate that there has been no change to the Housing and Population Target percentage allocated to Clane with **2.4%** of the overall housing and population growth for the county over the plan period being designated to Clane. This percentage allocation has not changed and remains consistent with the allocation percentage included as part of the current 2017-2023 plan, despite the town being upgraded to a *Self-Sustaining Town* as part of the Draft Plan. In addition to this, it is submitted that this 2.4% allocation does not accord with the actual percentage growth as per the latest census results. From a review of the Census population results over the last census period from 2011-2016 it is noted that Kildare experienced an overall population growth of **5.8%** from 2011 (210,312, CSO 2011) to 2016 (222,504, CSO 2016). The town of Clane experienced a population growth of **8.62%** from 2011 (6,702, CSO 2011) to 2016 (7,280, CSO 2016). The below table provides further clarity in this regard:

Population Data for Kildare and Clane from 2011-2016 (CSO)				
Area	2011 (CSO)	2016 (CSO)	% Change from 2011-2016	Growth of Clane as a % of the overall Growth of Kildare from 2011-2016
Kildare	210,312	222,504	(+12,192) + 5.8%	
Clane	6,702	7,280	(+578) + 8.62%	
				578 ÷ 12,192 = 00.474 X 100 = 4.74%

Table 1.0 Table showing the population growth for Clane from 2011-2016 as a percentage of the overall growth for Kildare over the same period.

The above table clearly indicates that the population growth of Clane represented approximately 4.74% of the overall growth of Kildare over the last Census period from 2011-2016. Considering the above growth percentage in line with the projected population growth for the County over the plan period of 25,146 no. persons (**260,533 (population target 2023-2028, Table 2.8) - 235,387 (2021 population estimate, Table 2.8) = 25,146**), and allocating **4.74%** (as opposed to 2.4%) of this growth to Clane, would result in a **Population Target 2023-2028 of 1,192.92 no. persons**. This figure is considered to be more in line with both recent population trends and the status of Clane as a *Self-Sustaining Town*. We respectfully request that the Planning Authority take the above into account in their review of the Settlement Strategy Figures.

Settlement Type	Settlement Name	Census 2016 Population	Settlements percentage per total County population	2021 Population Estimate (based on % growth from 2011-2016)	Housing & Population Target %	Population Target 2023 to 2028 (end of Q4) (persons)	Housing Target 2023 to 2028 (end of Q4) (units) in accordance with HSTGs	Residential Zoned Land Requirement (ha)	Target Residential Density (UPH)
County	Kildare	222,504		235387		260533	9144		
Key Town	Naas	21,393	9.60%	22632	14.9%	3747	1362	40	35-50
	Maynooth (MASP)	14,585	6.60%	15429	10.90%	2741	997 ^a		35-50
Self-Sustaining Growth Towns	Newbridge	22,742	10.20%	24059	11.60%	2917	1061	35	35-50
	Leixlip	15,504	7%	16402	10.20%	2565	933	31	35-50
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	Athy	9,677	4.30%	10237	4.80%	1207	439	15	35-40
Self-Sustaining Towns	Celbridge	20,288	9.10%	21463	10.00%	2515	914	30	35-40
	Kilcock	6,093	2.70%	6446	4.00%	1006	366	12	35-40
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	Clane	7,280	3.27%	7702	2.40%	604	219	7	35-40
	Sallins	5,849	2.62%	6188	1.90%	478	174	6	35-40
	Kilcullen	3,710	1.70%	3925	2.50%	629	229	8	35-40

Figure 25.0 Extract of Settlement Hierarchy contained within the Draft Kildare County Development Plan 2023-2029, with Clane outlined in red.

From a review of the above table, it is noted that the total housing target for Clane over the plan period is 219 no. dwellings, this would result in an average delivery of 37 no. dwellings per year, which is not representative of a *Self-Sustaining Town*. To compare, the town of Kilcullen which is designated as a *Town* and has half the population of Clane has been designated a greater allocation of housing growth (2.50%), the same can be said for the Self-Sustaining Town of Kilcock which has a total population of 1,187 less than Clane, yet a greater proportion of growth (4.00%) has been allocated to this settlement. We would encourage the Planning Authority to review the above figures and see fit to allocate an increased proportion of growth to Clane.

It is noted that other towns, such as Kilcock and Monasterevin, are classified as Self-sustaining Towns in the Draft County Development Plan despite having smaller populations than Clane and similar employment status. It is also noted that neither of these towns provide the same employment opportunities as Clane which has established itself as a health centre with the presence of a hospital and fertility clinic.

