



**24<sup>th</sup> May '22**

**Submission to Kildare County Council  
on the Draft County Development Plan 2023 to 2029**

The following is the submission from the Kilcloon Environmental Action Association (KEAA) on the Kildare County Draft Development Plan 2023 to 2029.

KEAA is a local and community based organisation in south County Meath.

KEAA wish to re-state our concerns related to proposals by Meath County Council to zone a large area of rural lands just north of the Kildare key town of Maynooth as “Maynooth Environs” in their new County Development Plan 2022 to 2027, and the impact such zoning would have on the proper planning and development of Maynooth.

As part of this submission, we have attached below our previous letter to Kildare County Council dated 28th Feb 2022 which raises a number of issues relevant to Maynooth as Key town and the impact on this Kildare town of decisions taken by Meath County Council (MCC) in their recently adopted County Development Plan 2022 to 2027.

**Maynooth Joint Local Area Plan.**

Regional Policy Objective 4.35 from the Regional Spatial and Economic Strategy (RSES) adopted by the Eastern and Midlands Regional Authority states that

*"A cross boundary Joint Local Area Plan (LAP) shall be prepared by Kildare County Council and Meath County Council to provide a co-ordinated planning framework for the Maynooth area. The Joint LAP shall identify a boundary for the plan area, strategic housing and employment development areas and infrastructure investment requirements and promote greater co-ordination and sequential delivery of serviced lands for development".*

We refer again to the correspondence dated 18<sup>h</sup> August 2021 from the Office of the Planning Regulator to MCC seeking assurances (under OPR Observation No. 9) that MCC

*"would prioritise the preparation of the Joint UAP for Drogheda and the Joint LAP for Maynooth ahead of any other LAPs setting out target dates for commencement of the process and for the eventual making of the said joint plans"*

KEAA notes that while the County Meath adopted CDP contains an Objective to work with KCC in agreeing a Joint LAP for Maynooth and that this should be “prioritised”, there is no commitment from MCC that this should be in place by any stated date or in advance of development proceeding in the zoned area designated as Maynooth Environs.

KEAA have now become aware that a development of 360 no. residential units (194 no. houses, 166 no. apartments), creche and associated site works within this area of “Maynooth Environs” has been submitted to an Bord Pleanála (ABP) under the Strategic Housing Development (SHD) process (Case reference: TC17.312213) and a decision on the pre-planning process is now due from the Board.

We are also aware that a Masterplan covering a large part of the Maynooth Environs land has been drawn up by the prospective Developer in conjunction with Meath County Council. However, that Masterplan has not been published and it is our understanding that it includes for up to 1,000 residential units, together with industrial and commercial development outlined in the Appendix below for the significant 350 acre/140 Hectare Maynooth Environs area in County Meath.

It is the position of the KEAA that this SHD application to ABP is proceeding in County Meath in advance of any work by the two Planning Authorities on the required joint Local Area Plan. This proposed development thus undermines and prejudices many of the policies and objectives set out in the Kildare Draft County Development Plan, and RSES RPO 4.35 as referenced earlier.

**KEAA submits that Kildare County Council should include, as a stated Objective, that no development should proceed purporting to be part of the key town of Maynooth in advance of an agreed joint Local Area Plan that ensures proper planning and sequential growth which applies the tiered approach, all as set out in the National Planning Framework, the RSES and the Kildare Draft CDP.**

The joint LAP should be prepared in consultation with the local communities in the respective Planning Authority areas.

**KEAA further submit that Kildare County Council should amend the specific objective RE Objective 16 (Chapter 4 Draft CDP) so that it is conditional on Meath County Council complying with the requirements of the RSES RPO 4.35 that a joint LAP be agreed between MCC and KCC in order to “provide a co-ordinated planning framework for the Maynooth area”.**

### **Transport & Mobility**

**KEAA submits supports the policies and objectives set out in Section 5.3 of the draft CDP that identifies “the need to underpin the planning process with an integrated approach to sustainable transport. Integrated land-use and transportation has a key role to play in delivering social, economic, and environmental sustainability”.**

KEAA also supports Transport & Mobility Action Number 2 which seeks to “Prepare, implement and review (where appropriate) Local Transport Plans (LTPs)/Transport Strategies (TSs) for each of the statutory LAP settlements in County Kildare”

Chapter 5 of the KCC DCPD, **Transport & Mobility Objective #59** states that KCC will “Support and facilitate in conjunction with Meath County Council, private developers and landowners, the construction of the Maynooth Relief Road”.

