

Chief Executive's Report on
submissions/observations received to
the Proposed Variation (No. 1) of the

Kildare County Development 2017–2023

Planning Department
Kildare County Council
March 2020



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1.0 Introduction

This report relates to submissions and observations received from the public and prescribed bodies following the publication of the Draft Variation No. 1 to the Kildare County Development Plan 2017-2023 under Section 13 of the Planning and Development Act 2000 (as amended).

1.1 Legislative Requirements

Amendments were made to the Planning and Development Act, 2000 to enable the incorporation of the NPF and RSES into a development plan under Section 11(1)(b)(iii). Variation No. 1 relates to the proposed amendments to the existing County Development Plan on foot of the decision to integrate the NPF and RSES into the Plan. The review principally centres around revisions to the Core Strategy. The proposed variation also includes a number of other amendments relating to climate change.

Under Section 13 of the Planning and Development Act 2000 (as amended), the Chief Executive is required to prepare a report on any submissions or observations received during the public consultation period. This report shall list the persons who made submissions or observations, summarise the issues and make recommendations. The recommendations shall consider the proper planning and sustainable development of the area, the statutory obligations of the local authority and relevant policies or objectives of the Government or of any Minister of the Government.

1.2 Public Consultation

The Draft Variation No. 1 to the Kildare County Development Plan 2017-2023 was placed on public display from Thursday, 9th January 2020 to 5p.m. Thursday 6th February 2020 (inclusive). The Draft Variation was displayed at the following locations:

- Áras Chill Dara;
- Public libraries, during opening hours, located at: Athy, Ballitore, Celbridge, Clane, Clocha Rince, Kilcock, Kilcullen, Kildare Town, Leixlip, Maynooth, Monasterevin, Naas, Newbridge, Rathangan;
- Online at <https://consult.kildarecoco.ie>

Planning Staff conducted public consultation sessions. Staff were available to deal with any questions on the proposed variation on the following dates at Áras Chill Dara, Naas:

- 15th January 2020, 4 p.m. – 7 p.m.
- 21st January 2020, 2.30 p.m. – 5 p.m.
- 22nd January 2020, 10 a.m. – 12.30 p.m.
- 23rd January 2020, 2.30 p.m. – 5 p.m.
- 24th January 2020, 10 a.m. – 12.30 p.m.

The following documents were placed on public display with the Draft LAP:

- Written Statement of the Variation;

- SFRA Statement – pursuant to Section 28 of the Planning and Development Act 2000 (as amended);
- SEA Environmental Report on the likely significant effects on the environment of implementing the Variation - pursuant to the Planning and Development (Strategic Environmental Assessment) Regulations 2004 – 2011;
- Appropriate Assessment Screening Report - pursuant to the EU Habitats Directive (92/43/EEC).

A notice was published in the Irish Independent on 9th January 2020 notifying the public that the Draft Variation was on public display and inviting submissions over a period of four weeks. The prescribed bodies, including government departments and other agencies, as required by the Planning and Development Act 2000 (as amended) were notified accordingly.

Kildare County Council Social Media Channels (Facebook and Twitter) were used as mechanisms in promoting awareness of the Draft Variation public consultation and of the public consultation sessions.

The Members are advised that submissions are available for public viewing at <https://consult.kildarecoco.ie/en/node/5/submissions>

1.3 Content of the Chief Executive’s Report

The Chief Executive’s Report is set out as follows:

Section 1: Background.

Section 2: List of persons or bodies who made submissions or observations.

Section 3: Summaries of submissions/observations and the Chief Executive’s response and recommendations.

1.4 Next Steps

Within six weeks of receiving the Chief Executive’s Report, the Elected Members of Kildare County Council must consider the Chief Executive’s Report and the Draft Variation. Following consideration, the Members may, as they consider appropriate, by resolution, make the variation which would, if made, be a material alteration, with or without further modification or they may refuse to make it and may make further modification.

The Elected Members, shall be restricted to considering the proper planning and sustainable development of the area to which the development plan relates, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or any Minister of the Government.

2.0 List of Persons/Bodies Who Made Submissions

2.1 Submissions and Observations Received

During the public consultation period a total of 73 submissions/observations were received. The list of persons, prescribed bodies, groups and stakeholders who made valid submissions are listed in Table 2.1. A summary of the individual submissions is listed in Section 3 of this report.

1	Department of Education and Skills
2	Eastern and Midland Regional Assembly
3	Environmental Protection Agency
4	Transport Infrastructure Ireland
5	Michael Hoey
6	Michael Hoey
7	Health and Safety Authority
8	Laois County Council
9	Michael Hoey
10	Irish Water
11	Office of Public Works
12	Jennifer Whitty
13	Moyglare Hall Residents Association
14	Meath County Council
15	Mark Byrne
16	Gerard O'Connor

19	Westar Group
20	Cllr. Bill Clear
21	Irish Wind Energy Association
22	Flora McDonnell
23	Flora McDonnell
24	Patrick Donnelly
25	Babette and Louis Harris
26	Downey Planning on behalf of Randalswood Construction Ltd.
27	Gar Whelan
28	Declan Brassil on behalf of Lagan Homes Ireland Ltd.
29	Cllr. Íde Cussen
30	Ardstone Homes Ltd.
31	Department of Transport Tourism and Sport
32	John Spain on behalf St. Patrick's College, Maynooth
33	National Transport Authority
34	John J. Cross

17	Cllr. Kevin Duffy
18	Fingal County Council
37	Crylock Developments Ltd.
38	Melanie Treacy
39	Cllr. Pádraig McEvoy
40	Jane Tripp/Rita Shah
41	Office of the Planning Regulator
42	Celbridge Community Council
43	Crodaun Development Ltd. C/o David Mulcahy Planning Consultants Ltd.
44	WTNB Partnership C/o David Mulcahy Planning Consultants Ltd.
45	RPS on behalf of Venturis Investment Group
46	McCourt Investments
47	John Spain on behalf of Cairn Homes
48	McGill Planning Ltd. on behalf of landowners in Celbridge and Leixlip
49	RPS on behalf of Millennium Properties Ltd. Partnership
50	Cllr. Vanessa Liston
51	Cllr. Robert Power
52	Alice Power

35	Applegreen Services Areas Ltd. C/o Eugene Moore, Director
36	Tom Phillips + Associates on behalf of Arron McHale
56	MKO on behalf of Glenveagh Homes PLC
57	Colivet Family
58	O'Flynn Construction Limited
59	Mary Collins
60	Cllr. Ciara Galvin
61	Maynooth Planning Alliance
62	Coillte
63	Anne Birchall
64	Raymond King
65	Billy Mulhern
66	Senator Anthony Lawlor & Cllr. Fintan Brett
67	Devondale Ltd
68	Makros Ltd
69	Tom Treacy
70	Dennison Trailers
71	Dominic Fagan

53	Frank O'Rourke T.D.
54	Cllr. Michael Coleman
55	Cllr. Daragh Fitzpatrick

72	Steven Fadian
73	Cllr. Suzanne Doyle

3.0 Summary of submission/observations and the Chief Executive’s response and recommendations

The following Tables 3.1 (a) and (b) are a summary of the 73 submissions/observations made during the public consultation period for the Draft Variation. Table 3.1 (a) addresses the submissions from prescribed bodies, Table 3(b) addresses submissions from all other interested parties and stakeholders. The Chief Executive’s response and recommendation is set out under each submission which addresses the main issues raised in the submissions received and any recommended changes to the Proposed Variation as a result.

Table 3.1 (a)

Sub. No.	Name	Summary of Submission
1	Department of Education and Skills	<p>The submission welcomes the opportunity to input to the variation and notes its purpose is to respond to recent changes in national and regional policy and noted from Map 2.3 that Kildare is regarded as a core region of the EMRA Growth Strategy 2019-2031.</p> <p>The submission recognises the projected growth for the county in 2031 is now 266,500 which represents an increase of ca. 24,500 on the 2016 census figure for the county and notes changes to various tables and maps where Naas and Maynooth are given “Key Town” status. Submission accepts that the plans population projections will be adjusted to coincide with the life of the plan but notes the future projections to 2031 will now be an addition to the CDP. In this regard, the ramifications for future educational requirements extend beyond the life of this plan.</p> <p>The submissions states that to identify future education requirements within the county, it is vitally important ongoing and future engagements between the Department and the Council take into consideration both the short term and the longer-term population projections that are being proposed. Submission highlights that individual variations or planning developments may not result in a requirement for significantly increased educational provision but when taken cumulatively there could be a need for increased provision that will not be identified in a timely manner without collaboration.</p>

Sub. No.	Name	Summary of Submission
		<p>The submission also indicates the need for regular structured engagement to take place between respective organisations and to work together proactively to ensure that adequate educational provision is available in the appropriate locations to meet the needs of the increased population and states that the DES will continue to work closely with the council in relation to the provision of new schools and the development of existing schools, and emphasises the critical importance of the ongoing work of the Council in ensuring that sufficient and appropriate land is zoned for education purposes. In this regard, the Department would welcome the opportunity to meet with the Council regarding future planning for schools.</p> <p>Chief Executive's Response</p> <p>It should be noted that the estimated population increase to 2031 is 43,996 as opposed to the 24,500 outlined in the submission, this is calculated by the increase set between the 2016 Census of Population figure of 222,504 and the 2031 target of 266,500. The Council will continue to engage and work closely with the Department of Education and Skills to ensure adequate provision for schools is made in land use plans to cater for the projected population within settlements in accordance with the Memorandum of Understanding between the City and County Managers Association and the Department of Education and Skills.</p> <p>In relation to the identification of needs for specific locations/settlements across the County, once the process to vary the County Development Plan is complete the Council will proceed to prepare a suite of local area plans which will seek to address local education needs. In the preparation of these plans' an audit of enrolment figures and capacity of schools will be undertaken as part of the social infrastructure analysis which will inform the local area plan process and the Kildare County Development Plan which is due for review in early 2021.</p> <p>Chief Executive's Recommendation</p>

Sub. No.	Name	Summary of Submission
		No change recommended.
2	Eastern and Midland Regional Assembly (EMRA)	<p>The submission from the Assembly welcomes the proposed Variation in accordance with the Planning and Development Act 2000 (as amended) and welcomes recognition of the policy hierarchy and the acknowledgement of the Growth and Settlement Strategies as set out in Regional Spatial and Economic Strategy (RSES).</p> <p>The submission states that further consideration should be given to the following:</p> <p>Core Strategy – Regional Context and Settlement Hierarchy</p> <ul style="list-style-type: none"> • Map displayed as Figure 2.1 has been updated by the EMRA in the final published document of the RSES and should be similarly updated in the proposed Variation. The submission provides the required map attached as Appendix 2; • The Metropolitan Area Strategic Plan (MASP) is a key policy driver for the sustainable growth of the Dublin Metropolitan Area and this should be further emphasised by the inclusion of the MASP map (Figure 5.2 of the RSES) identifying the Strategic Development Corridors including the North-West Corridor relevant to County Kildare; • The submission states that Settlement Hierarchy and typologies are further defined and updated in Table 3.1 of Chapter 3 Settlement Strategy (Amendment 12) and accompanying Settlement Hierarchy Map (Map 3.1) and the heading of Table 3.1 should be revised to reflect the revised statutory period, 2017-2023; • Council’s attention is also drawn to Policy SS1 under 3.8 Policies: Settlement Strategy (Amendment 15) which should be amended replacing the reference from RPGs to RSES; • The submission requests that the Core Strategy Policy CS2 (2.16.1 Policies: Settlement Strategy, Amendment 10) be amended to align with RSES terminology as reflected in the Preferred Development Strategy (Section 2.7) by referencing the MASP area and the Key Towns for directed growth & the requested change would be in accordance with directing compact and

Sub. No.	Name	Summary of Submission
		<p>sustainable housing delivery in the MASP area (RPO 5.5), the overall Growth and Settlement Strategy of the RSES and alignment with the NPF Roadmap;</p> <ul style="list-style-type: none"> The submission notes the continued pressure for single homes in rural areas in County Kildare and states NPO 18b and RPO 4.78 has been aligned to the CDP in the new Core Strategy Policy objective CS4(a) regarding the programme for ‘New Homes in Small Towns and Villages’. <p>Compact Growth</p> <ul style="list-style-type: none"> Submission acknowledges the Core Strategy policies (Amendment 10) include revisions to Policy CS4 delivering sustainable compact urban areas through the regeneration of towns and villages, facilitated by a plan-led approach, and a delivery target of at least 30% of all homes to be within their existing built up footprint; RPO 3.3 seeks that regeneration lands are identified in Core Strategies and that specific objectives are set out to develop the lands; Reference is made to the sequential development of strategic residential development areas in the Dublin Metropolitan Area in Maynooth and at Confey Station in Leixlip – which were identified to deliver compact growth; Narrative under Amendment 13 outlines the current delivery status of Strategic Development Areas within the Metropolitan Key Town of Maynooth and the submission states that this is a welcome addition. Submission also states that the retention of the 10.9% growth rate for Maynooth is reasonable given the 3-year limited lifespan of the current plan; EMRA suggest that it would be appropriate to identify the sites that have the potential for further consolidation in the town centre of Maynooth and indeed any other brownfield/infill sites within the County Development Plan’s Core Strategy and references that guidance for same is provided in Chapter 3 Growth Strategy of the RSES; EMRA directs the Council to RPO 8.1 and the relevant Guiding Principles expressed in the Transport Strategy (Section 8.3) and MASP (Section 5.3) of the RSES which provide the basis for the integration of land use and transport in statutory land use plans;

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> • EMRA requests that a new specific objective should refer to the requirement for the preparation of a Joint LAP for Maynooth with Meath County Council. <p>Core Strategy Population Targets</p> <ul style="list-style-type: none"> • EMRA welcomes the incorporation of revised Population and Housing Targets set out in Table 2.4, which are stated to be based on the 2016 Census, RSES and National Planning Framework (NPF) and notes the application of headroom at 25% as set out in the Implementation Roadmap for the NPF, issued under DHPLG Circular FPS04/2018; • Notes the projections have been adjusted to the end of the first quarter of 2023, to coincide with the remaining life of the County Development Plan; • The new population projection for Kildare to the end of the development plan period to 2023 is calculated as 239,367 persons and the submission notes that the figure is stated as 238,993 under Section 3.5 Housing and Population Allocation, Amendment 13. This target is below the range of population targets for 2026 set out in the NPF and RSES (249,000-254,000) and should support achievement of NPF/RSES population targets; • Reference is made to NPO 68 which allows for up to 20% of the phased population growth targeted in Dublin City and suburbs to be transferred to Bray, Maynooth and Swords and will be agreed with the MASP Implementation Group. <p>Settlement Strategy – Housing Allocation and Delivery</p> <ul style="list-style-type: none"> • EMRA notes that the allocated percentage growth rate for each settlement has not changed from the existing Settlement Hierarchy; • Some towns/villages have a greater number of dwellings forecast to 2023 than were forecast previously, namely Maynooth, Monasterevin, Sallins, and each of the designated rural towns (Prosperous, Rathangan, Athgarvan, Castledermot and Derrinturn) and notes that the increases are not considered to be overtly divergent from the previous 2023 dwellings forecast;

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> • EMRA proposes strengthening revisions to the Core Strategy Economic Development Policies (CS6-CS8) that promote ‘catch-up’ investment and support self-sustaining employment-based opportunities in settlements to provide for employment growth for the existing population and reverse commuting patterns are a welcome addition. • EMRA notes the Council proposes to identify other social and physical infrastructure needs through the preparation of an infrastructural assessment and supported by proposed new Settlement Strategy Policy Objective SO11. • EMRA refer to official statistics produced by CSO, including number of people per household and housing completions, by county may also be of beneficial use in preparing the County’s future Core Strategy; • The Council is directed to reference the need for the preparation of an evidence-based Housing Need Demand Assessment (HNDA) to inform the future Housing Strategy as part of the review of the County Development Plan, in line with NPO 37 of the National Planning Framework; • It is considered that in the absence of guidance documents or relevant data being provided to assist local authorities, that the current Housing Strategy will continue to inform Housing Policy in the County for the duration of the current plan to 2023, with a full review and HNDA being carried out as part of the future County Development Plan 2023-2029; • Up-coming full review of the Development Plan will be required to take into account the results of an evidence-based Housing Needs Demand Assessment (HNDA). <p>Housing and Development Capacity</p> <ul style="list-style-type: none"> • Assembly acknowledges that the proposed Variation does not include provisions for amendments to existing land use zoning; • EMRA notes that sufficient land is zoned to cater for the housing demands of the County up to 2023 and beyond, some Towns, Villages and Settlements have surplus capacity relative to the Core Strategy allocation and some have a shortfall and the zoning surpluses

Sub. No.	Name	Summary of Submission
		<p>and shortfalls will be reviewed through the relevant land use plans; EMRA submission states that alternative land use zonings are to be considered in the first instance to address EMRA notes that surplus residential zoning and in the event that surplus zonings are retained, the development of lands will be subject to a sequential phasing approach;</p> <ul style="list-style-type: none"> • Submission notes that Settlement Strategy Objective SO 9 has been amended to require delivery of at least 30% of all new homes that are targeted in settlements within their existing built-up footprint; • Submission further notes that subject to Section 2.9 (Amendment 8) that the capacity of settlements in Kildare to accommodate the level of growth envisaged by the NPF and the delivery of sustainable communities well served by social and physical infrastructure will need to be carefully considered as part of the local area plan process for the relevant towns; • Welcomes that the Variation affirms that restricting growth of villages and rural settlements to 25% and 20% respectively over the period of the plan; • Council’s attention is drawn to RSES RPO 4.2, which promotes collaboration with infrastructure providers to ensure alignment of enabling infrastructure investment. • Assembly, acknowledge that the consideration and rationale for the zoning of land and related zoning objectives is more appropriately undertaken as part of the forthcoming full development plan review process and the Council should consider that any future zoning decisions will be made at County Development Plan level, and in accordance with RPO 4.1 and 4.2 of the RSES. <p>Economic and Retail Strategy</p> <ul style="list-style-type: none"> • Submission welcomes the explicit recognition of the Key Towns of Naas and Maynooth as economic drivers and notes the updated Economic Development Hierarchy; • Assembly suggests that a new and relevant economic policy translating the importance of the potential of strategic development areas along the MASP’s north-west corridor should be

Sub. No.	Name	Summary of Submission
		<p>included within the suite of policies for Economic Development as identified in Table 5.2 and expressed in RPO 5.6 of the RSES;</p> <ul style="list-style-type: none"> • The Council is requested to note a small error in the description of Self-Sustaining Town under Section 2.11.4 – “high levels of employment growth” should be “high levels of population growth” as per the settlement description under Table 4.2 of the RSES; • Update Retail Hierarchy as part of the Variation is noted; • Future full review of the County Development Plan will need to address the changing nature of retail and the challenges facing town and village centres in particular with regards to issues such as vacancy; • Council is directed to RPOs 6.12-6.14 which support place making and RPOs 4.36 and 4.5 concerning Naas and Maynooth in terms of public realm and permeability. <p>Climate Action</p> <ul style="list-style-type: none"> • Submission welcomes reference to the provisions of the National Adaptation Framework 2018 and implementation of the Kildare County Council Climate Change Adaptation Strategy 2019-2024; • Submission welcomes amended Policy CS16 ensuring that climate action considerations are integrated into land use planning; • Attention is also drawn to RPO 3.6 and the preceding paragraphs of the RSES which outline the requirement of Development Plans to assess their impact on carbon reduction targets. To this end, it should be noted that EMRA is leading an ESPON EU research project (QGasSP) to identify a robust method for quantifying the relative GHG impacts of alternative spatial planning policies, the outputs of which are anticipated in 2020, and may inform the upcoming review of the county development plan. <p>Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA)</p>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> The accompany documents to the written statement are noted and notes a SEA Statement will identify how environmental considerations and consultations have been integrated into the final Variation post adoption. <p>Chief Executive’s Response</p> <p>The submission from EMRA and contents of same are noted and acknowledged. Regarding the observations highlighted in the submission, the up to date settlement strategy map from the RSES will replace Map 2.1 of the Proposed Variation, a supplementary map will also be included in the Variation to identify the Strategic Development Corridors in the Region with particular reference to the north-west corridor which is relevant to County Kildare. A revision to Table 3.1 will also be made to reflect the statutory timeframe of the CDP and the typographical error regarding the RPG’s in policy SS1 will also be rectified.</p> <p>Regarding the identification of regeneration sites within the core strategy of the CDP, it is considered that given the number of settlements where such sites would be present, it is more appropriate to identify these at LAP level where targeted objectives for their redevelopment can be identified and implemented.</p> <p>The requirement to prepare a joint LAP with Meath County Council for the Key Town of Maynooth is considered to be a statutory requirement by virtue of RPO 4.35 and therefore it is not considered necessary to provide a specific objective requiring same. It should be noted that Kildare County Council is committed to the preparation of a coordinated planning framework for the town in conjunction with Meath County Council.</p> <p>Regarding the requirement for the preparation of a Housing Needs Demand Assessment, it is noted that the Assembly consider that this would be more appropriately carried out at full plan review stage. In addition, local authorities are awaiting ministerial guidelines on the matter.</p>

Sub. No.	Name	Summary of Submission
		<p>A minor amendment to the figure in table 3.5 is required to align with the 2023 figure of 239,367. It should be noted that the statement suggesting that this figure is below the 2026 target, is clarified under the response to the submission from the OPR. For clarity, the 239,367 figure is to end of the Plan period in early 2023 and allows ca. 22,500 persons over the remaining 4 years to the end of 2026. This is to provide a balanced growth rate over the current and future development plans.</p> <p>The minor error in Section 2. 1.4 is noted and will be rectified accordingly.</p> <p>Chief Executive's Recommendation The following amendments are recommended;</p> <ol style="list-style-type: none"> 1. Replace Map 2.1 of the Proposed Variation with up to date Settlement Strategy for the region as per the RSES 2. Include supplementary map to identify Strategic Development Corridors in the MASP area 3. Amend reference to the RPGs as a clerical error and replace with RSES. 4. (i) Amend Table 3.3 columns 9 and 10 to state <ol style="list-style-type: none"> a) population growth 2020-2023 and b) dwellings target 2023 (ii) Amend title of table 3.3 to remove reference to 2016-2023 and replace with 2020 to 2023 (Feb) (iii) Delete column 6 in its entirety as it relates to RPG housing forecasts and is no longer relevant 5. Insert explanatory footnote at end of Table 3.3 to address the methodology and rationale for the calculations 6. Insert footnote at end of Table 3.3 to address NPO 68 and additional population allocation to the Key Town of Maynooth 7. Amend minor error in Section 2.1.4

Sub. No.	Name	Summary of Submission
3	Environmental Protection Agency	<p>The Environmental Protection Agency outlines a number of items that should be contained in a SEA Environmental Report. A guidance document titled SEA of Local Authority Land Use Plans – EPA Recommendations and Resources was also submitted as part of the submission.</p> <p>The EPA makes a number of observations regarding the Environmental Report:</p> <ul style="list-style-type: none"> • Assessment of Alternatives to outline the selection and assessment process to determine the preferred alternative, which should be assessed against the alternatives the Strategic Environmental Objectives identified in the SEA ER. • Assessment of Environmental Effects to outline the likely significant environmental effects of implementing the Variation, including the potential for cumulative effects in combination with other relevant Plans/ Programmes and Projects. • Mitigation Measures to provide appropriate measures and commitments to avoid or minimise likely significant effects. • Monitoring to include a flexible programme to enable unforeseen and adverse impacts, including positive and negative effects. Remedial action should be suitable if adverse impacts arise during the implementation of the Variation. <p>The submission recommends the following in finalising the report:</p> <ul style="list-style-type: none"> • The key issues and challenges identified in ‘Ireland’s Environment-An Assessment 2016’ should be considered; • Future amendments to the Plan should be screened for likely significant effects using the same method of assessment applied in the SEA of the Variation; • On adoption of the Variation a SEA Statement should be prepared to incorporate the following, how environmental considerations have been integrated; how observations, consultation and the ER have been considered in the preparation; reason for the Variation in light of other

Sub. No.	Name	Summary of Submission
		<p>reasonable alternatives; measures decided upon to monitor significant environmental effects of implementation.</p> <p>The submission also lists the prescribed Environmental Authorities for the purposes of varying a County Development Plan.</p> <p>Chief Executive's Response The primary purpose for the publication of Proposed Variation to the Kildare County Development Plan 2017-2023 is to ensure the Council fulfil its statutory obligation to align the CDP with provisions of the NPF and RSES. Under the provisions of Section 11(1)(b)(iii) of the Planning and Development Act 2000 (as amended) Kildare County Council is statutorily obliged to prepare a variation of its CDP within 26 weeks of the RSES being adopted. The County Development Plan is due for review early 2021 and will be open to public consultation and will address a range of cross-cutting issues at various stages throughout this review. The Draft Variation has undergone SEA and AA and environmental considerations have been factored into the variation having regard to the SEA and AA.</p> <p>Chief Executive's Recommendation No change recommended.</p>
4	Transport Infrastructure Ireland (TII)	<p>Proposed Amendment No. 10 Submission acknowledges Proposed Amendment no. 10 which sets out amendment to Section 2.16 'Delivering the Core Strategy' TII would welcome, having regard to the foregoing, consideration by the Council of including as an additional Core Strategy Objective in the Development Plan the following strategic objectives;</p> <ul style="list-style-type: none"> • To maintain the strategic capacity and safety of the national roads network, • To safeguard the investment in national roads, and

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> • To facilitate the delivery of national road improvements in accordance with National Development Plan objectives; • N7 Naas to Newbridge bypass widening (under construction), • M4 Maynooth to Leixlip. <p>Proposed Amendment No. 13 and Proposed Amendment No. 15 The submission acknowledges that Amendment no. 13 references RPO 4.35 to prepare a joint LAP for Maynooth with Meath County Council and No. 15 includes an alteration to Objective SO 2 which outlines a commitment to carry out a Strategic Land Use, Employment and Transportation Study of northeast Kildare including the Dublin Metropolitan Area towns of Leixlip, Maynooth, Celbridge and Kilcock and the submission requests that TII are consulted during the preparation of same.</p> <p>Proposed Amendment No. 16 TII note the sectoral opportunity in Naas for the re-intensification of industrial lands to the north east of the town and reference is made to the Draft Naas LAP in May 2019 and the TII's submission during public consultation process. The submission states that potential impact to the national road from the development of the lands to the north east of the town should be considered and reference is made to planning file 15/500 (Appeal which was withdrawn from the Board). TII also note that the preparation of the Naas Transport Strategy has commenced and requests that KCC ensure any development does not take place in a piecemeal manner but integrates with existing development and infrastructure.</p> <p>TII advise that ABTA guidance is available to assist the Council and requests consultation on development proposals/masterplanning and recommends that any masterplan adoption process or framework should be clearly outlined and included in the LAP/Development Plan by way of a variation or amendment particularly where such policy informs the development management process.</p>

Sub. No.	Name	Summary of Submission
		<p>Chief Executive's Response</p> <p>The contents of the submission from TII are noted. Chapter 6 of the current CDP relates to Movement and Transport and sets out a number of policies and objectives to address a sustainable transport future for the County. Such policies include supporting sustainable modes of transport by spatially arranging activities around existing and planned high quality public transport and promoting the creation of appropriately phased integrated transport networks that service the needs of both communities and businesses. The CDP also sets out objectives for the protection of motorways and national roads under M1 – M5 and NR 1-7. It should be noted that NR7 is a specific policy of the Council to protect the capacity, efficiency and safety of the national road network.</p> <p>In relation to the preparation of the Joint LAP for Maynooth, the Council will engage T.I.I at all stages during the plan making process.</p> <p>Regarding the issues relating to the Naas LAP and the Transport Strategy currently being prepared to inform the LAP which will be published later this year. The Council acknowledge the input and engagement of TII in the preparation of the Transport Strategy and will further engage during the consultations throughout the LAP.</p> <p>Chief Executive's Recommendation No change recommended.</p>
7	Health and Safety Authority	<p>The HSA would expect the planning guidelines to contain:</p> <ol style="list-style-type: none"> 1. An indication of planning policy regarding major accident hazard sites as per the appropriate regulations, which reflects the intention of Article 13 of Directive 2012/18/EU. 2. Consultation distances and generic advice supplied by Authority in relation to such sites. 3. A policy on siting of new major hazard establishments taking account of the HSE policies and Article 13. This includes development adjacent to such establishments. 4. Mention of Intel Ireland and Irish Industrial Explosives as notified establishments.

Sub. No.	Name	Summary of Submission
		<p>Included in the submission is a Note on the Approach of the HSA to the Provision of Land-use Planning advice.</p> <p>Chief Executive's Response The contents of the submission are noted. The purpose of the Variation is to respond to recent changes in national and regional policy namely the publication of National Planning Framework (NPF) and the Eastern and Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES). The content of Proposed Variation No. 1 to the KCDP do not relate to Section 5.5 Prevention of Major Accidents and the development management standards contained under Section 17.12 Seveso Sites, as provided for under the Kildare County Development Plan 2017-2023.</p> <p>Chief Executive's Recommendation No change recommended.</p>
8	Laois County Council	<p>Contents of the Variation have been noted.</p> <p>Chief Executive's Recommendation No change recommended.</p>
10	Irish Water	<p>The submission from Irish Water indicates no objection to Proposed Variation No.1 of the KCDP, however the submission suggests additional text at Section 1.4.1(ii):</p> <p><i>Irish Water is preparing for the future by developing the National Water Resources Plan (NWRP). The strategic plan for water services will outline how we move towards a sustainable, secure and reliable public drinking water supply over the next 25 years, whilst safeguarding the environment. The NWRP will outline how Irish Water intends to maintain the balance between supply from water sources around the country and demand for drinking water over the short, medium and long-term. This will</i></p>

Sub. No.	Name	Summary of Submission
		<p><i>allow preparation for the future and ensure the provision of sufficient safe, clean drinking water to facilitate the social and economic growth of our country.</i></p> <p>Chief Executive's Response The purpose of Proposed Variation No. 1 of the KCDP is to respond to recent changes in national and regional policy namely the publication of National Planning Framework (NPF) and the Eastern and Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES). The text within the existing CDP states the Council will facilitate Irish Water in the delivery of the Water Services Strategic Plan and will work in conjunction with Irish Water to protect, manage and optimise water supply networks in the county. The Kildare County Development Plan is due for a full review in early 2021 and this will include detailed consultation with Irish Water.</p> <p>Chief Executive's Recommendation No change recommended.</p>
11	Office of Public Works	<p>The submission from the OPW encourages the addition of a 'Settlement Strategy' objective and suggests that in line with the Planning System and Flood Management Guidelines (2009) and associated circulars, zoning decisions be carried out in line with the guidelines and ensure the sequential approach to flood risk management is used. The submission notes that the SFRA Statement acknowledges the continued commitment to the guidelines and that no land use amendments are included as part of the Variation.</p> <p>Chief Executive's Response Policy SW 5 of the Kildare County Development Plan 2017-2023 states that it is a policy of the Council to manage flood risk in the county in accordance with the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities, DECLG and OPW (2009)</p>

Sub. No.	Name	Summary of Submission
		<p>and circular PL02/2014 (August 2014), in particular when preparing plans and programmes and same are considered robust and sufficient in terms of managing flood risk throughout the County.</p> <p>Chief Executive's Recommendation No change recommended.</p>
14	Meath County Council	<p>This submission welcomes the opportunity to facilitate co-operation between the counties as well as ensuring the delivery of the objectives of the RSES.</p> <p>Opportunities for Co-operation: The boundary between Meath and Kildare stretches approximately 45km from Ongar/Hansfield to the west. There are a number of important matters that will need to be addressed over the coming years particularly due to the Metropolitan Area Strategic Plan (MASP) as set out in the RSES.</p> <ul style="list-style-type: none"> • The co-operation between both counties will be important on delivering infrastructure, reducing reliance on rural housing, protecting the environment and providing settlements that can provide sustainable compact growth, particularly in the case of Maynooth and Kilcock. • The commentary in Section 3.5 of the Variation is welcomed and it is noted that RPO 4.35 of the RSES requires Kildare County Council to prepare a Joint Local Area Plan for Maynooth with Meath County Council (MCC). Maynooth is identified as Key Growth Town and as such it is important that a comprehensive plan is prepared to ensure that compact growth and sustainable development can be delivered. • MCC highlights objective CS OBJ 11 of the Draft Meath County Development Plan 2020-2026 <i>'To prepare a Joint Vision and Local Area Plan for Maynooth in partnership with Kildare County Council within the lifetime of this Plan in accordance with the requirements of Regional Policy Objective 4.35 of the RSES for the Eastern and Midland Region.'</i> • The delivery of the Maynooth Outer Orbital Route is important to deliver the level of growth planned for the town. This is strongly supported in the RSES, Table 5.1.

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> • Co-operation between both local authorities will be important to the development of Kilcock town and environs in order to focus on the delivery of sustainable compact growth with a focus on providing 'live-work; communities to reduce reliance on commuting. • Rural housing, environmental matters and infrastructure delivery must be managed in a co-ordinated fashion to avoid inconsistent and unsustainable development on different sides of the county boundary. In this regard, Policy, CS 4(a) of the proposed variation is welcomed and considered with the approach to settlements proposed as part of the Draft Meath County Development Plan 2020-2026 <p>Infrastructure Development A number of options are being considered for a new route between the N2, N3 and N4 as part of the M50 resilience project being undertaken by TII. Given the potential for this route to improve connectivity between Meath, Fingal and Kildare, it hoped that KCC will be supportive of this proposal and specifically include a policy supporting the provision of such a link as part of the variation and in the future CDP review scheduled to commence in 2021.</p> <p>Population Projections It is noted that as per National Policy Objective 68 of the NPF, the transitional population projections methodology allows for up to 20% of phased growth targeted in Dublin City and suburbs to be re-allocated to other areas in the MASP i.e. the Key Growth Towns of Bray, Maynooth and Swords and the quantum of population to be transferred is to be addressed by the MASP Implementation Group (Section 5.7 of the RSES),</p> <p>In the context of Maynooth, Meath and Kildare County Councils must work together to create the necessary conditions for the delivery of the proposed population, as outlined in the Core Strategies for Kildare and Meath as well as the additional transitional population that may be assigned to Maynooth.</p>

Sub. No.	Name	Summary of Submission
		<p>Such an approach will ensure that the town grows in a sustainable manner that will ensure compact growth as well as 'live work' communities as envisaged in the RSES.</p> <p>Chief Executive's Response The issues raised in the submission are noted. Kildare County Council looks forward to working with Meath County Council in the preparation of the Joint Maynooth LAP in accordance with RPO 4.35 of the RSES for Kildare's Key Town in the Metropolitan Area, to provide a coordinated planning framework for the town which identifies strategic housing and employment development and infrastructural investment requirements and to ensure compliance with the National Policy Objectives of the NPF and the Regional Policy Objectives of the RSES.</p> <p>Chief Executives' Recommendation No change recommended.</p>
18	Fingal County Council	<p>The submission from Fingal County Council supports for the changes required to the KCDP 2017-2023 to ensure it is consistent with the objectives of the NPF and EMRA Regional Spatial Economic Strategy. The submission also welcomes the opportunity to work together with Kildare County Council and the other Eastern and Midland Region Local Authorities to achieve continued sustainable and consolidated population and employment growth and notes that Fingal County Council is currently undertaking a similar process.</p> <p>Chief Executive's Response The submission is noted.</p> <p>Chief Executive's Recommendation No change recommended.</p>

Sub. No.	Name	Summary of Submission
31	Department of Transport, Tourism and Sport	<p>The submission states that since the Development Plan was published in 2017 there have been important policy developments which are relevant to Chapter 6 Movement and Transportation and which DTTAS considers should be reflected in the Variation, including;</p> <ul style="list-style-type: none"> • Local Link Rural Transport Programme Strategic Plan 2018 to 2022; • National Disability Inclusion Strategy (NDIS) 2017-2021 and the ratification by Ireland in 2018 of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD). <p>DTTAS can assist with appropriate text for Chapter 6 for inclusion in the Proposed Variation.</p> <p>DTTAS is currently carrying out a review of sustainable mobility policy which includes both active travel (walking and cycling) and public transport policy. A new sustainable mobility policy framework will be developed over the course of 2020 which will replace the existing policy documents – Smarter Travel, A Sustainable Transport Future 2009-2020 and the National Cycle Policy Framework - which are referenced in the Kildare County Development Plan.</p> <p>Chief Executive’s Response The purpose of the Variation is to respond to recent changes in national and regional policy namely the publication of National Planning Framework (NPF) and the Eastern and Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES).</p> <p>The Kildare County Development Plan is due for review in early 2021, and consultation with various stakeholders and statutory consultees will be carried out as part of this process. The CDP will be updated to reflect these policy changes at this time.</p> <p>Chief Executive’s Recommendation No change recommended.</p>

Sub. No.	Name	Summary of Submission
33	National Transport Authority (NTA)	<p>The submission from the NTA notes contents of Variation No. However, it states that the total population figure in column 'NPF 2026 Pop Growth' at 39,370 would result in a higher population figure for Kildare for 2026 than indicated in Appendix B of the RSES.</p> <p>The submission also suggests that it is unclear where the allocation of 8% growth to 'rural dwellers' will be accommodated in terms of the rural hierarchy as identified, namely 'villages', 'rural settlements' and 'rural nodes' and notes that no associated 2016 existing population figure for 'rural dwellers' category. Therefore, it is not possible to identify the total population distributions and growth figures for the rural categories.</p> <p>Chief Executive's Response</p> <p>Attention is drawn to Section 3(a) of the Implementation Roadmap for the National Planning Framework which sets out the background to the Transitional Population Projections and more importantly the 'Implications and Safeguards' therein. The NPF notes that further to paragraph 4.14 of the 2007 Development Plan Guidelines for Planning Authorities, planning authorities have generally made provision for 50% more zoned land than is required to meet demand during the six-year lifetime of a Development Plan i.e. sufficient land for a further three years. This is known as 'headroom'. The published NPF/NDP national average baseline population projection accounts for a 25% 'headroom' allowance for additional population growth nationally, for each Census year and related intercensal period.</p> <p>Cumulatively, this means provision for 25% headroom to 2026 has effectively been accounted for at a within the figures nationally with limited provision for further headroom in most cases. Notwithstanding previous DHPLG guidance, the roadmap advises that this will be reflected in forthcoming updated Development Plan guidance. The Roadmap is explicit in stating that providing further headroom in counties where provision for population growth has been significantly adjusted up to the national</p>

