

CHIEF EXECUTIVE'S REPORT

for pre-draft stage of the
Kildare County Development
Plan 2023-2029

April 2021



Planning Department
Kildare County Council



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Glossary

| | |
|-------|---|
| AA | Appropriate Assessment |
| CDP | County Development Plan |
| CARO | Climate Action Regional Office |
| DMURS | Design Manual for Urban Roads and Streets |
| EMRA | East and Midlands Regional Assembly |
| HNDA | Housing Needs Demand Assessment |
| LAP | Local Area Plan |
| NPF | National Planning Framework |
| NTA | National Transport Authority |
| OPR | Office of the Planning Regulator |
| OPW | Office of Public Works |
| PPN | Public Participation Network |
| P&D | Planning and Development |
| RSES | Regional Spatial and Economic Strategy |
| SEA | Strategic Environmental Assessment |
| SFRA | Strategic Flood Risk Assessment |
| SPPR | Specific Planning Policy Requirements (as referred to in Section 28 Guidelines) |
| SuDS | Sustainable Urban Drainage Systems |
| TII | Transport Infrastructure Ireland |

1.0 Introduction

Kildare County Council gave notice of its intention to review the existing Kildare County Development Plan 2017-2023 and to prepare a new County Development Plan for the period 2023-2029 on Monday 11th January 2021 in accordance with Section 11 of the Planning and Development Act 2000 (as amended) (hereafter referred to as 'the Act').

The review will take up to two years and will conclude with the adoption of the Kildare County Development Plan 2023-2029 in ca. January 2023.

This report relates to submissions and observations received from the public and prescribed bodies during an 8 week consultation period between 11th January to 8th March 2021 following the publication of the statutory notice and Issues Paper for the Pre-Draft stage of the Kildare County Development Plan 2023-2029.

1.1 Legislative Requirements

In accordance with Section 11 of the Act, 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 and persons or bodies consulted by the authority, summarise the issues raised, give the opinion of the Chief Executive to the issues raised and make recommendations on the policies to be included in the draft development plan. The opinion of the Chief Executive shall take account of 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

In accordance with Section 11 of the Act, a public notice was published in the Irish Independent on the 11th January 2021 informing members of the public of the pre-draft stage of the County Development Plan 2023-2029 and inviting members of the public to participate in the public consultation process for an 8 week period to the 8th March 2021. Furthermore,

- Notices were also published in the Leinster Leader, the Nationalist and the Liffey Champion.
- Radio ads were played on KFM three times daily for the duration of the consultation period.
- Regular messages were published on Kildare County Council's social media, e.g. Facebook, Twitter and Instagram.
- Notification was sent to all Elected Members and Kildare Oireachtas Members.
- Notification was sent to all statutory authorities.
- Notification was sent to all members of the Kildare Public Participation Network (approx. 1200) and Kildare Comhairle na nÓg.

Issues Paper and Consult

An Issues Paper was published to encourage and stimulate discussion and debate around the strategic issues facing County Kildare for this development plan period and beyond. The issues highlighted in this document were based on 7 strategic themes as follows:

Healthy Placemaking: People and Places

Economic Opportunity: Innovation, Enterprise and Employment

Climate Action: Environment, Climate Change and Adaptation
Sustainable Mobility: Movement and Transport
Creative Places: Social, Community and Cultural Development
Enhanced Amenity & Heritage: Landscape & Green Infrastructure
Making it Happen: Infrastructure, Energy & Communications

The Issues Paper was published online and hard copies were made available for posting. A Frequently Asked Questions section (FAQ's) and two Powerpoint presentations (with voiceovers) were also published online in relation to the development plan process.

Public Meetings

Two online public meetings took place on Tuesday 2nd February 2021 at 11am and on Thursday 11th February 2021 at 7pm. The meetings were independently facilitated and included a presentation from the Planning Department, a questions and answers session and a discussion about a future vision for County Kildare.

Approx. 80 members of the public attended these meetings which included community groups, climate action groups, residents' associations, environmental groups, business, media, citizens etc. The Facilitator's report for both meetings is attached as an appendix to this report.

The Planning Department also presented to the Public Participation Network (PPN) at their online meeting to discuss the Issues Paper and Development Plan process.



Fig 1: Examples of social media messages about public consultation

Youth Engagement

A Youth Photographic Competition was launched, targeted at young people of primary and secondary school-going age, with the theme 'This is my Kildare!'. This was advertised on social media and an e-flyer was sent to all Primary Schools and Secondary Schools in the County. An invitation was also extended to Kildare Youth Services, KWETB and Comhairle na nÓg. 305 photographs were received, and it is planned to publish many of these photographs in the Draft County Development Plan.

The photographs received cover a range of themes, but mainly landscape, nature, home, community and family.

An online workshop with members of Comhairle na nÓg was facilitated by Kildare Youth Services on Wednesday 3rd March 2021. A detailed discussion took place around the themes contained in the Issues Paper. An interactive 'padlet' was used to record the input from the group and this is attached as an Appendix to this report.

Bodies consulted

In accordance with Section 11(2) of the Planning and Development Act 2000 (as amended), the Issues Paper and Public Notice was referred to the prescribed authorities for the purposes of preparing a Development Plan, as set out in Article 13 of the Planning and Development Regulations 2001 (as amended).

Meetings were held with the Eastern and Midlands Regional Authority (EMRA), Irish Water, the Department of Education, the National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and the Department of Housing, Local Government and Heritage.

Discussions have also taken place with the Climate Action Regional Office (CARO) and the Climate Action Strategic Policy Committee.

Discussions will continue to take place with the Local Community Development Committee (LCDC) in relation to the Local Economic and Community Plan (LECP).

1.3 My submission - How to read this report

A list of the people and organisations that made submissions is included in Table 2.1 of this report. The strategic themes addressed in each submission is also highlighted in Table 2.1. The reader is advised to note that the number reference you would have received through our Consultation Portal is likely to differ from the submission references in this report as listed in Table 2.1

A summary of all submissions is attached, for reference, as an Appendix to this report.

A summary of all the issues raised in the submissions is set out in Section 4 of the report. The issues are grouped in accordance with the 7 no. strategic themes on which the Issues Paper is based.

The Chief Executive's opinion on the issues raised and recommendations on the policies to be included in the Draft Development Plan are also included in Section 4 of this report.

The opinion of the Chief Executive must take account of 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.

1.4 Zoning Requests

In accordance with Section 11(2)(b)(bc) of the Act, a submission (or part of a submission) that refers to requests or proposals for zoning of particular land for any purpose **shall not be considered at this stage**. However, such submissions have been considered more generally where sites put forward for certain land uses cannot be clearly identified.

1.5 Next Steps

Consideration of Chief Executive's Report

The elected members have up to ten weeks to consider the Chief Executive's Report. An Elected Members briefing/workshop will take place on May 20th 2021 (with an additional date of May 25th set aside as a provisional second date) for discussion around the submissions and observations as required. Following consideration of this report the Elected Members may issue directions to the Chief Executive regarding the preparation of the Draft County Development Plan.

Pursuant to the requirements of Section 11(4)(d) of the Act, the members of the Planning Authority may issue directions to the Chief Executive regarding the preparation of the draft development plan. In this regard, any such directions shall be strategic in nature, consistent with the draft core strategy, and shall take account of the statutory obligations of the Local Authority and any relevant policies or objectives for the time being of the Government or of any Minister of the Government and the Chief Executive shall comply with any such directions. The Elected Members will consider the Chief Executive's Report on the Pre-Draft consultation for the Development Plan at a Special Meeting of Full Council in ca. June 2021.

Preparation of the Draft Development Plan

Not later than twelve weeks after the consideration of the Chief Executive's Report and the issuing of directions, the Chief Executive is required to prepare the proposed Draft Kildare County Development Plan 2023-2029 and submit this to the Elected Members of the Council for their consideration. Elected Members will then have an 8 week period within which to consider the proposed Draft Plan. Further stages will follow in accordance with the Planning and Development Acts, 2000 (as amended).