In conclusion, we fully support the designation of Clane as a *Self-Sustaining Town* as part of the Draft Plan. By improving the status of Clane in the development plan, Clane can access the necessary funding to improve services, infrastructure and employment opportunities in the town. This will ultimately reduce the number of daily commuters by allowing residents to work locally, creating a more sustainable town.

5.1.2 Shortfall in Housing Delivery

It is also prudent to highlight that the economic recession experienced between c. 2008-2015 and the rising construction costs during the subsequent recovery, resulted in a substantial drop in the growth and supply of housing output. In addition, the halt in construction projects during the Covid-19 pandemic period from 2020-2021, as well as the associated unprecedented increase in construction costs would indicate that the previous housing allocation and delivery targets outlined in the previous Core Strategy were not achieved.

In this regard, it is noted that Kildare and more specifically Clane, is a popular residential location, where there is a high demand for residential units of varying sizes to accommodate a mix of tenures. On this basis, it is of critical importance that sufficient levels of population and housing growth are allocated as part of the new Kildare County Development Plan 2023-2029, to accommodate a growing demand. To this end, we would also highlight that whilst the Planning Authority are of the view that there is an adequate quantum of zoned lands available within Clane to accommodate the future demand, the residential yield of zoned lands far exceeds the allocated housing growth for the town over the plan period. We believe this should be reconsidered as part of the draft plan to enable the sustainable development of the town to proceed over the plan period, in line with the objectives of the NPF and the RSES.

6.0 Conclusion

This submission is prepared in response to the Draft Kildare Development Plan 2023-2029 in preparation for a new development plan for the county. Our clients welcome the opportunity to contribute to the second stage of the development plan process for drafting the Kildare County Development Plan 2023-2029 and trusts that Kildare County Council will consider the recommendations provided within this submission in preparation of the new plan.

Whilst our client welcomes the designation of Clane as a *Self-Sustaining Town* as part of the Draft Plan and commends the Planning Authority on this inclusion, however we strongly consider that an additional proportion of both population growth be allocated to Clane, in line with its designation as a *Self-Sustaining Town*. Furthermore, upon review of the plan and the recent and projected population trends our clients are of the strong view that the existing town of Sallins should be identified as a *Self-Sustaining Town*, in line with its designation within the Regional Spatial and Economic Strategy for the Eastern and Midland Regions. A summary of these requests are set out in turn below:

- *We request that Kildare County Council review the Housing and Population Targets for Clane included as part of the Draft Kildare County Development Plan 2023-2029 and provide for an increased allocation of population and housing for the town over plan period, in accordance with its designation as a Self-Sustaining Town.*
- *We request that Kildare County Council upgrade the status of Sallins from a 'Town' to a 'Self-Sustaining Town' as part of the final iteration of the Kildare County Development Plan 2023-2029, in accordance with its identification within the Regional Spatial and Economic Strategy for the Eastern and Midland Regions (RSES). In line with this request, it is considered necessary to designate and increased Housing and Population Targets for the town over the plan period.*

In addition to the above, this submission also makes some suggested policy amendments and inclusions relating to road and sustainable transport infrastructure including:

- *We request that the scope of Item No. 17 as included within Table 5.4 'Priority Road and Bridge Projects' of the Draft Kildare County Development Plan 2023-2029, which indicates that it is the intent of the Planning Authority to 'examine options for a link road from the R407 to the R403 including a new Liffey Crossing east of Clane', be broadened to also include for the associated provision of pedestrian and cycle infrastructure along this link and crossing.*
- *We request that Kildare County Council designate Action **TM A18** as listed within the Draft Plan, which relates to a feasibility study in respect of a 'new pedestrian bridge crossing the River Liffey in the vicinity of Alexandra Bridge in Clane', be designated as a development plan objective as opposed to an action to expedite this assessment in the shorter term.*
- *We request the inclusion of a new objective as part of the Draft Plan which provides for the undertaking of a feasibility study regarding the provision of a cycle-way from Clane to Sallins along the R407 road, in line with the recently published Draft Greater Dublin Area Cycle Network strategy, to facilitate additional sustainable travel options between Clane and Sallins*

We trust that the Planning Authority will have regard to the contents of this submission in the adoption of the Kildare County Development Plan 2023-2029 and we look forward to positive engagement with the Council and local communities in respect of the future development of Kildare and Clane.



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