KEAA respectfully submits that Kildare County Council amend Transport and Mobility Objective Number 59 so that it is consistent with the policies set out in Section 5.3 and T&M Action Number 2 and, as per our earlier submission on RE Objective 16, Objective T&M 59 should be made explicitly conditional on the completion of the Local Transport Plan / Transport Strategy for Maynooth and the subsequent completion of the joint LAP for Maynooth.

KEAA also submits that the proposed development of the lands designated as “Maynooth Environs” or “Moygaddy Masterplan” constitutes developer led planning. The traffic arising from such a development in advance on any transport or land use planning is likely to result in a significant and unpredictable impact on the local road network, the traffic on those roads and on the local community in Maynooth and in County Meath.

KEAA submits that such developer led development within the “Maynooth Environs” area of County Meath will undermine and act counter to the following aspects of the Kildare Draft CDP as outlined in the extracts below :

## **2.6 Compact Growth & Climate Action**

*The promotion of a compact urban form of development is a central part of mitigating climate change. The policies and objectives of this Core Strategy seek to provide for a consolidated urban form within existing settlements. In applying this approach, alongside the various other components in the Development Plan, the aim is to strive towards the delivery of connected neighbourhoods and the 10-minute settlement concept within the urban settlements.*

### **2.8.1-Tiered Approach**

*Individual Local Area Plans will be prepared for higher order settlements, where individual Infrastructural Assessments will be carried out to apply the tiered approach to the zoning provisions associated with their respective housing allocations*

### **4.4.2 Key Towns**

*The growth of these Key Towns will require sustainable, compact and sequential development and urban regeneration in the town core.*

### **14.3.3 Urban Design & the Concept of the 10-minute settlement**

*The 10 Minute Town Concept seeks to have all community facilities and services accessible within a 10 minute walk or cycle from homes or to ensure that they are accessible by public transport services that connect to larger scaled settlements*

## **UD 03**

***“Support and promote the ‘10-minute settlement’ concept across all towns and villages in the county and require that all Local Area Plans incorporate policies and objectives that will assist in its implementation.***

KEAA submits that the current SHD pre-application to An Bord Pleanala to build 360 residential units in rural on un-serviced rural lands in County Meath purporting to form part of Maynooth and the zoning of lands for 1,000 residential lands in the Moygaddy area all serve to undermine compact growth, the 10-minute settlement, the sequential approach and the tiered approach.

## **Transport and Land Use Planning – Maynooth Outer Orbital Route**

While there is a recognised need for an outer orbital route to relieve traffic congestion within Maynooth Town centre, KEAA submits that this can be best accommodated within KCC's own administrative area through the adoption of a "C-Ring" approach to connect the town Centre, existing and planned developments and NUIM in the west.

A key part of the eastern section of this C-Ring, the Eastern Bypass from the R148 Leixlip road to the R405 Celbridge road, already has LIHAF funding, with as small section remaining from the R405 Celbridge road to the R406 Straffan Road close to junction 7 on the M4. The Western sections are listed in Table 5.4 as item 4 (Inner relief road from the R148 Kilcock road to the L1012 Moyglare road and item 5 (Western Relief Road from R148 Kilcock road to the Straffan/Rathcoffey roads and the M4 junction). These 2 western sections will enable and facilitate the multiple research and development strategies associated with NUIM.

In addition the existing inner relief road through the Lyreen/Mariavilla development from the Moyglare road to the upgraded Dunboyne road will provide a complete ring road encircling Maynooth.

The provision of these transport corridors will also enable close connectivity from all parts of the town Maynooth Business Park and the development of the entire area west of junction 7 on the M4. This area is optimally located for motorway access at the M4, has links to the M7 and M3 and to existing bus routes and to Maynooth train station.

The suggested approach to the orbital route for Maynooth is consistent with the existing and planned urban growth patterns and services and is also consistent with the principles of compact growth and the avoidance of suburban sprawl as set out in the National Planning Framework.

The proposal contained within MCC's proposed "Maynooth Environs" to construct a section of the Maynooth Outer Orbital Route remote from the town is thus unnecessary and is not aligned with and is counter to Maynooth's needs. As this road section will be developer led and funded, the sole purpose of this road infrastructure, will be to open up a very large area of rural Meath to low density, non-sequential urban development of unserviced lands, undermining the policy of compact development of Maynooth, sustainable transport use and the protection of landscapes and the environment. Any such development in 'Maynooth Environs' will severely impact the already constrained traffic, social infrastructure and facilities in Maynooth and undermine multiple sections within the Kildare draft CDP, as stated earlier.