A preliminary timescale for the entire process is outlined in **Table 1** below.

| STAGE | ACTION | TIMEFRAME | DATES |
|---|--|---|-------------------------------|
| Stage 1 Pre-Draft | Public Notice | | 11 th January 2021 |
| | Pre-Draft Public Consultation | 8 weeks | 8 th March 2021 |
| | Prepare Chief Executive's Report on Submissions received | 8 weeks | 30 th April 2021 |
| | Elected Members Directions | 10 weeks | July 2021 |
| | Preparation of Draft Plan | 12 weeks | October 2021 |
| | Elected Members consideration of Draft Plan | 8 weeks | ca. November 2021 |
| Stage 2 Draft Plan | Preparation of Draft County Development Plan | 2 weeks | ca. December 2021 |
| | Draft Plan Public Consultation | 10 weeks | ca. February 2022 |
| | Prepare Chief Executive's Report on Draft Plan submissions | 12 weeks | ca. May 2022 |
| | Elected Members consider Chief Executive's Report on submissions and ADOPT or AMEND Draft Plan | 12 weeks | ca. August 2022 |
| Stage 3 Amendments to Draft Plan | Preparation of Amendments to Draft Plan | 3 weeks (or more if required by AA/SEA) | ca. August 2022 |
| | Public consultation on Amendments to Draft Plan | 4 weeks | ca. September 2022 |

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|---------------------|--|---------|-------------------|
| | Preparation of Chief Executive's Report on Submissions | 4 weeks | ca. October 2022 |
| | Elected Members consider Chief Executive's Report on Submissions. Plan must be MADE. | 6 weeks | ca. December 2022 |
| Adopted Plan | Kildare County Development Plan 2023-2029 comes into effect | 6 weeks | ca. January 2023 |

Table 1 – Summary of the Review Process

Note: *It should be noted that in accordance with Section 12 (16) of the Planning and Development Act 2000 (as amended) a person shall not question the validity of the development plan by reason only that the procedures as set out under subsections (3) to (5) of section 11 and subsections (1), (4), (5), (6), (7), (8) and (9) of Section 12 were not completed within the time required under the relevant subsection.*

2.0 List of Persons/Bodies Who Made Submissions

During the public consultation period a total of 320 submissions/observations were received. The list of persons, prescribed bodies, groups and stakeholders who made valid submissions are listed in Table 2.1.

The themes referred to in the submissions are also highlighted in Table 2.1.

Table 2.1 List of persons/bodies who made submissions

| No. | Name | Healthy Placemaking | Economic Opportunity | Climate Action | Sustainable Mobility | Creative Places | Amenity & Heritage | Making it Happen | Miscellaneous |
|-----|---|---------------------|----------------------|----------------|----------------------|-----------------|--------------------|------------------|---------------|
| 1 | Office of the Planning Regulator | | | | | | | | |
| 2 | Minister for Culture, Heritage, Gaeltacht | | | | | | | | |
| 3 | National Transport Authority | | | | | | | | |
| 4 | Transport Infrastructure Ireland | | | | | | | | |
| 5 | EMRA | | | | | | | | |
| 6 | Dept. of Transport | | | | | | | | |
| 7 | OPW Flood Risk | | | | | | | | |
| 8 | Irish Water | | | | | | | | |
| 9 | Dept. Culture, Heritage & Gaeltacht | | | | | | | | |
| 10 | Dept. of Tourism Culture Arts etc. | | | | | | | | |
| 11 | Department of Education | | | | | | | | |
| 12 | Coillte | | | | | | | | |
| 13 | OPW Heritage | | | | | | | | |
| 14 | An Taisce | | | | | | | | |
| 15 | Faite Ireland | | | | | | | | |
| 16 | Meath County Council | | | | | | | | |
| 17 | Dept. of Public Health | | | | | | | | |
| 18 | Environmental Health, HSE | | | | | | | | |
| 19 | Eirgrid | | | | | | | | |

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| 20 | GSI | | | | | | | |
| 21 | Demesne Architects | | | | | | | |
| 22 | Ed Nyhof | | | | | | | |
| 23 | Mary Gillan | | | | | | | |
| 24 | EOL | | | | | | | |
| 25 | Kings Court Residents Association | | | | | | | |
| 26 | Teach Tearmainn | | | | | | | |
| 27 | Caroline Morrissey | | | | | | | |
| 28 | Keeping Ireland Open | | | | | | | |
| 29 | Dr Louie and Babette Harris | | | | | | | |
| 30 | Amber Nugent McCarthy | | | | | | | |
| 31 | David Mulcahy | | | | | | | |
| 32 | Stephen Fitzpatrick | | | | | | | |
| 33 | Cairn Homes | | | | | | | |
| 34 | Noel Geary | | | | | | | |
| 35 | An Post | | | | | | | |
| 36 | Maureen Boylan | | | | | | | |
| 37 | Eileen Devine | | | | | | | |
| 38 | Wild Kildare | | | | | | | |
| 39 | OPW (National Historic Properties Unit) | | | | | | | |
| 40 | 040 Westin Homes | | | | | | | |
| 41 | 041 Belmont Data Centres | | | | | | | |
| 42 | 042 Value Retail Dublin Ltd (KTOV) | | | | | | | |
| 43 | Kildare Local Transport Link | | | | | | | |
| 44 | Peter Hamilton | | | | | | | |
| 45 | 045 Pat Breen | | | | | | | |
| 46 | Michael Skelton | | | | | | | |
| 47 | Birdwatch Ireland Kildare Branch | | | | | | | |
| 48 | Castletown Foundation | | | | | | | |
| 49 | Butterfly Conservation Ireland | | | | | | | |

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|----|---|--|--|--|--|--|--|--|--|
| 50 | Gavin McDermott | | | | | | | | |
| 51 | Crylock Development Ltd. | | | | | | | | |
| 52 | Michael Higgins | | | | | | | | |
| 53 | Vincent Kearns | | | | | | | | |
| 54 | Niall Purcell | | | | | | | | |
| 55 | Richard Cotter | | | | | | | | |
| 56 | Kilcloon Environmental Action Association | | | | | | | | |
| 57 | Clane SuperValu | | | | | | | | |
| 58 | Maynooth Tidy Towns | | | | | | | | |
| 59 | Liam & Angela O'Beirne | | | | | | | | |
| 60 | Debbie Hurley | | | | | | | | |
| 61 | Cliona Kelliher | | | | | | | | |
| 62 | Louise Hyland | | | | | | | | |
| 63 | Kingsfurze Avenue Residents Association | | | | | | | | |
| 64 | Canal Side Residents & Business | | | | | | | | |
| 65 | Anthony O'Regan | | | | | | | | |
| 66 | Ballyshannon Action Group | | | | | | | | |
| 67 | Lorraine Benson | | | | | | | | |
| 68 | Phil Hayden | | | | | | | | |
| 69 | Naas Access & Disability Group | | | | | | | | |
| 70 | CKAN | | | | | | | | |
| 71 | Sean O'Broin | | | | | | | | |
| 72 | Maynooth Tidy Towns | | | | | | | | |
| 73 | Rosemary Flanagan | | | | | | | | |
| 74 | Andrew Griffith | | | | | | | | |
| 75 | Bru na Riogh Residents | | | | | | | | |
| 76 | Kevin Greene | | | | | | | | |
| 77 | Emma Hannon | | | | | | | | |
| 78 | Eileen Keogh | | | | | | | | |

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| 79 | Pat Keogh | | | | | | | | |
| 80 | Helena Hearne | | | | | | | | |
| 81 | Teresa O'Neill | | | | | | | | |
| 82 | Cllr. Noel Heavey | | | | | | | | |
| 83 | Cllr. Noel Heavey et al | | | | | | | | |
| 84 | Cllr. Noel Heavey and Pat O'Mahoney | | | | | | | | |
| 85 | Michael Grogan | | | | | | | | |
| 86 | Jacinta Gale | | | | | | | | |
| 87 | Angela Cawley | | | | | | | | |
| 88 | Philip Cawley | | | | | | | | |
| 89 | Fianna Fail Members | | | | | | | | |
| 90 | Eilish Kavanagh | | | | | | | | |
| 91 | Larry & Anne Breen | | | | | | | | |
| 92 | Michael Piare | | | | | | | | |
| 93 | Cllr Anne Breen | | | | | | | | |
| 94 | Kathleen Moran | | | | | | | | |
| 95 | Thomas Maguire | | | | | | | | |
| 96 | Hester McAllister | | | | | | | | |
| 97 | Cllr. Brian Dooley | | | | | | | | |
| 98 | Matthew Madigan | | | | | | | | |
| 99 | Clanard Court Hotel and Michael Fennin | | | | | | | | |
| 100 | David and Susan Sexton | | | | | | | | |
| 101 | Paul Stapleton | | | | | | | | |
| 102 | Joseph Neville | | | | | | | | |
| 103 | June Stuart | | | | | | | | |
| 104 | Joe Colfer | | | | | | | | |
| 105 | Wind Energy Ireland | | | | | | | | |
| 106 | Celbridge Cycling Campaign | | | | | | | | |
| 107 | Louise Lardner | | | | | | | | |
| 108 | Colm Kenny | | | | | | | | |