Sub. No.	Name	Summary of Submission
		<p>average, would be inappropriate, to ensure that land zoning is broadly matched to an evidence-based assessment of need and co-ordination in infrastructure investment.</p> <p>However, it is also clear in stating that ‘scope for headroom, not exceeding 25%, can be considered to 2026 in those counties where projected population growth is projected to be at or above the national average baseline, of which Kildare is one. In order to facilitate a relatively seamless transition and, to ensure the continuity of supply of housing in the County, Kildare County Council has made provision for this additional headroom within the published figures set out in Table 3.3. Regarding the rural dwellers category, a Census of Population will take place in April 2021, with results becoming available during the full review of the Kildare County Development Plan which will be initiated in Feb/March 2021. This will allow an evidence-based review of the performance of each settlement and rural areas and the potential for additional allocated growth based on the most up to date figures for both population & housing stock at which stage the settlement hierarchy can be reviewed (if necessary) based on the figures in the Census.</p> <p>Chief Executive’s Recommendation No change recommended.</p>
41	Office of the Planning Regulator (OPR)	<p>The submission from the OPR acknowledges Kildare County Council’s work in preparing the Variation. The submission welcomes the proposed variation and is generally satisfied that it will align the County Development Plan with the NPF and RSES. The submission makes reference to NPO 68 that 20% of the targeted growth is being transferred from the Dublin City and suburbs allocation to other settlements in the MASP which include Maynooth and the submission further states that the OPR understands that the consultation is underway and that the Regional Assembly, working with all the relevant local authorities and the Department of Housing, Planning and Local Government will provide clarity on the appropriate adjustments of broad NPF and RSES population forecasts to take</p>

Sub. No.	Name	Summary of Submission
		<p>account of NPO 68. The OPR make recommendation 1 in relation to text from page 113 of the RSES regarding the Metropolitan Key Town of Maynooth.</p> <p>The submission states that the OPR notes that the population projection of 238,993 for the county to 2023 on page 58 of the variation is below the range of 249,000-254,000 for 2026 from the NPF Implementation Roadmap and observes that the figures for population growth and dwellings target to 2023 appear to have been extrapolated using a 7-year rather than 10-year period. The submission requests that the Council sets out a methodology to provide clarity on how the figures for population growth and dwellings targets were calculated and suggests that this may also affect the figures for population projection and additional dwelling need on pages 38 and 58 of the variation.</p> <p>The OPR welcomes the inclusion of the text on pages 58 and 59, and in particular the need for an infrastructural assessment and preparation of a joint LAP for Maynooth with Meath County Council and also welcomes the inclusion of reference to the strategic development areas for residential and employment within the North-West Corridor of the Metropolitan Area Strategy Plan (MASP) in the RSES. The OPR advises the planning authority to include a copy of the map of the MASP from Figure 5.2 of the RSES to provide clarity on the relationship of the county to the overall strategic plan and welcomes the inclusion of policy CS 4 (a) for viable and sustainable rural settlements and notes the existing policies to manage the population growth of Villages to ensure their sustainable growth. The existing plan makes reference to the preparation of a strategic Land Use, Employment and Transportation Study of northeast Kildare, the proposed variation does not make reference to the need to prepare local transport plans (in conjunction with the NTA) for the towns of Naas and Newbridge. In order to provide for greater consistency with the RSES in respect of transport policy</p>

Sub. No.	Name	Summary of Submission
		<p>and Regional Policy Objective (RPO) 8.6 specifically, the OPR advises the planning authority to include reference to the need to prepare a local transport study for the towns of Naas and Newbridge. The submission also advises that the planning authority may wish to consider including a brief summary referring to the establishment of the Office of the Planning Regulator and its evaluation role in Chapter 1.</p> <p>The submission concludes with the following observations:</p> <ul style="list-style-type: none"> ▪ Settlement Strategy map proposed to be inserted as Figure 2.1 is not consistent with the adopted RSES. The map legend refers to Hinterland Areas and Outer Region instead of Core Region and Gateway Region respectively; ▪ Proposed variation appropriately refers to the RSES designation of Naas and Maynooth as Key Towns. However, it does not acknowledge or make the distinction that Maynooth is one of three Metropolitan Key Towns while Naas is a Key Town in the Core Region; ▪ The population figures and housing targets for the county in Table 2.4 and the county's settlements at Table 3.3 appear to relate to the period from 2020 to 2023 rather than the period from 2016 to 2020; ▪ Policy SS 1 refers to the now superseded RPGs in respect of managing the county's settlement pattern in accordance with housing unit allocations set out regional guidance etc. <p>Recommendation 1 <i>Arising from the foregoing evaluation and assessment of the proposed Variation no. 1 to the Kildare County Development Plan and in order to ensure effective co-ordination of national, regional and local planning requirements by the planning authority in the discharge of its development planning functions, the Office recommends Kildare County Council include appropriate reference to the</i></p>

Sub. No.	Name	Summary of Submission
		<p><i>potential of up to 20% of the targeted growth in the city being transferred to the Metropolitan Key Towns of Maynooth, Swords and Bray in consultation with the MASP Implementation Group.</i></p> <p>Chief Executives Response</p> <p>The submission from the OPR is noted and the comments acknowledged. Regarding the observations highlighted in the submission, the up to date settlement strategy map from the RSES will replace Map 2.1 of the Proposed Variation. It is also proposed to differentiate Maynooth and Naas on Table 3.3 of the Proposed Variation so as to easily identify that Maynooth is a key Town in the MASP and Naas is a Key Town in the Core Region. The reference to the RPGs is a clerical error and will be amended accordingly.</p> <p>In relation to the population targets in table 2.4 and the request for clarification on the methodology for the calculations, the following should be noted; In order to clarify the methodology used to determine the population projections going forward, it is considered necessary to outline the source of the original 32,497 housing unit target before clarifying the reduction and associated methodology set out in Proposed Variation No. 1 of the KCDP.</p> <p>The Regional Planning Guidelines (for the GDA) 2010-2022 set out a housing target for County Kildare for 2016 and 2022 (see table 6 page 84 of the RPGs). These targets were set at 93,748 units to 2016 & 112,477 units to 2022. It is important to note at this stage, that the RPGs identified growth in housing units rather than population as is the case in the NPF Roadmap and the RSES.</p> <p>The 2016 census indicated a housing stock of 80,158 units in County Kildare, which was significantly below the projected target of 93,748 units for that year. A number of factors, most significantly the economic crash, contributed to the county not achieving its target to 2016. Therefore, in order to achieve the target, set for 2022 of 112,477 units, it was necessary to make provision in the 2017-2023 Kildare County Development Plan for an additional 32,497 units (which included ca.13,000 units</p>

Sub. No.	Name	Summary of Submission
		<p>which had not been delivered in the 2010 to 2016 period). In early 2018 the National Spatial Strategy was replaced by the National Planning Framework (NPF). In mid-2018, an Implementation Roadmap for the NPF was published which set out a set of transitional population targets which would inform the forthcoming Regional Spatial & Economic Strategy. The Roadmap stated that these projections plot a growth trajectory set approximately mid-way between what is currently being planned for in Statutory Development Plans if projected forward to 2031, and the more likely evidence based and nationally coherent projected scenario to 2031 and 2040 in line with historic growth rates in the census. The RSES, which came into effect in June 2019, replicated the revised targets for Kildare. Section 11(1)(b)(iii) of the Planning and Development Act 2000 (as amended) requires a variation of the CDP to align it with the NPF & RSES within 26 weeks of the making of the RSES. The population targets set for County Kildare in the NPF Roadmap and RSES (Appendix B) are 249,000-254,000 to 2026 and 259,000-266,500 to 2031. To 2026 this provides a growth range of 26,496 – 31,496 persons which equates to a range of 9,462 – 11,248 units. This is a notably lower growth rate than that projected in the RPGs. The 2016 census of population for County Kildare was 222,504 persons with a housing stock of 80,158 units. For the purposes of aligning the current CDP with the NPF & RSES, the higher range was taken. i.e. a target population of 254,000 persons by 2026 which equates to an increase of 31,496 persons on the 2016 census figure. It should be noted at this stage that the NPF Roadmap is explicit in relation to the universal application of ‘headroom’ & scope for up to 25% may be considered to 2026 in counties where projected population growth is above the national average. Kildare is identified as being one of those counties where headroom of up to 25% is allowable, for the purposes of transitioning to the revised targets.</p> <p>This increases the adjusted target from 31,496 to 39,370 persons. Applying an occupancy rate of 2.8 persons per unit (in accordance with the 2016 census for County Kildare) this equates to a housing unit target of 14,060 units to 2026 or ca. 2,000 units per year between 2020 and 2026.</p>

Sub. No.	Name	Summary of Submission
		<p>For the purposes of aligning the CDP with the NPF & RSES the 3-year period remaining for the current CDP must make provision for an additional 6023 units i.e. ca. 2000 units per year which is a projected reduction of ca. 700 units per year across the county from the RPG housing delivery target. Whilst it is acknowledged that the figures represent an optical reduction, the County Development Plan only has 3 years remaining¹ and still makes provision for 2000 units per year & with a similar rate applied over the remaining 4 years i.e. 2023, 2024, 2025 & 2026 will achieve the 2026 NPF & RSES target. The previous target covered a period between 2016 & 2023 & also carried over the underperformance in housing delivery from the economic downturn.</p> <p>Proposed Variation No. 1 has taken the revised population targets from the National Planning Framework Implementation Roadmap and RSES and distributed this in accordance with the percentage growth for each settlement that was adopted and set out in the County Development Plan. It should be noted at this stage that the statutory review of the CDP will be initiated in February 2021, at which stage, the designations, percentage growth allocation & other issues will be reconsidered. It is also important to note at this stage, that the targets and resultant housing land requirements for the towns of Naas, Maynooth, Celbridge, Leixlip, Kilcock, Clane, Sallins, Newbridge, Kildare Town, Athy, Monasterevin and Kilcullen will be addressed at Local Area Plan stage over the course of the coming years when each of these are reviewed & will cover the period from 2020 & 2021 to 2026 & 2027 & beyond.</p> <p>It is noted that the submission requests clarification on the methodology for the calculation set out in Table 3.3 noting that the numbers were calculated based on a 7-year period from 2020 – 2026 (all years fully inclusive) rather than a 10-year period from 2016 -2026.</p> <p>The following are of note;</p>

¹ The current CDP runs until Feb 2023, therefore the 2023 annual allocation does not include the 2023 housing units.

Sub. No.	Name	Summary of Submission
		<p>A) Kildare County Council has taken the higher range + 25% in calculating the 2026 target which is reducing the potential allocation to 2031.</p> <p>B) The 2026 population target is 254,000 which equates to an additional 31,496 persons</p> <p>C) Add the 25% headroom = 39,370 persons to 2026 (= 261,874 persons)</p> <p>D) The transitional population targets are set to 2026 & 2031 (with the exception of Maynooth)</p> <p>E) The 2031 figure for Kildare is 266,5000 persons which is an additional 4,626 persons across the county for the period between 2026 & 2031.</p> <p>F) The census of population was in 2016, no further conclusive updates on population growth (in particular) and housing stock are available since this date.</p> <p>In the absence of a standardised methodology for developing core strategies in development plans and in the absence of definitive population growth figures 2 scenarios were considered</p> <ul style="list-style-type: none"> • 7-year methodology - from the adoption of the RSES in June 2019 where the revised population projection were prescribed to the end of 2026 • 10-year methodology - from the last census of population in 2016 until the end of 2026 <p>7-year methodology provides for ca. 16,863 persons (6023 housing units) over the remainder of the plan (2020, 2021 and 2022 as the plan expires in early 2023) with ca. 22,507 persons (8038 housing units) over the remaining 4 years to the end of 2026 which anticipates ca. 2000 units per year over the 7 years period which is considered to be a sustainable rate of growth and reasonable rate of housing delivery.</p> <p>10-year methodology provides for ca. 27,543 persons (9837 housing units) over the remainder of the plan (2020, 2021 and 2022 as the plan expires in early 2023) with ca. 11,827 persons (4224 housing units) over the remaining 4 years to the end of 2026. The result is a higher target to 2023 however</p>

Sub. No.	Name	Summary of Submission
		<p>results in a significantly reduced target for the remaining 4 years of the population allocation (i.e. 2023, 2024, 2025, 2026) of 500 units per year.</p> <p>It should be noted at this stage point E above which highlights that using the higher range AND the 25% headroom in the 2026 figure already reduces the 2026-2031 potential allocation to 4,626 persons or 1850 units over the remaining years between 2026 and 2031.</p> <p>It is further noted that a Census of Population will take place in April 2021, with results becoming available during the full review of the Kildare County Development Plan which will be initiated in Feb/March 2021. This will allow an evidence-based review of the performance of each settlement & the potential for additional allocated growth percentage based on the most up to date figures for both population & housing stock at which stage the settlement hierarchy can be reviewed (if necessary) based on the figures in the census.</p> <p>It was considered that the 7-year period made provision for a reasonable transition to the revised targets without significantly reducing future targets and for allowing a continuity of supply of housing to meet demand in County Kildare during this and future plan periods of ca. 2000 units per year over the remaining 3 years of the CDP.</p> <p>Chief Executive's Recommendation</p> <p>The following typographical and presentation amendments are recommended;</p> <ol style="list-style-type: none"> 1. Replace Map 2.1 of the Proposed Variation with up to date Settlement Strategy for the region 2. Differentiate Maynooth and Naas on Table 3.3 so as more readily identify that Maynooth is a key Town in the MASP and Naas is a Key Town in the Core Region. 3. Amend reference to the RPGs and replace with RSES. 4. (i) Amend Table 3.3 columns 9 and 10 to state <ol style="list-style-type: none"> a) population growth 2020-2023 and

Sub. No.	Name	Summary of Submission
		<p style="text-align: center;">b) dwellings target 2020-2023</p> <p>(ii) Amend title of table 3.3 to remove reference to 2016-2023</p> <p>(iii) Delete column 6 in its entirety as it relates to RPG housing forecasts and is no longer relevant</p> <ol style="list-style-type: none"> 5. Insert explanatory footnote at end of Table 3.3 to address the methodology and rationale for the calculations 6. Insert footnote at end of Table 3.3 to address NPO 68 and additional population allocation to Key Town of Maynooth 7. Insert reference to role of the OPR in Plan-making in Chapter 1.

Table 3.1 (b)

Sub. No.	Name	Summary of Submission
1	Department of Education and Skills	Please see Table 3.1 (a).
2	Eastern and Midland Regional Assembly	Please see Table 3.1 (a).
3	Environmental Protection Agency	Please see Table 3.1 (a).
4	Transport Infrastructure Ireland (TII)	Please see Table 3.1 (a).
5	Michael Hoey	<p>The submission suggests that current water supply to sustain the CDP is not assured.</p> <p>The submission includes two attachments; Appendix 4, ‘Map Showing Raised Bogs in the Region’ and Appendix 5, a report prepared for Bord na Móna by the Forest Ecosystem Research Group, University College Dublin, 2007 “Carbon as balances in industrial cutaway peatlands in Ireland”.</p> <p>The Executive Summary of the report states that pristine peatlands play an important role in regulating the global climate by acting as long-term carbon (C) sinks. With the commencement of industrial peat harvesting, C gas dynamics are transformed, and the peatland becomes a C source.</p>

Sub. No.	Name	Summary of Submission
		<p>The author of the report states that their knowledge of C dynamics in cutaway peatlands where harvesting has ceased, and a new land use option has been developed is limited.</p> <p>The Bord na Móna funded CARBAL project was initiated in 1999 to investigate carbon dioxide (CO₂) and methane (CH₄) exchange in a number of potential after uses for industrial cutaway peatlands. These were (1) commercial Sitka spruce afforestation, (2) natural regeneration to birch/willow woodland and (3) wetland creation. A range of methodologies (biomass and chamber measurements) were employed in the study to provide an estimate of the annual C balance in each land use option.</p> <p>The summary concludes that there is considerable variation in the ability of the three land use options to sequester C. The reasons may be due to climatic variations, management practices, hydrology or edaphic factors. However, these results should be interpreted with caution and any global application of them to the industrial cutaways is not recommended.</p> <p>Chief Executive's Response The primary purpose for the publication of Proposed Variation to the Kildare County Development Plan 2017-2023 is to ensure the Council fulfils its statutory obligation to align the CDP with provisions of the NPF and RSES. Under the provisions of Section 11(1)(b)(iii) of the Planning and Development Act 2000 (as amended) Kildare County Council is statutorily obliged to prepare a variation of its CDP within 26 weeks of the RSES being adopted. The County Development Plan is due for review early 2021 and will be open to public consultation and will address a range of cross-cutting issues at various stages throughout this review.</p> <p>Chief Executive's Recommendation No change recommended.</p>
6	Michael Hoey	The submission includes six appendices, which it states also applies to Laois and Offaly County Councils, in addition to Kildare County Council.

Sub. No.	Name	Summary of Submission
		<p>The submission details the long-term plan for the cutaway bogs which was agreed with the European Commission in 1995 and states:</p> <ul style="list-style-type: none"> • <i>I am a Navigation Authority for the purposes of section 21 of the Water Supplies Act of 1942. Kildare County Council are ignoring their statutory duty to have the Interference Notice (which I issued) heard and or removed before the High Court under section 21 (8) of the act. I issued the Interference Notice against the Provisional Order approved for the removal of water directly and indirectly from the Barrow Navigation. There can be no proper or sustainable development plan made or achieved while this Interference Notice remains in force.</i> • The current water supply to sustain the CDP is not assured. The water supply project to take water from the Shannon does not take into account the damage caused to the Barrow Navigation through the various water supply abstractions. Permanent loss of water which is accountable to KCC. The O'Brien v Bord na Mona case is referred to. Consequently, a valid development plan cannot be attained while the Interference Notice remains in force. • The EPA don't monitor the quality of the River Barrow. The EPA set the 95% percentile flow for the Barrow Abstraction Proposal, and no account was taken of the other abstractions and the loss of water to the Barrow Navigation identified in Table 1 or from the depletion of the raised bogs in the catchment. The submission states that the abstractions which have occurred since 2001 are without the EPA monitoring the quantitative status. There is no legitimate basis for further development in the region until the issue of the draft of the Navigation is resolved. • The Water Management Plan of 1985 was the last relevant attempt to establish the condition of the River Barrow. Since 1998 the compensatory measures required to ensure the overall coherence of Natura 2000 have not been provided. The Kildare Water Strategy was not prepared as a public document and was based on the findings of the 1996 Greater Dublin Water Supply Strategic Project which stated, 'the potential for using water from the Barrow would be limited to supplementing the Liffey System at times when flows are high'. • To date all of the water abstractions except Robertstown have been carried out.

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> • Page IV of the Kildare Water Strategy describes the development of the Curragh aquifer as a parallel strand to the main proposals on groundwater, the River Barrow and the River Liffey. • The River Barrow constitutes a habitat for the Irish subspecies of the freshwater pearl mussel which is included in Annex II of the Habitats Directive. The population now stands at 200 from a high of 20,000 in 1991. Reproduction of the Nore Pearl has not occurred since 1970. Sedimentation is threatening its existence. • The information set out in Section 7.2.1 of the current CDP is misleading. Table 1 shows KCC accountable for 92.5 m³ of water. The Environmental Report submitted for Rathangan Wellfield envisages the abstraction of 5M/l day from 6 production wells drilled into the bedrock aquifer. The hybla ER outlines proposals to develop the North Kildare aquifer. The Barrow abstraction will contribute to the future water needs of the county. • The EIS provided for the surface water abstraction at Srowland Athy states it is proposed to abstract 40,000m³ of water daily. It is clear from the figures given in the proposal for the Variation of the CDP that the water abstractions carried out by KCC since 2001 have not gone to supplement the water supply needs of Co. Kildare. • The EPA’s submission to the draft National Peatlands Strategy stated that the EPA is of the view that the industrial licensing process used to regulate peat extraction in Ireland (for plots of greater than 50ha) is not appropriate for managing and regulating ecologically sensitive areas such as peatlands. • The EPA views of peat extraction should be considered. A cross government approach should be implemented to promote sustainable development and additional sub sections on Water Quality and Air Quality, and Biodiversity. • Regarding alternatives to wind energy, Section 8.6 of the CDP refers to hydro energy, many rivers and tributaries in the county are protected under the Birds and Habitats Directives or another heritage designation such as protected structures and this should be a consideration during the investigation of any possible suitable site

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> • Policies HD1-4 are referenced. • The draft of the Barrow navigation is the single most important issue which has not been included in the CDP. • A Memorandum of Understanding permitted burning peat from identified boglands, this activity was to cease from 2015. • 26,000 ha was agreed to be flooded and planted and made available for tourism and amenity use. A condition on Bord na Mona to implement a development plan for the bogs supplying the new station after the peat is extracted, dividing areas between coniferous forestry, deciduous forestry, grassland and wetlands was also imposed. It is the view that at that time the European Commission were misinformed of the status of the bogs from which peat for burning was to be removed. • The CARBAL Report (appendix 5, attached with the submission) was published in an effort to comply with the Memorandum of Understanding of 1998, which identified management options to minimise losses of CO2 from cutaway bogs and maximise uptake. • With the agreement on the 26,000 ha in place the need to flood the bogs and to cover every particle of disturbed bog was confirmed in the CARBAL Report. • The Memorandum of Understanding is the only clear coherent after use plan which could remedy the loss of water to the Barrow Navigation and return the cutaway bogs to CO2 sinks which should be in place for each cutaway peatland. • The pollution abatement and flood protection at the centre of this new wetland creation contained in the Water Framework Directive compliments both the long erm plan for the cutaway bogs and encompasses the CARBAL report. • Unauthorised peat removal has been accommodated by Counties Kildare, Offaly, Laois and Westmeath. • EPA has issued IPC licences for Bord na Mona activities without having regard to the discharge to the Barrow and directly to the Grand Canal at Daingean from Ballycommon bog.

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> • European Communities (Environmental Impact Assessment) (Amendment) Regulations, 1999 which came into operation on 1 May 1999 imposed an obligation to apply for planning permission and carry out an EIA for peat extraction. No application for permission or retention was ever made. The qualifying Raised Bogs were drained, and harvesting commenced without permission being applied for or granted. • Cannot have sustainable development until the role of bogs in their previous intact state is recognised. All the water necessary for the Navigation was an is vested in the Navigation by Charters. • Public Health Act 1878 states "Nothing in this Act shall be construed to authorise any sanitary authority to injuriously affect any reservoir, canal, river, or stream, or the feeders thereof, or the supply, quality, or fall of water....", and in this case, the sanitary authority is to be substituted for planning authority. • The water supply from Srowland is a blended supply. In 2018 the European Commission opened an infringement case against Ireland in the EU Court of Justice because it has continued to exceed the limits of trihalomethane contamination in drinking water supplies across the country. Scientific studies suggest a link between THMs and cancer. • Kildare Town sewage discharge and the HSE. Regarding a submission by the Health Service Executive in the belief that 20ML/day would be increased in time to 40ML/day, did not know the alternative abstractions were being carried out in parallel to the main proposal. • Clear that neither the planning authority nor Irish Water have secured a sustainable water supply for Rathangan or for Kildare Town and there is no legitimate basis for the planning authority to approve this amendment without taking on board this submission. • Currently there is no basis for granting permission because of the precarious uncertainty of the water supply. • Policies WS 4 (of CPD) cannot be met or complied.

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> • Objective of WS 1: 'To provide water, sufficient in quantity and quality to serve all lands zoned for development in this plan. Where deficiencies exist, the Council will facilitate only as much development as can be provided for, based on available water supply'. This is an immoral compromise, false economy with no justifiable basis for having dual objectives for Rathangan and Kildare Town. • A grant of permission is a property right, to a full supply (without known restrictions and deficiencies being incorporated into the planning conditions because of deficiencies and further pressures in the overall supply system), of wholesome water which the supplier can guarantee and stand over or be held accountable if the water is deficient. • The constraints identified in the application form for water connections is proof positive of the failure of Irish Authorities to achieve Good water Quality and Quantity status by 2015. • Granting development consent for housing estates or planning permission for once off houses now includes an unsuspecting member of the public purchasing or building a house or a well-informed developer or speculator, signing away your right to a guaranteed water supply of good quality quantity constitutes what is now a public health hazard and for which the public should be notified, which is not sustainable development or in the public interest. • Appendix 4 is a map of the Intact raised bog which have for the most part been removed and their loss will have to be taken into account with this amendment of the County Development along with the other plans in the region particularly the Climate Change Adaption Strategy mentioned by KCC • Included in the submission is a map of the groundwater which has been lost to the Grand Canal by the construction of the Kildare By-Pass which has to be restored and will have to be included in the proposed development plan. <p>A number of attachments relating to the submission were also submitted.</p> <p>Chief Executive's Response</p>

Sub. No.	Name	Summary of Submission
		<p>The primary purpose of Proposed Variation is for Kildare County Council to fulfil its statutory obligation to align the CDP with provisions of the NPF and RSES. The County Development Plan is due for review in early 2021. Such a review will require a full assessment of all supporting social and physical infrastructure be undertaken.</p> <p>Chief Executive's Recommendation No change recommended.</p>
7	Health and Safety Authority	Please see Table 3.1 (a).
8	Laois County Council	Please see Table 3.1 (a).
9	Michael Hoey	<p>The submission is as summarised in Submission No. 6 (above) and also includes 3 no. appendices.</p> <p>The appendices are as follows; Appendix 1 Table 1.Updated.pdf Extract of the Memorandum of Understanding 1995 to 1999 Appendix 8-Cutaway bogs.pdf Appendix 2 The Draft of the Barrow Navigation + access to information on the Environment_Redacted.pdf</p> <p>Chief Executive's Response The central purpose of Proposed Variation No. 1 is for Kildare County Council to fulfil its statutory obligation to align the CDP with provisions of the NPF and RSES. The County Development Plan is due for review in early 2021. Such a review will require a full assessment of all supporting social and physical infrastructure be undertaken.</p>

Sub. No.	Name	Summary of Submission
		<p>Chief Executive's Recommendation No change recommended.</p>
10	Irish Water	Please see Table 3.1 (a).
11	Office of Public Works	Please see Table 3.1 (a).
12	Jennifer Whitty	<p>Submission notes the designation of Maynooth as a Key Town in the RSES and raises concerns as follows:</p> <ul style="list-style-type: none"> • Traffic: Maynooth is under siege by traffic generated by schools and the university. A second entrance to the university from the Motorway is required before any further expansion of same takes place. • Public Open Space: Amenities must be prioritised for existing residents before any more new homes are built. The community has awaited the development of The Harbour Field for many years, a bigger playground and amenities centre with swimming pool is required. Currently the nearest public pool to Maynooth is located in Trim, Co. Meath. Children must travel to other towns to access astro-turf pitches. Accessing such amenities in other towns generates huge individual car trips that could be saved by the provision of such amenities in Maynooth. • Losing the unique character of the town: The new building height policy is noted. This may allow for unrestricted building heights in the town. This submission requests that the character of Maynooth is not compromised by the development of large-scale apartment blocks for student accommodation. This type of development should be accommodated on the university campus. The town cannot cope with further construction traffic or the traffic associated with new residents. Traffic and road planning must be prioritised.

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> • Enhancement of the town: The visual enhancement of the town should be prioritised, including the upgrade of Carton Square and the pedestrianisation of the back lanes. The pedestrianisation of Main Street between The Roost and Manor Mills should be considered. There is a huge amount of pedestrian traffic to and from the train station and the footpaths do not provide adequate space. <p>Chief Executive's Response Maynooth was designated as a Key Town in the Metropolitan Area in the Regional Spatial and Economic Strategy adopted in June 2019 by the Midlands Eastern Regional Assembly. It is not within the remit or legislative framework of this variation to amend such a designation. Following the completion of the process to vary the County Development Plan the Council will proceed to prepare a suite of local area plans which will include a Joint Maynooth LAP, prepared in conjunction with Meath County Council in accordance with RPO 4.35 of the RSES. A Social Infrastructure Audit will be carried out as part of the preparation of the LAP which will examine the current availability and capacity of social infrastructure facilities in the area, to determine future requirements and make recommendations on priority areas for future investment to ensure housing is delivered in tandem with the necessary social and physical infrastructure. Similarly, a Strategic Transport Strategy will be undertaken which will inform zoning decisions for the forthcoming LAP in tandem with solutions for improving public transport, cycling and permeability throughout the town. The Council will have regard to the new Urban Development and Building Height Guidelines (2019) where there is a requirement to identify, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategy.</p> <p>Chief Executive's Recommendation No change recommended.</p>

Sub. No.	Name	Summary of Submission
13	Moyglare Hall Residents	<p>This submission from the Moyglare Residents Association raises the following concerns:</p> <ul style="list-style-type: none"> • More childcare facilities must be provided before the construction of any additional houses; • More playgrounds are needed; • Prioritise better road and public transport infrastructure. This is needed now. • Improved road management with the provision of roundabouts instead of traffic lights everywhere; • A proper Garda Station is required; • Additional car parking and safe cycle parking at the train station is required and the provision of longer carriages on the trains at peak times are needed as a short-term solution until the DART is constructed. The car park is full after 7.30am; • Green spaces and trees should be created/saved; • Water supply needs to be improved; • Night-time lighting in the town needs to be improved; • Create more direct pedestrian only access to the town from Moyglare Hall via Mariavilla; • Maintain affordable parking in the town; • Greater control of property in the town i.e. not allowing the sale of huge blocks of residents to foreign cuckoo funds to be used for rent-only purposes; • Serious concerns regarding the lack traffic/pedestrian lights at the new entrance to Moyglare Hall at Moyglare Rd given the number of school-going children crossing the road daily. This will be exacerbated when the road running through the estate opens and the secondary school opens; • Planning conditions such as traffic calming and creche building need to be enforced; • Ring road is needed as a matter of urgency; • Better climate friendly/GHG reduction technologies and policies are needed; • Smarter and better cycle lanes are needed; • Community centre and entertainment is needed e.g. cinema/arts/cultural centre;

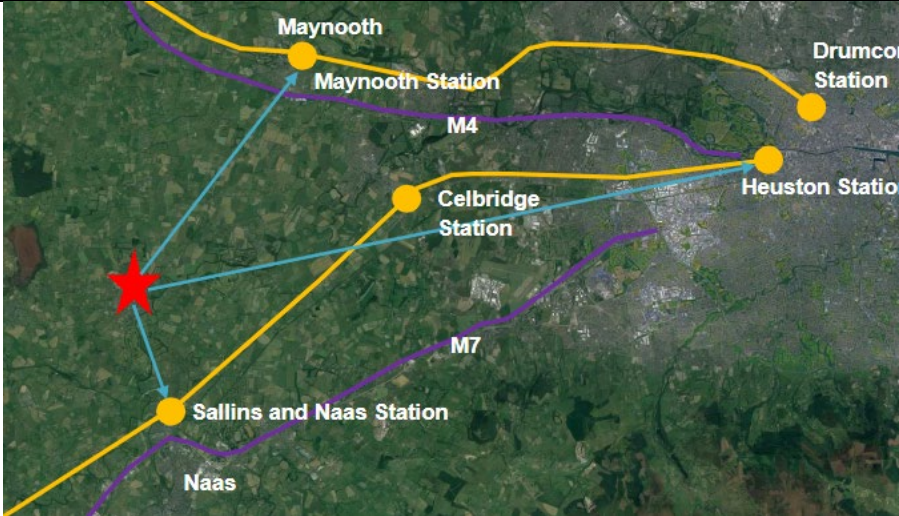
Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> • Preservation and promotion of more biodiversity building zones. <p>Chief Executive’s Response Following the process to vary the County Development Plan the Council will proceed to prepare a suite of local area plans which will include a Joint Maynooth LAP, prepared in conjunction with Meath County Council in accordance with RPO 4.35 of the RSES.</p> <p>A Social Infrastructure Audit will be carried out as part of the preparation of the LAP which will examine the current availability and capacity of social infrastructure facilities in the area, to determine future requirements and make recommendations on priority areas for future investment to ensure housing is delivered in tandem with the necessary social and physical infrastructure. Similarly, a Strategic Transport Strategy will be undertaken which will inform zoning decisions for the forthcoming LAP in tandem with solutions for improving public transport, cycling and permeability throughout the town. The Council will have regard to the new Urban Development and Building Height Guidelines (2019) where there is a requirement to identify, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategy.</p> <p>Chief Executives’ Recommendation No change recommended.</p>
14	Meath County Council	Please see Table 3.1 (a).
15	Seamus O’ Reilly	The submission is prepared by Mark Byrne Engineering Ltd on behalf of Seamus O’Reilly to consider zoning a site south east of the settlement boundary in Crookstown for new residential or enterprise and employment.

Sub. No.	Name	Summary of Submission
		<div data-bbox="987 280 1637 730" data-label="Image"> </div> <p data-bbox="1048 738 1576 767" style="text-align: center;">Map indicating location of site in Crookstown</p> <p data-bbox="593 807 2024 986">The subject lands extend to 0.23-hectare site and are currently situated at a location which is contiguous to the identified development boundary and the submission suggests that they should be included within the settlement boundary. The submission states that the subject lands are adjacent to public roads and have available services including adequate foul sewer and water supply and are not located within an area which is identified as at a risk of flooding.</p> <p data-bbox="593 1031 1021 1059">Chief Executive’s Response</p> <p data-bbox="593 1067 2033 1279">Proposed Variation No. 1 of the KCDP does not affect the development (settlement boundary) for the Village of Crookstown. The purpose of the Proposed Variation is to respond to recent changes in national and regional policy namely the publication of National Planning Framework (NPF) and the Eastern and Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES). The proposed variation does not address land use zonings in villages within the county and therefore the submission to zone land cannot be considered during this process. However, it should be noted</p>

Sub. No.	Name	Summary of Submission
		<p>that the Kildare County Development Plan is due for a full review in early 2021 at which stage consideration will be given to settlement boundaries etc for towns/villages and submissions regarding land use zoning can be taken into consideration during this process.</p> <p>Chief Executive's Recommendation No change recommended.</p>
16	Gerard O'Connor	<p>Submission highlights that the River Liffey section from Straffan to the Leixlip reservoir is one of the critical water courses in Ireland and it is in poor condition. There is visible pollution, no riverbank management, absence of appropriate signage, large amounts of junk deposited on the riverbed and poor ad hoc amelioration of flooding. The submission suggests that there is a lack of published mapping information on incoming water sources and condition of the water and there is a failure by Kildare County Council to manage this stretch of river. The submission requests that a comprehensive management programme of the Liffey from Straffan to Leixlip should be put in place - no amount of water cleaning and scrubbing at the treatment works can guarantee safety if the source is filthy and polluted with debris, chemicals, faeces and agricultural runoff. The submission requests that a managed programme specific to this waterway section is included in the Variation.</p> <p>Chief Executive's Response The issues raised in the submission area noted. However, the purpose of the Variation is to respond to recent changes in national and regional policy namely the publication of National Planning Framework (NPF) and the Eastern and Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES). The Kildare County Development Plan 2017-2023 is due for a full review in early 2021 and will undergo further public consultation to assist in devising the longer terms policies and objectives required for the Plan period which may include policies to support improvements in water quality and/or maintenance.</p>

Sub. No.	Name	Summary of Submission
		<p>Chief Executive's Recommendation No change recommended.</p>
17	Cllr Kevin Duffy	<p>This submission from Cllr Kevin Duffy supports the designation of Monasterevin as a 'Self-Sustaining Town'. The submission notes that Table 3.3 provides the housing unit allocations to 2023 but does not provide any indication of the number of housing units approved or planning applications being considered as at Jan 2020, so the potential development pipeline can be easily understood.</p> <p>Chief Executive's Response The number of existing planning permissions is constantly evolving through the development management process with new permissions being granted and/or amended and also permissions expiring. It should also be noted that the number of permissions granted is not considered to be an accurate indication of housing delivery as a number of permissions are limited in terms of delivery of pieces of local infrastructure e.g. local water network upgrades, road upgrades etc. Consideration of extant permission and live planning applications will be detailed at local area plan level for each settlement and will be considered during the full review of the County Development Plan in early 2021 during which time the results of the Census in 2021 will begin to become available. Furthermore, following the completion of the Variation process the Council will begin the preparation of a suite of local area plans which will assess the extant and pipeline planning permissions for each town which will inform the future development strategy for the particular settlement.</p> <p>Chief Executive's Recommendation No change recommended.</p>
18	Fingal County Council	Please see Table 3.1 (a).
19	Westar Group	The submission request that Clane be recognised as a 'Self-sustaining Town' in line with National and Regional policies and update the Kildare Settlement Hierarchy to include Clane in the Self-Sustaining

Sub. No.	Name	Summary of Submission
		<p>Town settlement category. A report was submitted prepared by Hughes Planning & Development Consultants.</p> <p>The submission outlines the description in RSES for Self-sustaining Towns and states that RSES recognises Clane as an example of a Self-sustaining Town and the submission refers to an excerpt of RSES on page 93 and suggests that Clane meets the requirement of a Self-sustaining Town due to its; high population growth, weak employment base, reliant on other towns for employment, strategic location, connectivity and skilled workforce. The submission notes that the town has seen a population increase by 8.62%, however it notes that a sizable proportion commute for work.</p> <p>The submission suggests that Clane supports a number of local businesses and employment centres including UMPC Kildare Private Hospital, the National Mobility Centre, a range of retail services, engineering services and hospitality jobs and further suggests that Clane occupies a strategic location in the County.</p>

Sub. No.	Name	Summary of Submission
		 <p>The submission notes that Kilcock and Monasterevin are Self-sustaining Towns with less population and similar employment status, apart from the health facilities Clane accommodates.</p> <p>The submission makes reference to an error in the description of a Self-sustaining town under Section 2.11.4 and suggests that 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;</p> <p>The submission points out that Clane is a Level 3, Key Service Centre as designated in RSES, which classifies Clane, Leixlip and Monasterevin as Level 3 and in light of the current status of Clane in comparison to other towns in Kildare such as Kilcock and Monasterevin, the submission requests that Kildare County Council reclassify Clane as a Self - Sustaining Town. The submission makes reference to Project Ireland 2040 - National Planning Framework (2018) in terms of NPO 3(a)</p>

Sub. No.	Name	Summary of Submission
		<p>requiring 40% of new homes within the built-up area and that NPO 3c requires 30%; and NPO11, NPO 13 and NPO 35 are also referenced.</p> <p>Further reference is made to the National Development Plan 2018-2027 in terms of the plan to extend DART services to Maynooth and Hazelhatch and Celbridge train stations, both of which are located within a 15-minute drive of Clane,</p> <p><u>Kildare County Development Plan 2017-2023</u> The submission states the CDP states that small towns comprise populations of between 1,500 – 5,000 and the Settlement Strategy seeks to ‘direct growth into the Large Growth Towns, followed by Moderate Sustainable Growth Towns and Small Towns, whilst also recognising the settlement requirements of rural communities’ (Policy SS2). The submission notes that Clane had the fourth highest growth in population in the county’s urban areas after Newbridge, Celbridge and Maynooth, rising to a total of 7,077 residents in 2016, thus far exceeding the guided population for a small town; The submission also notes that Clane is intended to provide 780 no units to 2023.</p> <p><u>Clane Local Area Plan 2017- 2023</u> Reference is made to the ‘Vision for Clane’ included in the Clane Local Area Plan 2017-2023, which states that the future development of Clane is based on its role as a ‘Small Town’ in the context of the Kildare Settlement Hierarchy and further reference is made to the position of Clane in the Kildare Settlement Strategy and the Core Strategy Objectives. In terms of the zoning in the LAP the submission states that Clane contains appropriately zoned lands to facilitate growth and development and create a self-sustaining settlement.</p> <p><u>Conclusion</u> The proposed Variation to the Kildare County Development Plan 2017-2023 contravenes the objectives of the RSES as well as National policy regarding the classification of Clane as a Small</p>

Sub. No.	Name	Summary of Submission
		<p>Town in the Settlement Hierarchy and states that Clane needs to be recognised as a Self-sustaining Town in order to allow the sustainable development needed to support further economic growth.</p> <p>Chief Executive’s Response The contents of the submission from Westar are noted. During the preparation of the Proposed Variation, a review of the settlements including Clane was undertaken. Indicators such as social and physical infrastructure provision (and constraints as the case may be), access to public transport and economic performance were reviewed. The Proposed Variation designates Clane as a Small Town which is a similar designation to that under the current County Development Plan Settlement Hierarchy. In designating the town of Clane, the Council is cognisant of the town’s potential to deliver housing however, the settlement strategy of the proposed Variation, seeks to balance national policy on the delivery of housing, the efficient use of existing transport and water services infrastructure with government policy that seeks to maximise access to and encourage the use of public transport.</p> <p>Having regard to Clane’s high commuter levels, private car dependency and lack of access to ‘high quality’ public transport links it is not considered to be self-sufficient at this stage. It should be noted that the designation of towns within each settlement will be reviewed in early 2021 as part of the full review of the CDP and this review will also form part of each successive Plan at which stage towns/settlements may move up, or indeed down in the settlement hierarchy.</p> <p>The submission makes reference to Clane having far exceeded the Small Town population of 5,000. It should be noted that under Proposed Amendment No. 6, Section 2.5.1 Settlement Hierarchy – Defining Principles. This is proposed to be deleted and would therefore would no longer be applicable in defining a settlement typology.</p>

Sub. No.	Name	Summary of Submission
		<p>Funding opportunities will be explored by the Council on a 'needs' basis rather than on a designation basis, as was previously the case under former funding streams. Similarly, as per Objective SO 3 the Council will facilitate the implementation of key strategic infrastructure in accordance with the Council's Capital Works Programme and subject to the availability of financial resources.</p> <p>The clerical error under Proposed Amendment No. 9, Section 2.11.4 Self-Sustaining Town is noted and shall be corrected accordingly.</p> <p>Chief Executive's Recommendation Amend clerical error under Proposed Amendment No. 9, Section 2.11.4 Self-Sustaining Town, on page 41.</p> <p>RSES describe these settlements as those with "high levels of employment growth and a weak employment base" - this should state "with high levels of population growth and a weak employment base" in accordance with the RSES (emphasis added to highlight).</p>
20	Cllr. Bill Clear	<p>The submission from Cllr Clear requests that a number of specific Actions from the National Climate Action Plan be incorporated into the variation and relate to</p> <ul style="list-style-type: none"> • Action 72: Develop the EV charging network necessary to support the growth of EVs to at least 800,000 by 2030 and set a target for the supply of infrastructure to stay sufficiently ahead of demand; • Action 73: Develop and implement planning rules and guidelines across residential and non-residential parking locations for EV charging infrastructure; The DHPLG are the lead on the steps necessary for delivery as follows: <ul style="list-style-type: none"> - Update planning rules and guidelines, as appropriate, based on updated standards, grid requirements and implementation of the revised Directive 2018/844/EU; (Q1 2020); - Review planning guidelines with a view to increasing the obligation, (Q4 2020); • Action 74: Ensure our regulatory regime for buildings requires the installation of EV charging infrastructure.

