of the

differentiate between zoned lands that are serviced and zoned lands

**Chapter 2 Kildare Core Strategy and Settlement Strategy.**

Section 2.1 of the Draft CDP states that the Overall aim is *“to provide for the delivery of an additional 9,144 housing units to accommodate 25,146 people by the end of the plan period, through the delivery of sustainable compact settlements supported by a commensurate level of physical and social infrastructure to mitigate against climate change”*

In Table 2.8 the Settlement Hierarchy – Population and Housing Unit targets identify

the distribution of the 9,144 housing units across the settlement types identified in the

table. The Key Town of Naas indicates a housing target of 1,362 units (2023-2028 in accordance with HSTG’s.

As a consequence of Variation No.1 of the Kildare County Development Plan 2017-2023 which led to a reduction in the population allocation , the recent Naas Local Area Plan 2021-2027 was restricted from delivering the additional population proposed at Material Alterations stage of that LAP. Thus, it was considered necessary to remove a top Tier 1 site ( As categorised under the Naas LAP SPIA) and reclassify it as C: New Residential Phase 2 in order to comply with the Core strategy. Kildare County Council may consider that should the revised housing unit targets increase in the adopted Kildare County Development Plan 2023-2019, then this event might lead to a revision of the Population targets within the Naas Local Area Plan 2021-2027 . In the case of additional Population/Dwelling targets being made available to the Naas LAP then in accordance with Appendix 3 of the National planning Framework the most appropriate lands for additional housing allocation would be on highly Serviced lands such as Tier 1 Serviced Zoned Land . In their submission to the Draft Kildare County Development Plan 2023-2029 The RSES have specifically highlighted the importance of the SPIA in terms of identifying appropriate lands.

In addition, The Office of the Planning Regulator in *their Observation 1-Population and compact Growth to the Draft Naas LAP 2021-2027* clarified this position as follows :

“*Observation 1 – Population and compact Growth c. In consideration of the zoning of New Residential and Residential Phase 2 lands, the sequential approach to development must be applied in accordance with Regional Policy Objective 4.2 in the RSES. The findings of the Sustainable Planning & Infrastructure Assessment Report should inform this approach such that lands in proximity to the town core and categorised as Tier 1 lands are zoned for new residential use with residential phase 2 zoning afforded to Tier 2 sites where appropriate”*

The second factor in identifying appropriate land for additional housing should be by reference to the current Naas LAP which will have recently considered all of the lands in detail in the making of the Naas LAP. However certain Tier 1 lands were zoned C:New Residential Phase 2 instead of C: New Residential Phase 1 (solely due to the Core constraints with respect to population targets). In the event of increased Housing target figures, these lands categorised as C: New Residential Phase 2 -Tier 1 should be considered for housing allocation as a priority over other less appropriately categorised lands. Thus providing a sequential and balanced approach to the allocation of land.

Table 11.1 of the( Naas LAP 2021-2027) Land-Use Zoning Objectives specifically addresses the matter as follows :

Table 11.1 Land-Use Zoning Objectives

*“64 The Kildare County Development Plan will be reviewed and adopted during the lifetime of the Plan. The new CDP may contain provisions, including revised population/housing targets for Naas, which may differ from those on which this Plan is based.*

1. *(a) The land identified as Phase 2 could be brought forward for New Residential through a statutory amendment under Section 20 of the Planning and Development Act 2000 (as amended) to align the local area plan with revised population growth contained in the Core Strategy.”*

*P.175 Naas Local Area Plan 2021-2027*

***Conclusion***

*In accordance with the NPF, RSES and by reference to the Naas Local Area Plan 2021-2027 We suggest that any increased Housing/Population targets for Naas are allocated to lands recently identified in the Naas Local Area Plan 2021-2027 as the most appropriate for development, namely lands that meet* ***BOTH*** *of the following criteria :*

1. *Lands that are currently Zoned New Residential Phase 2*

*And*

1. *Lands that are currently categorised as Tier 1 Lands in accordance with the Naas LAP Strategic Planning and Infrastructure Assessment (SPIA). In accordance with the provisions of “Appendix 3 of the National Framework Plan (NPF Tier 1: Serviced Zoned Land This zoning comprises lands that are able to connect to existing development services and can therefore accommodate new development.”*

.