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|-----|---|--|--|--|--|--|--|--|--|
| 109 | Ursula King | | | | | | | | |
| 110 | Landen Park Owner's Management Company | | | | | | | | |
| 111 | Dublin Gliding Club | | | | | | | | |
| 112 | Naomi Scott Hayward | | | | | | | | |
| 113 | Newbridge Access Group | | | | | | | | |
| 114 | Monasterevin Sustainable Energy Community | | | | | | | | |
| 115 | Ivan Codd | | | | | | | | |
| 116 | Straffan AFC | | | | | | | | |
| 117 | Joint Owners of Rathangan Demesne | | | | | | | | |
| 118 | Mark Hendrick | | | | | | | | |
| 119 | Fergal Reidy | | | | | | | | |
| 120 | Monasterevin Sustainable Energy Community (SEC) | | | | | | | | |
| 121 | Emer Hynan | | | | | | | | |
| 122 | Gerard Burns | | | | | | | | |
| 123 | Deirdre Kennedy | | | | | | | | |
| 124 | Niamh Young | | | | | | | | |
| 125 | Irish Green Building Council | | | | | | | | |
| 126 | L Carey | | | | | | | | |
| 127 | David Martin Wright | | | | | | | | |
| 128 | Creative Rathangan Meitheal | | | | | | | | |
| 129 | Irish Peatland Conservation Council | | | | | | | | |
| 130 | Newbridge Family Resource Centre | | | | | | | | |
| 131 | Joe Penny | | | | | | | | |
| 132 | Eco Parish Prosperous | | | | | | | | |
| 133 | Brendan Colivet | | | | | | | | |
| 134 | Una Halpin | | | | | | | | |
| 135 | Reada Cronin | | | | | | | | |

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| 136 | Clane Community Council | | | | | | | | |
| 137 | Sonya Moore | | | | | | | | |
| 138 | Maynooth Campus | | | | | | | | |
| 139 | Swindon Investment Company | | | | | | | | |
| 140 | ESB | | | | | | | | |
| 141 | IWAI Royal Canal | | | | | | | | |
| 142 | Maynooth Cycling Campaign | | | | | | | | |
| 143 | Joanne Pender | | | | | | | | |
| 144 | Elizabeth Cullen | | | | | | | | |
| 145 | Liam Knowles | | | | | | | | |
| 146 | Bracq Ltd | | | | | | | | |
| 147 | Ardlea Construction Ltd | | | | | | | | |
| 148 | Felipe Reitz | | | | | | | | |
| 149 | Cormac Hickey | | | | | | | | |
| 150 | David Mulcahy (Brenda Woods) | | | | | | | | |
| 151 | David Mulcahy | | | | | | | | |
| 152 | Celbridge Guided Tours | | | | | | | | |
| 153 | Eddie Lenehan | | | | | | | | |
| 154 | Paul Murphy | | | | | | | | |
| 155 | Fine Gael - Caragh Branch | | | | | | | | |
| 156 | Teresa Behan | | | | | | | | |
| 157 | Shane Blake | | | | | | | | |
| 158 | Steven Fadian | | | | | | | | |
| 159 | Alan Stewart | | | | | | | | |
| 160 | Barry Redmond | | | | | | | | |
| 161 | Ann Moran | | | | | | | | |
| 162 | Maynooth Community Council | | | | | | | | |
| 163 | John O'Dwyer | | | | | | | | |
| 164 | Glenveagh Properties | | | | | | | | |
| 165 | Lullymore Heritage & Discovery Park | | | | | | | | |

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| 166 | Social Democrats | | | | | | | | |
| 167 | Ann Behan | | | | | | | | |
| 168 | Claire Meehan | | | | | | | | |
| 169 | Gerard Byrne | | | | | | | | |
| 170 | Ronan Foley | | | | | | | | |
| 171 | Newbridge Playground Group | | | | | | | | |
| 172 | North Kildare Trout & Salmon Anglers Association | | | | | | | | |
| 173 | Corcom Development Partners (CDP) | | | | | | | | |
| 174 | Irish Heart Foundation | | | | | | | | |
| 175 | Cllr. Kevin Duffy | | | | | | | | |
| 176 | Gas Networks Ireland | | | | | | | | |
| 177 | Leo Gordon | | | | | | | | |
| 178 | Martin Waters | | | | | | | | |
| 179 | Kildare West Wicklow Irish Farmers Association | | | | | | | | |
| 180 | DS Breathnach | | | | | | | | |
| 181 | Jane Tripp and Rita Shah | | | | | | | | |
| 182 | Irish Rail | | | | | | | | |
| 183 | Richard Godsil & Edward Frisby | | | | | | | | |
| 184 | Grainne McGlinchey | | | | | | | | |
| 185 | Bord na Móna | | | | | | | | |
| 186 | Cllr Vanessa Liston | | | | | | | | |
| 187 | Se Dolan & Linda Ryan | | | | | | | | |
| 188 | Brendan Kenny | | | | | | | | |
| 189 | Alan Kelly | | | | | | | | |
| 190 | John Kavanagh | | | | | | | | |
| 191 | Anthony Lawlor | | | | | | | | |
| 192 | Louise Donnelly | | | | | | | | |
| 193 | Celbridge Community Council | | | | | | | | |

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|-----|---|--|--|--|--|--|--|--|--|
| 194 | Umeras Community Development CLG | | | | | | | | |
| 195 | Seamus Caulfield | | | | | | | | |
| 196 | Labour Party Group | | | | | | | | |
| 197 | Liz Collins | | | | | | | | |
| 198 | Kildare PPN | | | | | | | | |
| 199 | National Asset Management Agency | | | | | | | | |
| 200 | County Kildare Chamber | | | | | | | | |
| 201 | Michael Madden (Receiver for Maplewood Dev. Ltd. & Barina Construction Ltd) | | | | | | | | |
| 202 | Climate Action Linkage Group | | | | | | | | |
| 203 | Ballymore Eustace Community Development Association | | | | | | | | |
| 204 | Dee Scallan | | | | | | | | |
| 205 | Valerie O'Brien | | | | | | | | |
| 206 | Dr. Louie & Babette Harris | | | | | | | | |
| 207 | Kilcock Wheelers Cycling Club | | | | | | | | |
| 208 | Liz Donohoe | | | | | | | | |
| 209 | Brian Connolly | | | | | | | | |
| 210 | Forensic Science Ireland | | | | | | | | |
| 211 | Fiona Oloughlin | | | | | | | | |
| 212 | Frank Fogarty | | | | | | | | |
| 213 | Brian Clohessy | | | | | | | | |
| 214 | Conor Winchcombe | | | | | | | | |
| 215 | Etienne du Plessis | | | | | | | | |
| 216 | Leo Moore | | | | | | | | |
| 217 | Brian McArdle | | | | | | | | |
| 218 | Inland Waterways Association of Ireland | | | | | | | | |
| 219 | Damien Murray | | | | | | | | |
| 220 | Jenny Reynolds | | | | | | | | |