Sub. No.	Name	Summary of Submission
		<p>The DHPLG are the lead on the steps necessary for delivery as follows:</p> <ul style="list-style-type: none"> - Transposition of Article 8 of Energy Performance in Buildings Directive on electromobility for residential, non-residential, new and existing buildings, (Q1 2020); - Provide for measures to simplify deployment of recharging points in new and existing residential and non-residential buildings and address regulatory barriers, (Q1 2020); - For non-residential buildings with more than 20 car spaces – lay down requirements for installation of minimum number of recharging points, (Q1 2025); <p>That the cycling plans under the Climate Action Plan in relation to cycling are achieved in the time frame of the rest of this plan.</p> <ul style="list-style-type: none"> • Action 97: Commence full implementation of the National Cycle Policy Framework; <p>Chief Executive’s Response</p> <p>The Council will have regard, in the performance of the functions of the Planning Authority to any Ministerial Guidelines. To date no Section 28 guidelines have been issued by the Department of Housing, Planning and Local Government as suggested in the submission. However, the Council is cognisant of the need for the roll-out of EV charging infrastructure. Section 17.7.6 Car Parking states that the Council will liaise with ESB Networks to continue the roll-out of rapid charge points throughout the county. Within this Section, reference is particularly made to non-residential developments to provide spaces of up to 10%. However, planning applications for residential developments are also conditioned to provide EV charging points and enabling infrastructure, which is also the case for applications decided by An Bord Pleanála.</p> <p>It should be noted that the current County Development Plan 2017-2023 contains an objective under WCO 8 to actively support the implementation of the National Cycle Policy Framework, with a focus on encouraging a modal shift from vehicular to cycling modes, which is considered sufficient in supporting the implementation of the National Cycle Policy Framework.</p>

Sub. No.	Name	Summary of Submission
		<p>The full review of the CPD will commence in early 2021 and it is planned that climate change adaptation and mitigation will be threaded through all sections of the plan.</p> <p>Chief Executive's Recommendation No change recommended.</p>
21	Irish Wind Energy Association	<p>The submission highlights that one of the key objectives of RSES is to support renewable energy opportunities and suggests that Proposed Variation No. 1 does not address the need for increased renewable energy in any substantive way. The submission further notes that while the focus of KCC's Climate Change Adaption Strategy is towards its own internal actions and activities, KCC can play a leading role in promoting the opportunity for renewable energy in the decarbonisation of electricity.</p> <p>The submission suggests that the inclusion of Climate Change Adaption Strategy 2019-2024 relates to internal actions by the Council and not to any wind energy strategy or to any renewable energy strategy for County Kildare. The submission highlights that the National Climate Action Plan (CAP) 2019 has set out an ambitious 70% target for renewable energy production out to 2030 and states that to meet this target, the amount of electricity generated from renewables will have to be doubled on current figures.</p> <p>Other issues raised in the submission include;</p> <ul style="list-style-type: none"> • On-shore wind will provide the majority of the required electricity yield out to 2030, KCC should be cautious when zoning not to constrain areas which have renewable energy potential; • Reference is made to the submission made by the OPR on the Offaly County Development Plan where it was advised to maximise the output of renewable energy sources in line with national policies on climate change; • IWEA strongly promotes the delivery of a regional Renewable Energy Strategy to facilitate the implementation of Regional Policy Objective (RPO's 7.35, 7.36 and 10.20);

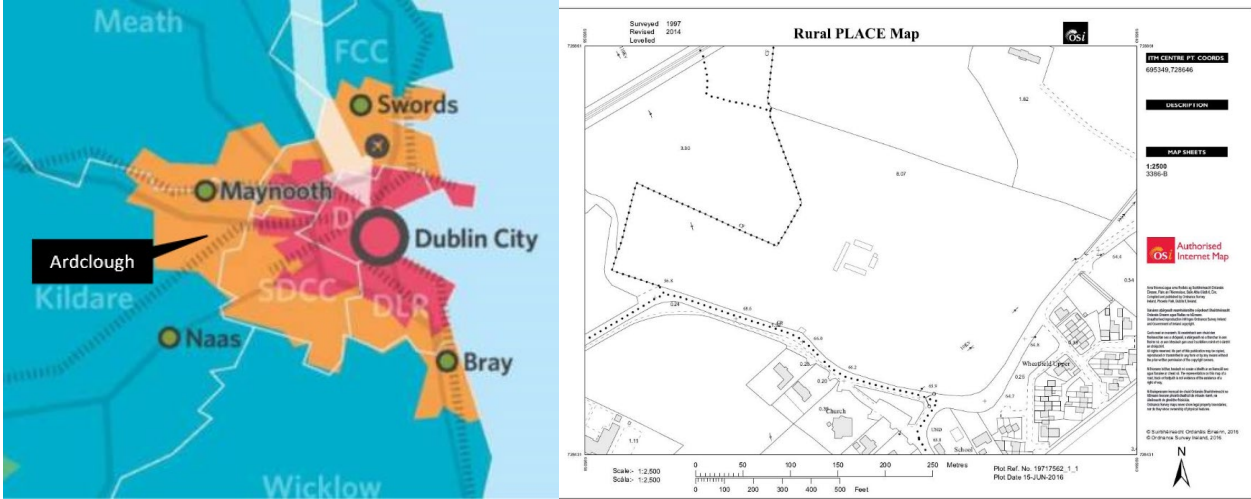
Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> • In the absence of realisation of RPO’s 10.19 to 10.23 of RSES and in response to the OPR, a local renewable energy strategy is an absolute requirement as part of the CDP review or variations; • Reference is made in the submission to Specific Planning Policy Requirement (SPPR) 1 of the 2019 Draft Revised Wind Energy Guidelines which essentially requires the preparation of a Wind Energy Strategy as part of a County Development Plan; • Request KCC to carry out a full assessment for areas with renewable energy development potential and zone accordingly to ensure that there is no planning ambiguity surrounding any unzoned areas; • Request that KCC and all Local Authorities develop a consistent and transparent renewable energy zoning methodology to include the standards, ‘No-Go’, ‘Open to Consideration’ and ‘Preferred’ Areas; • Criteria for a Landscape Character Assessment (LCA) should also be developed with appropriate weighting for different sensitivity types, and the 2004 LCA document should be updated to reflect this; • The SEAI Wind Atlas should not be used as a constraint due to the advancement of various technologies, and that wind resource is a developer’s constraint; • Grid constraints should not be considered in the preparation of Renewable Energy Strategies as this is a developer’s constraint; • The criteria outlined in the submission should be considered when drafting future Renewable Energy Strategies. <p>Chief Executive’s Response The issues raised in the submission are noted. Objective EO 27 of the Kildare County Development Plan 2017-2023 states that it is an objective of the Council to work with Sustainable Energy Authority of Ireland (SEAI) to develop a Local Authority Renewable Energy Strategy (LARES) incorporating EU</p>

Sub. No.	Name	Summary of Submission
		<p>guidelines and training and this is considered to be sufficiently robust in detailing the Councils intentions regarding the preparation of a Renewable Energy Strategy.</p> <p>The Draft Revised Wind Energy Development Guidelines were published by the Department of Housing, Planning and Local Government for consultation with the relevant stakeholders and interested parties. Following the publication of these Guidelines the requirement to identify locations where there is significant wind energy potential will be taken into consideration during the full review of Kildare County Development Plan 2017-2023, which is due to commence in early 2021.</p> <p>Chief Executive's Recommendation No change recommended.</p>
22	Flora McDonnell	<p>This submission sets out full agreement with the submission made by Celbridge Community Council as well as the submission made by Councillor Vanessa Liston.</p> <p>Chief Executive's Response The submission is noted. Please refer to the two referenced submissions No. 42 and No. 50 for a detailed response.</p> <p>Chief Executive's Recommendation No change recommended.</p>
23	Flora McDonnell	<p>This submission supports the climate mitigation measures suggested by Cllr Vanessa Liston and agrees with Celbridge being designated a Self-Sustaining Town provided the funding and delivery support will be outlined and made available to Celbridge to be able to catch-up with sustainable development in the light of recent and near future population increases. The submission requests that confirmation of the funding and delivery mechanisms that will be used for designated self-sustaining towns, specifically Celbridge, to become self-sustaining with regards of key infrastructure such as transport, childcare, amenities and local employment opportunities. The submission highlights that the</p>

Sub. No.	Name	Summary of Submission
		<p>designation of towns into the various settlement groups will be reviewed and if needed adjusted following the production of a Housing Needs Assessment, Development Plan Guidelines and the Rural Housing Policy all of which should be required for the next County Development Plan. The submission also outlines how the cluster approach will benefit self-sustaining towns such as Celbridge re-balance population growth. Submission questions how local employment can be leveraged to re-balance the population growth expected in Celbridge in the next 5 years given its location at a large distance from the North-West corridor/Maynooth train line.</p> <p>The submission further states that Celbridge is dependent on either Dublin amenities (e.g. pool in Lucan) or amenities further a far such as Clondalkin and the submission proposes to define and specify desired outcomes, including key indicators of the cluster approach for each settlement type. Specifically, the cluster strategy needs to define how a mutually dependent way, so that the amenities and economies of the whole cluster are greater than the sum of the individual parts can be achieved in the future given this particular example. The submission concludes by noting that that the populations targets have been scaled back, however highlights the absence of required infrastructure, transport, childcare, and amenities to support such large numbers until it has caught up and has actually become more self-sustaining in material terms.</p> <p>Chief Executive’s Response The proposed Settlement Hierarchy, in line with the RSES classifications on settlement typologies, indicates towns for ‘catch-up’. It should be noted that there is no “side-lining” for investment as a result of the proposed designations. The areas specific to each settlement to be prioritised for ‘catch-up’ will be dealt with at local area plan level. Similarly, the Council through the Urban and Rural Regeneration Development Funds will seek funding to carry out a myriad of projects within various level settlements throughout the County and funding opportunities will continue to be explored by the Council on a ‘needs’ basis rather than on a designation basis. Similarly, as per Objective SO 3 the</p>

Sub. No.	Name	Summary of Submission
		<p>Council will facilitate the implementation of key strategic infrastructure in accordance with the Council's Capital Works Programme and subject to the availability of financial resources.</p> <p>There will be an opportunity to review the designation of towns within each settlement category as part of the full review of the CDP which is due to commence in early 2021. This will be informed by a Housing Need Demand Assessment (HNDA), the Development Plan Guidelines and Rural Housing Guidelines, which the Department of Housing, Planning and Local Government has stated are due to be published.</p> <p>Regarding the cluster approach, it is evident that the 3 major towns in north Kildare and other towns in close proximity such as Lucan are interdependent both for social and physical infrastructure and also for economic and employment purposes. The variation does not address specific detail in relation to the service provision in each town in the County, however, a social infrastructure audit will be prepared in advance of the preparation of LAP and settlement plans and these will address sharing or clustering of services/facilities.</p> <p>The reduction in population projections are in line with the transitional population projections set out in the Governments NPF Roadmap and the RSES and are considered to be a more realistic and evidence-based growth projection which will provide towns that have experienced significant levels of new housing over recent times, to deliver 'catch-up' social and physical infrastructure.</p> <p>Chief Executive's Recommendation No change recommended.</p>
24	Patrick Donnelly	This submission relates to a piece of un-zoned land west of the Narraghmore rural settlement boundary. It is submitted that this site is suitable for inclusion in land re-zoning of Narraghmore village as it is an infill site with houses on either side and the primary reason for this submission is due to the

Sub. No.	Name	Summary of Submission
		<p>lack of available zoned land to meet local needs and the submission suggests that there is more land zoned within the village which would be better suited to community and recreational use.</p> <p>Location</p> <p>FOR ILLUSTRATION PURPOSES ONLY</p> <p>Map indicating location of site in Narraghmore</p> <p>Chief Executive’s Response Proposed Variation No. 1 of the KCDP does not affect the development (settlement) boundary for the Village of Narraghmore. The purpose of the Proposed Variation is to respond to recent changes in national and regional policy namely the publication of National Planning Framework (NPF) and the Eastern and Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES). The proposed variation does not address land use zonings in villages within the county and therefore the submission to zone land cannot be considered during this process. However, it should be noted that the Kildare County Development Plan is due for a full review in early 2021 at which stage consideration will be given to settlement boundaries etc for towns/villages and submissions regarding land use zoning can be taken into consideration during this process.</p> <p>Chief Executive’s Recommendation</p>

Sub. No.	Name	Summary of Submission
		No change recommended.
25	Babette Harris and Louie Harris	<p>The submission was prepared by David Mulcahy Consultants Ltd on behalf of Babette and Louis Harris. The subject lands extend to an 8-ha site at Wheatfield Upper, Ardclough, located north of school and church and not within the settlement boundary. The submission sets out a reasoning for the site's inclusion within the settlement boundary for Ardclough.</p> <div style="text-align: center;">  <p>Map indicating location of Ardclough in Metropolitan Area and site in village</p> </div> <p>The submission states that the lands are centrally located within the village but are not currently included in the settlement boundary. In the CDP 2005-2011 the subject lands were in the settlement boundary and were also an integral part of a detailed village design statement published by KCC in March 2009. The submission further states that Ardclough should be elevated to village status as it is the only rural settlement in Kildare within the Dublin Metropolitan area - the NPF and RSES each give</p>

Sub. No.	Name	Summary of Submission
		<p>stronger emphasis to the Metropolitan Area as a basis for compact strategic planning. The submission also suggests that demand for one-off housing in the area could be allayed by providing low-density residential development in Ardclough, as the infrastructure is already in place with the subject lands conveniently located close to community services such as the school, shop, church and GAA club (within 50km speed limit). The submission further notes that the lands are within a convenient distance to a high-quality public transport node and a national primary road. Hazelhatch station (due to become a DART station) is a 5-minute drive from Ardclough. Its proximity to the N7 underscores its importance and demonstrates its potential in terms of economic use of transport infrastructure.</p> <p>Other contentions within the submission include</p> <ul style="list-style-type: none"> • that significant employment announcements were recently made regarding potential for new jobs in the immediate area including investment in Ag Tech Innovation Hub (beside Ardclough), Lufthansa in Celbridge as well as the major Intel expansion at Leixlip. • Potential of the area has been overlooked, as it has a high demand for housing; • Ardclough has not developed sequentially around the central core in a natural way. • Restore the 2005-2011 settlement boundary and elevate Ardclough to village status to capitalise on its strategic location within the Dublin Metropolitan Area. <p>Chief Executive's Response</p> <p>Whilst the contents of the submission are noted, Proposed Variation No. 1 of the KCDP does not affect the development (settlement boundary for the Village of Ardclough). The purpose of the Proposed Variation is to respond to recent changes in national and regional policy namely the publication of National Planning Framework (NPF) and the Eastern and Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES). The proposed variation does not address land use zonings in villages within the county and therefore the submission to zone land cannot be considered during this process. However, it should be noted that the Kildare County Development Plan is due for</p>

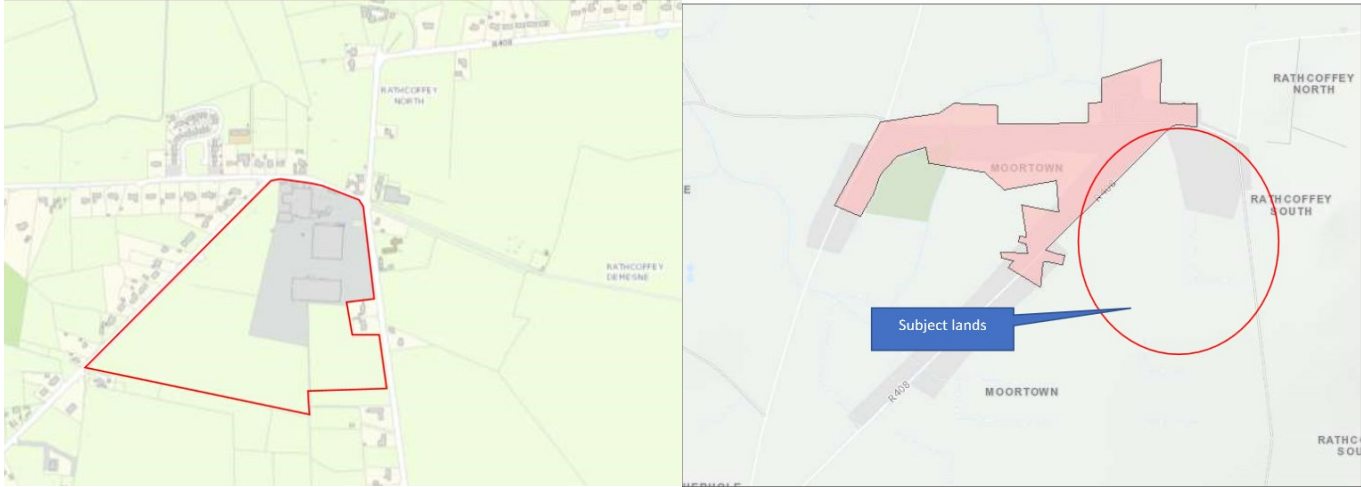
Sub. No.	Name	Summary of Submission
		<p>a full review in early 2021 at which stage consideration will be given to settlement boundaries etc for towns/villages and submissions regarding land use zoning can be taken into consideration during this process.</p> <p>It should also be noted that in relation to the demand for housing in the area particularly for one off housing, the Proposed Variation acknowledges that there is continued pressure for development of single homes in rural areas across County Kildare. The National Planning Framework acknowledges that this is a national issue and further acknowledges that in rural Ireland, many people seek the opportunity to build their own homes but find it difficult to do so in smaller settlements because of a lack of available sites and services. The NPF also states that in order to assist this, local authorities will be supported in undertaking, the necessary land acquisition, site preparation and local infrastructure provision to deliver self-build development options in smaller towns/villages.</p> <p>National Policy Objective (NPO) 18b of the NPF specifically makes provision to develop a programme for 'new homes in small towns and villages' with local authorities, public infrastructure agencies such as Irish Water and local communities to provide serviced sites with appropriate infrastructure to attract people to build their own homes and live in small towns and villages.</p> <p>It is envisaged that the provision of serviced sites to create 'build your own home' opportunities within the existing footprint of rural settlements will provide an alternative to one-off housing in the countryside. This is provided for under CS 4(a) of the Proposed Variation which states that it is the policy of the Council to "develop in accordance with the National Planning Framework (NPO 18b) a programme for new homes in small towns and villages in association with public infrastructure agencies, local communities, housing bodies and landowners to identify lands for the provision of low density serviced sites with appropriate infrastructure throughout settlements identified as Rural Towns, Villages and Rural Settlements (as identified in Table 3.3)".</p>

Sub. No.	Name	Summary of Submission
		<p>However, it is noted that in Ardclough, which had an estimated population of 153 persons in 2015 (Table 3.3 of the current CDP) a new housing scheme of 68 houses is under construction.</p> <p>Chief Executive’s Recommendation No change recommended.</p>
26	Randalswood Construction Ltd.	<p>This submission was prepared by Downey Planning, Chartered Town Planners on behalf of their client Randalswood Construction Limited.</p> <p>Proposed Amendment No. 5 Notes 30% of all new homes within the built-up area.</p> <p>Proposed Amendment No. 6 Notes the RSES sets out the settlement hierarchy for Kildare.</p> <p>Proposed Amendment No. 7 The submission notes that Kildare County Council has provided for the preferred development strategy as informed by the RSES with particular focus on achieving “critical mass in the Metropolitan Area Strategic Plan (MASP) area (Maynooth, Leixlip, Celbridge, Kilcock) and in the key towns of Naas and Maynooth.</p> <p>Proposed Amendment No. 8</p> <ul style="list-style-type: none"> • The submission notes the 2.8 occupancy rate used but notes that ‘Average Household Size’ as outlined in the Census 2016, where in urban areas (i.e. settlements with a population of 1,500 persons or more) the average household size was listed as 2.6; • The submission also references the CSO national household survey with an average household rate of 2.3 persons and the NPF use 2.75 people with an expected decline to 2.5 by 2040;

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> • The submission states that Kildare County Development Plan needs to take account for the current economic situation and the number of houses which will be built over the lifetime of this Plan, allowing for the average household size to be reduced further and for a wider choice of tenure for single occupancy options to be provided; • Submission requests a reduction in the occupancy rate applied. <p>Proposed Amendment No. 9</p> <ul style="list-style-type: none"> • Welcomes that the variation provides for a focus on developing the Key Towns of Naas and Maynooth, to act as economic drivers in line with the NPF and RSES. <p>Proposed Amendment No. 12</p> <ul style="list-style-type: none"> • Naas and Maynooth will require additional units to ensure consolidation and therefore careful consideration when projecting future population growth and housing need is required. <p>Proposed Amendment No. 13</p> <ul style="list-style-type: none"> • The submission notes the decrease in population as a result of the NPF Roadmap; • Naas maintains 14.9% of growth the submission requests that this should be higher; • Dwelling target for Naas is drastically underestimated and will stall development; • Naas should have no cap or restriction up to 2023; • Higher growth percentage should be applied to take account of the range of economic opportunities within the town and those which will be realized within the Plan period, including the construction of the MERITS Tech-Hub and the further development of the northwest quadrant of the town, including Millennium Park; • Reference is made to 5,000 people commuting to Naas for work on a daily basis and these should be accommodated within the town; • Length of time required to successfully navigate the planning system, the tender process and finally the construction of units and closing of sales. These are critical factors in realizing the

Sub. No.	Name	Summary of Submission
		<p>critical mass and successful development of the Town, to cap the number of units required to 898, will prevent the objectives of both National Policy and the objectives of the Kildare County Development Plan from being realized.</p> <p>Concluding Comments</p> <ul style="list-style-type: none"> • Increase the 14.9% population growth forecast to reflect the important status of Naas Town, as a Key Town and economic driver for the County; • Reduce the average household size from 2.8 to 2.5 in line with the NPF forecast for 2040 and in keeping with the European averages of 2.3. This will ensure future sustainable growth within the County and most importantly the Key Town of Naas; • Prevent a cap on the housing unit's allocation of Naas Town to allow for delays in extant permission, future housing needs and employment opportunities in the pipeline. <p>Chief Executive's Response</p> <p>The occupancy rate figure used is 2.8 persons as this is the figure for the county as reported by the CSO (Census 2016) and represents a logical and evidence base for the purposes of the core strategy calculation. Single occupancy units accounted for 17.5% of the overall household size within Kildare for Census 2016 and it is important to note figure of 2.5 persons occupancy used in the NPF is the projected figure for 2040 and if appropriate will be phased into future core strategy calculations should the future censuses indicate that this is a reality for County Kildare.</p> <p>Naas was allocated 14.9% in the CDP 2017-2023 as the County Town and Large Growth Town 1 for the period 2017-2023, which was justified given the towns historic function within the County and Region. Due consideration has been given to the designations and allocations set out in Table 3.3 of the Proposed Variation particularly regarding the percentage growth to be accommodated in each town. Given that the NPF and RSES figures provide for a universal reduction in population targets, to align with an evidence-based approach based on most recent censuses, it was considered</p>

Sub. No.	Name	Summary of Submission
		<p>appropriate for the purposes of the proposed variation, and in the absence of any revised and definitive population figures, to retain the existing percentage growth targets with the potential to revisit same during the full review of the CDP when the Census 2021 figures begin to become available.</p> <p>Furthermore, in the case of the Key Towns, it is acknowledged, that Naas and Maynooth have seen permissions for a significant level of new housing over the past 4-5 years in order to allow pent-up demand to be fulfilled and housing to be delivered at critical locations. Such a provision over the short-term (for the duration of this CDP up to 2023) will provide an opportunity for the towns such as Maynooth and Naas to absorb recent and pipeline developments. In allowing this ‘absorption period’, the Council will also be in a position to identify other social and physical infrastructure needs (through the preparation of an infrastructural assessment in accordance with Appendix 3 of the NPF) which will inform the sustainable development of the towns into the future through the LAP and subsequent CDP preparation processes.</p> <p>To place no cap/restriction on growth within a settlement would be contrary to the proper planning and development of an area. It is imperative that the necessary services, physical and social infrastructure are provided in tandem with population growth. The Proposed Variation was published in order to comply with the Councils statutory requirements to align the CDP with the Transitional Population Projections set out in the NPF and RSES. It should be noted that the full 2-year CDP review process will be initiated in early 2021 and there will be an opportunity for a full reconsideration of the growth allocations for each settlement as part of the review of the Core Strategy.</p> <p>Chief Executive’s Recommendation No change recommended.</p>
27	Gar Whelan	Submission made by David Mulcahy Consultants on behalf of Gar Whelan relates to a 16-ha site at Farringtons Mill in Rathcoffey village.

Sub. No.	Name	Summary of Submission
		 <p data-bbox="772 807 1854 834">Map provided indicating location of site in Rathcoffey and context with CSO settlement area</p> <p data-bbox="593 874 2033 1278">The submission states that this brownfield site is centrally located within the village adjacent to the school. However, the subject lands do not fall within the settlement boundary defined by the CSO. It is planned to redevelop the site with a mixed use residential, community and employment development and it is stated that discussions have taken place with the Planning Authority in respect of a masterplan for the site. It is submitted that the site complies with NPO 16 & NPO 17 i.e. targets reversal of rural decline in the core of small towns and villages through measures that address vacant premises and deliver sustainable reuse and regeneration outcomes. Policy SO9 in the variation targets 30% of all new homes to be in settlements within their existing built up footprint (defined by CSO). It is submitted in the context of this site and others in Kildare that this policy should be amended to read “<i>or where such development is not feasible within centrally located brownfield lands adjoining the existing built-up footprint</i>”.</p>

Sub. No.	Name	Summary of Submission
		<p>Chief Executive’s Response The purpose of the Proposed Variation is to respond to recent changes in national and regional policy namely the publication of National Planning Framework (NPF) and the Eastern and Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES).</p> <p>It is noted that part of the site identified in red above is located within the Rathcoffey settlement boundary as shown in Volume 2 of the County Development Plan 2016-2023, it is also noted a large greenfield portion extends beyond same and does not form part of the built-up area.</p> <p>Whilst, acknowledging many brownfield sites suitable for regeneration may fall outside the existing built up footprint (defined by CSO) there are other considerations such as service/design/location/quantum etc which would be assessed as part of any proposal for new development within settlements in County Kildare. It is considered that there is adequate flexibility within the plan to enable suitable regeneration sites to be brought forward for consideration and the location of CSO Settlement Boundaries would not be the sole consideration for any proposal at Development Management stage. While it is noted that national policy objectives refer to addressing areas of rural decline through targeting vacant premises there is sufficient policies and objectives within the Plan relating to the re-use and regeneration of land and buildings to comply with the national policy objectives.</p> <p>Chief Executive’s Recommendation No change recommended.</p>
28	Lagan Homes Ireland Ltd	The submission was prepared by Declan Brassil & Company Ltd on behalf of their client.

Sub. No.	Name	Summary of Submission
		<p>The submission states that the proposed Variation will constrain house building and the delivery of Social and Affordable homes, in the County over the remaining life of the County Development Plan and beyond and will potentially result in a significant increase in house prices in the County and is in direct contravention of national policy to support and expedite the delivery of affordable new homes. The submission suggests that the Proposed Variation significantly undermines investor confidence in the County, which will undermine housing delivery for the foreseeable future. The submission further states that the Draft Variation sterilises and effectively ‘dezones’ the majority of zoned land in the County that does not have the benefit of an extant permission at the time of the making of the Variation and states that this is unjust, disproportionate, contrary to the spirit of a Development Plan as a contract between the Council and the public and states that the Proposed Variation renders the current Development Plan not fit for purpose as it creates a fundamental disconnect between the Settlement Strategy and the zoning maps for each settlement and suggests the Zoning maps are meaningless in the context of the allocations. The submission also states that no analysis has been provided of the conversion of extant permissions into commenced and completed units. The submission notes that KCC is the only EMRA county outside of the Dublin SPA that has proceeded with a Variation rather than a review of its Development Plan (a graphic has been included in the submission which identifies how each local authority has proceeded to align its Development Plan with the NPF Implementation Roadmap).</p> <p>The submission also suggests that the allocations in the NPF Implementation Roadmap are significantly underestimated and are under review by the ESRI therefore Draft Variation is premature and not fit for purpose pending the outcome of this review and states that there are issues with the ESRI baseline figures have been identified since the publication of the NPF Implementation Roadmap:</p> <ul style="list-style-type: none"> • The baseline is based on a growth scenario that assumes a significantly lower level of net inward migration than what has been historically and recently achieved.

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> • The baseline is based on an inappropriate application of headroom provision; NPF applies a flat 50% headroom increase to growth levels from the ESRI's baseline. This approach is not consistent with best practice as set out in the Development Plan Guidelines. • The policy-driven redistribution of population growth under the NPF is very aspirational and does not properly reflect recent population trends. <p>The submission states that the Variation does not make allowance for extant permissions which must be deducted from the allocations in the consideration of future planning applications. Where the extant permitted units exceed the allocation to a town, all residential zoned land without an extant permission is sterilised. The submission also states that there is a failure to take account of extant planning permissions; committed pipeline development and other pipeline development within settlements, results in the proposed housing allocations for a large number of settlements being already exceeded, particularly where there is an extant SHD permission in place.</p> <p>The submission quotes Section 3.23 of the Development Plan Guidelines regarding the variation of a development plan and the Departmental Guidance Note on Core Strategies (November, 2010) and states the approach to the Variation is contrary to national guidance and is far too blunt to address the complexities of controlling the sustained and sustainable delivery of housing in plan-led manner. The submission states that the current Development Plan was made and adopted in accordance with the Development Plan Guidelines respecting the democratic plan making procedure for public and private sector investment over the plan period, gives spatial expression to the Settlement Strategy of the plan and provided a framework for investment decisions over a 6-year horizon and concludes by suggesting that the Draft Variation should be rejected, or the process of achieving alignment of the Settlement Strategy with the NPF Implementation Roadmap should be deferred until the review of the County Plan commencing in 2021, or until the NPF projections are updated.</p> <p>Chief Executive's Response</p>

Sub. No.	Name	Summary of Submission
		<p>The content of the submission is noted. The submission highlights concern that the housing delivery targets for County Kildare have been reduced from ca. 32,000 to ca. 6,000 units which represents a reduction of ca. 26,000 units.</p> <p>A detailed clarification regarding the revised population figures is set out under the response to submission no. 41 (OPR.)</p> <p>The comments regarding extant permissions are also noted. The number of existing planning permissions is constantly evolving through the development management process with new permissions being granted and/or amended and also permissions expiring. It should also be noted that the number of permissions granted is not considered to be an accurate indication of housing delivery as a number of variables affect the numbers delivered at various stages and location. Furthermore, many permissions are limited and/or phased on delivery of pieces of local infrastructure e.g. local water network upgrades, road upgrades etc and will also span over the current and future CDP and/or LAP as the case may be. Consideration of extant permission and live planning applications will be detailed at local area plan level for each settlement and will be supplemented by details of the 2021 Census regarding during the preparation of the 2023-2029 CDP.</p> <p>Chief Executive's Recommendation No change recommended.</p>
29	Cllr. Íde Cussen	<p>Submission from Cllr Cussen is titled 'WE NEED TO REVISIT CELBRIDGE' and notes that the Core Strategy currently determines that Celbridge have an allocated percentage growth of 10%. Submission states that during the making of the County Development Plan (CDP) it had been proposed that Celbridge would have a 13% allocation of growth (units) and that the author opposed such a move. The submission states that during both the Celbridge and Leixlip LAP processes she called for a review of the CDP to amend the Core Strategy to reduce the overall percentage allocation for Celbridge and Leixlip. The submission notes that a presentation given to Members on the</p>

Sub. No.	Name	Summary of Submission
		<p>Proposed Variation to CDP stated, <i>"towns to grow at a level appropriate to position in the settlement hierarchy and in tandem with delivery of necessary infrastructure and services"</i>. Submission requests that the Celbridge LAP which was adopted in 2017, be varied in order that the percentage of allocated growth (i.e. % of housing units) be restructured into Phase 1 and Phase 2 (similar to what was adopted in the Leixlip LAP which was adopted 2019). Such a variation should also include the objective (Objective MTO3.1, Chapter 8) to carry out a Traffic and Transport Management Plan (including a Public Transport Strategy), be fulfilled and adopted into the LAP. The submission states that if such a variation is not possible then a full review of the Celbridge LAP is required. The submission refers again to the objective in the Celbridge LAP to carry out a Traffic and Transport Management Plan (TMP) with included provision for it to be carried out within 12 months. The submission states that this has not happened even though several Motions have been put forward on the matter, including as recently as November 2019. Submission notes that a motion put forward in January 2019, was passed by the Celbridge-Leixlip Municipal District. This agreed that <i>"the Celbridge Local Area Plan clearly states that a Transport Management Plan and Public Transport Strategy are prepared within 12 months of the adoption of the LAP and that the TMP be adopted by statutory amendment, that this MD (Municipal District) recommends that decisions on Strategic Housing Developments (SHDs) be reserved until this is delivered"</i>. Submission states this was not within remit of KCC as SHDs go to An Bord Pleanála. However, it was agreed by members that for any Report on SHDs the Councillors would be submitting, would object on principle as the TMP hasn't been prepared. In January the Members of Celbridge Leixlip Municipal District prepared a Report on a SHD for Celbridge (ABP Shackleton Road) and the header to our Report is as follows : <i>"In the absence of the Transport Management Plan and Public Transport Strategy prepared (Celbridge LAP) Councillors are not able to support a SHD planning application in the Celbridge Area"</i>. Submission states that without a TMP, Celbridge is expected to absorb housing units with no social or physical infrastructure supporting new residential development. The submission concludes by stating that members and residents of Celbridge must be given responses to the following issues:</p>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> ○ The opportunities/possibilities for Celbridge to have a different designation in this Variation and in the Review of CDP ○ The rationale for the designation of 'Self-Sustaining Town' for Celbridge must be outlined together with the rationale for any proposed designation of 'Self-Sustaining Growth Town' for the town. ○ That funding constraints and/or opportunities for applications and allocations to attract social and physical infrastructure as they apply to town designations needs to be detailed to Members. <p>Chief Executive's Response</p> <p>During the preparation of the Proposed Variation, a review of the settlements including Celbridge was undertaken. Indicators such as social and physical infrastructure provision (and constraints as the case may be), access to public transport and economic performance were reviewed. The Proposed Variation designates Celbridge as a Self-Sustaining Town which is a similar designation to that under the current County Development Plan Settlement Hierarchy. In designating the town of Celbridge, the Council is cognisant of the town's potential to deliver housing. However, the settlement strategy of the proposed Variation, seeks to balance national policy on the delivery of housing, the efficient use of existing transport and water services infrastructure with government policy that seeks to maximise access to and encourage the use of public transport.</p> <p>It should be noted that the designation of towns within each settlement will be reviewed in early 2021 as part of the full review of the CDP and this review will also form part of each successive Plan at which stage towns/settlements may move up, or indeed down in the settlement hierarchy.</p> <p>The issue raised regarding the Traffic and Transport Management Plan (TMP) for Celbridge is noted. However, this is an objective contained in the current local area plan for Celbridge and the reason for the Variation is solely to align the CDP with the NPF and the RSES. The delivery and implementation of the policies and objectives of the Celbridge LAP are ongoing.</p>