**KEAA supports the Kildare draft CDP's stated position that "Integrated land-use and transportation has a key role to play in delivering social, economic and environmental sustainability" and welcomes Transport & Mobility Action #2 and further notes and supports RE Objective 014 (Chapter 4 of draft CDP) which states:**

*Undertake, within the first 2 years from the adoption of the Plan, a Strategic Land Use, Employment and Transportation Study of northeast Kildare including the Dublin Metropolitan area towns of Leixlip, (and Collinstown), Maynooth, Celbridge and Kilcock.  
The preparation of the study will have regard to existing and emerging local area plans.*

*"Prepare, implement and review (where appropriate) Local Transport Plans (LTPs)/Transport Strategies (TSs) for each of the statutory LAP settlements in County Kildare in consultation with the TII and NTA"*

KEAA notes that these local transport plans or strategies should be drawn up prior to the drafting of LAPs (including the Maynooth Joint LAP) as “The Accessibility and Movement Objectives of Local Area Plans should be based on relevant LTPs”.

The development of such transport plans should have due Community engagement

### **Research, Science and Technology related to Maynooth University**

KEAA submits that the incorporation by MCC into their adopted plans for Maynooth Environs of a "Science and Technology Park" which is explicitly stated to be in association with NUIM undermines and prejudices the following Aims of the draft Kildare CDP.

Furthermore, KEAA submits that the proposed zoning of large areas of the Carton Estate that are in County Meath for “Industrial / Science & Technology” uses under the “Maynooth Environs” proposals will facilitate the destruction of the historic Carton House setting and landscape, again undermining the benefit of this unique asset to the people of Maynooth, Kildare and beyond.

Extracts from KCC Draft CDP

#### **2.15.1 Key Towns**

*In Maynooth the potential of the Research and Technology lands to the west could be realised to deliver significant commercial functions. Knowledge based employment focusing on ICT and manufacturing could also be strengthened through the development of a research and technology campus. Further development of Maynooth University as a leading third level research and educational facility with potential synergies to large new and established employers offers significant potential as does the development of St. Patrick’s College Campus for a mix of uses.*

#### **2.15.2 MASP**

*a number of key strategic employment sites were identified including, in particular, a research and technology park adjoining Maynooth University (further emphasising the importance of Maynooth as a Key Town)*

Yours Sincerely, and on behalf of KEAA

*Ciaran Burke*

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Ciaran Burke

Secretary, Kilcoon Environmental Action Association



## **Appendix**

KEAA has pointed out in our previous letter to KCC that the prospective developer of lands at Moygaddy within “Maynooth Environs” zoned lands in County Meath has prepared what purports to be a “Moygaddy Masterplan”. It is KEAA’s understanding that this Masterplan includes:

- 1,000 housing units
- Student accommodation
- 15Ha Medical Campus including a proposed hospital
- 32 Ha Business Campus with office, commercial/warehousing and light industrial elements
- 150 bed hotel including leisure and conference facilities
- Retail facilities

## Attachment

**Kilcloon Environmental Action Association  
C/O Ciaran Burke, Secretary**

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**28th February '22**  
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**Att: Ms Sonya Kavanagh,  
Interim Chief Executive, Kildare County Council;  
Head Office Áras Chill Dara,  
Devoy Park,  
Naas, Co. Kildare.**

**RE: Draft Kildare County Development Plan 2023 – 2029.**

Dear Ms Kavanagh,

I am writing to you on behalf of Kilcloon Environmental Action Association (KEAA), a community-based organisation based in Kilcloon, County Meath.

We note that Kildare County Council's elected members are currently considering the draft Kildare County Development Plan (CDP) 2023 to 2029, prior to its planned publication in March 2022.

The KEAA has previously made a formal submission to Kildare County Council (KCC) on the Issues Paper related to the earlier stages of the CDP process in March 2021.

This highlighted our concerns related to proposals by Meath County Council to zone a large area of rural lands just north of the Kildare key town of Maynooth as "Maynooth Environs" in their new County Development Plan 2022 to 2027, then at draft stage, and the impact such zoning would have on the proper planning and development of Maynooth.

Meath County Council (MCC) has now adopted their County Development Plan 2022 to 2027.