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|-----|---------------------------------|--|--|--|--|--|--|--|--|
| 221 | Newbridge Community Development | | | | | | | | |
| 222 | Stephen Coy | | | | | | | | |
| 223 | Fionnuala Corcoran | | | | | | | | |
| 224 | S. Fennin | | | | | | | | |
| 225 | June Galligan | | | | | | | | |
| 226 | Kilcock 4 Climate Action | | | | | | | | |
| 227 | Celbridge Tidy Towns | | | | | | | | |
| 228 | Anastasia Nadezhina | | | | | | | | |
| 229 | Kilcock Tidy towns | | | | | | | | |
| 230 | Suzanne Murphy | | | | | | | | |
| 231 | Lydia Lee | | | | | | | | |
| 232 | Fine Gael Branch Newbridge | | | | | | | | |
| 233 | Rathangan Tidy Towns | | | | | | | | |
| 234 | Flora McDonnell | | | | | | | | |
| 235 | Bridget Armstrong | | | | | | | | |
| 236 | Aidan Doorey | | | | | | | | |
| 237 | Mary Gordon | | | | | | | | |
| 238 | Tesco | | | | | | | | |
| 239 | Peggy O' Dwyer | | | | | | | | |
| 240 | Fergal Gordon | | | | | | | | |
| 241 | Margharita Solon | | | | | | | | |
| 242 | Carmel Geissel | | | | | | | | |
| 243 | Elizabeth Geissel | | | | | | | | |
| 244 | Jana Drennan | | | | | | | | |
| 245 | Jennifer Murphy | | | | | | | | |
| 246 | Marie O' Neill | | | | | | | | |
| 247 | Adrian Geissel | | | | | | | | |
| 248 | Michael O'Brien | | | | | | | | |
| 249 | Marion Rackard | | | | | | | | |
| 250 | Kate Solon | | | | | | | | |

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| 251 | Declan Brady | | | | | | | | |
| 252 | Joy Herron | | | | | | | | |
| 253 | Aisling Twomey | | | | | | | | |
| 254 | Richard Kearns | | | | | | | | |
| 255 | Cormac Ahern | | | | | | | | |
| 256 | Celbridge Guided Tours | | | | | | | | |
| 257 | Louise Quinn | | | | | | | | |
| 258 | Ruth Murphy | | | | | | | | |
| 259 | Annemarie McGrath | | | | | | | | |
| 260 | Cormac O'Donovan | | | | | | | | |
| 261 | Gay Brabazon, Declan Browne, Karen Tyrrell | | | | | | | | |
| 262 | Keith Costigan | | | | | | | | |
| 263 | Mary Taaffe | | | | | | | | |
| 264 | Kevin Mullaney | | | | | | | | |
| 265 | Edmund Murphy | | | | | | | | |
| 266 | Eilis Kavanagh | | | | | | | | |
| 267 | Hughes Planning on Behalf of Helen O' Brien and The Donovan Family | | | | | | | | |
| 268 | McGill Planning Ltd. on Behalf of O' Flynn, Montane and O'Connor | | | | | | | | |
| 269 | CSR on Behalf of Mr. Brendan O'Donoghue | | | | | | | | |
| 270 | Brian Connolly | | | | | | | | |
| 271 | Noel Stynes (redacted) | | | | | | | | |
| 272 | Eithne Ni Fhlathartaigh | | | | | | | | |
| 273 | Venturis Investments | | | | | | | | |
| 274 | Queally Group | | | | | | | | |
| 275 | Pierce Greaney | | | | | | | | |
| 276 | Fonsall Ltd. | | | | | | | | |

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| 277 | Equitas | | | | | | | | |
| 278 | Newtownsland (Kill) Limited | | | | | | | | |
| 279 | Cill Dara le Gaeilge | | | | | | | | |
| 280 | Kevin Mullen | | | | | | | | |
| 281 | Roisin Stewart | | | | | | | | |
| 282 | Michael Moore | | | | | | | | |
| 283 | Clyde Doyle | | | | | | | | |
| 284 | Eilish Kavanagh | | | | | | | | |
| 285 | Ballymore Group | | | | | | | | |
| 286 | Beans Group | | | | | | | | |
| 287 | Castledermot GAA | | | | | | | | |
| 288 | DAA | | | | | | | | |
| 289 | Yvonne Codd | | | | | | | | |
| 290 | Pat O' Mahony | | | | | | | | |
| 291 | Roadstone | | | | | | | | |
| 292 | John Duggan | | | | | | | | |
| 293 | Statkraft | | | | | | | | |
| 294 | Cllr. Seamie Moore | | | | | | | | |
| 295 | Jennifer Doyle | | | | | | | | |
| 296 | Ballymore Eustace Trout & Salmon Angler's Association | | | | | | | | |
| 297 | HOJYAR | | | | | | | | |
| 298 | Naas Community Men's Shed | | | | | | | | |
| 299 | Kildare Environmental Network | | | | | | | | |
| 300 | Sinn Fein Party | | | | | | | | |
| 301 | Cllr O Cearuil | | | | | | | | |
| 302 | Umeras Community Development | | | | | | | | |
| 303 | Seamus Lenehan | | | | | | | | |
| 304 | Ray Nolan | | | | | | | | |
| 305 | James Kelly | | | | | | | | |

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| 306 | Colin McKenna | | | | | | | | |
| 307 | O'Flynn Group | | | | | | | | |
| 308 | EL Prendergast | | | | | | | | |
| 309 | Adrian McAndrew | | | | | | | | |
| 310 | Alan Byrne | | | | | | | | |
| 311 | Hubert Beaumont | | | | | | | | |
| 312 | Devondale Ltd | | | | | | | | |
| 313 | Core Industrial NEP Ltd | | | | | | | | |
| 314 | Makros | | | | | | | | |
| 315 | Castletown Homes Ltd & Janus Securities Ltd | | | | | | | | |
| 316 | Pirowell Ltd | | | | | | | | |
| 317 | Aidan Kelly | | | | | | | | |
| 318 | Lidon Group | | | | | | | | |
| 319 | Patricia Gammell | | | | | | | | |
| 320 | Kieron Gammell | | | | | | | | |

3.0 Issues raised in Statutory Authority Submissions and Chief Executive's Opinion and Recommendation

The following is a summary of the issues raised in the submissions received from the statutory authorities and the Chief Executive's opinion and recommendation in response to those issues.

3.1 Office of the Planning Regulator

| Sub. No.1 | Name; Office of the Planning Regulator (OPR) |
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| Issues Raised <u>Core Strategy & Settlement Strategy</u> <ul style="list-style-type: none"> NPF population targets for County Kildare represents an increase of 31,500 people by 2026 and up to 44,000 by 2031. Adjustments should also be included for the Metropolitan Key Town of Maynooth (NPO 68). It will be necessary to demonstrate the manner in which the core strategy and other elements of the plan are consistent with the NPF 50:50 City housing demand projection scenario identified by ESRI subject to the methodology set out in Section 4.0 of the guidelines and adjusted for the plan period. The OPR advises the Planning Authority to revisit the categorisation and positioning of settlements in the hierarchy having regard to this and the asset based approach outlined in RSES. This must also be consistent with the growth enablers and guiding principles relating to the regions within the RSES. A significant proportion of the county's future homes will need to be allocated to the designated key towns and larger settlements. Settlement hierarchy and housing supply targets should inform quantum of land zoned for development in other settlements, with the allowance allocated to the rural remainder. The extent of land zoned for residential development (including LAPs) must be aligned with population projections and housing supply targets in the Core Strategy. The Development Plan must provide sufficient clarity and certainty in terms of measures proposed under Section 10(2)(n) to direct the preparation of future LAPs. It is strongly advised that all land use zoning objectives for the County are included as part of the development plan rather than delayed to the preparation of LAPs. <u>Metropolitan Area Strategic Plan (MASP)</u> <ul style="list-style-type: none"> The Core Strategy must have a focus and implementation strategy for the strategic development of areas identified in the North West Corridor in Table 5.1 of the RSES. Table 5.2 sets out spatial guidance for increased employment densities in the MASP. Section 6.3 sets out guiding principles for strategic employment and investment prioritisation. <u>Compact Growth and Zoning</u> <ul style="list-style-type: none"> Guiding principles for infill and brownfield development are included in Chapter 3 of RSES (e.g. a database of brownfield sites). There is potential for regeneration, consolidation and compact growth in the Key Towns of Maynooth and Naas. A key challenge is ensuring that opportunities for compact and sequential growth in the higher tier settlements are not undermined by the greenfield development in the lower tier settlements. In relation to zoning, NPO72a states: <i>Planning authorities will be required to apply a standardized, tiered approach to differentiate between (i) zoned land that is serviced and (ii) zoned land that is serviceable within the life of the plan</i>. (See Appendix 3 of NPF). Policies and implementation measures to encourage infill/brownfield development in the MASP and county's towns should be specific, targeted and measurable. | |

Local Area Plans

- It is important that the preparation of a joint local area plan with Meath Co. Co. is prioritised for Maynooth and should be informed by a local transport plan in consultation with TII and NTA. A key priority for Naas is the regeneration of the historic town centre with enhancement of retail and commercial functions and consolidation of strategic development areas.
- A critical issue is to ensure that the extent of land zoned for residential development in the county's towns including settlements that have a statutory LAP is aligned with the population projections and housing need allocations set out in the Core strategy.