Sub. No.	Name	Summary of Submission
		<p>In relation to the suggestion regarding the phasing of development and/or an amendment to the Celbridge LAP, it should be noted that a significant quantum of housing in the town is dependent on the delivery of critical physical infrastructure i.e. Section 13.5 Phasing; the lands at Ballyoulster require the new pedestrian and cycle link from Main Street to the Dublin Road to be delivered after the initial 351 units are delivered in this Key Development Area (KDA) and the entire KDA at Simmonstown is fully dependant on the completion of the new vehicular bridge over the River Liffey. It is not likely that the delivery of the second Liffey crossing will take place during the lifetime of the current LAP and as such, the realisation of the new housing at Simmonstown will be reconsidered in the context of the review of the current</p> <p>Regarding an amendment to the Celbridge LAP, taking the above points into account, an amendment to the LAP is not an immediate priority, but will need to be considered into the future. Lastly, it should be noted that Celbridge remains in the MASP area and has been approved for a study regarding the second river crossing and also, flood studies around the Celbridge-Hazelhatch train station.</p> <p>Chief Executive's Recommendation No change recommended.</p>
30	Ardstone Homes Ltd.	<p>The submission includes a letter from Ardstone Homes Ltd and a technical summary from Ardstone's Planning Consultant, Declan Brassil & Associated (both have been summarised).</p> <p>The submission highlights the following issues. The Variation, if adopted, will completely stifle the development of new residential development in Kildare and will have very serious consequences to the commercial and social structure of the entire county. The submission details Ardstone's developments in Kildare since 2016 to present and states that these projects required significant investment, a stable planning process and a clear and unambiguous development plan and that the Proposed Variation decimates the population targets and resultant proposed housing units for the</p>

Sub. No.	Name	Summary of Submission
		<p>entire county and will lead to absence of the necessary development in the coming years. Submission highlights that the proposed Variation would reduce the overall target house completions from +32,497 to + 6,023.</p> <p>Submission suggests that designating Naas and Maynooth as Key Towns if the target house completion targets are unsustainably low, same can be said for the Self-Sustaining Growth Towns and questions how is the county going to attract industry to the likes of Millennium Park in Naas and other sites in Newbridge if the housing targets are being reduced to proposed levels. Submission further states that Kildare has significant quanta of serviced land and transport links close to Dublin, proximity to the airport and ports and housing development targets are being cut by 81% with no assessment of extant permissions in the Variation.</p> <p>The submission states that various classifications of towns in the Variation and Development Plan are largely irrelevant as the population targets are so minimal that the classifications are meaningless and redundant.</p> <p>The submission suggests that the variation creates confusion as the zoning maps will suggest the land is zoned though it may not be possible to obtain planning permission on the land and figures will impact the vibrancy of villages and impact on local sports club if no new families are coming into the village. Submission suggests that consideration must be given to impact schools and other local services. The submission further suggests that the net effect of the Variation on Naas would be the sterilisation of 113 hectares of zoned development land. The total amount of land de-zoned in the county being 587ha.</p> <p>The submission also suggests that there would be result in a dramatic reduction in social housing units and would lead to scarcity of buildable land and will increase prices and therefore increase price of new home.</p>

Sub. No.	Name	Summary of Submission
		<p>The submission states that the Council should reconsider and reject the proposed variation or at least the process of achieving alignment of the Settlement Strategy with the NPF Implementation Roadmap should be deferred until the review of the County Plan commences in 2021 at which time the review of the allocations in the NPF Implementation Roadmap will have been completed.</p> <p><u>Declan Brassil & Associates Submission (part of Ardstone Homes Ltd.'s submission)</u></p> <p>Submission states that the Proposed Variation will constrain house building and the delivery of Social and Affordable homes, in the county over the remaining life of the County Development Plan and beyond and will potentially result in a significant increase in house prices in the county and suggests that the proposed variation is in contravention of national policy to support and expedite the delivery of affordable new home, which, the submission suggests significantly undermines investor confidence in the county, which will undermine housing delivery for the foreseeable future.</p> <p>The submission suggests that the Proposed Variation sterilises a effectively 'de-zones' the majority of zoned land in the county that does not have the benefit of an extant permission at the time of the making of the Variation; contrary to the spirit of a Development Plan as a contract between the Council and the public. The submission further suggests that the Proposed Variation renders the current Development Plan not fit for purpose as it creates a fundamental disconnect between the Settlement Strategy and the zoning maps for each settlement.</p> <p>The submission states that the zoning maps are meaningless in the context of the allocation and no analysis has been provided of the conversion of extant permissions into commenced and completed units.</p> <p>The submission notes that KCC is the only EMRA County outside of the Dublin SPA that has proceeded with a Variation rather than a review of its Development Plan and suggests that the</p>

Sub. No.	Name	Summary of Submission
		<p>allocations in the NPF Implementation Roadmap are significantly underestimated and are under review by the ESRI therefore suggests that the Draft Variation is premature and not fit for purpose pending the outcome of this review and further suggests that there are issues with the ESRI baseline figures have been identified since the publication of the NPF Implementation Roadmap as the baseline is based on a growth scenario that assumes a significantly lower level of net inward migration than what has been historically and recently achieved and is based on an inappropriate application of headroom provision. NPF applies a flat 50% headroom increase to growth levels from the ESRI's baseline and the submission states that this approach is not consistent with best practice as set out in the Development Plan Guidelines.</p> <p>The submission highlights concern with the policy-driven redistribution of population growth under the NPF is very aspirational and does not properly reflect recent population trends.</p> <p>The submission also notes concerns regarding extant permissions and pipeline developments and the impacts of these on percentage allocations in settlements and states that failure to take account of extant planning permissions; committed pipeline development and other pipeline development within settlements, results in the proposed housing allocations for a large number of settlements being already exceeded, particularly where there is an extant SHD permission in place.</p> <p>Chief Executive's Response</p> <p>The issues raised in the submission are noted. The population projections are outlined in the NPF Roadmap (July 2018) and confirmed in Appendix B of the RSES. It should be noted that under the provisions of Section 11 of the Planning and Development Act 2000 (as amended) Kildare County Council is statutorily obliged to prepare a variation (or early review) of its CDP within 26 weeks of the RSES being adopted, to incorporate the population projections as provided. Accordingly, the Council is not in a position to await any review of the figures which may be published by the ERSI and must adhere to those projections already set out. In any event, the NPF Roadmap Figures have been issued to all Local Authorities by the Government to inform their plan making processes. It is further noted that</p>

Sub. No.	Name	Summary of Submission
		<p>the Variation proposes to take the higher range population projection for the county in the period to 2026 and also includes a further 25% headroom for counties like Kildare, with a projected growth rate of more than the national average in the period to 2026, are allowed to take if they so choose.</p> <p>The queries regarding the inclusion of live applications and lands where permission has already been granted (i.e. extant permissions) into the overall population figures is noted. The consideration of extant permissions and live planning applications will be dealt within the specific LAP for each settlement.</p> <p>The comments are noted as to the methodology used to arrive at the figures. Please see response to the submission made by the Office of the Planning Regulator Submission No. 41.</p> <p>Regarding the issue of population allocation to the Key Towns, as previously noted, the CDP is due for review early 2021, where a full assessment of all supporting social and physical infrastructure to be undertaken. This will include all settlements in the county within the settlement hierarchy. This review will present an opportunity for a full reconsideration of the percentage housing and population allocations for each of the towns including both Naas and Maynooth, based on this assessment and an accompanying in-depth economic assessment. Draft LAPs for both towns are envisaged to be published by the Planning Authority later this year. These draft LAPs will provide a unit allocation for each town which will cover the 6 years of the plan (i.e. extending beyond the lifetime of the present County Development Plan). The specific Regional Planning Objectives (RPOs) for both Key Towns (as outlined in the RSES) will be fully incorporated into the draft LAPs for each respective settlement. Furthermore, decisions concerning the zoning of all residential lands must now be subject to a site-specific infrastructural assessment which will apply a tiered approach to assess whether they are currently 'serviced' or 'serviceable' within the lifetime of a plan in accordance with Appendix 3 of the NPF.</p> <p>Chief Executive's Recommendation No change recommended.</p>

Sub. No.	Name	Summary of Submission
31	Department of Transport, Tourism and Sport	Please see Table 3.1 (a).
32	St. Patrick's College Maynooth	<p>This submission was prepared by John Spain and Associates on behalf of St Patricks College, Maynooth. The key points of the submission are as follows:</p> <p>Population Projections</p> <ul style="list-style-type: none"> • Recent population data as published by the CSO since publication of the NPF, show a significantly higher level of inward migration and higher level of population growth than anticipated in the National Planning Framework (NPF). • The NPF population projections were based on information which included 2011-2016 Census data, which coincided with a period of low growth and net emigration, which has had the effect of under estimating growth in population for the period up to 2040. • It is submitted that the adopted Variation should reflect the up to date position in relation to population growth and housing needs in 2020 based on actual figures recorded in the period 2017-2019. • It is particularly important to factor in the actual population growth rates which have occurred since the preparations of the NPF (some 3 years ago). The NPF predicts that the population nationally will grow by 900,000 from 2016 at an average annual rate of c. 0.9%, however noting the higher level of in-migration, the framework sets out a target to accommodate a population increase of 1.1m by 2040 with an average growth rate of 0.96% p.a. over the 24 year period. This was predicated on a net migration rate of 8,000 p.a. It is noted that the NPF states that progress towards these targets are subject to review in the course of the plan period. However, no review has been undertaken to date. <p>CSO Population Data</p>

Sub. No.	Name	Summary of Submission
		<p>This submission details a number of CSO statistics relating to national figures, with projections regarding inward migration. This figure is substantially higher than the NPF figures, which have informed the population figures for the RSES and the proposed variation. This will result in an increase in population nationally of 1.486 million which is significantly greater than that set out in the NPF population projection.</p> <p>The statistical evidence available points to the housing crisis resulting in a trend of increased household size, arising from the significant shortfall in the provision of new housing.</p> <ul style="list-style-type: none"> • Table 2.4 of the proposed variation uses an average household size figure of 2.8 persons, which is exceptionally high. This compares with the commentary in the NPF, which notes that future housing will be required to serve smaller households. • One of the primary purposes of the proposed variation should be to reallocate growth to the designated Key Towns, including Maynooth, based on the RSES designations. Development should be prioritised for the “Key Towns”, to reflect their designation and capitalise on existing and planned investment in public infrastructure. • Given the RSES objective that a Joint Spatial Plan would be prepared jointly by Kildare and Meath County Councils, there is a need to ensure a coordinated approach is taken, as presently there is an inconsistency between the proposed Variation to the Kildare County Development Plan, and the draft Meath County Development Plan, which could lead to an imbalanced development of Maynooth town. <p>Occupancy Rate</p> <p>The submission again notes that Table 2.4 in the proposed Variation uses an average household figure of 2.8 persons per household which is exceptionally high and contrary to the NPF rate which is 2.5. Therefore, the variation should revise its occupancy rate to 2.5, which would result in a requirement of 6,753 units compared to the currently identified 6,023 units. Using the overall</p>

Sub. No.	Name	Summary of Submission
		<p>population increase of 39,370 to 2026, would result in a new household requirement of 15,748 units, compared to the 14,060 units used in Table 2.4, a shortfall of 1,688 dwellings.</p> <p>Shortfall of Housing Provision This submission carries out an analysis of national population and housing statistics and suggests that it is important when assessing housing need requirements, that the existing shortfall in housing provision for the county is recognised and addressed upfront. There is a need for a twofold approach, firstly to set out the housing need to meet the deficit of housing for the existing population and then to add to that, the additional housing needs for projected population growth. This results in significantly increased level of housing need over and above that based on the traditional population growth basis only.</p> <p>The submission states that there is a need to address this in the first instance and there is a need for a significant amount of “catch-up” housing to meet the needs of existing population. This “catch-up” housing must be provided for in the proposed variation, prior to providing for the requirement of future population growth in the County. The submission further states that the traditional approach taken to date in preparation of a Development Plan is to link housing need over the plan period solely to forecast population growth. It is submitted that this is no longer a valid approach and failure to make this provision in the housing need assessment requirement for the County, will result in exacerbation of the current housing crisis and its continuation for the planned period.</p> <p>Headroom The submission states that there are some suggestions in the Implementation Roadmap for the NPF and other documents, that it is not necessary to provide for the same level of headroom in the future, having regard to the uplift in population projections incorporated in the NPF, however, CSO data has now demonstrated that these uplifted population projection figures in themselves, underestimate the level of population growth currently taking place and therefore, the need or headroom is actually even greater than previous and not less as anticipated by the NPF Implementation Roadmap.</p>

Sub. No.	Name	Summary of Submission
		<p>The submission suggests that the NPF and RSES require a more detailed assessment of the suitability of potentially zoned land for development, including availability to infrastructure and services. However, it is recognised that it would take some time to comprehensively assess all lands in respect of these matters in preparation of the proposed variation timescale and it is difficult to accurately assess likely delivery levels. Therefore, there is a need to maintain headroom levels of 50% or greater in the Assessment of housing land requirements.</p> <p>Maynooth This submission details the designation of Maynooth as a Key Town in the RSES and sets out the relevant RPOs (RPO 4.33, 4.34, 4.35, 4.36). The following points enable the growth of the town:</p> <ul style="list-style-type: none"> • Economic Development: The RSES outlines that there are significant opportunities to develop knowledge based employment through the development of a research and technology campus to the west of the existing university campus and the further development of Maynooth University as a leading third level research and educational facility is critical for the economic development of the town. • Enabling Infrastructure: The DART Expansion project, the M4 upgrades, a bridge and relief road to the south east of the town, additional road capacity around the town offers an opportunity for improved public transport, walking and cycling networks. • North-West Corridor: This area will contain strategic development areas and will support sequential growth in Leixlip and Maynooth. • It is submitted that the proposed Variation should be targeting an increase in the allocation of growth to the 2 no. designated Key Towns of Maynooth and Naas. <p>Proposed Amendment No. 8</p>

Sub. No.	Name	Summary of Submission
		<p>The submission suggests that Table 2.4 of the Proposed Variation includes several assumptions which will not address the urgent need housing required for Kildare.</p> <p>Proposed Amendment No. 13</p> <p>The submission suggests that the justification for retaining the county allocation of 10.9% for Maynooth is based on the potential development of a number of sites over the next few years. The purpose of its designation as a Key Town is the recognition that Maynooth has the capacity to develop at a rapid pace using the existing infrastructure. Maynooth is also particularly well placed to avail of the additional 20% growth being transferred within the MASP. This additional 20% should be included in the population figures for Maynooth. The submission further suggests the variation does not fully reflect the RSES insofar as the settlement hierarchy has not been adjusted to cater for the designation of Maynooth and Naas as Key Towns in the RSES. Table 3.3 should be adjusted, and part of the growth identified for the lower order towns should be directed to the key towns, and Maynooth in particular. The submission highlights that the aim of the proposed variation should be to prioritise key towns and other locations that are strategic from a county perspective. In order to do this, it will be necessary to carefully manage the level of development land that may come forward in other more dispersed locations.</p> <p>The submission notes that Meath County Council in their Draft County Development Plan have allocated c. 400 housing units to a peripheral area to north east of the town. This would result in an unbalanced growth of the town and there is a need to reconcile this housing allocation with the small allocation (657) in the proposed Variation in order to provide for a more balanced growth of housing provision in the town. This can only be achieved by providing for a greater proportion of the overall housing need within Kildare County Council administrative area of Maynooth in accordance with sustainable development principles.</p> <p>Conclusion/Summary</p> <p>The key points of the submission are as follows:</p>


Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> • Recent population data as published by the CSO since publication of the NPF, show a significantly higher level of inward migration and higher level of population growth than anticipated in the National Planning Framework (NPF). • It is submitted that the adopted variation should reflect the up to date position in relation to population growth and housing needs in 2020. • It is important that in assessing housing need requirements, that the existing shortfall in housing provision for the county of Kildare is recognised and addressed upfront. • The National Planning Framework recognises that “currently, 7 out of 10 households in the State consist of three people or less, with an average household size of 2.75 people. This is expected to decline to around 2.5 people per household by 2040. Yet, the stock of housing in Ireland is largely comprised of detached and semi-detached houses with three to four bedrooms.” • The statistical evidence available points to the housing crisis resulting in a trend of increased household size, arising from the significant shortfall in the provision of new housing. • Table 2.4 of the proposed variation uses an average household size figure of 2.8 persons, which is exceptionally high. This compares with the commentary in the NPF, which notes that future housing will be required to serve smaller households. • One of the primary purposes of the proposed variation should be to reallocate growth to the designated Key Towns, including Maynooth, based on the RSES designations. Development should be prioritised for the “Key Towns”, to reflect their designation and capitalise on existing and planned investment in public infrastructure. • Given the RSES objective that a Joint Spatial Plan would be prepared jointly by Kildare and Meath County Councils, there is a need to ensure a coordinated approach is taken, as presently there is an inconsistency between the proposed Variation to the Kildare County Development Plan, and the draft Meath County Development Plan, which could lead to an imbalanced development of Maynooth town.

Sub. No.	Name	Summary of Submission
		<p>Chief Executive's Response</p> <p>The issues raised in relation to population projections, underestimation of housing need, headroom, the CSO data are noted, however, KCC is statutorily required to vary (or review) the CDP to align same with the NPF and RSEs and the Transitional Population projections contained therein. It should be noted that the population analysis and projections in the NPF are based on a longer period than just one or years of population growth or decline. Clarification regarding the population projections, headroom and general calculation methodology are set out in the response to submission no. 41 (OPR) and submission no. 28 (Lagan Homes).</p> <p>The Variation has acknowledged the designation of Maynooth and Naas as Key Towns. The percentage growth allocation of the county will be revisited under the full review of the CDP in early 2021 which will give time for the 'absorption period' as referred to under Section 3.5 of the proposed Variation, and an agreement to be reached on the transfer of up to 20% of the targeted growth in the city to Maynooth, Bray and Swords as per NPO 68, to be approved by the Department of Housing, Planning and Local Government.</p> <p>The occupancy rate figure used is 2.8 persons as this is the figure for the county as reported by the CSO (Census 2016) and represents a local occupancy rate and not that of the country generally. The figure of 2.5 persons per house used in the NPF is the projected figure for 2040 and there is no legal requirement to apply this during the current calculations. It is the intention of the Council that successive plans in conjunction with successive censuses will work towards aligning with the 2040 housing occupancy rate of 2.5 in stages over the next 20 years.</p> <p>The issue raised concerning the Draft Meath County Development Plan 2020-2026 are noted, however, this plan is at draft stage, on public display until 6th March 2020.</p> <p>Chief Executive's Recommendation</p>

Sub. No.	Name	Summary of Submission
		No change recommended.
33	National Transport Authority (NTA)	Please see Table 3.1 (a).
34	John J Cross	<p>This submission relates to rural housing in County Kildare. The submission states that the vast majority of rural housing is refused under policies RH4, RH9 and RH 10 of the County Development Plan and this is particularly evident in the northern part of the county and highlights issues regarding refusals for applications from applicants adhering to both the NPF, in particular, NPO 19, the Sustainable Rural Housing Guidelines, 2005 and the policies and objectives of the CDP relating to Local Needs and Housing Needs. The submission states that policy RH9 (iv) is the main reason for refusal which is namely the ability of an area to absorb further development and the submission contends that this is not based on any facts or independent assessment, is completely arbitrary and is at the discretion of the planning authority. The submission suggests that policy needs to be amended to allow applicants who fulfil local need / criteria to have a reasonable expectation of obtaining a grant of planning permission and it is further contended that the development plan conflicts with national policy (namely NPO 20) as it fails to have a Housing Need Demand Assessment (HNDA) tool. Reference is also made in the submission to Section 2.5.2 where allocated growth is 1.6% in rural settlements and 8% in the rural countryside and highlights that the 8% (371 houses per annum) growth target for houses in the countryside will not be achieved due to the rate of refusals particularly in north Kildare. To achieve this policies RH4, RH10 should be amended and RH9 (iv) removed entirely.</p> <p>The submission states that the Council's own core strategy policy allows for 370 rural houses per annum yet only 120 were granted in 2019 with very little in the north of the County.</p> <p>Chief Executive's Response</p>

Sub. No.	Name	Summary of Submission
		<p>The contents of the submission are noted. The contention in the submission regarding the rate of refusal is also noted. It should be noted that Proposed Variation No. 1 does not affect the rural housing policy in the current County Development Plan.</p> <p>It should also be noted that County Kildare has accommodated the construction of 8,959 rural one-off dwellings between 1998-2015 (an average of 530 dwellings per annum). A commitment to review the Rural Housing Design Guidelines and Policy was given to the elected members and is programmed for commencement later in 2020. In addition, a workshop with agents and practioners who engage with Kildare County Council is planned in the short term.</p> <p>The requirement for a Housing Need Demand Assessment (HNDA) is noted, however, in the absence of the publication of any national guidance documents, associated data and supporting material regarding the preparation of a HNDA it is not considered appropriate or practicable to prepare a HNDA at this time. Local Authorities have been informed by the DHPLG that a guidance document is currently being prepared.</p> <p>Chief Executive's Recommendation No change recommended.</p>
35	Applegreen Services Area Ltd	<p>Submission prepared by David Mulcahy, Planning Consultants Ltd. on behalf of Applegreen Services Area Ltd and relates to the former Cemex site at Maudlins, Naas measuring 6.37 ha. Reference is made in the submission to Amendment No. 16 regarding the 're-intensification of industrial lands in the north east of the town and the submission welcomes the formal recognition of these high-profile lands. The submission highlights that the landowners are eager to develop lands and awaiting the new Naas LAP. The submission states that the owners are in discussions with the adjoining landowners in Donnelly Mirrors and both parties are in a position to fund the preparation of a masterplan by appropriate experts.</p>

Sub. No.	Name	Summary of Submission
		<p>The submission requests that a specific statement requiring a masterplan be included into the Variation to guide future development of the site, which would allow an imminent planning application to be made, which will occur post the release of the Naas Transport Strategy. The submission also refers to the Togher Masterplan at Junction 17 in County Laois, which refer to lands zoned for Employment and Enterprise to be specifically identified for motorway uses and the submission states that this should be a template for the subject lands.</p> <p>Climate Change The submission states that having regard to the need to promote renewable energy use, it is their wish to develop the subject lands beyond the 'traditional' ancillary vehicle fuel facilities to include a Low Carbon Hub comprising of an on-line Compressed Natural Gas facility (in conjunction with the likes of Gas Networks Ireland) and Electric Vehicle fast charging hub and other national level pilot projects for other alternative and sustainable fuels e.g. Hydrogen facilities for the larger HGV's etc and requests a specific policy to be a Low Carbon Hub.</p> <p>TII Submission The submission requests that the Council facilitate engagement with TII in relation to the masterplan.</p>

Sub. No.	Name	Summary of Submission
		 <p>Chief Executive's Response Proposed Variation No.1 of the Kildare County Development Plan is a statutory variation to align the CDP with the National Planning Framework and the Regional Spatial and Economic Strategy. The primary focus of the variation is to translate the transitional population targets sets out in the NPF Roadmap and RSES and the revised settlement designations into the Settlement Hierarchy for County Kildare.</p> <p>Whilst the contents of the submission from Applegreen are noted and the importance of the subject lands are acknowledged, it is considered that the Local Area Plan process is most appropriate channel for addressing specific sites within towns. It should be noted that a Draft Local Area Plan for Naas is currently being prepared which will informed by a Transport Strategy and will be published later this year.</p>

Sub. No.	Name	Summary of Submission
		<p>The request to facilitate engagement with TII in relation to a masterplan is noted and as always, the Council are willing to facilitate same if/when appropriate.</p> <p>Chief Executive's Recommendation No change recommended.</p>
36	Aaron McHale	<p>The submission welcomes both Athy's designation as a '<i>Self-Sustaining Growth Town</i>' given its current population and employment base, and the preparation of a Draft Local Area Plan (LAP) for the town. However, it expresses concerns regarding the allocated growth assigned to Athy (of only 4.8% of the total for the County) which equates to 289 no. dwellings to 2023. The submission states that the rationale for arriving at these specific figures for Athy is unclear. Furthermore, it questions if the figures include sufficient headroom, having regard to Athy's designation as a Self-sustaining Growth Town, particularly in a case where there are any delays in the delivery of housing in the period to 2023.</p> <p>The submission requests that that the proposed variation be amended to give priority to the development of sites that form part of partially constructed residential estates, in conjunction with the focus on compact growth and urban regeneration, in order to address legacy issues in a timely manner.</p> <p>The submission notes that Co. Kildare includes a number of partially constructed residential estates, which though they may no longer be on the <i>Unfinished Housing Survey</i>, still require to be further developed, including the provision of additional residential units and associated amenities and complete/sustainably utilise existing infrastructure.</p>

Sub. No.	Name	Summary of Submission
		<p>In order to reflect the issues outlined above the submission states that the Proposed Variation will need to be amended at the following points to update the criteria relating to new development, to include reference to the appropriate completion of existing residential developments:</p> <ul style="list-style-type: none"> ○ Section 2.2, which lists the criteria for the ‘focus of new development’; ○ Section 3.4.2, as a subsection of the Sequential Approach; and ○ Section 3.9, which lists the Objective of the Settlement Strategy. The amendment could either form a further amendment to SO 9, to note the need to complete partially completed estates within settlements, or as a standalone new SO 12 Objective. <p>By way of example, the submission refers to lands at Prusselstown Green, Athy which are c.3.87 and located off Geraldine Road. The submission notes that lands are undeveloped (see Figure 1 below). However, as previous planning permissions were partially implemented on the site and on lands directly adjacent to it where 13 No. completed and occupied detached units now adjoin lands in question, which have also been subject to ground works leaving the ground in a disturbed condition. Submission notes that existing infrastructure services at the site are in place to cater for a greater number of residential units than the 13 No. constructed. The available infrastructure includes a connection to the public road network via a Right of Way over the existing common access road; an attenuation system and foul drainage pumping station and rising main, the latter of which are within the subject site, although they serve the 13 No. completed dwellings in separate ownership. The existing drainage infrastructure has capacity to cater for a greater number of units than the adjoining 13 no. dwellings.</p> <p>The submission states, that in cases like the subject site, it is in the interest of the residential amenity of existing residents and the quality of housing in Co. Kildare, that such lands are developed to provide <i>inter alia</i> an adequate range of residential amenities (such as public open space, childcare facilities as appropriate and as originally intended) for existing residents, and to ensure that associated existing infrastructure is fully-utilised to capacity and maintained adequately.</p>

Sub. No.	Name	Summary of Submission
		<div data-bbox="1039 276 1588 718" data-label="Image"> </div> <p data-bbox="1039 718 1328 738"><i>Figure 1: Lands at Prusselstown Green, Athy.</i></p> <p data-bbox="593 778 1021 810">Chief Executive's Response</p> <p data-bbox="593 817 1995 1070">The welcoming of the designation of Athy as a Self-Sustaining Growth Town and the intention to prepare a Local Area Plan (LAP) for the town is noted. Regarding the concern outlined in the submission in relation to the percentage and unit number growth allocated to Athy until 2023, it is noted that the CDP is due for review within the next 12 months. Such a review will require a full assessment of all supporting social and physical infrastructure to be undertaken, this will include all settlements in the county from Key Towns to settlement nodes. Regarding clarification on the basis for the calculations see response to submission no. 41 (OPR).</p> <p data-bbox="593 1150 2022 1256">There will be an opportunity for a full reconsideration of the designation and housing/population allocations for each of the towns, including Athy, based on this assessment and an accompanying in-depth economic assessment. Once the Variation is adopted, the Athy LAP, will form part of a suite of</p>

Sub. No.	Name	Summary of Submission
		<p>local area plans which the Council will place on public display, at staged intervals. The Plan will provide a unit allocation which will cover a period of 6 years to 2027 (i.e. extending beyond the lifetime of the present County Development Plan).</p> <p>The request that the proposed Variation should be amended to include an objective/policy to support completion of partially constructed residential estates is noted, however, the central purpose of the proposed variation is to incorporate the objectives of the NPF and RSES with respect to Co. Kildare. Critical to both documents are the principles of compact growth and sequential development, with neither document having reference to unfinished or incomplete residential developments. Due to the highly diverse site-specific characteristics of such landholdings, it is considered more appropriate that policies governing the future sustainable development of these sites should be implemented at a local level through the Local Area Plan (LAP) process, rather than at county level. It is within this policy framework that the particular individual attributes of such sites can best be considered in conjunction with other critical factors such as the principles of compact growth and sequential development.</p> <p>Chief Executive's Recommendation No change recommended.</p>
37	Crylock Developments Ltd.	This submission was prepared by John Spain Associates on behalf of Crylock Developments Ltd., Newhall, Naas, Co. Kildare. A written report including Appendices have been included and they relate to lands that extend to 110 hectares 2 km west of Naas Town adjacent to the Newhall Junction of the M7;

Sub. No.	Name	Summary of Submission
		<div data-bbox="972 276 1749 738" data-label="Image"> </div> <p data-bbox="593 778 1973 887">The submission requests two additional objectives included in the Variation recognising the appropriateness of the county, and the environs of Naas in particular, to accommodate an agglomeration of data storage facility type uses and suggests the following polices to be included:</p> <ul data-bbox="640 927 2033 1182" style="list-style-type: none"> • EO 7 To support and facilitate the development of data centres on suitable sites with supporting infrastructure subject to obtaining the relevant consents. • EO 8 Support the delivery of an agglomeration of data storage facility development and associated related infrastructure within the environs of Naas, to be set in a high-quality campus Submission style setting with low site coverage. Employment types other than those strictly related to data storage shall show a clear process related requirement to locate in proximity to a data centre. <p data-bbox="593 1225 1832 1259">Planning Policy Support for Data Centre Development at Newhall/Ladytown, Naas</p>

Sub. No.	Name	Summary of Submission
		<p><u>National Planning Framework</u> This submission notes the NPF strong policy support for delivery of data centres, therefore, should include an objective to comply and greater align with NPF to promote the delivery of space extensive/less intensive employment uses (which data centre type development constitutes) at locations outside the M50 ring and the built up area of Dublin City;</p> <p>Submission suggests that as land zoned for space extensive employment uses within the built-up area of Dublin reduces, it is imperative that equivalent lands be provided concurrently to facilitate the future growth of less intensive employment uses such as data centres (Section 2.4).</p> <p>Submission also notes National Policy Objective 10b of the NPF encourages ‘Regional and Local Authorities to identify and quantify locations for strategic employment development, where suitable, in urban and rural areas generally and states that the environs of Naas are a suitable location for employment extensive uses such as data centre development (Section 2.5). To support this, reference is made to NPF stating <i>‘relocating less intensive uses outside the M50 ring in particular and from the existing built-up area generally; the submission puts forward the argument that Naas is outside the M50 and the subject lands are not within the built up area and satisfies the need to address outward commuting in Naas.</i></p> <p>Eastern and Midland Region RSES Submission notes that the RSES supports the delivery and location of data centre development and seeks to ‘Align to national strategy and approach for data centres – right location for use and energy demand and further notes RPO 8.25 <i>‘support the national objective to promote Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities at appropriate locations’.</i> Reference is also made to Guiding Principles in for Strategic Employment Development.</p>

Sub. No.	Name	Summary of Submission
		<p>Government Statement on the Role of Data Centres in Ireland’s Enterprise Strategy – June 2018</p> <p>The submission states that the above document highlights that Data centres area central to digital economy and contribute to job creation. The document does, however, acknowledge that the energy demands of data centres are one of the key challenges to the future planning and operation of such development and the addition of new objectives within the CDP would accord with Government policy;</p> <p>Relevant Precedents</p> <p>The submission references a number of grants of permission for data centres which are outside the M50 ring proximate to the national road network and reference is also made to objectives relating to data centres within the Meath and Wicklow Development Plans.</p> <p>Appendix 1</p> <p>The submission is accompanied by an appendix which provides details of the site location and the neighbouring road network and employment generating uses.</p> <p>Appendix 2</p> <p>This documents sets out reasons supporting the delivery of data centre development highlight that the subject lands traversed from north to south by a 380 KVA power transmission line and from east to west by a 110 KVA power transmission line, both making this area of land ideally suitable for the location of an electrical sub-station which is required;</p> <p>Appendix 3</p>

Sub. No.	Name	Summary of Submission
		<p>This appendix details why Data centre campuses should be located in proximity to motorway interchanges and reference is made to two data centre campuses permitted on lands situated in proximity to motorways;</p> <ul style="list-style-type: none"> Reference is also made to Apple Data Centre project and to the Board noting that Apple only expected to deliver 150 no. jobs and Facebook 60 no. jobs, thereby demonstrating that data centre development such as that envisaged for the environs of Naas, will not generate significant traffic movements. <p>Chief Executive's Response The M7 is part of the EU TEN-T Core Network of which the strategic function must be safeguarded. It is considered premature to insert specific objectives into the Variation, designating 110 hectares of land in close proximity to the M7 for employment use without examining the impact on the national motorway network. The designation of such lands would also prejudice the preparation of the draft Naas LAP, which once the Variation is adopted, the Naas LAP, will form part of a suite of local area plans which the Council will place on public display, at staged intervals.</p> <p>The policy of the Economic Strategy contained within the CDP is to facilitate and support the growth of the economy in a sustainable manner across a range of sectors and there are considerable undeveloped employment lands on both greenfield and brownfield sites throughout the county, which may be considered suitable for data centres. It is not considered appropriate to designate these sites and their suitability for data centre type development through the variation process.</p> <p>Chief Executive's Recommendation No change recommended.</p>
38	Melanie Treacy	This submission relates to a piece of un-zoned land north of the rural settlement of Narraghmore.

Sub. No.	Name	Summary of Submission
		<div data-bbox="1021 280 1603 695" data-label="Image"> </div> <p data-bbox="1021 703 1603 730">Map showing site (outlined blue) in Narraghmore</p> <p data-bbox="593 735 1982 874">The map identifies a site north of the settlement core and requests that it be zoned for residential development as it had been in the previous CDP 2011-2017 due to the demand for housing in the area and further suggests a parcel of land in the village currently designated settlement expansion could be designated community/recreational.</p> <p data-bbox="593 882 1021 909">Chief Executive's Response</p> <p data-bbox="593 917 2038 1056">Proposed Variation No. 1 of the KCDP does not affect the development (settlement) boundary for the Village of Narraghmore. The purpose of the Proposed Variation is to respond to recent changes in national and regional policy namely the publication of National Planning Framework (NPF) and the Eastern and Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES).</p> <p data-bbox="593 1106 2038 1212">It should be noted that the Kildare County Development Plan is due for a full review in early 2021 at which stage consideration will be given to settlement boundaries etc for particular towns/villages and submissions regarding land use zoning will be taken into consideration during this process.</p> <p data-bbox="593 1252 1137 1279">Chief Executive's Recommendation</p>

Sub. No.	Name	Summary of Submission
		No change recommended.
39	Cllr Pádraig McEvoy	<p>The submission from Cllr McEvoy sets out that the Variation should be consistent with the population targets set out in the NPF and notes that climate action requirements and core strategy projection/growth targets should be proportionally allocated to settlements which are served by sustainable transport to help offset the use of the car for travel.</p> <p>Chief Executive’s Response Table 3.3 which is set out in the proposed Variation provides for growth in line with the population projections contained in the NPF Implementation Roadmap and adopted as part of the RSES. The determination of settlement designations in the Settlement Hierarchy, as defined in the Variation, have been informed by a review of capacity for growth through the availability of services and access to high quality public transport, an economic analysis and infrastructure (physical & social) assessment.</p> <p>Chief Executive’s Recommendation No change recommended.</p>
40	Jane Tripp & Rita Shah	<p>The submission was prepared by Kieran O’Malley + Co. Ltd., Town Planning Consultants on behalf of their clients Jane Tripp and Rita Shah who are the owners of Moyvalley Hotel and Golf Resort. Their vision for the property is to enhance and expand the existing tourism facility and develop a fully integrated and complementary sustainable aged care (retirement) community.</p> <p>The submission comprises of three enclosures:</p> <ul style="list-style-type: none"> ➤ Development of Aged Friendly Community at Moyvalley Analysis, prepared by Tom McNamara & Partners; ➤ Masterplan prepared by MOLA Architecture; ➤ Storyboard prepared by MOLA Architecture.

Sub. No.	Name	Summary of Submission
		<p>The submission states that the Variation does not address the ageing population and their housing and health needs, as required by NPF and the RSES and suggests that a new policy be included as follows under Section 2.16.1:</p> <p><i>Policy CS4 (b): Encourage and facilitate in accordance with the National Planning Framework (NPO 30), the provision of planned ageing communities within urban and rural locations that have social and infrastructural capacity to respond to the urgent housing and health requirements of the county's ageing population.</i></p> <p>The submission outlines the planning history for the subject lands over the last 20 years and the describes the current facilities on site and reference is made to text and objectives in the NPF and RSES in relation to the requirements for the country's ageing population. The submission states that there is an urgent need for response housing – RSES and highlights RPO 9.1 – integration of age friendly ad family friendly strategies in development plans.</p> <p>The submission describes retirement villages as a dedicated older persons' housing typology and provides a socioeconomic analysis outlining why it would be a suitable location for the retirement village and also includes a storey board and masterplan. The analysis examined a number of criteria including;</p> <ul style="list-style-type: none"> ➤ Expected catchment area; ➤ Aged population within the catchment area and Kildare; ➤ Current Retirement Village and Nursing Homes within the catchment; ➤ Number of empty nesters within the catchment area and Kildare; ➤ Affordability-Median House Price; ➤ Median Income Gross Income.