During the MCC CDP consultation process the KEAA also corresponded with the Office of the Planning Regulator (OPR), expressing our concerns that the proposed zoning of "Maynooth Environs" was not consistent with the stated objectives of the National Planning Framework 2018 to promote the consolidation of town centres, compact growth, and sequential development.

The OPR responded by letter dated 18th. August 2020 (attached) by pointing out OPR Observation No. 9 from the OPR submission (dated 6th. March 2020) to Meath County Council in relation to the draft Meath CDP requiring that Meath County Council (MCC) draft and agree with the adjoining Kildare County Council a joint LAP for Maynooth key town.

The OPR also referenced Regional Policy Objective 4.35 from the Regional Spatial and Economic Strategy (RSES) adopted by the Eastern and Midlands Regional Authority which states that *"A cross boundary Joint Local Area Plan (LAP) shall be prepared by Kildare County Council and Meath County Council to provide a co-ordinated planning framework for the Maynooth area. The Joint LAP shall identify a boundary for the plan area, strategic housing and employment development areas and infrastructure investment requirements and promote greater co-ordination and sequential delivery of serviced lands for development"*

The OPR, in their letter of August 18th 2020 and in the context of Observation No. 9 and RPO 4.35 stated as follows:

*"It is essential that such growth (of Maynooth key town) is properly planned in advance, hence the matter raised in observation 9, which applies to the objectives of the plan relating to Maynooth and all other locations, whether or not they are specifically named".*

Observation No. 9 required that MCC *"prioritise the preparation of the Joint UAP for Drogheda and the Joint LAP for Maynooth ahead of any other LAPs, setting out target dates for commencement of the process and for the eventual making of the said joint plans"*

We are writing to Kildare County Council now to highlight the fact that, while MCC have included in their adopted CDP an Objective to work with KCC in agreeing a Joint LAP for Maynooth and that this should be "prioritised", there is no commitment that this should be in place by any stated date or in advance of development proceeding in the zoned area designated as Maynooth Environs.

We have recently become aware that a development of 360 no. residential units (194 no. houses, 166 no. apartments), crèche and associated site works within this area of "Maynooth Environs" has been submitted to an Bord Pleanála under the Strategic Housing Development process (Case reference: TC17.312213) and a decision on the pre-planning process is due before 14th. April 2022.

We are also aware that a representative of the Developer is meeting with local community groups in this area, showing large scale plans for the entire development of the "Maynooth Environs" area (also known as Moygaddy) which is said to include:

- 1,000 houses
- 15Ha Medical Campus including a proposed hospital
- 32 Ha Office Campus based on "high technology uses"
- 150 bed hotel including leisure and conference facilities
- Retail, Sports, and Cultural facilities

It is difficult to see how Kildare County Council, as the relevant statutory Planning Authority responsible for the designated key town of Maynooth can ensure the appropriate planning and development of this town and its environs in a manner consistent with the NPF, RSES and best planning practice if developers in County Meath are proceeding to plan for the development of large areas of zoned rural lands in that county, with the apparent support of Meath County Council, in advance of any agreed approach by the two Planning Authorities as would be set out in the aforementioned joint Local Area Plan.

As the OPR has stated in their letter to KEAA as referenced earlier "It is essential that such growth (of Maynooth key town) is properly planned in advance".

The KEAA fully supports the view of the OPR that the sole purpose of a joint LAP for Maynooth is to allow this key town to be *"properly planned in advance"* which is supported by RSES Regional Planning Objective (RPO 4.35) stating that the required joint LAP will *"provide a co-ordinated planning framework for the Maynooth area"*.

It is our contention that these aims and statutory objectives will be undermined by developments proceeding in advance of any joint LAP within the designated County Meath area of "Maynooth Environs".

The Kilcloon Environmental Action Association is, therefore, calling on Kildare County Council to ensure, through appropriate objectives within their Draft County Development Plan 2023 to 2029 and through urgent communications with MCC, the OPR and through observations to ABP on the current SHD process, that no developments proceed within the area designated by MCC as “Maynooth Environs” unless and until both Planning Authorities have formally agreed a Joint Local Area Plan for the key town of Maynooth.

This is in line with the spirit and letter of the stated requirements of the OPR, the stated objectives set out in the Meath CDP, the Regional Planning Objective (RPO 4.35) in the RSES and the NPF.

Regards,

Yours Sincerely,

*Ciarán Burke*

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Ciarán Burke  
Secretary



cc:

Eoghan Ryan, KCC Director of Services – Planning and Strategic Development

cc Request - All elected members of Kildare County Council.