Economic Development and Employment

- The Covid 19 pandemic and Brexit are acknowledged challenges.
- RSES identified specific economic opportunities for Naas and Maynooth as economic drivers for the county.
- The Development Plan should set out the level of retail provision in the county consistent with the regional retail hierarchy in table 6.1 of the RSES, with the *Retail Planning Guidelines for Planning Authorities 2012* (6.12-6.14) and with the RSES guiding principles for the location of trip intensive development.
- A key challenge will be to ensure that housing is delivered in higher tier towns that have existing or planned employment and access to good public transport.
- The plan must demonstrate how it can implement and measure the implementation of economic and regeneration objectives and initiatives in the NPF and RSES. Land use and transport planning must be coordinated especially the location of employment zoned lands where they can be served by sustainable transport and not undermine the strategic function of national road infrastructure.

Transport & Infrastructure

- It will be essential for the planning authority to achieve a significant modal shift in the county in order to meet the requirements of Section 10(2)(n) of the Act. It is recommended that modal shift targets are included in the plan.
- Chapter 8 of RSES contains a transport strategy and a framework for integrating transport planning with spatial planning policies. This and the Transport Strategy for the Greater Dublin Area 2016-2035 will inform the sustainable settlement and transport strategies, in line with the Act.
- A key issue for the plan is to ensure that policies protect the strategic function of national roads and maximise the benefits of existing and planned public transport (e.g. in areas like the northwest quadrant of Naas).
- Proactive implementation of DMURS will assist in delivering sustainable active travel modes, improve street environment and quality of life.
- The Planning Authority must work proactively with Irish Water to ensure deficiencies at strategic locations such as Maynooth and Leixlip (identified in RSES) are resolved over short to medium term.
- Surface water management in the plan should ensure implementation of SuDS.
- Consultation with the NTA, TII and neighbouring planning authorities is recommended during the preparation of land use and transport plans. Policies and development management standards regarding access to national roads (including exceptional circumstances) must be consistent with the Spatial Planning and National Roads Guidelines (2012).
- The promotion of sustainable settlement and transport strategies for urban and rural areas with measures to reduce CHG emissions, reduce energy usage and to adapt to climate change. The plan should include targets for modal shift over the plan period aligned to specific implementation and monitoring measures.

Rural Development

- The Plan should include a strong policy to protect against urban generated housing in the open countryside and to proactively address town/village decline and compact growth. See NPO 15, NPO 19 and NPO 20 of NPF.
- The Plan should consider policy and practical implementation measures to facilitate the building of homes within existing footprints of rural settlements. Measures such as land acquisition and serviced sites should be considered. See NPO18a and NPO18b.
- Rural housing policies should be consistent with NPO18 and 19 and shall distinguish between areas under strong urban influence and elsewhere; and shall support regeneration of rural towns/villages by directing residential development to serviced areas.

Flood Risk Assessment

- The SFRA should be consistent with *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)*. It is advised NOT to use information from the OPW's Preliminary Flood Risk Assessment (PFRA) and arterial drainage benefitting land maps (Note: No reason is specified why). It is advised TO take account of OPW Flood Relief Schemes including those proposed or being implemented. Flood risk assessment should be undertaken to inform zoning decisions. Zoning objectives should support and not impede such schemes.
- Flood mapping should overlay land use zoning maps in the Plan in this regard.

Climate Action and Energy

- The county's transition to a low carbon economy and the overall reduction in carbon emissions will become a central issue in the preparation of the plan.
- The Council's ambition to be exemplar in its planning strategies, plans and policies is commended.
- The promotion of renewable energy will be critical to ensure Ireland meets national targets to reduce greenhouse gas emissions and contribute towards achieving a net zero carbon economy by 2050, as supported by NPF and RSES.
- The SPPR of the interim Wind Energy Guidelines requires a planning authority to indicate how the implementation of its development plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and potential resource in megawatts.
- The promotion of renewable energy sources in accordance with Section 28 Guidance and in particular the SPPR under the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017)*.

CHIEF EXECUTIVE'S OPINION:

The comprehensive submission received from the OPR which draws the Council's attention to a number of key areas that must and will be addressed as part of the review of the Kildare County Development Plan 2017-2023 (the Plan) is acknowledged and noted.

First and foremost, the population targets as set out for Kildare in the NPF and RSES are acknowledged and will be reflected in the emerging Plan as well as the additional population allocation for Maynooth owing to its location in the MASP area. The settlement hierarchy/strategy for County Kildare will be reviewed and updated to align with the overall targets for the county which will take account of a range of factors including the level of existing and planned social, community and physical infrastructure and access to good public transport. In this regard survey work has already commenced for the lower tier settlements (Villages/Rural Settlements/Nodes) which will provide an evidence base to inform the emerging Settlement Strategy.

A significant number of submissions received as part of the pre-draft consultation related to the importance of achieving compact growth, a key theme which underpins both the NPF and RSES through the sequential development of land, the use of infill and brownfield sites and phasing as appropriate.

These issues have also come through very strongly in the OPR submission and the inclusion of objectives to ensure that sustainable, compact growth is achieved will be included in the Draft Plan.

There will be a particular focus on the future development of Maynooth and Leixlip given that these towns are identified as 'Strategic Development Areas' in the RSES being located along key public transport corridors where strategic employment and investment will be key to the development of these areas of north east Kildare. There will be an inevitable focus on Maynooth as one of Kildare's two Key Towns. Preliminary work on the Maynooth LAP has now commenced as has the preparation of a Local Transport Plan which will inform the future development strategy for the town. The Council continues to engage with TII and the NTA in relation to the preparation of Local Transport Plans for the larger settlements in County Kildare.

The past year has brought with it significant challenges that have been rightly acknowledged by the OPR. There are a number of ways that we intend addressing particular issues that have come to the fore related to employment, urban centres, the public realm and access to our open spaces and amenities.

The Draft Plan will focus on each of the above in order to make Kildare a more attractive one for all those who live, work, visit and recreate here. It will include specific objectives to revitalise our towns and villages, improve our public realm and improve the County's offering in relation to open spaces and amenities that have been heavily relied upon over the past 12 months in particular. Universal access and design will be fundamental to the policies and objectives guiding the future development of Kildare to accommodate all citizens, of all abilities.

Kildare is very fortunately placed in the country to have excellent access to airports, ports, strategic national road and rail infrastructure. This has served to attract employment at all levels in the county and we will continue to work with key partners to improve the attractiveness of Kildare as a county in which to invest and do business.

The Plan will promote the establishment of employment facilities at locations where sustainable modes of transports either exist or are planned.

We will continue to engage with Irish Water, the NTA, TII and all other relevant stakeholders to continually improve services and infrastructure to support the future development of County Kildare.

In order to better provide for our citizens and to get the balance right between urban and rural living the Plan will consider measures to improve the service offering in our towns and villages in particular which will include the inclusion of serviced sites in order to lessen the burden on the Council to provide services and facilities at locations far removed from existing infrastructure including social, community and physical infrastructure.

Underpinning all of the above is a requirement to meet our Climate Target of net zero emissions by 2050. To this end we are committed to including in the Plan a set of measurable and achievable targets to order to monitor our Plans progress in that regard.

CHIEF EXECUTIVE'S RECOMMENDATIONS:

Core Strategy & Settlement Strategy

To ensure that the housing targets in the Draft CDP comply with the 'Housing Supply Target Methodology for Development Planning' (December 2000).

To ensure that the Settlement Strategy aligns with the housing targets.

To ensure that the quantum of zoned land aligns with the housing targets in the Settlement Strategy.