Sub. No.	Name	Summary of Submission
		<p>The submission notes that the catchment area (1-hour drive from Moyvalley) identifies 8 retirement villages with only one in Kildare, with affordability not predicted to be an issue. It also identifies an increase in demand for units of up to 3,657 in 2036, and population increase in the catchment area of up to 872,000 by 2036. The masterplan includes sustainable communities uses, additional recreational uses, intergenerational living, significant new hotel and leisure facilities, and a perimeter forest park with serviced housing sites. The retirement village would also complement community village facilities and provide a more compact development of rural housing. It would strengthen the existing communities at Cadamstown and Moyvalley through an increase in transport links, increase in the demand for services, population growth and integration, and help reduce social isolation. The proposal would provide up to 350 jobs and create a more sustainable local economy and reduce CO2 emissions by jobs being locally based. It would enable the use of existing infrastructure including the wastewater treatment plant, use of electric vehicles, local transport links, extensive forestry, existing facilities in the hotel, and proposed energy sources such as the solar farm. Submission requests inclusion of an ageing population policy in the Core Strategy and states that to defer or delay would set back delivery of retirement villages in the county.</p> <p>The enclosure titled the Development of Aged Friendly Community at Moyvalley Analysis, prepared by Tom McNamara & Partners outlined the following:</p> <ul style="list-style-type: none"> • Growth in aging population; • Huge gap in the services offered to those who wished to remain independent; • Retirement Villages enable people to age in place and live longer in the community; • Providing care in the community is significantly more cost effective than providing care in a nursing home; • Ireland's current health system for the aged population is operating at or above capacity across most services; • Government is looking at developing retirement villages as part of its aged housing and health strategy;

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> Based on the demographic information for Kildare and the Catchment Area there is already an urgent need and demand for additional housing for the aged population that is currently not available. <p>Chief Executive's Response The Kildare County Development Plan 2017-2023 contains several policies relating to the provision of housing for older people. Under policy OP 1 the Council will facilitate the provision of continuing care facilities for the elderly, such as own homes (designed to meet the needs of elderly people), sheltered housing, day-care facilities, nursing homes and specialised care units (e.g. dementia specific units) at appropriate locations throughout the county. Through the Council's land use plans suitably sited land has been zoned for community uses such as nursing homes. Group/special needs housing is also permitted in principle across a myriad of land use zonings. Planning applications will continue to be determined as part of the development management process to cater for the diversity of older persons housing needs at appropriate locations throughout the county.</p> <p>Chief Executive's Recommendation No change recommended.</p>
41	Office of the Planning Regulator (OPR)	Please see Table 3.1 (a).
42	Celbridge Community Council	<p>The submission states that it supports many aspects of the NPF and RSES that the proposed Variation seeks to incorporate into the County Development Plan (CDP), in particular proposed amendments Nos. 2, 4, 5, 7, 10, 14 and 15. Submission further states that in its desire to see Celbridge develop sustainably, investment in physical and social infrastructure including (but not limited to) the following is essential;</p> <ul style="list-style-type: none"> Enhanced public transport provision to reduce the level of car dependency;

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> ○ A second Liffey crossing and orbital route around the town; ○ Prioritisation of safe cycling and pedestrian routes; ○ Local facilities for performing arts, sports and recreation; ○ Provision of local childcare facilities, schools, medical practices, etc.; ○ Provision for local employment growth to facilitate re-balancing the employment to population ratio. <p>Designations of Settlements</p> <p>Submission states that “Self-Sustaining Town” designation appears most fitting provided it is supported by investment to enable rebalancing. However, the proposed designation contradicts the population targets for Celbridge insofar as the population and unit allocation for the town has not been changed, and at 10% is equivalent to that of Maynooth (Key Town) and Leixlip (Self-Sustaining Growth Town). The submission states that based on their designations these settlements should allocated a significantly greater proportion of the target growth. Submission states that “Self-Sustaining Town” is an appropriate designation for Celbridge provided such a designation has no bearing on a town’s ability to attract investment for physical and social infrastructure. Submission also refers to a number of recent and live planning applications within Key Development Areas (KDAs) around the town and expresses concerns that these developments are ‘car dependent’ and together account for in excess of 1,000 new housing units. Submission refers to the Draft Meath County Development Plan 2020-2026 noting that it uses very clear language to express the Council's intentions with respect to the towns designated as Self-Sustaining Growth Towns versus Self-Sustaining Towns – though it recognises Celbridge’s position within the Metropolitan Area Strategic Plan (MASP) area.</p> <p>Strategy for the Dublin MASP Area in North-East Kildare</p> <p>The submission acknowledges the designation of Maynooth as a “Key Town” provides clarity and presents a real opportunity for more sustainable development in the area and for fostering stronger connections between the settlements of north-east Kildare. This is an area where the unique</p>

Sub. No.	Name	Summary of Submission
		<p>proximity of the large highly urbanised settlements of Maynooth, Leixlip and Celbridge has perhaps detracted from a coherent strategy for the area as a whole in the past.</p> <p>The submission further notes that while the RSES outlines indicative opportunities for employment development in Maynooth and the CDP contains a concept of economic clusters, the proposed Variation to the CDP fails to enunciate a strategy for developing both individually sustainable towns and a broadly sustainable north-east Kildare area with strong connections between all settlements therein. Since a review of the Maynooth LAP is pending and will likely predate a full review of the CDP, it is important that the varied CDP provides a robust framework for how Maynooth as a “Key Town” will influence, support and become the economic driver for north-east Kildare in a manner that is positive and sustainable for residents across all settlements.</p> <p>The submission states that consideration therefore needs to be given to a range of matters, the most important being the development of a transport strategy for the whole MASP area is needed and not just a transport strategy for Maynooth in isolation.</p> <p>The submission concludes with several suggested alterations to the proposed amendments as follows:</p> <ul style="list-style-type: none"> • Proposed Amendment # 5 - Section 2.2 - Ensure that the economic strategies for “Self-Sustaining Growth Towns”, “Self-Sustaining Towns” and the Dublin MASP settlements are clearly stated including: • Clarification of whether “Achieving economies of scale for services and infrastructure in identified growth towns” in (iv) includes or excludes “Self-Sustaining Towns”. • Elaboration on how the unique proximity of the highly urbanised settlements in the Dublin MASP area will be leveraged to strengthen connections between the settlements and support local sustainability in the area as a whole; • Addition of wording regarding a focus on delivering economic development in a manner that supports sustainable live-work communities. This should include listing the locally strategic

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		<p>employment sites and not just the regional “Strategic Employment Development Areas” outlined in the Dublin MASP - the proposed replacement of the words “<i>economic clusters</i>” with “<i>Strategic Employment Development Areas in the North-West corridor of the Metropolitan Area, in line with the overall Growth Strategy</i>” in (v) loses something important that is not otherwise accounted for.</p> <ul style="list-style-type: none"> • Proposed Amendments # 5 to # 10 Outline more clearly in the Core Strategy how to achieve balanced residential development through the provision of employment opportunities and the infrastructure across the MASP area of Kildare thereby protecting towns like Celbridge and Kilcock from developing as dormitory towns overshadowed by prioritisation of infrastructural provision in Maynooth. The strategy should list desired outcomes, including key indicators of success for each type of settlement. It is important to be clear on this, so it can be expanded on in the forthcoming full review of the CDP. • Analyse the designation of Celbridge as a “Self-Sustaining Town” and if it is deemed to be the correct designation, examine Proposed Amendment # 13 - Table 3.3 (Settlement Hierarchy – Population and Housing Unit Allocation 2016 - 2023) with a view to revising appropriately to reflect more limited residential growth if a “Self-Sustaining Growth Town” is felt to be more appropriate, make the necessary edits e.g. to Proposed Amendment # 6 - Table 2.2 (Settlement Hierarchy County Kildare), etc. • Proposed Amendment # 9 Outline more clearly in Sections 2.11.3 and 2.11.4 what Kildare County Council’s vision is for “Self-Sustaining Growth Towns” and “Self-Sustaining Towns”. Such clarity would provide essential guidance for sustainable development of our town. Reference the Draft Meath CDP 2020-2026 for ideas. • Correct the clerical error in Section 2.11.4 (Self-Sustaining Town) which describes Self-Sustaining towns as settlements “with high levels of <i>employment</i> growth and a weak employment base” - this should state “with high levels of <i>population</i> growth and a weak employment base” in accordance with the RSES. • Proposed Amendment # 13 - Table 3.3 (Settlement Hierarchy – Population and Housing Unit Allocation 2016 - 2023) - Check/correct the values in the 2023 Dwellings Forecast and NPF

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		<p>2026 Pop Growth columns - even if the percentage for Celbridge remains at 10%, the values in these columns are old values/ too high (we cannot speak to values for towns other than Celbridge but they should also be checked).</p> <ul style="list-style-type: none"> • Proposed Amendment # 16 - Table 5.2 (Economic Development Hierarchy) - Expand the “Sectoral Opportunities” identified for “Self-Sustaining Towns” as the current list appears overly restrictive - this table could be revised to say a lot more! • Proposed Amendment # 16 - Table 5.2 (Economic Development Hierarchy) - Move Monasterevin up to the “Self-Sustaining Towns”. <p>Chief Executive’s Response</p> <p>The observations and suggestions submitted by the Celbridge Community Council are noted. With regard to the possible effect on public investment as a result of the proposed designations, Celbridge remains an important settlement within the Metropolitan area and has been approved for a study regarding the second river crossing (funded under the URDF in 2018) and also, flood studies around Celbridge-Hazelhatch train station. Regarding the proposed designation, the CDP is due for review in early 2021 where a full assessment of all social and physical infrastructure will take place, this will include all settlements in the county from Key Towns to settlement nodes. There will be an opportunity for a full reconsideration of the designation and percentage population/unit allocation for each of the towns based on this assessment and a separate economic assessment.</p> <p>The issues raised in relation to the economic role that Celbridge will play as a ‘self-sustaining town’ within the MASP area is acknowledged. It should be noted that the timeframe to initiate the Variation process of the CDP was challenging. Consequently, the priority of Kildare County Council, conscious of the upcoming review of the CDP next year, was to transpose the key provisions of the NPF and RSES into the CDP in order to comply with our immediate statutory obligations, as prescribed under the Planning and Development Act 2000 (as amended). As noted above, the review of the CDP will</p>

Sub. No.	Name	Summary of Submission
		<p>involve a comprehensive economic assessment of the function and role of all settlements in the county, in particular those located within the MASP area.</p> <ul style="list-style-type: none"> • The clerical error in Section 2.11.4 (Self-Sustaining Town) which describes Self-Sustaining towns as settlements “with high levels of employment growth and a weak employment base” is noted. It is recommended that this be amended to include the correct wording. • The observation made in relation to Proposed Amendment No.13 - Table 3.3 (Settlement Hierarchy – Population and Housing Unit Allocation 2016 - 2023) is noted. The column titled ‘2023 <i>Dwellings Forecast</i>’ should not be included in the table and will be omitted in its entirety. The figures in the column titled ‘NPF 2026 Pop Growth’ are correct and are based on a provision in the National Planning Framework Roadmap (July 2018) (see Section 3(a) Transitional Population Projections, pages 5-6, NPF Roadmap) which allows for counties with a projected growth rate of more than the national average to provide for additional headroom not exceeding 25% in the period to 2026. The title of the column will be amended and a footnote to Table 3.3 inserted to provide a more detailed explanation of the figures outlined in this column. • In relation to Celbridge it should be noted that the Variation currently proposes it to be a ‘Self-sustaining town’ within the new settlement hierarchy. <p>Chief Executive’s Recommendation</p> <p>Amend Section 2.11.4 (Self-Sustaining Town) replace the reference which describes Self-Sustaining towns as settlements “with high levels of employment growth and a weak employment base” with “with high levels of population growth and a weak employment base” in accordance with the RSES.</p> <p>Delete the entire column titled ‘2023 <i>Dwelling Forecast</i>’. Amend the wording on the column titled ‘NPF 2026 Pop Growth’ so that it is better described and insert a footnote to explain how the figures in this column were calculated (i.e. the inclusion of the 25% extra headroom).</p>

Sub. No.	Name	Summary of Submission
43	Crodaun Development Ltd.	<p>The submission states that Crodaun Development Ltd. owns 13 hectares of lands zoned new residential at Crodaun, Celbridge. The submission notes that the proposed Variation involves a massively reduced housing allocation up until 2023, from 32,497 housing units under the current CDP to only 6,023 units and states that this will have “crippling consequences” for future residential development over the remaining lifetime of the CDP as essentially under any LAP that comes up for review under the lifetime of the current CDP, most existing residential land will end up being phased until post 2023 and there will be no new residential zoned lands provided. The submission suggests that any residential zoned lands which are the subject of advanced SHD proposals and are ready to go should not be included in any phasing. The submission further notes that allocations from the NPF are currently being reviewed by the ESRI and Variation should wait until this review is completed. The submission also states that the Proposed variation does not appear to take extant planning permissions into account and does not appear to take account of commenced permissions, is based on an average household size of 2.8 whereas the National Planning Framework is based 2.5.</p> <p>Chief Executive’s Response</p> <p>The population projections are outlined in the in NPF Roadmap (July 2018) and confirmed in Appendix B of the RSES adopted in June 2019. These figures are based on revised projections which plot a growth trajectory set approximately mid-way between what is currently being planned for in Statutory Development Plans if projected forward to 2031, and the more likely evidence-based and nationally coherent projected scenario to 2031 and 2040. It should be noted that under the provisions of the Planning and Development Act 2000 (as amended) Kildare County Council is statutorily obliged to prepare a Variation of its CDP within 26 weeks of the RSES being adopted. Accordingly, the council is not in a position to wait until any review of the figures has been published by the ERSI and must adhere to those projections already set out. It is further noted that the Variation proposes to take the higher range population projection for the county in the period to 2026 and also includes a further</p>

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		<p>25% headroom which counties like Kildare, with a projected growth rate of more than the national average in the period to 2026, are allowed to take if they so choose.</p> <p>The queries regarding the inclusion of live applications and lands where permission has already been granted (i.e. extant permissions) into the overall population figures is noted. A key aspect of the proposed Variation was to insert the revised population projections. The consideration of extant permissions and live planning applications will be dealt within the specific LAP for each settlement. Regarding the household size figure of 2.8 used in the proposed variation, this is the figure for County Kildare as reported in Census 2016. The figure of 2.5 used in the NPF is the projected figure for 2040. It is the intention of the Council that successive plans will work towards achieving the 2040 housing occupancy rate of 2.5 in stages in the period to 2040.</p> <p>Chief Executive's Recommendation No change recommended.</p>
44	WTNB Partnership	<p>This submission was prepared by David Mulcahy Planning Consultants Ltd on behalf of their client.</p> <p>The submission states that W.T.N.B Partnership owns 11 hectares of lands at Walshestown, Newbridge, Co. Kildare which was previously zoned low density residential but was de-zoned under the 2013 Newbridge LAP. An earlier planning application in 2008 was refused by An Bord Pleanála on the sole reason of an existing deficiency in the provision of sewerage facilities. The submission further states that as informed by Conor Furey & Associates, Consulting Engineers the lands in question are fully serviceable and 'ready to go'. Moreover, whilst many residential zoned lands are constrained by the need for foul infrastructure, these lands can connect into the Kilcullen-Osberstown Sewer and are not therefore constrained. W.T.N.B Partnership are fully funded and ready to act on any permission for housing that they obtain. The submission refers the Council to the Circular (PL 8/2016- Rebuilding Ireland) which specifically advised that "sites in key demand areas, that have been zoned for many years, are ready-to-go but are not being made available for development but</p>

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		<p>which are counted as part of Core Strategy development potential calculations, should be examined critically to determine whether other similar well-located and ready-to-go but un-zoned lands should be considered as alternative zoned lands, where the prospects for making available for development of such alternative lands are better". The submission highlights that the Circular further states that "in effect, under the measures above, the development plan should be actively used as a mechanism to first and foremost secure the most appropriate locations and forms of development, including housing, but where various options for locating future housing exist, to ensure that, in zoning land, the feasibility of such development occurring is taken into account".</p> <p>The submission requests that specific reference should be made to this Circular in the Core Strategy under Variation No.1 which would allow flexibility to consider un-zoned lands which are 'ready to go' as part of local area plans prepared under the remaining life of the CDP. The submission states that the provisions of the circular is particularly relevant in Newbridge it is considered that the new Eastern Interceptor will not be a panacea for development of all residential zoned lands in the town and many such lands will still have to overcome significant surface water infrastructure problems - which the subject lands are free from. The Council is referred to Policy SO 11 under the proposed variation which seeks to prepare an Infrastructural Assessment for Local Area Plans to inform the zoning of land based on their potential to be serviced. It is submitted that this is the ideal location for inclusion of reference to Circular PL 8/2016 - Rebuilding Ireland.</p> <p>The submission also expresses concerns regarding the serious implication of the proposed variation, with specific reference to the reduced housing allocation up to 2023. The submission states that this is likely to have crippling consequences for future residential development in the county over the remaining lifetime of the plan. Also, it states that this will result in most of the zoned lands will end up being phased until post 2023 and no new residential zoned lands will be provided.</p>

Sub. No.	Name	Summary of Submission
		<p>The submission notes that the allocations from the NPF are currently being reviewed by the ESRI and strongly submits that any variation to the Plan should wait until this review is completed. The submission concludes by stating that the variation does not appear to take extant planning permissions into account or does not appear to take account of commenced permissions.</p> <p>Chief Executive's Response</p> <p>The contents of Circular (PL 8/2016- Rebuilding Ireland) are noted by the Planning Authority. The central purpose of Proposed Variation is for Kildare County Council to fulfil its statutory obligation to align the CDP with provisions of the NPF and RSES. Regarding the zoning of particular sites for residential development in larger settlements, the LAP process already takes into consideration the provisions contained with Circular PL 8/2016 when assessing the suitability of such lands.</p> <p>Accordingly, it is considered unnecessary that such an amendment would be inserted into the proposed Variation of the CDP. It is envisaged that a new draft LAP will be prepared for Newbridge prior to the expiry of the Plan in 2021. Such a new plan will include a comprehensive infrastructural assessment which will examine a range of sites (whether currently zoned or not) to investigate their suitability with regard to the presence of existing servicing infrastructure or the deliverability of critical infrastructure within the lifetime of a new LAP. All potential new residential lands will be also assessed to see if they comply with principles such as compact growth and sequential development as outlined in the NPF and RSES.</p> <p>The concerns expressed relating to the potential impact on housing development in Kildare in the period up to 2023 and beyond is noted. A response to this concern is outlined in the Chief Executive's Response to Submission No. 41 (see above).</p>

Sub. No.	Name	Summary of Submission
		<p>The request that the Council postpone the variation of the CDP until the ESRI have concluded their review of the NPF growth targets is noted. A response to this request is outlined in the Chief Executive's Response to Submission No. 43 (see above).</p> <p>In relation to the contention that the Variation does not appear to take extant planning permissions into account or take account of commenced permissions. A key aspect of the proposed variation was to insert the revised population projections. The consideration of extant permissions and commenced permissions will be dealt within the specific LAP for each settlement.</p> <p>Chief Executive's Recommendation No change recommended.</p>
45	Venturis Investments Group	<p>The submission prepared by RPS on behalf of Venturis Investments Group notes the purpose of the Variation (i.e. to comply with the NPF, NPF Roadmap and RSES) and expresses concern that it does not appropriately respond to changes in national and regional policy, particularly with regard to the provision of urgently needed housing and residential development in Naas.</p> <p>The submission states that the limited population and housing projections set out Variation No. 1 will hinder the development of Naas and thereby undermine the significant public and private investment made to support such growth and endanger any future investment. The submission provides an overview of the town of Naas highlighting its various attributes including its accessible/strategic location and the fact that it has more jobs (10,999) than resident workers (9,806) (Appendix 1, NPF).</p> <p>The submission further notes that the development of Naas, supported by an appropriate and longstanding planning policy framework as detailed below has underpinned significant public and private investment in delivering the necessary infrastructure to enable Naas to develop in accordance with long standing planning policy. Reference is made to the National Spatial Strategy where Naas</p>

Sub. No.	Name	Summary of Submission
		<p>was designated a '<i>Primary Growth Centre</i>', and the Regional Planning Guidelines where the town is designated a '<i>Large Growth Town 1</i>'.</p> <p>Reference is also made to the provisions of Naas Town Development Plans (2005-2017) which it states has explicitly provided a framework for the growth and development of Naas.</p> <p>The submission notes that significant progress has been made in bringing forward the vision set out in the aforementioned policy documents and references specific examples of major infrastructure projects and policy that have been implemented / proposed for Naas over the past number of years to provide for strengthened development and refers to the provisions of the NPF and the guiding principles it sets out for the future growth and economic development of towns such as Naas. Notes that this will require an integrated approach which exploits local strengths and secures employment opportunities to drive self-sustaining, rather than mainly housing-led development.</p> <p>The submission references several National Policy Objectives (NPOs) of the NPF including; NPO 4, NPO 5 and NPO 32. Also notes that the NPF acknowledges the strategic location of Co. Kildare in the Mid-East and its proximity to Dublin and to the NPF Roadmap, noting that regarding population targets the document provides scope for headroom, not exceeding 25%, to be considered to 2026 for Kildare where projected population growth is projected to be at or above the national average baseline and notes that the proposed variation incorporates this headroom.</p> <p>The submission outlines the provisions of the RSES with regard to the development of Naas including its designation as a 'Key Town' within the region and lists the Regional Planning Objectives (RPOs) which specifically relate to the town (RPO 4.48 – RPO 4.53).</p> <p>The submission also notes the comments of the Office of the Planning Regulator (OPR) to Wicklow Council with respect to their Issues Booklet for the Wicklow County Development Plan. Submission</p>

Sub. No.	Name	Summary of Submission
		<p>submits that Wicklow faces many of the same challenges as Kildare with regard to reduced population targets and points out though Wicklow has six growth towns in its current Core Strategy, the NPF reduces this to two Key Towns. In this regard it notes that in their letter to the Council the OPR notes that <i>“there is scope to prioritise the development of Wicklow-Rathnew and Bray to reflect their designations as Key Towns in RSES and capitalise on existing and planned investments in infrastructure”</i>. With regard to proposals in lower tier settlements, it states:</p> <p><i>“If the development plan is to prioritise Key Towns and other locations that are strategic from a county perspective, it will be necessary to carefully manage the level of development land that may come forward in other more dispersed locations. In the current county development plan, some level 5 and 6 tier settlements indicate the following quanta of future theoretical development potential, which in many cases would be dependent on fresh investment in enabling infrastructure”</i>.</p> <p>On this point, the OPR conclude:</p> <p><i>“Having regard to the above, there would appear to be a need to review the extent and phasing of lands currently zoned for residential development in the lower tier settlements in the context of future need and available infrastructure to support future growth. This should also have regard to extant planning permissions and settlements with a prevalence of vacant units”</i>.</p> <p>The submission states that the OPR’s letter to Wicklow outlines how there should be a focus on developments in Key Towns which have seen significant infrastructure investment which needs to be utilised. The continued zoning of land in lower tier settlements might be reliant on fresh investment in enabling infrastructure. The submission submits that the OPR have clearly set out their interpretation of the NPF and RSES’s policies and objectives which are to focus development on Key Towns which have the required level of infrastructure development to support additional residential development. The submission also notes that Proposed Variation No. 1 identifies two ‘Key Towns’ of Maynooth and Naas in line with the RSES and that the variation contains significant policy support to prioritise the</p>

Sub. No.	Name	Summary of Submission
		<p>development of Naas and Maynooth to reflect their designation as Key Towns and optimise the existing and planned investment in infrastructure. The submission outlines various sections and tables in the variation relating to Key Towns and Naas and the fact that 14.9% of residential development in the County will be focused in Naas up to 2023 and 10.9% will be focused in Maynooth. The submission suggests that on the basis of the variation, it is submitted that Naas will not fulfil its role as one of the nine Key Towns in the Eastern and Midland Region and that significant weight should be given to the Key Towns at local level.</p> <p>The submission states Table 3.3 of the Proposed Variation provides for an increase of 5,866 persons (in the period to 2026) and submits that that this level of growth is insufficient for a Key Town which is also the County Town and has benefitted from significant investment in the servicing and transportation infrastructure within the town. The submission notes that Key Towns in the RSES are defined as <i>“large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres”</i>. Reference is again made to RPO 4.53 which states the following objective: <i>“support an enhanced role and function of Naas as the county town of Kildare, particularly as a hub for high quality employment, residential and amenities”</i>. Accordingly, it is submitted that the RSES clearly provide for Naas’s role to be enhanced, rather than just maintained.</p> <p>Reference is again made to the fact that Naas has a higher number of jobs than it has resident workers, a rare situation in the Dublin hinterland and it demonstrates Naas’s important role. Additional housing in Naas is required to support the town’s continued growth. The submission contends that having regard to the OPRs letter to Wicklow County Council it is submitted that a figure in the region of 20% of the County’s population target should be focused on Naas and states that the lower tiered settlements still account for a considerable proportion of the population targets for the county development in lower tiered settlements would be inconsistent with the national/regional policy which focuses on creating towns of scale. Notes that the continued zoning of residential land in lower tiered</p>

Sub. No.	Name	Summary of Submission
		<p>settlements may also require further investment. It is therefore considered that a growth strategy which focuses on the Key Towns of Maynooth and Naas, with less focus on lower tier settlements and rural residential development, would be more compliant with the NPF and RSES than the current Proposed Variation.</p> <p>Chief Executive's Response The contents of the submission are noted. Naas as a Key Town and previously as the Large Growth Town 1 have been prioritised to reflect its status in the overall county hierarchy in the current Development Plan and the proposed Variation and as such has an allocation of 14.9% of the overall growth allocation. The OPR in its submission did not make any recommendation to the Draft Variation with regards the percentage allocation for the Key Towns, however, it should be noted that Maynooth is a Key Town in the Metropolitan Area and will, under NPO 68 of the NPF, benefit from an additional population allocation which will my provision for an additional ca. 3000 new homes in the town over the next 10 years. The CDP is due for review in early 2021 and a full assessment of all supporting social and physical infrastructure to be undertaken, this will include all settlements in the county from Key Towns to settlement nodes and this will present an opportunity for a full reconsideration of the housing/population allocations for each of the towns, based on this assessment and an accompanying in-depth economic assessment. It should be further noted that the Draft Naas LAP which is envisaged to be published later this year, will provide a unit allocation which will cover the 6 years of the plan to from 2021 to 2027 (i.e. extending beyond the life time of the present County Development Plan).</p> <p>Chief Executive's Recommendation No change recommended.</p>
46	McCourt Investments Limited	<p>The submission was prepared by Simon Clear & Associates, Planning and Development Consultants on behalf of McCourt Investments Ltd with specific reference to Kill.</p> <p>Population Growth and Dwelling Allocation</p>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> • Kill has maintained its current allocated growth of 1.3%; • Growth allocation based on old census data and does not necessarily reflect urbanisation particularly in the Metropolitan area; • 78 units by 2023 is by far the lowest allocation to a settlement in the ‘small town’ tier of the hierarchy. • KCDP envisages small towns to have populations of up to 5,000 persons. Kill is well short of this target and more growth should be allocated to enable it to fulfil its role as a sustainable small town; • NPF and RSES are restrictive in established urban areas that can cater for greater population concentrations; • Kill is an area which can accommodate increased population growth without creating urban sprawl; • Restrictive population and dwelling allocations in urban areas will result in a shortage of housing for future populations. This will lead to stop start development, material contraventions for modest schemes and/or refusals / judicial reviews. <p>Clarity on Implementation of Variation 1</p> <p>The submission requests that clarity be provided as to when the amended dwelling targets come into effect and whether dwelling target takes current and proposed developments into account;</p> <ul style="list-style-type: none"> • Kill Housing Survey – total 193 units committed between 2016-2023; • 152 units at Kilheale Manor • SHD application granted for 147 units <p>The submission states that Kill could yield 492 units if all extant developments are implemented and the dwelling targets in the variation are already accounted for in permitted developments since 2016. The submission suggests that an undersupply may arise which may restrict and prevents future development within Kill for the next 6 years as the allocation has already been far exceeded.</p>

Sub. No.	Name	Summary of Submission
		<p>Submission states that the Proposed Variation should be amended appropriately to allow for sustainable densities on zoned land and come into effect on the day the Variation is adopted and apply to future planning applications in a longer-term strategic development context to 2026 and beyond.</p> <p>Planning for Sustainable Densities Two sites zoned 'New Residential' in Kill are 9.59 ha in total, therefore the target of 78 will only yield a density of 8 units per ha. This is not in accordance with local, regional or national policy. A dwelling target which allows for sustainable development of land zoned residential should be included in the Variation.</p> <p>Dwellings Permitted Vs Dwellings Completed It is estimated that 45% of planning grants have been completed in Kildare from 2017-2019 (based on AIB Housing Report January 2019) and it could be assumed 55% of permitted developments are not completed in a timely manner. It is suggested an over provision for dwelling targets should be provided for in Kill to reflect this trend.</p> <p>Summary and Conclusion A factor for non-commencement/completion of 50% should be applied as a standard to allow for continual supply of dwellings, specifically in urban areas and no case should be made for lower 'edge of settlement' densities envisaged by KCC in the current KCDP as this is not supported by Government Guidelines on Sustainable Residential Development. The submission states that the dwelling targets provided would result in an extremely low, inefficient density on the existing zoned land which is not in accordance with government guidelines and will not be supported by ABP and suggest that the dwelling targets be amended taking into account the expectation that the average household size is expected to decline to 2.5 by 2040 and the submission requests that this be applied immediately in respect of higher density sustainable housing schemes.</p>

Sub. No.	Name	Summary of Submission
		<p>Chief Executive's Response</p> <p>It should be noted that the primary purpose of the Variation is to respond to recent changes in national and regional policy namely the publication of National Planning Framework (NPF) and the Eastern and Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES).</p> <p>The allocated of growth in each settlement type has not been amended in the proposed variation and will not be amended during this process. However, the Kildare County Development Plan is due for review in early 2021, and submissions regarding the level and rate of growth for settlements can be considered during the review period.</p> <p>Regarding the suggestion that Kill is short of the 5,000-population target outlined in the 2016-2023 County Development Plan, it should be clarified that the population target for Kill has been reduced in accordance with RSES population projections for Kildare. The variation is consistent with RSES projections. The issues regarding residential capacity vis a vis densities in the submission are noted. Figures stated represent an estimate only and 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.</p> <p>Whilst acknowledging the suggestion to allow an overprovision of 50% for permissions that will not commence or be completed it should be noted that 25% headroom has been incorporated into growth figures in addition to using the higher end allocation from RSES. Notwithstanding this some areas will experience higher or lower rates of unit completion than others and therefore can be reviewed at a local level to inform decisions based on the availability of service infrastructure.</p>

Sub. No.	Name	Summary of Submission
		<p>Finally, it is not proposed to apply an average household size of 2.5 as census data from 2016 confirms the average household size in Kildare is 2.8 which is considered to be the most definitive local information available to the Council for the purposes of calculating housing targets.</p> <p>Chief Executive's Recommendation No change recommended.</p>
47	Cairn Homes Properties Ltd.	<p>The submission includes an executive summary providing an overview of the issues set out in the document.</p> <p>Introduction The submission provides details on the activities of Cairn Homes Properties Ltd in Co. Kildare, which was founded in 2014 and states that the company has a clear strategy to deliver high-quality new homes with an emphasis on design, innovation and customer service. The submission further states that the company is actively engaged in the delivery of some 15,000 homes over the coming years with many being constructed on various land banks in the county, most notably in Naas and Maynooth. The submission provides a series of details (locations, unit numbers and timeframes) on house building activities in these towns.</p> <p>Why Population Figures for Variation No. 1 Have Been Superseded It is submitted that the adopted variation needs to reflect the up-to-date position in relation to population growth and housing needs in 2020 for Co. Kildare. If not addressed, this would result in a material exacerbation in the existing housing crisis in the County/region. The submission states that the NPF population projections were based on the 2011-2016 Census data, which coincided with a period of low growth and emigration and has had the effect of significantly under-estimating growth in population for the period up to 2040.</p>

Sub. No.	Name	Summary of Submission
		<p>The submission contends that the population growth estimates used in the NPF, and by extension the RSES, were prepared in 2017 when the economy was still only returning towards full employment and net inward migration, and the increase in housing demand, wasn't fully appreciated. Since 2017, housing demand has increased further, as the economy has undergone a sustained period of growth. NPF predicted that the population growth nationally will grow by 900,000 from 2016 at an average annual rate of c. 0.9%, however noting the higher level in migration, the framework sets out a target to accommodate a population increase of 1.1m by 2040 with an average growth rate of 0.96% p.a. over the 24 year period. The submission includes an extract of Appendix 2 of the Implementation Roadmap (July 2018) which details the Transitional Regional and County Population Projections to 2031 for the Mid-East counties and states that Circular FPS04/2018 (July 2018) confirms that the Roadmap will be subject to review in the course of the NPF and notes that no review has been undertaken to date by the Department, which is unhelpful to the current review of Development Plans by Planning Authorities.</p> <p>The submission highlights recent population data as published by the CSO since publication of the NPF, show a significantly higher level of inward migration and higher level of population growth than anticipated in the NPF. The population and migration estimates published by the CSO in August 2018, show national population increase from 4.792m in April 2017 to 4.857m in April 2018. Further figures released in August 2019 show a further increase in population to 4.921m in April 2019. This represents an annual rate of increase in recent years of approximately 1.3%, a combination of migration and natural increase – substantially higher than the NPF figures. States that if this rate of increase is applied up to 2040, it will result in an increase in population nationally of 1.486m which is significantly greater than set out in the NPF (an additional 0.385m over the NPF higher figure).</p> <p>The submission also includes a table (see below) which shows the projected increase in population between 2016 and 2031 for the State and regions.</p>

Sub. No.	Name	Summary of Submission					
			Mid-East '000s	Dublin '000s	Midlands '000s	EMRA '000s	State '000s
2016	690.9	1,335.9	293.4	2,320.2	4,739.6		
2021	754.2	1,426.0	319.8	2,500.0	5,044.3		
2026	823.1	1,491.2	347.9	2,662.2	5,316.7		
2031	893.0	1,544.1	376.3	2,813.4	5,568.3		
Source: CSO Table 3.5 Actual and projected population and dependency ratios for Regional Authority areas, 2016 - 2036 (M1F2 Dublin Outflow)							
<p>The submission states that while disaggregated figures are not available, it is likely that a high proportion of this population growth has taken place in the Greater Dublin Area and it is likely therefore that the figures set out in the RSES are a further underestimate of actual population growth that is currently taking place and likely to continue for the foreseeable future.</p>							
<p>It is suggested that it is vital that the proposed variation accounts for CSO population forecast growth and that the projected future housing needs are based on these current population growth levels, rather than the materially significant lower levels which have been predicted in preparation of the NPF and the RSES.</p>							
<p>The submission contends that the broad framework of both the NPF and the RSES in directing growth to the metropolitan area of Dublin and Key Towns is an acceptable objective however, such a framework has placed Planning Authorities in a difficult position with regard to fulfilling their objectives in respect of providing sufficient and suitable land to meet the requirements of the Planning Authority, particularly with regard to the Housing Strategy and also notes that under Section 95 (1) of the Planning Act 2000 (as amended), planning authorities are obliged to:</p> <p><i>“ensure that sufficient and suitable land is zoned for residential use, or for a mixture of residential and other uses, to meet the requirements of the housing strategy and to ensure</i></p>							

Sub. No.	Name	Summary of Submission
		<p><i>that a scarcity of such land does not occur at any time during the period of the development plan.</i>” (emphasis added in submission).</p> <p>The submission further refers to Section 10 (1a) of the Planning and Development Acts (2000 as amended), which states that: <i>“(1A) The written statement referred to in subsection (1) shall include a core strategy which shows that the development objectives in the development plan are consistent, as far as practicable, with national and regional development objectives set out in the National Planning Framework and the regional spatial and economic strategy and with specific planning policy requirements specified in guidelines under subsection (1) of section 28.”</i> (emphasis added in submission).</p> <p>The submission also notes that that the wording of the Act (above) doesn’t confer an absolutist approach to the consistency between the core strategy and the regional development objectives set out in the NPF and RSES and further submits that the proposed variation (and amended core strategy) would be consistent “<i>as far as practicable</i>”, by allocating increased growth to the Key Towns of Maynooth and Naas. It is considered that this would still be consistent with the development objectives as both towns are identified as Key Towns in the settlement hierarchy (by the RSES). The submission suggests that the common good behoves the prioritisation of the delivery of housing and a sufficient supply of zoned land, within Kildare and states that the disconnect between the more up-to-date CSO population figures and the NPF out-of-date population figures (which Planning Authorities are being directed to use) means that the proposed variation as currently presented may not “<i>ensure continuity of supply of zoned residential land</i>” as set out in the Section 28 Development Plan Guidelines (2007) which states that: <i>“Planning authorities should take all reasonable steps to ensure that sufficient zoned residential land is available throughout the lifetime of the development plan and beyond to</i></p>

Sub. No.	Name	Summary of Submission
		<p><i>meet anticipated needs and allow for an element of choice. In particular, to ensure continuity of supply of zoned residential land, planning authorities should ensure that at the time they make a development plan, enough land will be available to meet residential needs for the next nine years. In this way, development plans will provide for sufficient zoned land to meet not just the expected demand arising within the development plan period of six years, but will also provide for the equivalent of 3 years demand beyond the date on which the current plan ceases to have effect.” (emphasis added in submission).</i></p> <p>The submission also refers to the housing crisis stating that population growth levels in recent years have not been adequately met by housing supply and notes that while some progress has been met through “<i>Rebuilding Ireland</i>” and other key government documents there remains a very significant gap between new housing construction levels and the need for new houses nationally and in the region. The submission states there has been an accumulation of shortfalls in housing building up over the last 10 years which will impact on housing supply for the foreseeable future. The parameters and out of date population figures within which the Planning Authority are being directed to amend their core strategy fail to acknowledge that consistency with the RSES (and by extension the population figures contained therein) are not absolutist, and Planning Authorities are only obliged to be consistent <i>as far as practicable</i>.</p> <p>The submission suggests that the Planning Authority uses its judgement to fulfil its obligations in the Act regarding the Housing Strategy, providing sufficient zoned land to accommodate Kildare’s growing population, while at the same time being consistent (as far as practicable), with the NPF and RSES. By directing growth into the designated “<i>Key Towns</i>” of Maynooth and Naas, (along with increased allocations of growth), the adopted variation would be consistent with both.</p> <p>The submission references various statistics which provide evidence of a substantial shortfall of suitable housing the low level of housing being constructed over the past number of years, data</p>

Sub. No.	Name	Summary of Submission
		<p>collected in Census 2016 – which revealed overcrowding and increasing numbers of households living in cramped conditions and also notes that “<i>Census of Population 2016 – Profile 1 Housing in Ireland</i>” revealed an increase in the national housing stock of just 8,800 units during the five-year intercensal period representing an increase of just 0.4 percent whilst the population increase 173,613 or 3.8%). Furthermore, almost 40% of these additional units were one off houses, the majority of which would never have come to market. Census 2016 also revealed a surprising rise in the average household size (from 2.73 to 2.75) (CSO, 2017).</p> <p>The submission notes that only 2% of dwellings nationally were built since 2011 and of these, almost half were in rural areas in the form of one-off houses. The increase in one-off houses, has resulted in the average household size having risen much more quickly in urban areas, according to CSO data. Average household size is also higher in counties such as Fingal, Meath, Kildare and South Dublin, with more than 3 persons per household compared with 2.73 nationally. States that in Kildare the figure was 3, also higher than the national average. The submission includes a diagram which illustrates the changes in population and housing stock for Ireland, 1991-2016.</p> <p>To support the contention of the submission, reference is made to data by the CSO states that “<i>the growth in household size is confined to urban areas</i>”. Notes that there was a 28% rise from 2011 to 2016 in the number of households with more persons than rooms. It states that this is a measure of the level of “<i>crowding</i>” within households. Submission includes a diagram which illustrates the number of households with more persons than rooms (CSO, 2017).The submission also states that all statistical evidence available points to the housing crisis resulting in “<i>crowding</i>” within existing houses in urban areas and there is a clear need for a significant amount of “<i>catchup</i>” housing to meet the needs of existing population.</p> <p>The submission notes that the approach taken to date in preparation of a Development Plan is to link housing need over the plan period solely to forecast population growth and suggests that this is clearly no longer a valid or sustainable approach. The submission refers to a recently published report</p>