To ensure that the Draft CDP is consistent with the asset-based approach and takes account of growth enablers and guiding principles in the RSES as they relate to Kildare.

Compact Growth and Zoning

To include objectives that take account of National Strategic Objective No. 1 of the NPF for compact growth and the Guiding Principles for infill and brownfield development as set out in Chapter 3 of RSES and to include targets and implementation measures to encourage infill/brownfield development.

To include policies/objectives on regeneration, consolidation and compact growth in all towns, particularly in Maynooth and Naas as the county's identified Key Towns.

To apply a standardised, tiered approach to zoning to differentiate between (i) zoned land that is serviced and (ii) zoned land that is serviceable in accordance with Appendix 3 of the NPF.

Economic Development and Employment

To include objectives that recognise the economic opportunities for Naas and Maynooth as set out in RSES.

To include a Retail hierarchy that is consistent with Table 6.1 of the RSES, the Retail Planning Guidelines for Planning Authorities 2012 and the RSES guiding principles for the location of trip intensive development.

To zone lands for housing in higher tier towns that have existing or planned employment and physical infrastructure and access to good public transport.

To include objectives to measure the implementation of economic and regeneration objectives and initiatives in the NPF and RSES.

Transport & Infrastructure

To include modal shift targets in the Plan, aligned to specific implementation and monitoring measures.

To have regard to Chapter 8 of RSES and the Transport Strategy for the GDA 2016-2035 (or any review of same) to inform the relevant settlement and transport strategies.

To include objectives that support the continued partnership approach with Irish Water to ensure deficiencies at strategic locations e.g. Maynooth and Leixlip are resolved over the short to medium term.

To include objectives to reduce greenhouse gas emissions, reduce energy usage and to adapt to climate change.

Rural Development

To include a strong, balanced approach to the management of urban generated housing in the open countryside

To prepare a Smalls Towns and Villages Strategy to address the requirements of NPO 18a and b of the NPF to build stronger rural communities and to promote the construction of homes within existing footprints of rural settlements including serviced sites to provide for sustainable alternatives to rural housing.

To devise policies and objectives that distinguish between areas of strong urban influence and elsewhere through the identification of Functional Urban Areas and their zone of influence.

Town/Villages

To include measurable objectives to address town/village decline in conjunction with the work of the Council's Public Realm team.

Flood Risk Management

To include a SFRA as part of the CDP which will seek to avoid inappropriate land use zonings and development in areas at risk of flooding in accordance with RPO7.12 of the RSES.

To consider overlaying flood mapping on land use zoning maps

To include a range of policies and objectives in the Draft CDP that relate to surface water and flooding

To include an objective in the Draft CDP to consider the OPW flood mapping data in the case of all future developments, unless more up to date mapping is available on the Kildare County Council website.

Climate Action & Energy

To prepare a Sustainable Energy Climate Action Plan (SECAP) for County Kildare to provide a basis for the inclusion of measurable targets on renewable energy and climate change mitigation and adaptation, in particular wind energy production and potential resource in megawatts.

3.2 Eastern and Midlands Regional Authority

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| Sub. No. 005 | Name: Eastern and Midland Regional Assembly (E.M.R.A.) |
| <p>Issues Raised</p> <p>The Planning Authority is reminded that in making the County Development Plan they shall ensure that it is consistent with the Regional Spatial and Economic Strategy for the Eastern and Midland Region (made in 2019) thus ensuring full alignment between local, regional, and national planning policy.</p> <p>The legislative context is outlined where it is noted the Assembly is obliged under the Act to prepare submissions/observations to be submitted to the relevant Planning Authority with a view to promoting consistency as far as possible, between housing, settlement and economic objectives in the plan and core strategy and the RSES as well as assisting in drafting the core strategy and other sections of the plan .</p> <p>Throughout the submission various sections and objectives are identified within RSES to assist in developing policy to ensure alignment of the plan under the 7 themes addressed in the issues paper. Prior to addressing each theme there is an emphasis on the Growth Strategy (Core Strategy and Settlement Strategy) and how those sections should align with RSES. The summary can be broken down in two parts.</p> <ul style="list-style-type: none"> - Part (I) primarily addresses the Growth Strategy and alignment with other plans. - Part (II) addresses the 7 themes outlined in the Issues Paper. <p>Part (I)</p> <p>This section includes commentary around chapters 2, 3, 4 and 5 of RSES which include <i>The Vision, Growth Strategy of the RSES, Sustainable Compact Growth, Settlement Strategy of the RSES, Metropolitan Area Strategic Plan, and the National and Regional Population Targets</i> are discussed. Various sections and objectives are highlighted under each heading to ensure the draft plan aligns with these sections.</p> <p><u><i>The Vision:</i></u></p> <ul style="list-style-type: none"> - The Vision, Key Principles and Regional Strategic Outcomes (RSO's) outlined in Chapter 2 of the RSES should be considered when determining the vision for the CDP. - These are aligned to the National Strategic Outcomes (NSO's) of the NPF. - The ability to demonstrate delivery of these may potentially be linked to future funding sources. <p><u><i>Growth Strategy of the RSES:</i></u></p> <ul style="list-style-type: none"> - Growth Enablers are specified in Section 3.2 of the RSES to facilitate sustainable growth across the region. They are underpinned by the spatial mapping of Functional Urban Areas (FUAs) within the Region. - The council should note the general Growth Enablers for the Eastern and Midland Region along with Growth Enablers for Dublin City and Metropolitan Area, the Core Region, and the Gateway Region. - County Kildare is predominantly located within the Core Region with the northeast of the county located in the Dublin Metropolitan Area while a portion in the southwest of the county forms part of the Gateway Region. | |

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| Sub. No. 005 | Name: Eastern and Midland Regional Assembly (E.M.R.A.) |
| <p><u>Sustainable Compact Growth:</u></p> <ul style="list-style-type: none"> - Delivery of compact growth will play a key role in achieving sustainable development in the region, by targeting delivery of new homes within the footprint of existing settlements and close to existing services and infrastructure in line with <i>NSO 1</i> of the NPF and <i>RSO 2</i> of the RSES. - The council's attention is also brought to <i>RPO 3.7</i> which outlines the need to ensure sustainable growth. The CDP shall ensure consistency with <i>RPO's 3.2</i> and <i>3.3</i> aimed at securing compact growth in line with the NPF. <p><u>Settlement Strategy of the RSES:</u></p> <ul style="list-style-type: none"> - In preparing the Core Strategy the council's attention is drawn to Chapter 4 of the RSES and <i>RPO's 4.1 and 4.2</i> which require that the hierarchy of settlements in the plan shall be determined in accordance with the settlement hierarchy, guiding principles and typology of settlements in the RSES. - Maynooth and Naas are identified as Key Towns in the RSES. <i>RPO's 4.26 and 4.27</i> address the role of Key Towns within Core Strategies and this is augmented by <i>RPO's 4.33 to 4.36</i> which relate to Maynooth and <i>RPO's 4.48 to 4.54</i> which relate to Naas. - A priority for the Key Town of Maynooth is the preparation and adoption of a Joint Local Area Plan for Maynooth to be completed. - The Assembly welcomed the recognition in the Issues Paper that the focus will be on developing the Key Towns of Naas and Maynooth as provided for in the RSES to act as economic drivers. - In developing the County's Settlement Hierarchy, it is anticipated that the local authority will revisit the existing categorisation and tiering of all settlements. - In doing so, Section 3.1 and Appendix A of the RSES should be referred to which provides detail on the Asset-Based Approach to spatial development. The council should find this useful in formulating a Settlement Strategy for the CDP. <p><u>Metropolitan Area Strategic Plan:</u></p> <ul style="list-style-type: none"> - Maynooth is identified as a Key Town in the Metropolitan Area Strategic Plan (MASP) which is a key policy driver setting out an integrated land use and transportation strategy for the sequential development of the Dublin Metropolitan Area. - Table 5.1 sets out further detail identifying several strategic areas along key public transport corridors, which have capacity to deliver sustainable compact growth. These include lands in Kildare along the North-West strategic development corridor within the towns of Maynooth and Leixlip. - Section 5.7 of the MASP and <i>RPO's 5.4 and 5.5</i> are relevant with respect to these lands therefore future development plan policy should be consistent with this approach. - The core strategy of the CDP should have a focus on the delivery of these sites in the MASP whilst retaining flexibility to provide for ongoing opportunities for increased densities, reduced vacancy, and re-use of underutilised lands. <p><u>National and Regional Population Targets:</u></p> <ul style="list-style-type: none"> - The stated alignment that is required between policies of the NPF and RSES with the Core Strategy of the CDP and the inclusion of population projections (outlined in RSES) is welcomed in the Issues Paper. - Population targets are to be applied in line with the requirements of the transitional population projections methodology in the Implementation Road Map for the NPF, issued under DHPLG Circular FPS04/2018. | |