Sub. No.	Name	Summary of Submission
		<p>by the Central Bank of Ireland entitled '<i>Population Change and Housing Demand in Ireland</i>', which notes that:</p> <ul style="list-style-type: none"> ○ <i>Growth in population has significantly exceeded the increase in the housing stock since 2011 and the average household size has risen.</i> ○ <i>To keep pace with population growth and changes in household formation, it is estimated that an average of around 27,000 dwellings would have been required per annum between 2011 and 2019.</i> ○ <i>Assuming unchanged household formation patterns and net inward migration close to current levels, around 34,000 new dwellings would be required each year until 2030.</i> <p>Furthermore, the submission suggests that a need for a two-fold approach, firstly to set out the housing need to meet the deficit of housing for the existing population and then also provide for the additional housing needs for projected population growth and notes that the well-established approach to this as set out in the Section 28 guidelines, is to allow an element of headroom of the order of 50% of land requirement, to reflect lands which are zoned, and which may not come forward for development during the plan. Submits that this has proven to be an essential part of ensuring adequate land supply and it is respectfully submitted that this approach should be continued in the proposed variation to the CDP.</p> <p>The submission notes that there are some suggestions in the Implementation Roadmap for the NPF and other documents, that it is not necessary to provide for the same level of headroom in the future, having regard to the uplift in population projections incorporated in the NPF. However, submission states that CSO data has now demonstrated that these uplifted population projection figures in themselves, underestimate the level of population growth currently taking place and therefore, the need or headroom is actually even greater than previously and not less as anticipated by the NPF Implementation Roadmap.</p>

Sub. No.	Name	Summary of Submission
		<p>The submission acknowledges that the NPF and RSES require a more detailed assessment of the suitability of potentially zoned land for development, including availability to infrastructure and services. However, states that it would take some time to comprehensively assess all lands in respect of these matters and consequently states that there is a need to maintain headroom levels of 50% or greater in the zoning of housing lands.</p> <p>Strategic Policy Supporting Higher Growth</p> <p>The submission notes the forecasted population projections contained to in the NPF and RSES along with the increase in housing targeted required to be built in the state until 2040 and refers to National Policy Objective (NPO) 9 which provides for <i>‘settlements not identified in Policy 2a or 2b of the Framework, may be identified for significant (i.e. 30% or more above 2016 population levels) rates of population growth at regional and local planning stages’</i> subject to various conditions.</p> <p>The submission contends that given the investment in public infrastructure (e.g., electrification of the rail line to DART) which will accrue to Maynooth, along with a strong employment base (in Maynooth University), it is considered that the town should be allocated growth commensurate with its designation. Furthermore, the submission notes NPO 6 which provides for a further provides that a <i>“Metropolitan Area Strategic Plan may enable up to 20% of the phased population growth.... in the wider metropolitan area... in addition to growth identified for the Metropolitan area.</i> This will be subject to various parameters.</p> <p>The submission notes that with reference to the above, Cairn’s landholding in Maynooth (within the MASP area), would support compact development in the form of a sequential, sustainable urban extension, and the key town of Maynooth is located on a high capacity public transport (upgraded to DART standard), adjacent to a significant employment location (Maynooth University) and refers to Appendix 3 of the NPF which provides for land zoning decisions to be based on an infrastructural assessment which will apply a tiered approach to assess whether they are currently Tier 1 ‘serviced’</p>

Sub. No.	Name	Summary of Submission
		<p>or Tier 2 'serviceable' within the life time of a plan. States that <i>Cairn's landholdings in Maynooth and Naas would fall under the Tier 1 category</i> as they are able to connect to existing development services and there is capacity available.</p> <p>Reference is also made to NPO 37 regarding the need to carry out a Housing Needs Demand Assessment (HNDA) and the purpose of such an analysis. Notes that this has not been carried out for Co. Kildare and submits that this is a fundamental element to the review of the Core Strategy and consider that a HNDA would identify and prioritise the Key Towns of Maynooth and Naas, for additional growth.</p> <p>The submission also notes that Appendix 2 of the NPF also identifies Naas as possessing a '<i>jobs to workers</i>' ratio of 1.122, reflecting the need for additional housing in the settlement to contribute to its sustainable function. The ratio confirms the strong service and employment role of Naas within its hinterland and that housing is required to provide a balance between employment and housing within Naas and notes that due to Naas's strategically accessible location and Maynooth's role as a University town both are well placed to provide more housing.</p> <p>The submission again refers to NPO 9 of the NPF which allows for some settlements to be identified for significant growth (i.e., greater than 30% growth above 2016 levels) provided there is agreement at regional assembly level and or local authority as appropriate, and that this may entail a balancing of growth elsewhere, so that the totality of growth is in line with the overall growth target; all to ensure alignment with investment in infrastructure and the provision of employment (together with supporting amenities). Naas and Maynooth should be prime candidates for availing of NPO 9 and should be identified by the Planning Authority for significant growth and further notes that the RSES provides a regional strategy for the implementation of the NPF for the East and Midlands Region (EMRA) and is underpinned by the principles of Healthy Placemaking, Climate Action and Economic Opportunity.</p>

Sub. No.	Name	Summary of Submission
		<p>The submission refers to the strategic location of Naas and its key attributes. References various Regional Policy Objectives contained in the RSES that specifically apply to Naas. States that the RSES recognise and support the enhanced role and function of Naas as the county town of Kildare.</p> <p>Therefore, it is important that the adopted LAP for Naas provides for appropriately zoned residential land to ensure that the town fulfils its role and function as a “<i>Key Town</i>” and refers to the strategic location of Maynooth and its key attributes and references various Regional Policy Objectives contained in the RSES that specifically apply to Maynooth. References the town’s enabling infrastructure and economic development potential. The submission refers to the Metropolitan Area Strategic Plan (MASP) and notes that a key aim of the MASP is to unlock the development capacity of strategic development areas within the metropolitan area such as Maynooth by identifying the sequencing of enabling infrastructure and by directing the cross sectoral investment required to deliver development and notes that Section 5.7 on Housing Delivery (Page 113) of the RSES states: <i>“There is a further allowance of transition population targets in NPO 68 by way of up to 20% of the targeted growth in the city being transferred to other settlements in the MASP. This shall apply only to the three Metropolitan Key Towns in the MASP namely Bray, Maynooth and Swords, and only if they can demonstrate compact growth on high capacity planned or existing public transport corridors.”</i></p> <p>The submission further notes that Table 5.1 of the RSES (Strategic Development Areas and Corridors, Capacity Infrastructure and Phasing), includes Maynooth on the North-West corridor (on the Maynooth-Dunboyne commuter line) which sets out an increased population capacity of 37,000 including a short-term population capacity of 24,000 and states that Maynooth is particularly well-placed to avail of this additional 20% growth. To date, this has not been factored into the growth figures of Maynooth. With reference to the delivery of housing, submission notes the following in the RSES:</p>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> ○ Closer attention to the actual delivery (of housing) is required and Planning Authorities take steps that may be necessary to implement strategic planning aims and <i>“above all avoiding the hoarding of land and/or planning permissions.”</i> ○ Planning Authorities to tackle any tendencies towards land or/planning permission hoarding, or excessively slow delivery using vacant site levy <i>“and the release of alternative lands where permitted development, without any wider delivery constraints, is not being brought forward.”</i> ○ Planning Authorities to avoid creating <i>“an unreasonable dependency”</i> on certain sites which would impede the bringing forward of other suitable lands with better prospects for delivery in the short term, if the strategic sites are not being brought forward by their owners. <p>The submission states that having regard to the above that it is important that the proposed variation does not constrain the delivery of housing for the county because of an undue reliance on the delivery of housing in unsustainable locations and notes that the RSES acknowledges that achieving good performance (in delivering growth) – <i>“will require a range of more active land management measures, beyond just zoning land.”</i> Also, the RSES states that this <i>“will include analysis of service capacity, needs and overall cost, infill/brownfield potential and patterns of housing delivery and output, including the take-up and completion of planning permissions... All of this will require a suitable ‘pipeline’ of development opportunities, prioritised on the basis of likelihood of meeting targets and kept under review through monitoring and reporting.”</i></p> <p>Accordingly, the submission states that in order to meet the current and future demands in terms of housing allocation there is a clear requirement to allocate additional growth for Naas and Maynooth to help address this need.</p> <p>Review of Proposed Variation No. 1 <i>Proposed Amendment No. 8</i></p>

Sub. No.	Name	Summary of Submission
		<p>The submission notes that the fundamental issues with the overall (out of date) figures under which Local Authorities are being directed to use in the update of the Core Strategy has already been outlined above and states that Table 2.4 of the proposed variation includes a number of additional assumptions which Cairn state further underestimates the housing required for Kildare.</p> <p><u>Occupancy Rate - No. of Persons Per Household too high</u></p> <p>The submission contends that firstly, Table 2.4 of the proposed variation uses a per household figure of 2.8 persons per household, which is exceptionally high (and inconsistent with Kildare County Council’s Housing Strategy). Submission states that this is against the commentary in the NPF, which notes that future housing will be required to serve smaller households, and the submission considers a more appropriate figure, to use, would be 2.5 persons per household (as per NPF) as a more realistic occupancy rate, compared to the rate used in the calculations. Using a 2.5 per household occupancy rate would (using the same figures in Table 2.4 of the proposed variation) result in a requirement of 6,753 units, compared to the currently identified 6,023 units. Using the overall population increase of 39,370 to 2026, would result in a new household requirement of 15,748 units, compared to the 14,060 units used in Table 2.4, a shortfall of 1,688 dwellings.</p> <p>The submission refers to the existing Kildare Housing Strategy which confirms the trend of falling house sizes (prior to forced “crowding” where a figure of 2.39 persons per household is used. The Kildare Housing Strategy states: <i>“The average household size is continuing to decline with the average number of persons in private households in the county recorded as 2.39 in 2015, down from 3.01 in 2006. This trend indicates that a greater proportion of smaller houses will be required in the future.”</i></p> <p><u>No. of Existing Dwellings over-estimated</u></p> <p>The submission notes that the number of existing households is identified at 80,746, which includes vacant dwellings within the county (as per Census 2016). While a proportion of these houses would</p>

Sub. No.	Name	Summary of Submission
		<p>be brought back to use, and some may be habitable, some may not. It is unlikely that 100% of the vacant stock within Kildare would be brought back fully. The figure used by Kildare Co. Co. in their baseline is likely to overestimate the actual number of existing viable dwellings in the county and under-estimate the future number of units required. The submission further states that the figure of 6,023 dwellings to 2023 has been calculated (in Table 2.4) of the proposed variation is not clear. While the (now considered to be underestimated NPF) population growth figures to 2026 do include the 25% increase resulting in an overall increase of 39,370 to 2026, for the County, the population growth to 2023 is identified as being just 16,863. No indication of how this important population figure has been arrived at is provided as it forms the basis of the housing allocations for the County as contained in Table 3.1 of the proposed variation.</p> <p><u><i>Proposed Amendment No. 13</i></u></p> <p>The submission suggests that the allocations provided to the various towns in Table 3.3 should be closely aligned to the RSES and hierarchy of towns indicated in Table 3.1. It is noted the commentary in the proposed variation indicates that the rationale for retaining the county allocation of 10.9% for Maynooth is based on the potential development of a number of sites over the next couple of years and notes that one of the primary purposes of the proposed variation should be to reallocate growth to the designated growth centres based on the RSES designations and to direct growth into the Key Towns. The submission contends that these current allocations in Table 3.3 do not reflect the RSES and the strategic intent to direct growth into designated Key Towns along with a prioritisation of housing allocation. For example, the town of Celbridge, which is identified as a self-sustaining town in the hierarchy is allocated 603 no. units and Maynooth, which is identified as a key town (at the top of the settlement hierarchy) is allocated just 54 no. more units (657). Furthermore, it is noted Newbridge (again below Maynooth in the settlement hierarchy) is allocated more units 699 no. units, compared to Maynooth (657 no. units).</p>

Sub. No.	Name	Summary of Submission
		<p>The submission further states that the purpose of the key town designation is the recognition that Maynooth has the capacity to develop at a rapid pace using the existing infrastructure. Notwithstanding the designation of Maynooth as a “<i>key town</i>”, the effect of the proposed variation is to restrict the delivery of dwellings in the town, through the identification of an “<i>absorption period</i>” in the proposed variation. Furthermore, it is submitted that Maynooth is particularly well-placed to avail of the additional 20% growth (as per NPO 68 of the NPF). It is therefore recommended that the housing allocations in Table 3.3 are appropriately adjusted to cater for the designation of Maynooth and Naas as “<i>Key Towns</i>” in the RSES.</p> <p>The submission refers to a report by the ERSI which outlines that associated costs of providing social infrastructure in dispersed settlements and states that the aim of the proposed variation should be to prioritise Key Towns and other locations that are strategic from a county perspective. In order to do this, it will be necessary to carefully manage the level of development land that may come forward in other more dispersed locations.</p> <p>It is submitted that the adopted variation should prioritise growth into towns which have, good public services and supporting infrastructure. Directing growth into unsustainable locations, will have long-term implications for the spatial development of the county and will impact on the ability of the plan to achieve wider strategic development objectives and the requirements of the Act in respect of providing a Core Strategy which is consistent with national and regional planning policy objectives/requirements and states that the variation is also an opportunity to bring forward measures aimed at revitalising underutilised parts of rural towns and villages, bringing life back within their centres and offering an alternative to a proliferation of single houses in the countryside.</p> <p>Chief Executive’s Response The content of the submission from Cairn Homes is acknowledged. The contention that the proposed Variation relies on outdated information contained in the NPF/RSES and that recently published CSO</p>

Sub. No.	Name	Summary of Submission
		<p>data, shows a significantly higher level of inward migration and higher level of population growth than was projected by the NPF is also noted. Regarding the stated concern that the national population growth rate of recent years at 1.3% is higher than the NPF projection of an average 0.96% until 2040, it is noted that the projections outlined in the NPF forecasts that the rate of growth will be higher than average in the beginning of the framework period with growth slowing towards the end. This is due in part to factors such as decreasing birth rates and an aging population.</p> <p>The population projections outlined in proposed Variation are set out in the in NPF Roadmap (July 2018) and confirmed in Appendix B of the RSES adopted in June 2019. These figures are based on revised projections which plot a growth trajectory set approximately mid-way between what is currently being planned for in statutory Development Plans if projected forward to 2031, and the more likely evidence-based and nationally coherent projected scenario to 2031 and 2040. It should be noted that under the provisions of the Planning and Development Act 2000 (as amended) Kildare County Council is statutorily obliged to prepare a variation of its CDP within 26 weeks of the RSES being adopted to align same with the hierarchy of plans. Accordingly, the Kildare County Council must to use the projections outlined in the Roadmap and RSES until such a time as the projections contained in these strategic documents are reviewed and amended.</p> <p>Regarding the contention that the household size figure of 2.8 used in the proposed variation is too high, it should be noted that this is the figure for Co. Kildare in 2016 (CSO 2017). It is also the average household size for the Eastern and Midlands Area (p.196, RSES) and is considered most relevant and accurate in the calculation of core strategy and housing unit requirements for the county. The figure of 2.5 used in the NPF is the projected figure for 2040 and it is the intention of the Council that successive plans will work towards achieving the 2040 housing occupancy rate of 2.5 in stages over the period to 2040.</p>

Sub. No.	Name	Summary of Submission
		<p>The figure of 6,023 dwellings to 2023, as outlined in Table 2.4 of the proposed Variation, has been calculated on the basis of a 7-year methodology (i.e. from the adoption of the variation in 2020 to 2026 inclusive) which provides for c. 16,863 persons (6,023 units) between 2020 and the end of the CDP (i.e. 2020, 2021 and 2020 as the plan expires early in 2023) with c. 22,507 persons (8,038 housing units) over the remaining four years to the end of 2026 which anticipates c. 2,000 units to be constructed per year over the 7-year period. This is considered to be a sustainable rate of growth and a reasonable rate of housing delivery.</p> <p>On the issue of proposed percentage growth allocations to towns not corresponding with their designation in the Variation, it should be noted that the CDP is due for full review in early 2021. A full assessment of all supporting social and physical infrastructure to be undertaken which will include all settlements in the county from Key Towns to settlement nodes and will present an opportunity for a full reconsideration of the housing and population growth allocations for each of the towns including both Naas and Maynooth, based on this assessment and an accompanying economic assessment. In relation to concerns outlined regarding sufficient zoning of lands in both Naas and Maynooth, draft LAPs for both towns are envisaged to be published by the Planning Authority later this year. These draft LAPs will provide a unit allocation for each town which will cover the 6 years of the plan (i.e. extending beyond the lifetime of the present County Development Plan). The specific Regional Planning Objectives (RPOs) for both Key Towns (as outlined in the RSES) will be fully incorporated into the draft LAPs for each respective settlement. Furthermore, as noted in the submission, decisions concerning the zoning of all residential lands must now be subject to a site-specific infrastructural assessment which will apply a tiered approach to assess whether they are currently 'serviced' or 'serviceable' within the life time of a plan in accordance with Appendix 3 of the NPF.</p> <p>The need to carry out a Housing Needs Demand Assessment (HNDA) in Kildare in order to fulfil the requirements of NPO 37 is acknowledged by the Council. However, the Planning Authority is not in a position to undertake such an assessment as it is awaiting the publication of National Guidelines from</p>

Sub. No.	Name	Summary of Submission
		<p>the Department of Housing, Planning and Local Government. It is understood that these guidelines will provide a standardised methodology for all Councils on how such an analysis should be carried-out and should be published at some stage in 2020. Accordingly, it is envisaged that a HNDA will be carried-out during the review of the CDP and will form a crucial element of the next CDP's settlement strategy and housing strategy, which will cover the period from 2023 to 2029. It is also noted that the EMRA submission outlines that it is considered more appropriate to prepare this during the full review of the plan.</p> <p>It is acknowledged that 50% headroom as provided for in the Section 28 Guidelines on Development Plans (2007). However, it is considered that such provision has been superseded by the updated policies at both national and regional levels as the provision for such 'headroom' is now built-in to the population projections for each county. As stated in the RSES:</p> <p><i>'NPF Roadmap population projections already incorporate 25% headroom figures for all parts of the country (Implementation Roadmap for the National Planning Framework, Appendix 2). This may be supplemented by additional 25% headroom, applicable in the 16 local authority areas that are projected to grow at or above the national average growth figure (page 5 of the NPF Roadmap). This further headroom may be applied regionally and locally, at RSES and city and county development plan stage.'</i></p> <p style="text-align: right;">RSES (p. 50)</p> <p>Having regard to the above, it is noted that the Variation proposes to include the further 25% headroom as County Kildare one of the 16 local authorities with a projected growth rate of more than the national average in the period to 2026. Furthermore, it also takes the higher range population projection for the county over the period to 2026, as outlined in Appendix 2 of the Implementation Roadmap for the NPF.</p>

Sub. No.	Name	Summary of Submission
		<p>The Council acknowledges that NPO 68 provides for the further allowance of transition population targets of up to 20% of the targeted growth from the Dublin City and suburbs being transferred to other settlements in the MASP such as Maynooth. As outlined in the RSES <i>'the determination of population targets for local authorities within the MASP in accordance with the NPF and this strategy, including the population targets for the City and the Metropolitan Key Towns, should be agreed in consultation with the MASP Implementation Group'</i> (RSES, p.113). The Planning Authority understands that the consultation referred to above is underway and that the Regional Assembly, working with all the relevant local authorities and the Department of Housing, Planning and Local Government will provide clarity on the appropriate adjustments of broad NPF and RSES population forecasts to take account of NPO 68 and reference to same will be made in the Variation.</p> <p>Chief Executive's Recommendation See response to OPR submission regarding reference to NPO 68.</p>
48	Trevor Sadler (of McGill Planning Ltd.)	<p>The submission was prepared by McGill Planning Ltd. who represent a number of clients with significant landholdings in the towns of Celbridge and Leixlip, within the MASP area.</p> <p>The submission highlights concerns over how the population and housing targets for the County have been interpreted and allocated for the remainder of the Development Plan life and the designation of Celbridge as a third tier Self-sustaining town is regressive and unnecessary and clear justification within the RSES for it being classified as second tier with Leixlip and Newbridge.</p> <p>Inaccuracy in Allocation of 2023 Population and Housing Targets The submission states that the NPF Roadmap contains a 19% headroom on the baseline target, not 25%. The submission notes that these figures were incorporated into the RSES and notes that the Roadmap allows for an additional headroom of 25% for counties such as Kildare. The submission</p>

Sub. No.	Name	Summary of Submission												
		<p>notes the housing growth of 14,060 units between 2016 and 2026 but states significant issues arise when targets allocated to the remaining Development Plan period and the final two columns of Table 2.4 allocate a population and dwelling growth target to early 2023 elaborated from the 10-year projection. The submission suggests that the distribution of population and dwelling growth to the pre and post 2023 periods appears to be completely disproportionate and of the overall population increase target of 39,370 over 10 years to 2026, only 43%(16,863) of that growth is allocated to the period from 2016 to the start of 2023. The remaining 57% (22,646) is then assumed to be achieved in the last 3 years of the start of 2026;</p> <div data-bbox="736 612 1890 1174" style="border: 1px solid black; padding: 10px;"> <p>Table 2.4 Population and Housing Targets</p> <table border="1"> <thead> <tr> <th><u>Census 2016 Pop</u></th> <th><u>Census 2016 Dwellings</u></th> <th><u>NPF 2026 Pop Growth (with 25% increase)</u></th> <th><u>NPF 2026 growth target in units</u></th> <th><u>Population growth to 2023</u></th> <th><u>Dwellings Target to 2023</u></th> </tr> </thead> <tbody> <tr> <td>222,504²</td> <td>80,746</td> <td>39,370</td> <td>14,060³</td> <td>16,863</td> <td>6,023</td> </tr> </tbody> </table> <p style="color: red; font-weight: bold;">10 year population growth to 261,874 by 2026</p> <p style="color: red; font-weight: bold;">However only 43% of the population increase in the 7 years from 2016-2023? The remainder (22,507 / 57%) to be achieved in the 3 years from 2023-2026?</p> </div> <p>The submission states that the Variation does not provide an explanation why targets were allocated this way and states that the overall dwelling and population targets for Kildare proposed in the</p>	<u>Census 2016 Pop</u>	<u>Census 2016 Dwellings</u>	<u>NPF 2026 Pop Growth (with 25% increase)</u>	<u>NPF 2026 growth target in units</u>	<u>Population growth to 2023</u>	<u>Dwellings Target to 2023</u>	222,504 ²	80,746	39,370	14,060 ³	16,863	6,023
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222,504 ²	80,746	39,370	14,060 ³	16,863	6,023									

Sub. No.	Name	Summary of Submission
		<p>Variation will be exceeded well before 2023 is reached. The submission states that given the current unprecedented demand for housing in the North Kildare area, the quantum of units being granted permission and coming forward for planning in the short-term, and indeed the level of construction occurring, these figures are worryingly low and not reflective of what is happening on the ground;</p> <p>The submission relates to the growth of Maynooth, Celbridge, Leixlip between 2011-2016 which grew by 1,336 units when the country was still in a deep recession and states that the LAPs will be at complete odds with the CDP given the significant difference in housing and population targets. Reference is made to the Leixlip LAP and the Celbridge LAP and how the housing targets in those LAPs are now reduced and the submission requests the targets are reconsidered and rebalanced over the 10 year period. The submission suggests a population of 27,559 and a housing target of 9,843 to 2023. The submission states that additional units should be allocated to the MASP area along with Naas and Newbridge.</p> <p>Settlement Strategy and Celbridge The submission believes the designation of Celbridge as a Self-sustaining town is a demotion as it is the third largest town in the county and the RSES defines it as highly urbanised, it benefits from proximity to Intel, well served by social infrastructure and public transport and will benefit from DART expansion.</p> <p>Concluding Remarks The submission concludes by suggesting there is a disconnect between Variation and the LAP Core Strategies and further suggests that urban centres would be unduly held back due to an overly fastidious translation of prescribed growth targets into significantly reduced residential zoning quantum's, restricting units will have a devastating socio-economic effect and target figures mis-allocated and should be revised.</p>

Sub. No.	Name	Summary of Submission
		<p>Chief Executive’s Response The content of the submission is noted. The submission highlights concern that the housing delivery targets for County Kildare have been reduced from ca. 32,000 to ca. 6,000 units which represents a reduction of ca. 26,000 units which creates a disconnect between Variation and the LAP Core Strategies.</p> <p>A detailed clarification regarding the revised population figures is set out under the response to submission no. 41 (OPR.)</p> <p>Chief Executive’s Recommendation No change recommended.</p>
49	Millennium Properties Limited Partnership	<p>This submission as prepared by RPS on behalf of their client Millennium Properties Limited Partnership with regard Naas Northwest Quadrant and highlights the following issues;</p> <ul style="list-style-type: none"> • Northwest Quadrant identified in successive development plans and client invested significantly in public infrastructure; • Level of increase of growth considered appropriate and supported; • The submission queries the methodology used; • Equal division of NPF projected growth across 10-year period is a logical, planning based approach, and would provide an increase in the 2023 population of Naas (+ 4,106) and County Kildare (+27,559) respectively to 25,499 and 250,063. • Submission recommends the Population Projections are amended to ensure greater consistency with NPF and RSES projections to provide, as a minimum, for an increase in the population of Naas of 4,106 over the period 2016 – 2023; • Reference is made to the TII submission and the submission states that TII fails to acknowledge that the large scale infrastructure serving Naas including the M7 Osberstown Interchange and R407 Sallins Bypass has been provided for the express purpose of

Sub. No.	Name	Summary of Submission
		<p>facilitating the growth of Naas and the Northwest Quadrant as acknowledged by An Bord Pleanála Inspector's Report for the M7 Osberstown Interchange and R407 Sallins Bypass Scheme (ABP Reg. Ref. 09.HA0046 M7, 09.MA0013 and 09.KA0031);</p> <p>The submission includes a suggested amendment to the objective TII suggest being included:</p> <p><i>a) to maintain the strategic capacity and safety of the national roads network, whilst recognising the role of the M7 Osberstown Interchange and R407 Sallins Bypass in facilitating the development of the Naas Northwest Quadrant in accordance with statutory policy,</i></p> <p><i>b) to safeguard the investment in national roads, and</i></p> <p><i>c) to facilitate the delivery of national road improvements in accordance with National Development Plan objectives; N7 Naas to Newbridge bypass widening (under construction), M4 Maynooth to Leixlip."</i></p> <p>Introduction</p> <ul style="list-style-type: none"> • Long standing public policy in relation to the subject lands;

Sub. No.	Name	Summary of Submission
		<div data-bbox="922 284 1693 911" data-label="Image"> </div> <p data-bbox="922 922 1346 946">Figure 1-1 Location of Client Lands within Naas</p> <p data-bbox="593 994 2016 1102">The submission suggests that the limited population and housing projections set out in the Proposed Variation hinder the development of Naas, thereby undermining the significant public and private investment made to support such growth and endangering any future investment.</p> <p data-bbox="593 1106 1256 1137">Development of Naas – Investment Context</p> <p data-bbox="593 1141 2029 1249">The submission outlines investment in the area in terms of enabling infrastructure, M7 and Sallins Bypass and Osberstown Treatment Plant and Kildare Route Project is an outstanding infrastructural upgrade and the Naas Inner Relief for which LIHAF funding has been obtained.</p>

Sub. No.	Name	Summary of Submission																				
		<p>Regional Spatial and Economic Strategy</p> <ul style="list-style-type: none"> 6 no. Regional Policy Objectives pertaining directly to Naas within the RSES. <p>Revised Development Plan Population Projections</p> <table border="1" data-bbox="689 443 1921 746"> <thead> <tr> <th colspan="5" data-bbox="689 443 1921 483">Existing Population and Population Projections</th> </tr> <tr> <th data-bbox="689 483 846 603">Area</th> <th data-bbox="846 483 1189 603">2016 Census Population</th> <th data-bbox="1189 483 1451 603">2023 Current Development Plan Population Projections</th> <th data-bbox="1451 483 1709 603">2026 NPF Population Projection</th> <th data-bbox="1709 483 1921 603">2023 Proposed Variation Population Projection</th> </tr> </thead> <tbody> <tr> <td data-bbox="689 603 846 671">Co. Kildare</td> <td data-bbox="846 603 1189 671">222,504</td> <td data-bbox="1189 603 1451 671">253,600</td> <td data-bbox="1451 603 1709 671">261,874</td> <td data-bbox="1709 603 1921 671">239,367</td> </tr> <tr> <td data-bbox="689 671 846 746">Naas</td> <td data-bbox="846 671 1189 746">21,393</td> <td data-bbox="1189 671 1451 746">28,111</td> <td data-bbox="1451 671 1709 746">27,259</td> <td data-bbox="1709 671 1921 746">23,907</td> </tr> </tbody> </table> <p>The submission states that the Variation projections provide for a 1.1% population growth per annum in the period 2016 – 2023 whereas the NPF projections provide for a 1.8% population growth per annum in the period 2016 – 2026;</p> <ul style="list-style-type: none"> equal division of NPF projected growth (39,370 Co. Kildare) across the entire ten-year period (2016 – 2026) is a logical, planning based approach to the derivation of 2023 population projections; 	Existing Population and Population Projections					Area	2016 Census Population	2023 Current Development Plan Population Projections	2026 NPF Population Projection	2023 Proposed Variation Population Projection	Co. Kildare	222,504	253,600	261,874	239,367	Naas	21,393	28,111	27,259	23,907
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		<p data-bbox="689 288 1780 316">Table 4-2: Recommended Annualised Population Projection based on NPF 2026 Projection</p> <table border="1" data-bbox="689 331 1908 515"> <thead> <tr> <th colspan="12" data-bbox="689 331 1167 368">Recommended Population Projections</th> </tr> <tr> <th data-bbox="689 368 786 405"></th> <th data-bbox="786 368 898 405">2016</th> <th data-bbox="898 368 1010 405">2017</th> <th data-bbox="1010 368 1122 405">2018</th> <th data-bbox="1122 368 1234 405">2019</th> <th data-bbox="1234 368 1346 405">2020</th> <th data-bbox="1346 368 1458 405">2021</th> <th data-bbox="1458 368 1570 405">2022</th> <th data-bbox="1570 368 1682 405">2023</th> <th data-bbox="1682 368 1794 405">2024</th> <th data-bbox="1794 368 1906 405">2025</th> <th data-bbox="1906 368 2018 405">2026</th> </tr> </thead> <tbody> <tr> <td data-bbox="689 405 786 472">Co. Kildare</td> <td data-bbox="786 405 898 442">222,504</td> <td data-bbox="898 405 1010 442">226,441</td> <td data-bbox="1010 405 1122 442">230,378</td> <td data-bbox="1122 405 1234 442">234,315</td> <td data-bbox="1234 405 1346 442">238,252</td> <td data-bbox="1346 405 1458 442">242,189</td> <td data-bbox="1458 405 1570 442">246,126</td> <td data-bbox="1570 405 1682 442">250,063</td> <td data-bbox="1682 405 1794 442">254,000</td> <td data-bbox="1794 405 1906 442">257,937</td> <td data-bbox="1906 405 2018 442">261,874</td> </tr> <tr> <td data-bbox="689 472 786 515">Naas</td> <td data-bbox="786 472 898 509">21,393</td> <td data-bbox="898 472 1010 509">21,980</td> <td data-bbox="1010 472 1122 509">22,566</td> <td data-bbox="1122 472 1234 509">23,153</td> <td data-bbox="1234 472 1346 509">23,739</td> <td data-bbox="1346 472 1458 509">24,326</td> <td data-bbox="1458 472 1570 509">24,913</td> <td data-bbox="1570 472 1682 509">25,499</td> <td data-bbox="1682 472 1794 509">26,086</td> <td data-bbox="1794 472 1906 509">26,672</td> <td data-bbox="1906 472 2018 509">27,259</td> </tr> </tbody> </table> <ul data-bbox="640 568 2018 635" style="list-style-type: none"> • 587 people per annum for Naas, minimum level of growth acceptable for Naas given it's a Key Town; <p data-bbox="593 643 1939 710">The submission makes reference is made to the OPR submission on the Wicklow Issue Papers where they state there is scope to prioritise the development of Key Towns.</p> <p data-bbox="593 791 824 818">TII Submission</p> <p data-bbox="593 826 1644 858">The submission requests amendment to text in suggested objective by TII.</p> <p data-bbox="593 903 1021 930">Chief Executives' Response</p> <p data-bbox="593 938 2018 1082">It is acknowledged that the RSES identifies that there is potential for high quality high-density indigenous and Foreign Direct Investment within the Millennium Park in the Northwest Quadrant. The proposed Variation takes cognisance of same and outlines the sectoral opportunities for Naas within the Economic Development Hierarchy.</p> <p data-bbox="593 1118 2018 1257">The comments in relation to Table 3.3 are noted. In the preparation of the Core Strategy Table 3.3 a number of different scenarios were examined. A 7-year methodology was applied, as opposed to the 10-year approach as suggested in the submission, (please see response to the submission made by the Office of the Planning Regulator (OPR) No. 41.) as this would significantly reduce the target for</p>	Recommended Population Projections													2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	Co. Kildare	222,504	226,441	230,378	234,315	238,252	242,189	246,126	250,063	254,000	257,937	261,874	Naas	21,393	21,980	22,566	23,153	23,739	24,326	24,913	25,499	26,086	26,672	27,259
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Sub. No.	Name	Summary of Submission
		<p>the remaining four years of the population allocation (i.e. 2023, 2024, 2025, 2026) to 500 units per year.</p> <p>It should be noted that Naas as a Key Town and previously as a Large Growth Town 1 has been prioritised to reflect its status in the overall county hierarchy, within the current Development Plan and the proposed Variation and as such is allocated 14.9% of the overall growth for the County. It is acknowledged that the percentage allocation may be reconsidered during the full plan review process, which is due to commence in early 2021.</p> <p>With regards to the submissions suggestion that the variation is limiting the population growth and the impact on the economic development of NWQ, it should be noted that according to Census 2016 only 29% of those 'at work' within the settlement of Naas are employed in Naas. Therefore, there is a considerable existing population to serve the development of economic lands within the town.</p> <p>In relation to the TII submission, the comments stated by an Inspector in An Bord Pleanála during the course of an application are noted. However, the M7 Osberstown Interchange and Sallins By-pass have a wide-ranging benefit to larger area than solely the Northwest Quadrant, such as:</p> <ul style="list-style-type: none"> • Improvement in capacity of the M7 and the R407 in Sallins; • Supports the population, connectivity and economic development within Naas, Sallins and the surrounding environs; • Relieves traffic congestion in Sallins which will benefit locals, road users and the environment in Sallins; • Improves access to zoned lands within the primary economic development cluster (which includes the Naas Northwest Quadrant lands).