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| Sub. No. 005 | Name: Eastern and Midland Regional Assembly (E.M.R.A.) |
| <ul style="list-style-type: none"> - There is an allowance under NPO 68 of the NPF for up to 20% of the phased population growth targeted in Dublin City and suburbs, to be accommodated in the wider metropolitan area. - Allowance of transitional population targets shall be allocated to the Metropolitan Key Towns (<i>Maynooth</i>) but only if they can demonstrate compact growth on high capacity planned or existing public transport corridors. - If the identified population capacity is not realised in the Key Metropolitan Towns (<i>Maynooth</i>) within the lifetime of the RSES, then the transitional projections will revert to Dublin City and suburbs to cater for the long-term future needs of the city. - Population projections for Kildare to 2026 range from 249,000 (low) to 254,000 (high). For 2031, they range from 259,000 (low) to 276,000 (high-adjusted, which includes 10,000 allocated to Maynooth). <p>The Assembly welcomed the county profile analysis undertaken by the council in the issues paper and the recognition of the crucial role the CDP will play in achieving projected population targets as set out in the Implementation Road Map.</p> <ul style="list-style-type: none"> - The attention of the council is brought to Chapter 4 of the RSES and RPO's 4.1 and 4.2 emphasising that infrastructure investment and priorities be accordingly aligned with the spatial strategy to meet projected growth. - Population targets for settlements to be defined in the core strategy should be reflective of local conditions, place potential, and carefully consider the phasing of development lands to ensure a level of sustainable growth appropriate to their position in the settlement hierarchy. <p>To ensure better linkage between zoning of land and the availability of infrastructure (in accordance with NPO 72a and Appendix 3 of the NPF) the local authority is required to implement the new standardised methodology for core strategies that sets out a tiered approach to land use zoning.</p> <p>The <i>upcoming draft Departmental Guidelines for Development Plans</i> will further address the preparation of evidence-based core strategies that provide for an adequate supply of land and housing to meet projected population growth. The recognition in the Issues Paper that the core strategy must be consistent with NPF and RSES development objectives (pg. 7) is welcomed. In developing the core strategy, the council is directed to the contents of '<i>Housing Supply Target Methodology for Development Planning</i>' issued as Guidelines for Planning Authorities under Section 28 of the Act in December 2020.</p> <p>Part (II)</p> <p><u>Theme 1 - Healthy Placemaking; People and Places</u></p> <p>This theme is welcomed as it is a key principle of the RSES. In delivering sustainable settlement patterns through the core strategy of the Plan, it is important to ensure consistency with RSES – Key Areas. To assist in achieving consistency reference is made to the following sections:</p> <ul style="list-style-type: none"> - Chapter 9– "<i>Quality of Life</i>" and the relevant sections and objectives outlined within. - <i>Section 9.3 and table 3.1</i> gives further guidance which place an emphasis on the asset-based approach for the strategic location of residential development. - <i>RPO's 9.10 to 9.13</i> and the guiding principles set out in <i>section 9.4</i> are also relevant. - <i>Section 9.7</i> and related <i>RPO's 9.24 to 9.30</i> are relevant which highlight the role of built heritage in creating a sense of place. | |

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| Sub. No. 005 | Name: Eastern and Midland Regional Assembly (E.M.R.A.) |
| <p>Housing demand and need is also referred to under this theme and in particular rural housing need and pressures facing rural areas. The following sections will provide further direction to assist in formulating policy for the Plan.</p> <ul style="list-style-type: none"> - Section 9.3 deals with Housing and Regeneration - Section 4.8 more specifically deals with planning for future growth in rural places - RPO's 4.80 and 4.81 relate to rural housing provision. <p>The challenge of delivering higher densities to facilitate compact growth, and an appropriate mix of housing for communities, is recognised and the council's attention is brought to the following objectives in RSES:</p> <ul style="list-style-type: none"> - RPO 9.1 which supports the provision of a mix of housing typologies to meet diverse future needs - RPO 9.3 which supports a greater mix of housing type and tenure, including social and affordable - RPO's 5.4 and 5.5 support the provision of higher residential densities within the MASP area in line with national guidelines. - It is anticipated that the preparation of an evidence-based Housing Needs and Demand Assessment (HNDA) in accordance with NPO 37 of the NPF will support further evidence-based analysis of future housing need and demand within the county. <p>The issues paper recognises that lessons can be learned from COVID-19 in terms of the effective use of buildings and land.</p> <ul style="list-style-type: none"> - Revitalisation of town centres is a key priority to address declining footfall due to COVID and introduce a greater diversity of daytime and night-time uses. - There should be continued support for walking, cycling and placemaking initiatives to improve public realm in consultation with residents, business owners and stakeholders. - Interventions should incorporate monitoring measures to inform the implementation of permanent solutions where clear benefits are identified. <p><u>Theme 2 - Economic Opportunity: Innovation, Enterprise, and Employment.</u></p> <p>This theme also aligns with one of the key principles of the RSES which is ensuring Economic Opportunity for all. To ensure that conditions for the creation of enterprise and innovation are embraced and to assist with drafting policy the council is directed to Chapter 6 of the RSES "<i>Economy and Employment</i>" which promotes smart specialisation and clustering policies linked to place making as part of an orderly growth strategy that is consistent with the RSES settlement hierarchy.</p> <ul style="list-style-type: none"> - Section 6.4 sets out the regions key spatial and sectoral opportunities with a focus on the Dublin Metropolitan Area and developing networks and clusters in the Eastern Part of the region. - Specific opportunities for the Key towns of Maynooth and Naas are identified which should act as economic drivers for the county. <p><i>Spatial Distribution of Strategic Employment</i></p> <p>Identification of locations for strategic employment development in the Plan should be consistent with the Growth and Settlement Strategy in RSES. The review should be informed by an evidence-based assessment of the location, quantum, density, and capacity of existing and any future proposed</p> | |

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| <p>employment zoned lands to meet current and future employment needs and to ensure the best use of urban lands. The Plan should be informed by the following Sections in the RSES:</p> <ul style="list-style-type: none"> - Section 8.3 – Integration of Transport and Land Use in the RSES, which set out guiding principles for the location of trip intensive developments such as large-scale retailing and strategic employment zones. - Chapter 5 – MASP and Table 5.2 sets out further spatial guidance for the provision of increased employment densities in the Metropolitan area including along the North West Corridor (incl. Maynooth and Leixlip), and the development of strategic employment in appropriate locations with access to high quality public transport and services (see also RPO 5.6) - The council should also have regard to Section 6.3, Guiding Principles for the location of strategic employment and investment prioritisation that include access to suitable locations, serviced sites, connectivity, skilled labour force and local strengths. - The same principles should apply in development plans and through Local Economic and Community Plans (LECPs). - RSES also recognises the importance of skills and innovation (RPOs 6.25 – 6.27), research and technology (6.29) and co-working spaces and digital hubs (RPO 6.31) as drivers of future growth and to support smart towns and villages (RPO 6.30). <p><i>Sectoral Opportunities – Retail, Tourism, Agriculture, Low Carbon, and the Future Economy</i></p> <p>Agriculture, Low Carbon and the Future Economy</p> <ul style="list-style-type: none"> - Indigenous sectors such as small-scale enterprise, agriculture, the equine industry & rural enterprise are important to the county & region as set out in Section 6.5 of RSES. - The place based approach is supported by regional policies to develop and diversify key employment sectors in order to build resilience to external shocks and climate change, including Agriculture (RPO 6.24), opportunities to develop the low carbon and circular economy (RPO 6.23) and RPO 6.9 which supports relevant actions within the Regional Enterprise Plan. - The Climate Strategy in Chapter 7 of the RSES also sets out policies to accelerate a shift from fossil fuels to a range of low and zero-carbon sources including renewable energy and secondary heat sources, and to support the development of green technologies. <p>Tourism</p> <ul style="list-style-type: none"> - Natural & cultural assets will play a key role in developing the tourism & leisure sector. This is supported by RPO's 6.15 – 6.18 and 6.8 which supports alignment with strategic objectives of Fáilte Ireland's key tourism brands including Irelands Ancient East. - The role of Greenways, Blueways, and Peatways is highlighted in the Issues Paper. RSES identifies opportunities to develop a number of flagship greenways in the Region (RPO's 7.24, 7.25 and RPO 5.7) as part of a Strategic Network including the Grand Canal and Canal Loop Greenway (linking the Royal and Grand Canals) subject to careful routing and design to ensure the protection of environmentally sensitive sites. - RSES supports the further enhancement of the Royal and Grand Canal Greenways in the Key Towns of Maynooth (RPO 4.33) and Naas (RPO 4.4). <p>Retail</p> <ul style="list-style-type: none"> - The issues paper recognises the changing nature of retail and the challenges facing town centres and traditional on-street retailing. - The CDP should set out the level of retail provision in the county, consistent with the retail hierarchy for the region (see table 6.1 of RSES). This includes level 2 major town centres of | |