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		<p>Therefore, given the wide-reaching benefits of this road infrastructure it would be unreasonable to specifically single out through wording in an objective, one particular area above others.</p> <p>Chief Executive's Recommendation No change recommended.</p>
50	Cllr. Vanessa Liston	<p>The submission from Cllr Liston suggests that the NPF has not been adequately climate-proofed and the development of the RSES raised important issues regarding the scope of the Transport Strategy of the GDA to meet the objectives of the national Climate Action Plan.</p> <p>The submission states that there is an opportunity to take a policy of maximisation on climate and environmental actions within the Variation.</p> <p>Chapter 2 <i>Designation</i></p> <ul style="list-style-type: none"> • Celbridge is designated as a self-sustaining town. This is accurate for the short term as it reflects the need for catch up investment for the town to address its lack of transport options, services and infrastructure; • There are risks to Celbridge with Maynooth designated as a Key Town and Leixlip a Self-sustaining Growth Town; • Celbridge has not benefited from investment it has needed; • Celbridge LAP contains an objective for a Transport Management Plan to be completed within one year of adoption of the Plan that is still not completed; • Variation should have strong objective on prioritising areas for catch-up investment based on need;

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> An objective should be considered that addresses the issue of risk, in the context of the clusters outlined within the MASP and North-West Corridor, with an appropriate monitoring and scenario planning approach to development over the lifetime of the current CDP. <p>2.2 Strategy</p> <ul style="list-style-type: none"> Statement of objectives should more adequately reflect in their ambition and language the current climate crisis; Concept of live-work-play communities is also relevant to the objectives of the RSES and should be considered also for inclusion in the core strategy including section 2.5; The submission recommends the amendment to text (on page 21) : <p><i>This objective be expanded from</i> <i>(ii) Supporting the achievement of more sustainable towns and villages through residential and employment opportunities with a focus on urban regeneration and compact growth together with supporting social and community facilities;</i></p> <p>to</p> <p><i>Supporting the achievement of more <u>climate resilient</u> communities in towns and villages through residential and employment opportunities with a focus on <u>sustainable</u> urban regeneration, compact growth <u>and the development of live-work-play communities</u>, together with sufficient social and community facilities and services.</i></p> <p>Section 2.4 Water quality has emerged as a concerning issue for residents across regions in Kildare. Propose changing the text <i>‘Supports the transition to a low carbon, climate resilient and environmentally sustainable region’ to Supports the transition to low carbon, climate resilient <u>communities and a healthy environment with high quality air and water</u></i></p>

Sub. No.	Name	Summary of Submission
		<p>The Variation should consider the objectives RPO 7.10 and 7.11 on water quality from RSES. It should also consider RPO 7.7 from Air Quality.</p> <p>2.7 Preferred Development Strategy The submission highlights that there is no clear explanation as to what the term ‘Measured Growth’ means & the submission states that economic development and sustainable growth should be considered rather than undefined ‘economic growth’ alone. Reference is made to Table 2.2; measured growth with emphasis on economic growth in the towns identified as Self-Sustaining Growth Towns and Self-Sustaining Towns.</p> <p>2.15 Climate Change Strategy The submission states that this strategy has been adopted and the narrative should reflect that it has a direct impact now on policy, rather than an undefined period in the future. The importance of climate change should be reflected in the Variation as it will be three years before a new CDP is adopted. The recent developments in the Climate Change legislation and climate mitigation are not referenced.</p> <p>An objective should be considered that acknowledges the gap and promotes objectives of the CAP and CoM with reference to the Climate Action Plan and Covenant of Mayors.</p> <p>2.16.2 Policies Economic Development Policy CS8 should include the concept of live-work-play communities, which would adhere with Meath CDP and suggests that this could be developed within the Maynooth LAP.</p> <p>Proposed requested change underlined: <i>Address commuting patterns by building up the local economy to a more sustainable level by promoting self-sustaining employment-based development opportunities in settlements to provide for employment growth for the existing population in order to reverse commuting patterns <u>and promote live-work-play communities.</u></i></p>

Sub. No.	Name	Summary of Submission
		<p>2.16.5 Policies: National Climate Change Strategy Consider including the following additional text (underlined) under CS 16:</p> <p><i>Ensure that climate action considerations are integrated into land use planning and aid the transition to a climate resilient local carbon society. Promoting and maximising the most efficient and sustainable use of land <u>with the aim of achieving a healthy and richly diverse natural environment.</u></i></p> <p>Chapter 3 Settlement Strategy 3.3 Settlement Hierarchy</p> <ul style="list-style-type: none"> • The narrative does not include <u>need</u> of current areas as a criterion for infrastructure investment; • The requirement for moving towards sustainable modes of transport in car-dependent and congested areas should also be a criterion for decisions on infrastructure investment; • The designation of towns also determines their investment levels – for example Self-Sustaining Towns such as Celbridge will require significant ‘catch-up’ investment; • Narrative on investment in infrastructure should be updated to reflect objectives of RSES. <p>Table 3.3 Settlement Hierarchy-Population and Housing Unit Allocation 2016-2023 The submission states that the variation requires a clearer explanation on how figures are obtained and adjusted, and how this relates to headroom and figures per area, and how RSES figures translated to the table as it is clear how these numbers relate to KDAs in LAPs. This needs to be clearer to determine impacts on communities.</p> <p>Additional Points</p> <ul style="list-style-type: none"> • Narrative should also include reference to the new role of OPR;

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> • Electric Infrastructure Charging. EV charging infrastructure difficulties need to be resolved, including issues with apartments gaining access to the infrastructure; • The submission recommends objectives for the provision of charging infrastructure for all new developments and in the public realm.; • All new parking for new (or extensions to) housing, apartments and places of employment that provide car parking should have safe charging facilities. <p>Chief Executive's Response</p> <p>The issues raised in Cllr Liston's submission are noted. Regarding the Transport Strategy for the GDA, this document provides a transport planning policy around which other agencies involved in land use planning etc can align their investment priorities. The current CDP sets out policies and objectives regarding the delivery and implementation of this, specifically MT 6 which states that it is the policy of the Council to co-operate with and support the National Transport Authority and relevant regional agencies to facilitate the planning, delivery and implementation of improvements to the transport network of the County and the Greater Dublin Area. Regarding the scope of the Transport Strategy for the GDA to meet the objectives of the national Climate Action Plan, it is considered that this is an issue for the National Transport Authority as the appropriate body with responsibility for the preparation, implementation and monitoring of the Transport Strategy for the GDA.</p> <p>The issue raised regarding the Traffic and Transport Management Plan (TMP) for Celbridge is noted. However, this is an objective contained in the current local area plan for Celbridge and the reason for the Variation is solely to align the CDP with the NPF and the RSES. The delivery and implementation of the policies and objectives of the Celbridge LAP are ongoing.</p> <p>The Council note the suggested change in text under Section 2.2 page 21 and will incorporate same into the proposed Variation.</p>

Sub. No.	Name	Summary of Submission
		<p>The submission refers to RPO 7.7, 7.10 and 7.11 it is considered that that current CDP already has sufficiently robust policies and objectives which are in line with the RSES to protect water bodies and air quality across the county.</p> <p>As per Objective 1 and Goal 3 of the Climate Resilient Kildare document and taking cognisance of the Covenant of Mayors climate change will be a critical consideration informing land use plans by Kildare County Council. Once the Variation is adopted a suite of local area plans will be placed on public display which from the outset will have climate change central to all policies and objectives including decisions on land use zoning, as per our requirements under these documents.</p> <p>The text under Section 2.4 of the Proposed Variation will be amended to read as follows; <i><u>Supports the transition to low carbon, climate resilient communities and a healthy environment with high quality air and water</u></i></p> <p>Live-work communities are encouraged through various policies and objectives already contained in the CDP. The Council note the comments regarding developing out this concept further in the Maynooth LAP. The Council will endeavour to transpose this concept through all local area plans.</p> <p>The proposed Settlement Hierarchy in line with the RSES classifications on settlement typologies indicates towns for 'catch-up'. There is no side-lining for investment as a result of the proposed designations. The areas specific to each settlement to be prioritised for 'catch-up' will be dealt with at local area plan level. Similarly, the Council through the Urban and Rural Regeneration Development Funds will seek funding to carry out a myriad of projects within settlements. Funding opportunities will be explored by the Council on a 'needs' basis rather than on a designation basis, as previously the case under former funding streams. Similarly, as per Objective SO 3 the Council will facilitate the</p>

Sub. No.	Name	Summary of Submission
		<p>implementation of key strategic infrastructure in accordance with the Council’s Capital Works Programme and subject to the availability of financial resources.</p> <p>The comments in relation to providing clarify on the methodology for the population and housing allocations are noted. Please refer to response to submission No. 41 from the Office of the Planning Regulator for clarity on the approach taken. In relation to Key Development Areas (KDA) within land use plans, a review of all LAPs will take place following the completion of the process to vary which will determine the need, if appropriate to apply a phasing to the delivery of housing.</p> <p>The Council is cognisant of the need for the roll-out of EV charging infrastructure. Section 17.7.6 Car Parking states that the Council will liaise with ESB Networks to continue the roll-out of rapid charge points throughout the county. Within this Section, reference is particularly made to non-residential developments to provide spaces of up to 10%. However, planning applications for residential developments are also conditioned to provide EV charging points and enabling infrastructure, which is also the case for applications decided by An Bord Pleanála.</p> <p>Chief Executive’s Recommendation</p> <ol style="list-style-type: none"> 1. Amend text under Section 2.2 page 21 as follows; <i>Supporting the achievement of more <u>climate resilient</u> communities in towns and villages through residential and employment opportunities with a focus on <u>sustainable</u> urban regeneration, compact growth together with sufficient social and community facilities and services.</i> 2. Amend text under Section 2.4 of the Proposed Variation as follows; <i>‘Supports the transition to low carbon, climate resilient <u>communities and a healthy environment with high quality air and water</u>’</i>
51	Cllr Robert Power	The submission from Cllr Power highlights frustration that Kildare should be subject to a decrease in the population forecast for 2023 which will impact severely on the housing crisis. The submission suggests that development has previously been held up due to lack of infrastructure and demand has increased as a result of pressures on the Dublin market. The submission welcomes the focus on

Sub. No.	Name	Summary of Submission
		<p>urban regeneration and compact growth in towns and villages and also the “Build your own home” sites in rural areas ability to make impact on housing shortage, however notes that there is little information on how these sites will be delivered and should be clarified. The submission states there are several restrictions on the development of one-off houses in the existing CDP and proposes the removal of RH4 which restricts speculative development. The submission suggests that if a person be qualified to build in a rural area through meeting other considerations in the CDP, this should not be a barrier to construction.</p> <p>The submission also highlights the removal of Newbridge as a top tier town is a concern having recently strengthened its position. The submission suggests that future development of housing in the Newbridge area should be linked to a robust traffic management plan and the provision of a second bridge and should be a goal of the CDP within the plan time frame. The submission questions the ability of Naas to deliver on substantial levels of housing given that existing permissions are based on the condition of the implementation of a Naas Relief Road. The submission further notes that proposals for such a road was dismissed by municipal members in 2019, there are concerns whether this will further impact on existing and future planning proposals. The submission concludes that the ability of Naas to accommodate future growth in light of the lack of a relief road should be addressed.</p> <p>Chief Executive’s Response</p> <p>The primary purpose for the publication of Proposed Variation to the Kildare County Development Plan 2017-2023 is to ensure the Council fulfil its statutory obligation to align the CDP with provisions of the NPF and RSES. Under the provisions of Section 11(1)(b)(iii) of the Planning and Development Act 2000 (as amended) Kildare County Council is statutorily obliged to prepare a variation of its CDP within 26 weeks of the RSES being adopted to align the CPD with the revised population targets set out in the NPF Roadmap and subsequently the RSES.</p>

Sub. No.	Name	Summary of Submission
		<p>The Council is currently investigating the options for ‘build your own home’ sites and it is envisaged at this time that it may be both public sector and private sector led. The NPF states that this programme shall be in association with public infrastructure agencies, local communities, housing bodies and landowners. The comments are noted with regards to the removal of policy RH 4. The purpose of the Variation is to respond to recent changes in national and regional policy namely the publication of National Planning Framework (NPF) and the Eastern and Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES). RH 4 does not contravene any national or regional policy objectives and is therefore not the subject of this variation.</p> <p>The Regional Spatial and Economic Strategy designated both Naas and Maynooth as Key Towns. The remaining towns within the county were at the discretion of the local authority to designate at Development Plan level. Given that fact the Key Towns have been designated by the RSES, the Variation proposes to give Newbridge the highest possible designation that is permissible within the new hierarchy that of a ‘Self-Sustaining Growth Town’.</p> <p>Chief Executive’s Recommendation No change recommended.</p>
52	Statkraft Ireland Limited	<p>The submission from Statkraft notes that the company produces hydropower, wind power, solar power, gas-fired power and supplies district heating. The submission notes that Statkraft support the submission made by Irish Wind Energy Association and highlights that each local authority has a part to play in achieving 70% renewable electricity by 2030. The submission references Objective 2 under Goal 3 in the Climate Change Adaptation Strategy 2019-2024 which commits to:</p> <p><i>“Examine and pursue projects that seek to work towards the key objectives of the National Mitigation Plan and actions of the Climate Action Plan to decarbonise electricity, promote sustainable land uses and reduce energy consumption”.</i></p>

Sub. No.	Name	Summary of Submission
		<p>The submission states that the Climate Change Adaption Strategy 2019-2024 has not been budgeted to address this action and the strategy doesn't address how KCC intend to assist in achieving the Country's 70X30 targets. The key focus of the Strategy is its own internal actions and activities with no reference or commitment to producing a Renewable Energy Strategy. The submission states that the current Plan makes limited reference to Renewable or Wind Energy and suggests that KCC needs to be more active when it comes to clean energy and reducing carbon. KCC has a progressive attitude to solar development, but a number of wind farm applications brought forward have not been consented. Furthermore, the submission suggests that KCC departments should be aware of the targets under the Climate Action Plan and notes that KCC has previously raised concerns regarding roads and wind farm development however these issues have been addressed in other parts of the country.</p> <p>The submission concludes by suggesting that KCC offers every opportunity to bring forward projects that can deliver climate action. The submission suggests that KCC should carry out a full assessment of the County for Wind Energy Potential as a matter of urgency in line with recent policy changes and as set out in the IWEA submission to the proposed variation.</p> <p>Chief Executive's Response</p> <p>Objective EO 27 of the Kildare County Development Plan 2017-2023 states that it is an objective of the Council to work with Sustainable Energy Authority of Ireland (SEAI) to develop a Local Authority Renewable Energy Strategy (LARES) incorporating EU guidelines and training. However, as noted in the submission work has not progressed during the life of the Plan. However, the revised Wind Energy Development Guidelines are now in draft form. Once the Guidelines are finalised the Council can progress a Renewable Energy Strategy for the county. As per the draft Wind Energy Guidelines there is a requirement to identify where there is significant wind energy potential within the county, and this will form part of the Strategy along with other renewable energy options. A Renewable</p>

Sub. No.	Name	Summary of Submission
		<p>Energy Strategy will form part of the preparation of the Kildare County Development Plan 2023-2029, which is due to commence in early 2021.</p> <p>The current CDP provides for a number of policies that support the development of renewable energy initiatives including;</p> <ul style="list-style-type: none"> • Policy ER1 which ensures that KCC respond to the European and National Energy Programme through sustainable locally based renewable energy alternatives. • Policy ER3 which supports the development of renewable energy sources. • ER8 which outlines that the Renewable Electricity Policy and Development Framework should be referred to when assessing renewable energy proposals. <p>Regarding windfarm applications, the CDP sets out a number of policies in Section 8.5 of the CDP. Policy WE2 for example encourages the development of wind energy in suitable locations, while Policy WE3 identifies a number of elements including environmental impact when assessing wind energy development. Policies WE4 and WE5 also support small and medium scale wind energy development in appropriate locations.</p> <p>Chief Executive's Recommendation No change recommended.</p>
53	Frank O'Rourke T.D.	<p>Submission prepared Patrick M. Kerr Architecture on behalf of Frank O'Rourke TD (former) and relates to rural housing and the refusal rate in County Kildare. The submission states that the vast majority of applications for rural housing are refused under policies RH4, RH9 and RH 10 and this is particularly evident in the northern part of the county. The submission highlights issues regarding refusals for applications from applicants adhering to both the NPF, in particular, NPO 19, the Sustainable Rural Housing Guidelines, 2005 and the policies and objectives of the CDP relating to Local Needs and Housing Needs. The submission states that policy RH9 (iv) is the main reason for refusal which is namely the ability of an area to absorb further development and the submission</p>

Sub. No.	Name	Summary of Submission
		<p>contends that this is not based on any fact based or independent assessment, is completely arbitrary and at the discretion of the planning authority. The submission suggests that policy needs to be amended to allow applicants who fulfil local need / criteria to have a reasonable expectation of obtaining a grant of planning permission and it is further contended that the development plan conflicts with national policy (namely NPO 20) as it fails to have a Housing Need Demand Assessment (HNDA) tool. Reference is also made in the submission to Section 2.5.2 where allocated growth is 1.6% in rural settlements and 8% in the rural countryside and highlights that the 8% (371 houses per annum) growth target for houses in the countryside will not be achieved due to the rate of refusals particularly in north Kildare. To achieve this policies RH4, RH10 should be amended and RH9 (iv) removed entirely.</p> <p>Chief Executive's Response</p> <p>The contents of the submission are noted. The contention in the submission regarding the rate of refusal is also noted. It should be noted that Proposed Variation No. 1 does not affect the rural housing policy in the current County Development Plan.</p> <p>It should also be noted that County Kildare has accommodated the construction of 8,959 rural one-off dwellings between 1998-2015 (an average of 530 dwellings per annum). A commitment to review the Rural Housing Design Guidelines and Policy was given to the elected members and is programmed for commencement later in 2020. In addition, a workshop with agents and practioners who engage with Kildare County Council is planned in the short term.</p> <p>The requirement for a Housing Need Demand Assessment (HNDA) is noted, however, in the absence of the publication of any national guidance documents, associated data and supporting material regarding the preparation of a HNDA it is not considered appropriate or practicable to prepare a HNDA at this time. Local Authorities have been informed by the DHPLG that a guidance document is currently being prepared.</p>

Sub. No.	Name	Summary of Submission
		<p>Chief Executive's Recommendation No change recommended.</p>
54	Cllr. Michael Coleman	<p>Submission prepared Patrick M. Kerr Architecture on behalf of Cllr Michael Coleman and relates to rural housing and the refusal rate in County Kildare. The submission states that the vast majority of rural housing refused under RH4, RH9 and RH 10 and this is particularly evident in the northern part of the county and highlights issues regarding refusals for applications from applicants adhering to both the NPF, in particular, NPO 19, the Sustainable Rural Housing Guidelines, 2005 and the policies and objectives of the CDP relating to Local Needs and Housing Needs. The submission states that policy RH9 (iv) is the main reason for refusal which is namely the ability of an area to absorb further development and the submission contends that this is not based on any fact based or independent assessment, is completely arbitrary and at the discretion of the planning authority. The submission suggests that policy needs to be amended to allow applicants who fulfil local need / criteria to have a reasonable expectation of obtaining a grant of planning permission and it is further contended that the development plan conflicts with national policy (namely NPO 20) as it fails to have a Housing Need Demand Assessment (HNDA) tool. Reference is also made in the submission to Section 2.5.2 where allocated growth is 1.6% in rural settlements and 8% in the rural countryside and highlights that the 8% (371 houses per annum) growth target for houses in the countryside will not be achieved due to the rate of refusals particularly in north Kildare. To achieve this policies RH4, RH10 should be amended and RH9 (iv) removed entirely.</p> <p>The submission states that the Council's own core strategy policy allows for 370 rural houses per annum yet only 120 were granted in 2019 with very little in the north of the County.</p> <p>Chief Executive's Response See CE response and recommendation to submission no. 53 above.</p>

Sub. No.	Name	Summary of Submission
55	Cllr. Daragh Fitzpatrick	<p>Submission prepared Patrick M. Kerr Architecture on behalf of Cllr. Daragh Fitzpatrick and relates to rural housing and the refusal rate.</p> <p>The submission states that the vast majority of rural housing refused under RH4, RH9 and RH 10 and this is particularly evident in the northern part of the county and highlights issues regarding refusals for applications from applicants adhering to both the NPF, in particular, NPO 19, the Sustainable Rural Housing Guidelines, 2005 and the policies and objectives of the CDP relating to Local Needs and Housing Needs. The submission states that policy RH9 (iv) is the main reason for refusal which is namely the ability of an area to absorb further development and the submission contends that this is not based on any fact based or independent assessment, is completely arbitrary and at the discretion of the planning authority. The submission suggests that policy needs to be amended to allow applicants who fulfil local need / criteria to have a reasonable expectation of obtaining a grant of planning permission and it is further contended that the development plan conflicts with national policy (namely NPO 20) as it fails to have a Housing Need Demand Assessment (HNDA) tool. Reference is also made in the submission to Section 2.5.2 where allocated growth is 1.6% in rural settlements and 8% in the rural countryside and highlights that the 8% (371 houses per annum) growth target for houses in the countryside will not be achieved due to the rate of refusals particularly in north Kildare. To achieve this policies RH4, RH10 should be amended and RH9 (iv) removed entirely.</p> <p>The submission states that the Council's own core strategy policy allows for 370 rural houses per annum yet only 120 were granted in 2019 with very little in the north of the County.</p> <p>Chief Executive's Response See CE response and recommendation to submission no. 53 above.</p>
56	Glenveagh Homes PLC	<p>This submission was prepared by MKO on behalf of their client Glenveagh Homes PLC and the content of the submission can be summarised under the following headings:</p>

Sub. No.	Name	Summary of Submission
		<p>1.Design & Compact Growth 2.Core Strategy & Density</p> <p>Design and Compact Growth Innovative approach of own-door homes consistent with the NPF and a new approach to DM standards will be required to maintain residential amenity in high quality own door units. It is suggested that such an approach will cater for different age profiles and are seeking that KCC engage with developers regarding flexibility in DM standards to ensure compact growth and prioritise residential amenity. Several objectives and outcomes within the NPF are identified which promote high quality compact growth. These include; NSO 1 and policy objectives 3a, 3b,3c, 4, 13.</p> <p>The submission notes that Planning Authorities and An Bord Pleanála are required to apply any specific planning policy requirements (SPPRs) of the guidelines, within the meaning of Section 28 (1C) of the Planning and Development Act 2000 (as amended), in carrying out their functions. Reference is also made in the submission to SPPR 4 (minimum densities and mix of building heights) of the 2018 Building Height Guidelines, and Section 7.10 and 7.11 of the Sustainable Residential Development in Urban Area Guidelines.</p> <p>The RSES will be implemented in policy by way of the County Development Plan and therefore requires a focus on efficient use of serviced land and delivery of appropriate densities within urban settlements. In order to deliver the target of 30% of all new homes within the existing built-up areas to achieve compact growth of urban settlements KCC must consider the following;</p> <ul style="list-style-type: none"> • Looking beyond the conventional 3/4 semi-detached and apartment model. • Innovative design solutions to own door houses. • Provision of market and affordable housing.

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> • Flexible and adaptable homes. • Flexible house designs. • Appropriate masterplanning. <p>Appropriate densities, urban design, and design of individual buildings are identified. The use of contemporary and innovative design solutions should be encouraged.</p> <p>The submission requests a provision within the Development Plan that facilitates this innovative design and that meet the following suggested performance criteria:</p> <ul style="list-style-type: none"> • Privacy/Protection of Residential Amenity • Acceptable level of quality private and public amenity space • Appropriate management of shared spaces within a residential development • Removal of cars off the streets while maintaining Local Authority quantitative standards • Appropriate bin storage and cycle parking locations within the curtilage of the unit. <p>The submission requests that KCC gives further consideration to the development management standards applicable to residential schemes in the context of layout, separation distances and private open space requirements, in order to achieve the policy objectives, set out in the statutory RSES.</p> <p>The following text is proposed</p> <p><i>The planning authority welcomes contemporary designs and innovation (note; this sentence is already in the plan). In order to facilitate and encourage innovative design solutions the Council will exercise flexibility in the application of the development management standards in instances where</i></p>

Sub. No.	Name	Summary of Submission
		<p><i>high quality design and layout has been demonstrated and subject to the maintenance of privacy and protection of residential amenities.</i></p> <p>Core Strategy and Density The submission refers to achieving critical mass in both the MASP area and in Naas and Maynooth and suggests that population allocation to Kilcock fails to align with its status in the Metropolitan area. The submission requests to review Kilcock’s location in its settlement hierarchy based on Kilcock’s strategic location on the M4 corridor with multi-modal transport infrastructure. The submission also notes that Table 4.1 requires review and amendment as densities range from 20-50 units per hectare and need to align with NPF and RSES.</p> <p>Chief Executive’s Response It is considered that the CDP already provides an appropriate framework for innovative design solutions within Chapter 15 Urban Design Guidelines, Chapter 4 Housing and Chapter 17 Development Management Guidelines. Section 17.4 of the CDP identifies various Development Management Standards and other related guidelines in considering innovative design proposals. Other siting and design-based guidelines specifically referred to in the CDP include;</p> <ul style="list-style-type: none"> • Quality Housing for Sustainable Communities Best Practice Guidelines, DEHLG (2009) • The Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities, DEHLG (2009). • The Urban Design Manual Best Practice Guide, DEHLG (2009) • The Design Manual for Urban Roads and Streets, DTTS and DECLG (2013, updated 2019) <p><i>Parking and Streets</i> Regarding the provision of car parking and the design of streets, Section 17.7.6 identifies that ‘...lower rates of parking may be appropriate at certain sites’. Considering this, Policy PK2 outlines that car parking layouts are designed in accordance with the Design Manual for Urban Roads and</p>

Sub. No.	Name	Summary of Submission
		<p>Streets (2013). PK5 seeks to ensure that private parking is appropriate to the development it serves, and PK7 outlines that it should not deter from the attractiveness of the either the landscape or for pedestrian and cyclists. Shared surfaces are promoted where appropriate as identified in section 15.8.7 of the CDP.</p> <p><i>Amenity Space</i> On the issue of amenity space, Policy OS1 seeks to ensure the provision of high quality private open space that is integrated into the overall design. Objective OSO1 identifies that dwellings should be designed in accordance with ‘<i>Guidelines for Planning Authorities on Design Standards for New Apartments (2015), the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas and the companion Urban Design Manual – A Best Practice Guide (2009).</i>’</p> <p><i>Open Space</i> Regarding public open space, Policy PS1 seeks to ensure high quality space and amenity. PSO 1 ensures new residential development complies with Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas and Chapter 17 of the CDP. PSO 2 ensures clear definitions regarding public, semi-private, and private open space.</p> <p><i>Design</i> The promotion of high-quality urban design is a key focus of the current CDP and provided for in several specific policies and objectives of the plan, as follows;</p> <ul style="list-style-type: none"> • Policy DL1 promotes high quality design and layouts in new residential developments; • Objective DLO1 seeks to create high quality layouts and living environments for residents through the implementation of the DM standards; and • DLO3 supports the design of dwellings to be adaptable for different age profiles. DLO5 further identifies the need for typologies for adaptable housing types.

Sub. No.	Name	Summary of Submission
		<p>Planning applications and design will continue to be determined as part of the development management process.</p> <p>Kilcock's location within the Settlement Hierarchy was informed by an economic analysis and a social infrastructure assessment for the town. The location of the town in the MASP is acknowledged however it is considered the town has experiences high population growth and requires catch-up investment in both physical and social infrastructure. The growth allocation at 4% for Kilcock is therefore considered appropriate at this time. However, the County Development Plan is due for a review in early 2021 which will incorporate a full review of the settlement hierarchy during the review process.</p> <p>Table 4.2 of the County Plan relates to indicative density levels across the county and this table accords with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009). These Guidelines have not been superseded and are therefore still the appropriate guidance document for Planning Authorities. The table provides for indicative densities only. The number of units and permissible densities will be determined at detailed design stage based on a full assessment of site characteristics and local sensitivities.</p> <p>Chief Executive's Recommendation No change recommended.</p>
57	Colivet Family	<p>This submission was prepared by David Mulcahy, Planning Consultants Ltd and relates to 10.5 hectares on the Kilcullen Road, Naas;</p> <ul style="list-style-type: none"> • The submission wants to address the serious implication of the reduction in housing units; • Crippling consequences for future residential development; • Most existing zoned lands will end up being phased until post 2023 and no new residential zoned lands will be provided;

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> • Allocations from the NPF are currently being reviewed by the ESRI and we strongly submit that any variation to the Plan should wait until this review is complete. <p>Chief Executive’s Response Following the process to vary the County Development Plan the Council will proceed to prepare a suite of local area plans which will include the Naas LAP.</p> <p>A Social Infrastructure Audit will be carried out as part of the preparation of the LAP for Naas which will examine the current availability and capacity of social infrastructure facilities in the area, to determine future requirements and make recommendations on priority areas for future investment to ensure housing is delivered in tandem with the necessary social and physical infrastructure. Similarly, a Strategic Transport Strategy will be undertaken which will inform zoning decisions for the forthcoming LAP in tandem with solutions for improving public transport, cycling and permeability throughout the town. Which will, in combination with compliance with the NPF and RSES, inform a future development strategy for the town of Naas.</p> <p>It is considered that the most appropriate mechanism for zoning of land is through the LAP process which is informed by a series of evidence-based assessments.</p> <p>Chief Executive’s Recommendation No change recommended.</p>
58	O’Flynn Construction Limited	The submission provides details on the activities of O’Flynn Construction Limited in the county, stating that they are responsible for having delivered an extensive number of new homes in the GDA and have recently obtained permission for 251 homes at Oldtown, Celbridge. The submission relates to the future development of Celbridge and outlines its strategically important and accessible location within the Dublin Metropolitan Area and its proximity to existing and future infrastructure.

Sub. No.	Name	Summary of Submission
		<p>Hierarchical Priority of Celbridge</p> <p>The submission notes the purpose of the variation is to implement the NPF and RSES and states that it is important that recent national and regional policy changes and the hierarchical order of settlements are translated at a local level. In this regard the submission notes that the current CDP defines Celbridge as a Level 2 town and that under the proposed variation, the town is designated a 'self-sustaining town' is a Level 2 town (2ii) under the structure of the RSES. The submission expresses concern that the representation of the settlement strategy for Kildare in Section 2.5.1, Table 2.2 and Table 3.1 of the variation would imply that 'self-sustaining growth town' would sit above 'self-sustaining town', therefore reading as level 2 and level 3 respectively.</p> <p>The submission queries the justification for Athy and Kildare Town's designation with a smaller population and unit allocation than Celbridge, which would sit above them in the hierarchy when it is clear that all three towns are level 2 towns. Accordingly, the submission seeks amendments to the presentation of text and tables, to clarify the hierarchical priority of Celbridge so that tiered settlement level of the town would therefore be clearer and there would be no disparity between the wording of the extant development plan and the proposed variation.</p> <p>Transitional Arrangements and Actual Deliverability of Lands</p> <p>The submission states that under Objective 3c of the NPF at least 30% of all new homes in settlements (other than the Cities) must be delivered within the built-up footprints of those towns. However, it notes that the RSES also recognises that appropriate arrangements will be put in place where there may not be an ideal fit between some current plans and the more up-to-date broad national and regional future development parameters. It is submitted that the proposed variation does not recognise that not all infill and brownfield sites can come forward during the lifetime of the development plan and it is therefore important that development plans are cognisant of this issue.</p>

Sub. No.	Name	Summary of Submission
		<p>The submission also states that it is critical to recognise that zoning of land is not a straight-forward numbers exercise, as the zoning may not always represent the reality of land availability or distinguish between sites that will be brought forward in the short, medium or long-term or perhaps not at all. It is for this reason that the submission requests that the proposed variation be amended to include additional text at Sections 2.1(i), 2.16.1, 3.4.2, 3.6 and 3.9 (as set out in bold, below) in order to ensure that the zoning process takes account of the likelihood of lands being developed, and their capacity to deliver population growth targets within the lifetime of the CDP:</p> <ul style="list-style-type: none"> <li data-bbox="613 584 1742 746">▪ Section 2.2: Item (i) seeks to encourage the focus of new development on <i>“consolidation within the existing urban footprint, by ensuring 30% of all new homes are targeted within the existing built-up areas to achieve compact growth of urban settlements, where availability and capacity exists to deliver housing targets within the lifetime of the development plan.</i> <li data-bbox="613 788 1742 986">▪ Section 2.16.1: Policy CS 4 on settlement strategy states that it is policy of the Council to <i>“deliver sustainable compact urban areas through the regeneration of towns and villages through a plan led approach which requires delivery of a least 30% of all new homes that are targeted in these settlements to be within their existing built up footprint, where availability and capacity exists to deliver housing targets within the lifetime of the development plan.”</i> <p>The following paragraph to the end of Section 3.6:</p>

Sub. No.	Name	Summary of Submission
		<p>The RSES also requires that much closer attention is paid to actual delivery, taking the steps that may be necessary to implement strategic planning aims, housing delivery in the immediate term and above all, avoid the hoarding of land and / or planning permissions. The zoning of lands will, therefore, take account of the likelihood of the lands being developed and their capacity to deliver population growth targets within the lifetime of the development plan."</p> <ul style="list-style-type: none"> ▪ Section 3.9: Policy SO 9 proposes the following wording: <i>"Sequentially develop lands within towns and villages in accordance with the Development Plan Guidelines, DEHLG (2007) including any updated guidelines and deliver at least 30% of all new homes that are targeted in settlements within their existing built up footprint, where availability and capacity exists to deliver housing targets within the lifetime of the development plan. (defined by the CSO)."</i> <p>Chief Executive's Response The contents of the submission are noted. With regard to the concerns expressed as to the designation of Celbridge within the proposed new settlement hierarchy, it is important to clarify that it was not prepared to correspond with the various designations under the Regional Planning Guidelines. The proposed designation of each particular settlement has been determined on the role and function that each settlement plays within their respective area of the county, having regard to factors such as the level of servicing infrastructure and the local employment base, with self-sustaining growth towns and self-sustaining towns being selected on the basis of their meeting the criteria as set out in page 93 of the RSES. The concept of 'Level 2' and 'Level 3' towns are not used in the RSES and are consequently considered to be redundant and therefore cannot and should not be applied to the new settlement hierarchy in the proposed Variation.</p>

Sub. No.	Name	Summary of Submission
		<p>It should be noted, that the County Development Plan is due for review in early 2021. Such a review will require a full re-assessment of all social and physical infrastructure to be undertaken within all settlements in the county. This will present an opportunity for a full reconsideration of the designation for each of the towns along with growth allocations, based on this assessment and an accompanying in-depth economic assessment and up to date census information regarding population growth and housing unit delivery.</p> <p>The request to seek additional wording to allow for additional flexibility on the implementation of targets to deliver 30% of housing development on infill lands to ensure that the zoning process takes account of the likelihood of lands being developed is noted. The provision in the RSES for transitional arrangements regarding the zoning of lands is also noted. It is however considered that due to the site-specific nature of issues such as deliverability of housing, that decisions in this regard are best taken in a targeted manner through the LAP process rather than through any broad-brush policy objective(s) of the County Development Plan. Furthermore, it should be noted that the zoning of all residential lands must now be subject to a site-specific infrastructural assessment which will apply a tiered approach to assess whether they are currently ‘serviced’ or ‘serviceable’ within the lifetime of a plan in accordance with Appendix 3 of the NPF. It is considered that the Infrastructural Assessment will greatly assist the Council in assessing the overall potential for specific lands to be developed within a defined timeframe, such as the lifetime of an LAP.</p> <p>Chief Executive’s Recommendation Amend Section 3.6 of Proposed Variation to include the following text;</p> <p>The RSES also requires that much closer attention is paid to actual delivery, taking the steps that may be necessary to implement strategic planning aims, housing delivery in the immediate term and above all, avoid the hoarding of land and / or planning permissions. The zoning of lands will, therefore, through site specific infrastructural assessments, take account of the likelihood of the lands</p>

Sub. No.	Name	Summary of Submission
		being developed and their capacity to deliver population growth targets within the lifetime of the development plan.
59	Mary Collins	<p>This submission relates to Maynooth and welcomes the integrated and sustainable development of the town as it is considered this has been lacking in Maynooth. The submission suggests that there is a need for focus on investment in transport, amenities and services in order for Maynooth to reach its potential. This submission raises a number of issues as follows:</p> <p>Public Transport The electrification of the railway line needs to be addressed in a timely manner as the current train service is full to capacity at peak times. 6-8-year timeframe is not in line with the current customer demand.</p> <p>Population allocation and services The retention of the current county allocation of 10.9% is welcome, however with less than 3 years (up to 2023), an urgent action plan needs to be agreed in order to improve transport, amenities and services in Maynooth.</p> <p>Maynooth LAP The Maynooth LAP must be completed ASAP. The submission suggests that the residents of Maynooth should not be forced to wait on Meath County Council in order to deliver a coordinated planning framework for the town.</p> <p>Climate Change Adaptation Vs Mitigation While it is acknowledged that there are multiple references to Climate Change Adaptation in the proposed Variation, there is no mention of mitigation. This needs to be addressed, as mitigation is of equal importance to adaptation. It was agreed by KCC to develop a mitigation strategy alongside the</p>

Sub. No.	Name	Summary of Submission
		<p>adaptation strategy. The proposed Variation should be expanded to include climate change mitigation to tie in with objectives relating to quality public transport links and the biodiversity.</p> <p>Water Supply The supply must be upgraded with new pumps as a matter of urgency to provide adequate supply for new population. Guarantees must be put in place to inform service users in cases of contamination. Communication with service users must be embedded into the Irish Water mandate by our Government.</p> <p>Childcare and Schools</p> <ul style="list-style-type: none"> • Maynooth does not have enough creche spaces and recent new residential developments in the town have not provided creches which has resulted in residents having to travel to adjoining towns for childcare. • Maynooth has waiting lists for all playschools and Montessori's in the town until 2020. • There are not enough primary level classrooms for children or after school care options for parents. • The construction of the new Boys National School has been delayed. • Primary schools are full. There is not enough capacity to cater for new residents. <p>Community Centre Maynooth has no community centre. An accessible and intergenerational space is much needed in the town for all the community.</p> <p>Swimming Pool Maynooth does not have a community swimming pool with families travelling to neighbouring towns and counties to avail of swimming lessons and access water-based amenities.</p>

Sub. No.	Name	Summary of Submission
		<p>Health Care The Community Health Care Centre is not fit for purpose with many residents travelling to Kilcock to access services and therefore a primary care facility is urgently needed to cater for the growing population. The submission suggests that a 'K-Doc' or similar service in addition to a 24-hour ambulance service is needed in the town.</p> <p>Garda Station A fulltime Garda Station is required in the town. It is the only University town in the country without a fulltime station. The town has a growing population, a Purple Flag for night-time economy, high crime rates but no fulltime Garda Station and the submission highlights that the community needs the support and security of a fulltime station.</p> <p>Areas of key concern to be addressed if Maynooth is to reach its potential as a Key Town 2016 CSO states population of Maynooth as 14,585 people. The development of Hayfield, Carton Grove, Carton Wood, Mariavilla and Limetree has significantly increased the population since 2016. There are approximately 15,000 staff and students in Maynooth University which translates over 30,000 people travelling to and through Maynooth daily.</p> <ul style="list-style-type: none"> • The submission suggests that there is an overuse of traffic lights in the town with 6 sets of lights from Tesco to Maynooth University, all of which are on the same pedestrian sequence which results in the town stopping every 3 minutes. • Outdoor restaurant seating on Main Street is forcing pedestrian to walk in the cycle lanes which in turn obstructs cyclists and the cycle lanes on the Straffan Road are as wide as the footpath with no signage. A proper cycle network similar to the Phoenix Park needs to be adapted for Maynooth. • The Orbital Road needs to be opened as a matter of urgency however it must be in keeping with the historic character of the town. A better solution for the northern part of this road is

Sub. No.	Name	Summary of Submission
		<p>required instead of putting it on an 'extremely dangerous' country road (as stated by An Bord Pleanála).</p> <ul style="list-style-type: none"> • Maynooth University needs a dedicated slip road off the M4. The campus is growing rapidly, and the college has not worked with the town to alleviate traffic issues associated with this growth. • Reduce the speed limit on the Dunboyne Rd. or install speed ramps. Pedestrians on the way to school are not safe at the 80km speed limit. • The condition and width of footpaths in the town need to be surveyed. There are many that are not wheelchair/pushchair accessible. • A transport hub needs to be provided close to Moyglare Hall as the nearest stop is 20-minute walk. There are 2 new secondary schools being built beside this estate. • The train line in Maynooth in the mornings is at capacity. The frequency and size of trains from 6.20am onwards need to be addressed. • A bike rental scheme similar to Dublin City would be welcomed especially along the Canal Greenway and would increase tourism and connectivity to Dublin City. <p>Chief Executive's Response</p> <p>Following the process to vary the County Development Plan the Council will proceed to prepare a suite of local area plans which will include the Joint Maynooth LAP, prepared in conjunction with Meath County Council in accordance with RPO 4.35 of the RSES.</p> <p>A Social Infrastructure Audit will be carried out as part of the preparation of the Joint LAP for Maynooth which will examine the current availability and capacity of social infrastructure facilities in the area, to determine future requirements and make recommendations on priority areas for future investment to ensure housing is delivered in tandem with the necessary social and physical infrastructure. Similarly, a Strategic Transport Strategy will be undertaken which will inform zoning decisions for the forthcoming LAP in tandem with solutions for improving public transport, cycling and</p>

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		<p>permeability throughout the town. The Council shall have regard to the new Urban Development and Building Height Guidelines (2019) where there is requirement to identify, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategy.</p> <p>It is considered that the most appropriate mechanism for zoning of land is through the LAP process which is informed by a series of evidence-based assessments.</p> <p>The Council is committed to mitigating causes of climate change and will pursue projects that seek to work towards the key objectives of the National Mitigation Plan and actions of the Climate Action Plan, which is an objective contained under the adopted Climate Change Adaptation Strategy 2019-2024. In the preparation of the Draft Maynooth LAP the Council will seek to integrate climate action and mitigation considerations into land use policy.</p> <p>Chief Executive’s Recommendation No change recommended.</p>
60	Cllr. Ciara Galvin	<p>The submission from Cllr Galvin highlights that there are multiple references to Climate Change Adaptation in the proposed Variation, but no references to mitigation and states that mitigation is of at least equal importance to adaptation. The submission suggests that the Proposed Variation should be expanded to include reference to climate change mitigation, as it ties in with other objectives of the plan around quality public transport links and biodiversity goals.</p> <p>The submission notes that Celbridge’s classification changes to “self-sustaining town” which means “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” and suggests that this is not an inaccurate description of Celbridge.</p>

Sub. No.	Name	Summary of Submission
		<p>The submission sets out that Celbridge is the 3rd largest town in Kildare, with high population growth, and is now expected to accommodate 10% more dwellings by 2023 with a population that is twice the size of the other two towns in the same category combined.</p> <p>No reason Celbridge should not be a Key Town or at least a Self-Sustaining Growth Town. Celbridge depends heavily on other areas for employment; lacks levels of public transport services that Maynooth and Leixlip have, even though higher population; poor physical infrastructure and lacks community facilities. The submission suggests that the proposed variation reinforces and perpetuates this inequality by assigning Celbridge the status of “Self-sustaining Town”, and then clustering the town with Maynooth and Leixlip. The submission also highlights concerns over the “economic cluster” of Maynooth, Leixlip, Celbridge and Kilcock and suggests that an “Economic cluster” undermines the likelihood that Celbridge will receive targeted catch-up investment.</p> <p>The submission further notes that no strategic employment locations identified in Celbridge and suggests that the council’s focus will again be on Maynooth and Leixlip, and Celbridge will slip below them for priority of funding. The submission concludes that Celbridge expected to take as many new dwellings as Maynooth and Leixlip despite inadequate infrastructure and states that Celbridge is underserved, undervalued, and under-invested in.</p> <p>Chief Executive’s Response</p> <p>The Proposed Variation highlights that the Climate Change Adaptation Strategy (2019-2024) will inform policy making at a county and local level into the future. The Council is committed to mitigating causes of climate change and will pursue projects that seek to work towards the key objectives of the National Mitigation Plan and actions of the Climate Action Plan, as per the adopted Climate Change Adaptation Strategy 2019-2024. Similarly, as per Goal 3, Action 5 of the Strategy states that, in the review of the CDP, research and incorporate (after consultation with organisations who provide best practice),</p>

Sub. No.	Name	Summary of Submission
		<p>mitigation measures in accordance with Section 10 (n) of the Planning and Development Act, 2000 (as amended).</p> <p>Regarding the comments on potential investment, funding constraints and housing for Celbridge, please see the Chief Executive's Response for Submission Nos. 29 and 42 (above).</p> <p>Chief Executive's Recommendation No change recommended.</p>
61	Maynooth Planning Alliance	<p>This submission relates to Maynooth and welcomes the integrated and sustainable development of the town as it is considered this has been lacking in Maynooth. The submission suggests that there is a need for focus on investment in transport, amenities and services in order for Maynooth to reach its potential. This submission raises a number of issues as follows:</p> <p>Public Transport The electrification of the railway line needs to be addressed in a timely manner as the current train service is full to capacity at peak times. 6-8-year timeframe is not in line with the current customer demand.</p> <p>Population allocation and services The retention of the current county allocation of 10.9% is welcome, however with less than 3 years (up to 2023), an urgent action plan needs to be agreed in order to improve transport, amenities and services in Maynooth.</p> <p>Maynooth LAP</p>

Sub. No.	Name	Summary of Submission
		<p>The Maynooth LAP must be completed ASAP. The submission suggests that the residents of Maynooth should not be forced to wait on Meath County Council in order to deliver a coordinated planning framework for the town.</p> <p>Climate Change Adaptation Vs Mitigation While it is acknowledged that there are multiple references to Climate Change Adaptation in the proposed Variation, there is no mention of mitigation. This needs to be addressed, as mitigation is of equal importance to adaptation. It was agreed by KCC to develop a mitigation strategy alongside the adaptation strategy. The proposed Variation should be expanded to include climate change mitigation to tie in with objectives relating to quality public transport links and the biodiversity.</p> <p>Water Supply The supply must be upgraded with new pumps as a matter of urgency to provide adequate supply for new population. Guarantees must be put in place to inform service users in cases of contamination. Communication with service users must be embedded into the Irish Water mandate by our Government.</p> <p>Childcare and Schools</p> <ul style="list-style-type: none"> • Maynooth does not have enough creche spaces and recent new residential developments in the town have not provided creches which has resulted in residents having to travel to adjoining towns for childcare. • Maynooth has waiting lists for all playschools and Montessori's in the town until 2020. • There are not enough primary level classrooms for children or after school care options for parents. • The construction of the new Boys National School has been delayed. • Primary schools are full. There is not enough capacity to cater for new residents.

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		<p>Community Centre Maynooth has no community centre. An accessible and intergenerational space is much needed in the town for all the community.</p> <p>Swimming Pool Maynooth does not have a community swimming pool with families travelling to neighbouring towns and counties to avail of swimming lessons and access water-based amenities.</p> <p>Health Care The Community Health Care Centre is not fit for purpose with many residents travelling to Kilcock to access services and therefore a primary care facility is urgently needed to cater for the growing population. The submission suggests that a 'K-Doc' or similar service in addition to a 24-hour ambulance service is needed in the town.</p> <p>Garda Station A fulltime Garda Station is required in the town. It is the only University town in the country without a fulltime station. The town has a growing population, a Purple Flag for night-time economy, high crime rates but no fulltime Garda Station and the submission highlights that the community needs the support and security of a fulltime station.</p> <p>Areas of key concern to be addressed if Maynooth is to reach its potential as a Key Town 2016 CSO states population of Maynooth as 14,585 people. The development of Hayfield, Carton Grove, Carton Wood, Mariavilla and Limetree has significantly increased the population since 2016. There are approximately 15,000 staff and students in Maynooth University which translates over 30,000 people travelling to and through Maynooth daily.</p>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> • The submission suggests that there is an overuse of traffic lights in the town with 6 sets of lights from Tesco to Maynooth University, all of which are on the same pedestrian sequence which results in the town stopping every 3 minutes. • Outdoor restaurant seating on Main Street is forcing pedestrian to walk in the cycle lanes which in turn obstructs cyclists and the cycle lanes on the Straffan Road are as wide as the footpath with no signage. A proper cycle network similar to the Phoenix Park needs to be adapted for Maynooth. • The Orbital Road needs to be opened as a matter of urgency however it must be in keeping with the historic character of the town. A better solution for the northern part of this road is required instead of putting it on an 'extremely dangerous' country road (as stated by An Bord Pleanála). • Maynooth University needs a dedicated slip road off the M4. The campus is growing rapidly, and the college has not worked with the town to alleviate traffic issues associated with this growth. • Reduce the speed limit on the Dunboyne Rd. or install speed ramps. Pedestrians on the way to school are not safe at the 80km speed limit. • The condition and width of footpaths in the town need to be surveyed. There are many that are not wheelchair/pushchair accessible. • A transport hub needs to be provided close to Moyglare Hall as the nearest stop is 20-minute walk. There are 2 new secondary schools being built beside this estate. • The train line in Maynooth in the mornings is at capacity. The frequency and size of trains from 6.20am onwards need to be addressed. • A bike rental scheme similar to Dublin City would be welcomed especially along the Canal Greenway and would increase tourism and connectivity to Dublin City. <p>Chief Executive's Response</p>

Sub. No.	Name	Summary of Submission
		<p>Please see Chief Executive’s response under Submission 59.</p> <p>Chief Executive’s Recommendation No change recommended.</p>
62	Coillte	<p>Coillte welcomes the opportunity to make a submission in response to the Variation of the CDP and the submission gives a comprehensive overview of Coillte’s businesses and activities in the forestry and renewables sectors.</p> <p>The submission suggests that the Council need a plan-led ‘Renewable Energy Strategies’ (RES) involving planners working in all tiers of government and the planning profession. The submission EMRA Regional Spatial and Economic Strategy (RSES) recognises the urgent need to decarbonise the energy sector. Identification of ‘Strategic Energy Zones as areas suitable for larger energy generating projects’; need a plan-led approach, a holistic Renewable Energy Strategy for the entire EMRA Region. The submission suggests that each local authority in the Region should incorporate a RES into the making/updating of its individual County Development Plan and engages closely with neighbouring local authorities and with other local authorities in the EMRA. Guiding principles should be agreed and used by all local authorities in developing local authority RES.</p> <p>The submission also suggests that local authorities should consider/reconsider their Landscape Character Areas and identify landscape sensitivities with regard to renewable energy developments and notes that turbine technologies have advanced significantly in the past decade.</p> <p>Coillte suggests that SEAI Wind Atlas, or similar general wind resource data, is not used as a hard constraint when identifying suitable areas for on-shore wind and recommend that existing grid constraints are not considered hard constraints when preparing RES; the development of the Grid will react to (planning) consented developments where necessary. Furthermore, the submission from</p>

Sub. No.	Name	Summary of Submission
		<p>Coillte wholly supports the delivery and upgrading of grid infrastructure to facilitate Renewable Energy potential and suggests that a Wind Energy Strategy should be incorporated into the current CDP review process.</p> <p>The submission states that the zoning of appropriate lands for the purposes of commercial, industrial, residential, tourism and recreational uses is essential to ensure the availability of appropriate land - banks into the future and the submission notes that Coillte has strategically located lands near urban centres which could deliver the objectives of sustainable growth and economic development and would like to work in partnership with KCC to identify and develop suitable lands that address local needs and to ensure the necessary infrastructure, services and supports are in place.</p> <p>Chief Executive's Response</p> <p>It should be noted that the purpose of the Variation is to respond to recent changes in national and regional policy specifically the publication of National Planning Framework (NPF) and the Eastern and Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES).</p> <p>Objective EO 27 of the Kildare County Development Plan 2017-2023 states that it is an objective of the Council to work with Sustainable Energy Authority of Ireland (SEAI) to develop a Local Authority Renewable Energy Strategy (LARES) incorporating EU guidelines and training. Work has not commenced given the delay in the completion of the Wind Energy Guidelines. However, the Draft Revised Wind Energy Development Guidelines were placed on public display in 2019. Once the Guidelines are finalised the Council will be in a better position to prepare a Renewable Energy Strategy as part of the full review of Kildare County Development Plan 2017-2023, which is due to commence in early 2021. Similarly, the review of the Landscape Character Assessment and the potential of identifying Strategic Energy Zones will be considered during the CDP review.</p>

Sub. No.	Name	Summary of Submission
		<p>Please also note the response to Submission No. 60 regarding the Climate Change Adaptation Strategy (2019-2024). As per Objective CS 16 of the Proposed Variation climate action considerations as detailed in the Council's Adaptation Strategy will be integrated into land use planning.</p> <p>Chief Executive's Recommendation No change recommended.</p>
63	Anne Birchall	<p>The proposed Variation suggests that Maynooth Town is ideally suited for providing houses, however financial investment and new community infrastructure should be provided to match this potential growth as follows:</p> <p>Water Supply The water supply to the town must be upgraded as a matter of urgency with new pumps etc to provide adequate supply for new population growth and guarantees should be put in place to inform service users immediately re contamination</p> <ul style="list-style-type: none"> • Communication with service users must be embedded and elevated into Irish water mandate by our Government. <p>Sustainable Housing The issues of affordability, social housing and rent caps to sustainable housing need to be addressed.</p> <p>Garda Station and Health Care The submission states that a 24 hr. Garda Station and ambulance cover 24/7 is needed.</p> <p>Childcare The submission requires enforcement of planning laws re the provision of creche facilities.</p>

Sub. No.	Name	Summary of Submission
		<p>Existing housing stock and residential estates Constant upgrading and investment is required in existing housing estates. Many older estates are neglected e.g. Carton Avenue and Old Greenfield</p> <p>Town Status We need our own self-regulation town council with direct rule similar to Westport.</p> <p>Maynooth University The submission suggests that communication between the town and University body must be put on a mandatory footing ASAP and the submission further states that the University must contribute financially to voluntary groups in town i.e. Maynooth Tidy Towns and motorised access to the University from Bond Bridge must be considered immediately.</p> <p>Transportation The submission states that a complete Orbital Ring Road for Maynooth Town is needed ASAP and the town can no longer allow additional development without the relief roads, road safety and any infrastructural issues must be installed/addressed prior to developments commencing</p> <p>Character of the town The submission states that protection and enhancement of historical features within the town boundary must be priority.</p> <p>Chief Executive's Response The issues raised in the submission are noted, however it is outside the remit of the Variation to the County Development Plan as a land use plan to address a number of the issues raised regarding</p>

Sub. No.	Name	Summary of Submission
		<p>presence of Gardai in the town, issues relating to the provision of Ambulance services in the town and communications to and from Maynooth University.</p> <p>Following the process to vary the County Development Plan the Council will proceed to prepare a suite of local area plans which will include the Joint Maynooth LAP, prepared in conjunction with Meath County Council in accordance with RPO 4.35 of the RSES.</p> <p>A Social Infrastructure Audit will be carried out as part of the preparation of the Joint LAP for Maynooth which will examine the current availability and capacity of social infrastructure facilities in the area, to determine future requirements and make recommendations on priority areas for future investment to ensure housing is delivered in tandem with the necessary social and physical infrastructure. Similarly, a Strategic Transport Strategy will be undertaken which will inform zoning decisions for the forthcoming LAP in tandem with solutions for improving public transport, cycling and permeability throughout the town. The Council will have regard to the new Urban Development and Building Height Guidelines (2019) where there is requirement to identify, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategy.</p> <p>It is considered that the most appropriate mechanism for zoning of land is through the LAP process which is informed by a series of evidence-based assessments.</p> <p>Chief Executive's Recommendation No change recommended.</p>
64	Raymond King	<p>The submission raises concern regarding the level of refusals for one off housing applications in Ardclough and states that it was hoped the Variation would provide more flexibility for people who wish to build their own home in the Ardclough area. The submission suggests that is considered the</p>

Sub. No.	Name	Summary of Submission
		<p>principle of people building their own home in the community where they grew up should be central to good planning for areas such as Ardclough and only piece of land marked for development is owned by one developer thus restricting availability of sites.</p> <p>The submission states that there are hardworking young people trying to make a start in life , willing to take on the challenge and the cost of providing their own home, where both the Council and the State have failed to meet their constitutional obligations to provide homes for the citizens of the State; The submission contends that rural communities need the addition of a new generation to maintain a social balance and suggests that large scale and cluster development should not be the only option available to rural communities.</p> <p>Chief Executive’s Response</p> <p>The demand for housing in the area particularly for one off housing is noted, and the NPF and the Proposed Variation acknowledges that there is continued pressure for development of single homes in rural areas across County Kildare and nationally. The National Planning Framework acknowledges that this is a national issue and further acknowledges that in rural Ireland, many people seek the opportunity to build their own homes but find it difficult to do so in smaller settlements because of a lack of available sites and services. The NPF also states that in order to assist this, local authorities will be supported in undertaking, the necessary land acquisition, site preparation and local infrastructure provision to deliver self-build development options in smaller towns/villages.</p> <p>National Policy Objective (NPO) 18b of the NPF specifically makes provision to develop a programme for ‘new homes in small towns and villages’ with local authorities, public infrastructure agencies such as Irish Water and local communities to provide serviced sites with appropriate infrastructure to attract people to build their own homes and live in small towns and villages.</p> <p>It is envisaged that the provision of serviced sites to create ‘build your own home’ opportunities within the existing footprint of rural settlements will provide an alternative to one-off housing in the countryside.</p>

Sub. No.	Name	Summary of Submission
		<p>This is provided for under CS 4(a) of the Proposed Variation which states that it is the policy of the Council to “develop in accordance with the National Planning Framework (NPO 18b) a programme for new homes in small towns and villages in association with public infrastructure agencies, local communities, housing bodies and landowners to identify lands for the provision of low density serviced sites with appropriate infrastructure throughout settlements identified as Rural Towns, Villages and Rural Settlements (as identified in Table 3.3)”.</p> <p>Chief Executive’s Recommendation No change recommended.</p>
65	Billy Mulhern	<p>The submission relates to lands adjacent to the proposed circular relief road on the Western side Kilcock to Crew Hill, which is contiguous to lands zoned ‘P’ (Research and Technology) in the Maynooth LAP. The submission acknowledges that the development strategy for Maynooth is to provide for an enlarged town and increase the residential population, commercial and amenity facilities for the town. The submission notes that the expansion of Maynooth University lands would increase the availability of housing and enhance university requirements considering the current demand. The submission notes that the subject lands are 500m from the proposed western relief road and are in the same radius of periphery to the centre of the town Maynooth lands as Moygaddy in County Meath which is included as part of the Maynooth Development Plan. The submission concludes by suggesting that the lands would support and enhance availability on the demands to support development, university accommodation and an expanding commuter townland.</p>

Sub. No.	Name	Summary of Submission
		<div data-bbox="1108 279 1518 861" data-label="Image"> </div> <p data-bbox="593 901 1019 933">Chief Executive's Response</p> <p data-bbox="593 941 2027 1228">Following the process to vary the County Development Plan the Council will proceed to prepare a suite of local area plans which will include the Joint Maynooth LAP, prepared in conjunction with Meath County Council in accordance with RPO 4.35 of the RSES. This is required to provide a coordinated planning framework for the town which identifies strategic housing and employment development and infrastructural investment requirements and to ensure compliance with the National Policy Objectives of the NPF and the Regional Policy Objectives of the RSES. It is considered that the most appropriate mechanism for zoning of land is through the LAP process which is informed by a series of evidence-based assessments.</p>

Sub. No.	Name	Summary of Submission
		<p>Chief Executive's Recommendation No change recommended.</p>
66	<p>Senator Anthony Lawlor & Cllr. Fintan Brett</p>	<p>The submission (joint) from Senator Lawlor and Cllr Brett highlights disappointment with the headline figure for Naas and county being so low. The submission notes that the dwellings total for the entire county to 2023 is less than the number of families on the housing list and states that the figure of 898 for Naas does not reflect the needs of the town and will result in rising prices and such a curtailment will limit the capacity for the county to increase employment due to a lack of homes for rental or purchase.</p> <p>Chief Executive's Response The NPF Implementation Roadmap and the RSES have reduced the population projections for the county and therefore this results in the reduction in housing units required across the county. Naas still retains the highest percentage allocation across the county of 14.9% recognising the designation as a Key Town.</p> <p>The role of Naas as a Key Town and the County Town results in people commuting from elsewhere in Kildare for work in Naas. According to Census 2016 of those residing in Naas a total of 29% are employed in Naas therefore there is a significant existing population within the town leaving the town to work. Therefore, it is considered that the reduction in housing targets will not limit the capacity to increase employment, having regard to the outflow of residents and the wide catchment given its county status.</p> <p>Note also response to Submission from the OPR which clarifies the methodology and housing target figures.</p> <p>Chief Executive's Recommendation No change recommended.</p>

Sub. No.	Name	Summary of Submission
67	Devondale Ltd	<p>The submission prepared by Brock McClure Consultants on behalf of Devondale Ltd notes that the variation has been prepared in response to recent changes in national and regional policy. The submission is focused on population projections, housing demand targets and Celbridge and it is contended that the population projections and housing need targets set out in the NPF are outdated and not reflective of demographic trends in Co. Kildare and the wider region. The projections are influenced by policy driven spatial allocation and assumptions, that may not be representative of the reality of growth, particularly its distribution and volume which are more dynamic and reflective of economic and societal factors than planning policy objectives.</p> <p>It is submitted that population growth in Kildare will be higher than anticipated in the NPF which is too conservative and not an accurate reflection of demographic trends. This results in an underestimate of the projected housing demand targets which will cause a shortfall of supply in the long term. The submission states that the proposed variation will frustrate the delivery of affordable homes in Kildare and the provision of housing needs to be significantly increased to keep pace with demographics. The submission suggests that that housing demand targets are reviewed in conjunction with the population projections for the purpose of the proposed variation and it is submitted that the population growth and dwelling target figures for Celbridge as illustrated in Table 3.3, require revision as they are calculated based on NPF figures which are not reflective of demographic trends and do not fully account for the growth potential of the town. Key points noted were that Celbridge is in the metropolitan area (MASP) and has no infrastructural constraint issues, while also being capable of accommodating increased infill development (in line with NPF) and capacity to absorb additional population and future growth.</p> <p>Chief Executive's Response</p> <p>The population projections are outlined in the NPF Roadmap (July 2018) and confirmed in Appendix B of the RSES. It should be noted that under the provisions of Section 11 of the Planning and Development Act 2000 (as amended) Kildare County Council is statutorily obliged to prepare a variation</p>

Sub. No.	Name	Summary of Submission
		<p>or review of its CDP within 26 weeks of the RSES being adopted, to incorporate the population projections as provided. Kildare County Council is not in a position to contravene the transitional population projections set out in the RSES. Further clarification on the methodology applied is discussed in the response to the Office of the Planning Regulator under Submission No. 41.</p> <p>Chief Executive's Recommendation No change recommended.</p>
68	Makros Ltd.	<p>The submission was prepared by Brock McClure, Planning & Development Consultants on behalf of their client Makros Ltd.</p> <p>The submission states that the population projections and housing target needs in the NPF and referred to in the Variation are outdated and not reflective of demographic trends in Kildare and the wider region.</p> <p>The submission refers to the Future Analytics Consulting (FAC) 'Kildare and EMRA Housing Needs Assessment' report (November 2019) states Kildare has been the fastest growing county for the past 50 years and is set to grow significantly; therefore, housing needs to be increased to keep pace with demographics and states that the FAC report projects 18,025 units required by 2026 and 28,146 units by 2031. The submission suggests that the permitted units in Kildare, as of October 2019, are not sufficient for the identified level of housing demand and planning consents would need to double to meet demand expected by 2026 and suggests that the NPF and RSES population figures are too conservative and would result in underestimate of projected housing demands and further suggests that housing demand targets, including affordability issues should be reviewed in conjunction with population targets.</p>

Sub. No.	Name	Summary of Submission
		<p>As per the RSES, development was to be in locations where infrastructure was already available such as Kildare town and the submission states that failure to build on the €17.5m investment in Kildare Town Wastewater Treatment Plan is a failure to secure a short-term return on investment which should have been further developed through the provision of funding for further infrastructure and specifically at South Green. The submission sets out that Kildare town is perfectly placed to provide additional affordable, sustainable development at an appropriate location and the proposed revisions to Core Strategy fails to take account of this and support development in other areas of the county where infrastructure requires significant investment to render land 'shovel ready'.</p> <p>Chief Executive's Response</p> <p>The population projections are outlined in the in NPF Roadmap (July 2018) and confirmed in Appendix B of the RSES. It should be noted that under the provisions Section 11 of the Planning and Development Act 2000 (as amended) Kildare County Council is statutorily obliged to prepare a variation or review of its CDP within 26 weeks of the RSES being adopted, to incorporate the population projections as provided. It is further noted that the variation proposes to take the higher range population projection for the county in the period to 2026 and also includes a further 25% headroom which counties like Kildare, with a projected growth rate of more than the national average in the period to 2026, are allowed to take if they so choose.</p> <p>A draft LAP for Kildare Town is envisaged to be published by the Planning Authority this year and will include a comprehensive infrastructural assessment which will examine a range of sites (whether currently zoned or not) to investigate their suitability with regard to the presence of existing servicing infrastructure or the deliverability of critical infrastructure within the lifetime of a new LAP. All potential new residential lands will be also assessed to see if they comply with principles such as compact growth and sequential development as outlined in the NPF and RSES. Furthermore, on the issue of the Variation supporting areas of the county where infrastructure requires significant investment to render land 'shovel ready' and failing to recognise areas with such infrastructure already in place, the</p>

Sub. No.	Name	Summary of Submission
		<p>CDP is due for review early 2021. Such a review will require a full assessment of all supporting social and physical infrastructure to be undertaken. This will include all settlements in the county from Key Towns to settlement nodes and will present an opportunity for a full reconsideration of the housing and population allocations for each of the towns, based on this assessment and an accompanying economic assessment.</p> <p>Chief Executive's Recommendation No change recommended.</p>
69	Tom Treacy	<p>The submission was prepared by Clarke, Engineers Architects on behalf of their client Tom Treacy and states that the removal of Newbridge from the top tier of towns in the county is of major concern, as this client has invested heavily in the commercial sector. The submission notes that the town of Newbridge was previously identified as a strategic Growth Centre and a revised designation will result in a “less glamorous” town for investors.</p> <p>Chief Executive's Response The Regional Spatial and Economic Strategy designated both Naas and Maynooth as Key Towns. The remaining towns within the county were to be designated at Development Plan level. Given that the Key Towns have been designated by the RSES, the Variation proposes to give Newbridge the highest possible CDP designation that is permissible within the new hierarchy that of a ‘Self-Sustaining Growth Town and will be supported in achieving housing and infrastructure delivery targets through the CDP and LAP.</p> <p>Chief Executive's Recommendation No change recommended.</p>
70	Dennison Trailers	<p>The submission was prepared by Clarke, Engineers Architects on behalf of their client Dennison Trailers relating to lands at Ladytown, Naas. The submission notes the landowner's appreciation for</p>

Sub. No.	Name	Summary of Submission
		<p>the opportunity to make a submission on the proposed Variation and states that Dennison Trailers are the owner of development land located to the west of Naas town centre and to the south of the M7.</p> <div data-bbox="1064 391 1563 842" data-label="Image"> </div> <p>The submission notes that the subject lands are ca 4.6ha and were zoned Industry and Warehousing in the environs plan for Naas in the Kildare County Development Plan 2011-2017.</p> <p>The submission notes that Proposed Amendment No. 16 refers to the subject lands in Table 5.2 Economic Development Hierarchy, Key Towns, Naas and the importance of developing this high-profile land in Naas and suggests that the development of these lands is consistent with the NPF and RSES which place emphasis on use of brownfield lands within existing settlements. The submission further suggests that the subject site has potential to significantly reduce commuting to Dublin by providing jobs for residents living in Naas and request that the Council strengthen its policy to regenerate these lands which can provide valuable employment and would result in strategic growth of Naas.</p>

Sub. No.	Name	Summary of Submission
		<p>Chief Executive's Response Regarding the proposals in this submission it should be noted that the Proposed Variation No.1 of the Kildare County Development Plan is a statutory variation to align the CDP with the National Planning Framework and the Regional Spatial and Economic Strategy. The primary focus of the variation is to translate the transitional population targets sets out in the NPF Roadmap and RSES and the revised settlement designations into the Settlement Hierarchy for County Kildare.</p> <p>Whilst the contents of the submission from Dennison Trailers are noted and the proposals for the subject lands are acknowledged, it is considered that the Local Area Plan process is the most appropriate channel for addressing specific sites within towns. It should be noted that a Draft Local Area Plan for Naas is currently being prepared which will informed by a Transport Strategy and will be published later this year.</p> <p>Chief Executive's Recommendation No change recommended.</p>
71	Dominic Fagan	<p>The submission was prepared by Clarke, Engineers Architects on behalf of their client Dominic Fagan relating to lands at Maudlins, Dublin Road and the submission notes that the subject lands extend to 6.3 ha. The submission contends that the lands are strategically located with direct access to the M7 and are a prominent brownfield site. The submission suggests that that the enterprise and employment zoning allocated to this site has failed to accommodate new development and it is proposed that a more imaginative scope of zoning possibilities needs to be applied to the subject site which allows a mix of uses that support and complement the established functions of the town and deliver new employment. The submission suggests that consideration should be given to a new broader zoning such as industrial / warehousing which would successfully integrate into the area; The submission sets out concerns that restrictions within the proposed Naas LAP will prevent development, citing the previous plan (2011-2017) as having more flexibility which allowed uses such as petrol station, shop (convenience), hot-food takeaway and warehouse (wholesale). It is suggested</p>

Sub. No.	Name	Summary of Submission
		<p>that other permitted uses should allow for a hotel and conference facility, office including warehouse and high-end motor sales. The submission notes City West as a successful example which shares characteristics with the subject site in terms of its setting which faces on to the M7 and acts as a gateway. It is suggested a similar approach is used for this area in terms of the zoning and permitted uses allocated by South Dublin. A variety of uses are listed that are believed will promote developments of exceptional quality.</p> <p>The submission also includes photographs of some industrial buildings advocating their suitability for gateway entrances to towns and reference is made to Amendment No. 16 which places a significant emphasis on the use of brownfield lands within existing settlements. It is suggested these lands are consistent with NPF and RSES in this regard and have the potential to significantly reduce commuting to Dublin by providing jobs for residents in Naas. The submission requests that the Council strengthen its policy for the need to regenerate this land which will create valuable employment and result in the strategic growth of Naas.</p> <div data-bbox="960 799 1666 1246" data-label="Image"> </div>

Map showing site (outlined in red) North East of Naas

Sub. No.	Name	Summary of Submission
		<p>Chief Executive's Response The Variation particularly references the re-intensification of industrial lands in the northeast of Naas, to which the subject lands relate, and the Variation incorporated the relevant text in line with the RSES. Whilst the contents of the submission are noted and the importance of the subject lands are acknowledged, it is considered that the Local Area Plan process is most appropriate channel for addressing specific sites within towns. It should be noted that a Draft Local Area Plan for Naas is currently being prepared which will be informed by a Transport Strategy and will be published later this year which will address in detail strategic sites across the town of Naas.</p> <p>Chief Executive's Recommendation No change recommended.</p>
72	Steven Fadian	<p>The submission contends that the purpose of the NPF to accommodate growth by facilitating a shift towards Ireland's regions and cities other than Dublin cannot be delivered as Dublin and its surrounding areas continue to increase rapidly.</p> <p>The submission states that as the population of Naas increases the number commuting to Dublin will rise, and therefore it is questioned whether Naas can "<i>successfully accommodate growth and change</i>"? as the road and rail network in the area become more congested. Reference is made to both networks being at/near/over capacity at peak times and to Section 2.1, page where it is stated a Core Strategy should demonstrate how future development supports public transport and services. On this basis it is expected there will be significant initiatives in the area of public transport in the long-awaited Naas Local Area Plan. In terms of physical infrastructure, it is contended that an Outer Ring Road is required in Naas due to continued increase in the volume of traffic month by month. The submission also raises concern regarding ensuring 30% of all new homes are located within existing built up areas, focus should be on alleviation of current issues rather than adding more housing.</p>

Sub. No.	Name	Summary of Submission
		<p>The submission notes that Naas needs high speed and frequent public transport services to Dublin City Centre and further reference is made to a lack of direct services to and from the train station in Sallins each day. The submission highlights relief that proposals for a road through Naas Racecourse were rejected as it was contrary to preserving the quality of the landscape, racecourse is a 'green lung' and should be protected in future from development.</p> <p>The submission suggests that Naas does not have capacity to fulfil its role as a Key Town and questions the reasoning as it was chosen as one due to its lack of infrastructure. The submission adds that there are issues regarding quality of life due to commuting and questions if education and health facilities can cater for the growing population. The submission further suggests that Naas does not provide employment for most of its residents and does not have the level of employment / jobs to prevent the thousands of commuters travelling to work in the Greater Dublin Area each day. Further states that Naas is a commuting town and questions whether it has capacity to provide the jobs necessary to make it self-sustainable and raises concern regarding 25% headroom being allowed for projected population growth. It is stated there should be no further projected increase to the population of Naas until the required infrastructure such as the Outer Ring Road and services are in place.</p> <p>Chief Executive's Response Naas, as Kildare's County Town has been designated in the RSES as a Key Town and the Council must adhere to this designation, in tandem with the parameters and characteristics set out in the RSES for the various settlement typologies. Similarly, National Policy Objective 3c requires 30% of all new homes to be delivered within the CSO defined boundary. It is a requirement of the Council to incorporate these changes into the Kildare County Development and therefore they formed part of the Variation.</p>

Sub. No.	Name	Summary of Submission
		<p>The forthcoming Naas LAP will be informed by a Transport Strategy. Whilst issue of the capacity of the public transport systems is outside the remit of a land use plan the Transport Strategy will inform the development strategy for the Naas.</p> <p>The Naas Town Development Plan 2011-2017 contained an objective (RPO 7) to prepare a constraints study to examine the possibility of providing a Southern Outer Orbital Route linking the east of Naas to the west of Naas. The Transport Strategy informing the forthcoming Naas LAP will also provide for road improvement projects that can be undertaken to alleviate traffic congestion during the plan period and beyond.</p> <p>Census 2016 noted that only 29% of residents at work in the settlement of Naas are employed in the town. However, there is a net daily gain in working population of +1,193 to the town. Naas under Census 2016 had 10,999 jobs and a population at work of 9,806. Therefore, Naas has a positive job ratio. With the provision of suitably zoned land and the introduction of initiatives such as the MERITS, tech-hub, it is hoped that residents within Naas will have a broader range of employment options available as an alternative to commuting.</p> <p>The population projections for the county have been reduced through the NPF Roadmap and the RSES. Headroom at 25% applied at local authority level is deemed necessary for the purpose of transitioning back the revised targets given the growth in Kildare has been above the national average. It is now proposed under the Variation, for Naas to have a dwelling target of 898 units to 2023, which includes the 25% headroom figure. The dwelling forecast of 12,568 to 2023 related to the Core Strategy as adopted in 2017. In the interests of clarity this column will be removed from Table 3.3 as per the response to Submission 41. The Department of Education and Skills will be consulted during the preparation of the Naas LAP on the revised population projections for the town in order to ensure the necessary provision of both primary and post-primary school places are available for the residents of Naas.</p>

Sub. No.	Name	Summary of Submission
		<p>Chief Executive's Recommendation No change recommended.</p>
73	Suzanne Doyle	<p>The submission from Cllr Doyle highlights the premise of focusing growth in a small number of key strategic towns that will have capacity to be successful balancing infrastructure, housing and jobs is supported and is viewed to be critical for Kildare given its dependence on commuting and the impact it can have for both quality of life and the economic vitality of an area. The submission also highlights concerns that like many previous plans the NDP is ignoring reality and presenting an academic proposal that will inhibit the success of overall objectives. The submission notes that Newbridge is the largest town in the county and has a rail network superior to the Key Towns and therefore suggests that, Newbridge along with Naas should be given a status similar to Dundalk and Drogheda (Regional Growth Centres).</p> <p>The submission also suggests that it is important to create regional economic drivers beyond 'the PALE' and identifies concerns that Objective SO3 will inhibit important strategic development of other towns that may have capacity to grow employment.</p> <p>The submission also notes particular concerns in the context of the need for a second bridge in Newbridge and suggests that Objective SO6 will inhibit the development of lands between Newbridge and Naas which is developing as a significant successful employment hub, the submission states that such an objective will undermine its further development and may give rise to vexatious objectors. The submission suggests that a matrix be developed to outline the minimum standard / level of infrastructure required for each population level. The matrix should include education, medical, recreation and amenity, broadband, water, wastewater, employment etc.</p> <p>The submission welcomes proposals to encourage and support serviced sites within the Plan, however suggests that it is necessary to fully review rural housing policy to align to the service site</p>

Sub. No.	Name	Summary of Submission
		<p>proposal and further suggests a quota system be implemented, to deliver a consistent approach and a more efficient mechanism for processing applications. The submission requests that RH9 & RH10 are removed until change can be implemented as they are unduly prohibitive.</p> <p>The submission states that the increasing level of applications through the SHD process throughout the county is a worry as it appears to have little regard to the proper planning and sustainable development of settlements and it is requested that the variation includes policies that guide this process in a more sustainable fashion.</p> <p>The submission suggests that policies should be included around the delivery of mixed development, particularly ones that promote and support developments that prioritise quality of life and it is recommended that height restrictions should be breached in order to create economies of scale to deliver spacious, quality living units with high levels of amenity and supports. The submission requests that an urgent objective to develop policies around this objective need be included in the variation, while appreciating timelines do not facilitate same.</p> <p>The submission also suggests the inclusion of a reasonable proportion of serviced sites in all settlements in the interest of delivering mixed development and discouraging dispersed development and requests an amendment to the zoning matrix to facilitate specific sites in LAP's that incorporate key zonings within town centres to protect land use for important infrastructure supports i.e. creche, nursing home etc. Such facilities as low margin business, tend to be located in sub optimal locations but would function better and improve quality of life if more appropriately located.</p> <p>Chief Executive's Response The designation of Naas and Maynooth as Key Towns formed part of the preparation of the RSES. It is outside the remit of the County Development Plan to elevate or alter the status of towns which have been designated in the RSES. However, the importance of Newbridge as a major town centre on the</p>

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		<p>same footing as Naas and Maynooth for retail is noted in the RSES which has been incorporated into the Variation at Proposed Amendment No. 17, County Retail Hierarchy.</p> <p>The concern raised over Objective SO 3 and Objective SO 6 is noted. However, it should be noted that there are no proposals to amend these objectives to align the CDP with the NPF and the RSES and therefore such a request cannot be accommodated at this stage in the variation process. It should be noted that these objectives formed part of the plan that was adopted by the members of Kildare County Council in 2017, however, same will be reviewed in the context of the full review of the CDP which will begin in early 2021. In this regard however, it is not considered that either objective inhibit important strategic development of other towns that may have capacity to grow employment and will not specifically inhibit the development of lands between Newbridge and Naas which is developing is acknowledged as a large employment hub in this area of the County. Given that the Key Towns have been designated by the RSES, the Variation proposes to give Newbridge the highest possible CDP designation that is permissible within the new hierarchy that of a 'Self-Sustaining Growth Town'."</p> <p>The submission refers to the levels of infrastructure required for population growth. It should be noted that a Social Infrastructure Audit will be carried out at local area plan level to inform the required social infrastructure for the projected population of each settlement. This will be carried to inform a Sustainable Planning and Infrastructure Assessment (to be published with each LAP) which will examine, water, wastewater and transport needs across the settlements to ensure land zoned is either serviced or serviceable through the life of the Plan for the projected population.</p> <p>It is not proposed to vary the Rural housing policy as part of the Variation as it considered to align with national and regional policy in its current form. Given that Kildare accommodated the construction of 8,959 rural one-off dwellings between 1998-2015, (an average of 530 dwellings per annum) it is considered many parts of the county have reached the point of saturation. In these circumstances,</p>

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		<p>many rural areas do not have capacity to absorb further development of one-off housing. Amending and removal of the policies suggested would lead to further saturation and unsustainable development which is not supported by the NPF or RSES.</p> <p>The proposed amendments to the Variation and the subsequent suite of local area plans which will be placed on public display, at staged intervals, following the adoption of the Variation, will guide the decisions made by An Bord Pleanála regarding Strategic Housing Development applications.</p> <p>Mixed use development, including the provision of live-work units as part of mixed-use developments in order to improve quality of life by reducing long distance commuter trends and congestion already exist within the current CDP.</p> <p>The Building Heights and Urban Development Guidelines (2019) contain specific policy requirements that local authorities must adhere to in relation to land use plans and planning application determinations. These Guidelines will be adhered to in the carrying out of the Planning Authorities functions.</p> <p>As detailed in Section 2.5.1 of the Variation serviced sites to create 'build your own home' opportunities within the existing footprint of rural settlements will provide an alternative to one-off housing in the countryside. This is in accordance with the RSES and the NPF. The County Development Plan is due for a full review in early 2021 which will incorporate further analysis of zoned land in rural settlements across the county, with focus on implementing this policy. The provision of serviced site on land within towns across the county would be contrary to national and regional policy to ensure compact growth is achieved.</p>

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		<p>The town centre zoning within local area plans provide for a myriad of land uses that are permitted in principle. These uses facilitate the provision of nursing homes and creches. Similarly, the Village Centre zoning in Appendix 2 of the CDP permit in principle similar uses at the centre of settlements.</p> <p>Chief Executive's Recommendation No change recommended.</p>