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| | <p>Naas/Newbridge and Maynooth and level 3 town / district centres of Celbridge, Kilcock, Kilcullen, Athy, Kildare, Monasterevin, Clane and Leixlip.</p> <ul style="list-style-type: none"> - RPO 6.11 of the RSES requires that provision of significant retail development shall be consistent with the Retail Planning Guidelines for Planning Authorities 2012 (or any subsequent update and the retail hierarchy for the region, expressed in RSES until this hierarchy is updated. - In terms of town renewal, the council is directed to RPOs 6.12 – 6.14 which supports placemaking and the revitalisation of urban centres. <p><i>Local Economic and Community Plan (LECP)</i></p> <ul style="list-style-type: none"> - RSES sets out policies that seek to diversify local economies, address skills shortage & lifelong learning, promote SMEs & indigenous enterprise to support sustainable job creation. - RPOs 6.31 and 6.32 recognise the key role played by enterprise agencies, Regional Skills Fora, LCDCs and Local Enterprise Offices (LEOs) including support for start-ups, SMEs and social enterprises. - The Kildare LECP is due for review and this will require updating to align with RSES. - Sections 6.4 and 9.5 of RSES should be noted which highlight the role of the LECP in enterprise development & in promoting social inclusion & economic opportunity for all. <p><u>Theme 3 – Climate Action: Environment, Climate Change and Adaptation.</u></p> <ul style="list-style-type: none"> - The focus on Climate Action is welcome particularly the statement that it will be one of the cross-cutting principles of the CDP in keeping with NSO 8 of the NPF. It also aligns with RSES key principle on Climate Action, supported by RSO's 6-11. - The council's adoption of the Climate Change Adaptation Strategy 2019-2024 is also welcomed which will inform policies and objectives throughout the Plan and increase emphasis on sustainable development and travel patterns, energy use and the protection of green infrastructure. - As a lead local authority for the 17 East and Midland counties CARO will continue to play a key role in helping Kildare achieve a transition to a low carbon resilient and environmentally sustainable economy. - The importance of achieving balance between growth and protection of the environment is recognised in the Issues paper. - Information contained at Chapters 4, 7, 8 and 10 of the RSES will assist the local authority in developing an integrated climate policy. - Section 7.9. Climate Change and the related RPOs address the need for decarbonisation of the transport, built environment and energy sectors. - Renewable energy production and energy efficiency is also highlighted, and the council is directed to Section 10.3 to support the roll out of smart grids and future energy networks enabling the promotion of renewable energy sources in line with RPO 10.19. - The draft Departmental Guidelines on Wind Energy Development are also available which may assist the council in formulating future policy on wind energy. - The council is directed to sections 7.3 and 7.4 of RSES and the related RPOs to assist in formulation of policy around water quality, flood risk, extreme weather events and the role of green solutions for better water management. - The Plan will be required to include measures to assess and monitor progress on carbon reduction targets in line with RPO 3.6 of RSES. - EMRA is leading a research programme to identify a robust method for quantifying the relative GHG impacts of alternative spatial planning policies, the outputs are anticipated in 2021 and should assist the council further in this area as it progresses. |

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| <p><u>Theme 4 – Sustainable Mobility: Movement and Transport.</u></p> <ul style="list-style-type: none"> - The council's commitment to integrated transport and land use and to sustainable mobility is welcomed. RSES recognises that the sustainable growth of the region requires the provision of services and infrastructure in a plan led manner to ensure that there is adequate capacity to support future development. - Chapter 8, Connectivity and Chapter 10, Infrastructure will assist the council in developing related policy. - Of note is RPO 8.1, which requires that the integration of transport and land use planning shall be consistent with the Guiding Principles set out in Section 8.3 of the RSES. - RSES seeks to ensure the effective integration of transport planning with spatial planning policies, from regional to local transport plans and associated transport investment priorities. - Of note is RPO 8.16 which supports the improvement and protection of the strategic TEN-T and national road network and RPO 8.4 which requires that land use plans within the GDA demonstrate consistency with the NTA's Transport Strategy for the Greater Dublin Area (currently under review). - The planned expansion and electrification of DART services to Maynooth, Hazelhatch and Celbridge and the delivery of bus connects, core bus corridors and orbital routes and improved interchange facilities are of relevance to Kildare. - RSES supports the delivery of rail and bus projects set out in tables 8.2 and 8.3 and similarly with the transport infrastructure projects identified within the MASP (RPO 5.2 and pg. 108). - Parking management and the need for park and ride/park and stride facilities is noted in the issues paper. RSES places emphasis on sustainability mobility within the Key Towns of Maynooth (RPO 4.33) and Naas (RPO 4.48). RPO 4.52 also supports the delivery of new & enhanced public transport infrastructure in Naas & Sallins, including Park & Ride and interchange facilities as identified by the NTA and the council. - RSES supports key targets set out in the Governments Smarter Travel Policy to achieve a reduction in car-based commuting, as expressed in <i>RPOs 5.2, 5.3, 8.7, 8.8 and 8.9</i> that requires future development to be planned and designed to facilitate sustainable modes of transport with a focus on walking and cycling and the Greater Dublin Area Cycle Network (Fig 5.3). - Early engagement with the transport agencies is required to ensure integration of transport and land use in the Plan and in preparation of Local Transport Plans for selected settlements in the Region, including Naas and Newbridge (RPO 8.6) to help achieve this mode shift. - The council is directed to the RSES section on Decarbonising Transport, Sustainable Settlement Patterns and Compact Growth set out in Chapter 7 and RPO 7.42 which requires the council to include proposals in statutory land use plans to facilitate and encourage an increase in electric vehicle use, including measures for more recharging facilities and prioritisation of parking for EV's in central locations. <p><u>Theme 5 – Creative Places: Social, Community and Cultural Development.</u></p> <ul style="list-style-type: none"> - Delivery of a range of community and cultural facilities integrated with placemaking is key to creating healthy and socially inclusive communities. - The council's attention is drawn to the recommendations contained above under Theme 1 - 'Healthy Placemaking', and to the Guiding Principles & related RPOs for Healthy Placemaking set out in Section 9.4 of RSES, & to RPO 9.2 which promotes active participation & social integration of minority groups in planning for diverse needs. - RPO's 9.14 to 9.17 are also relevant in relation to planning for the provision of recreation & open space facilities to support the creation of healthy & attractive places. - The council is directed to Sections 6.4 and 9.5 of the RSES in promoting social inclusion and local economic development and to RPOs 9.18 and 9.19 which support the role of the Local | |

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| <p>Economic and Community Plan (LECPs) in planning for social infrastructure to meet current and future population needs.</p> <p><u>Theme 6 – Enhanced Amenity and Heritage: Landscape and Green Infrastructure.</u></p> <ul style="list-style-type: none"> - Recognition of the Counties Heritage and Green Infrastructure as key strategic assets and valuable economic resources is welcomed. As the theme centres around the need to co-ordinate spatial planning to conserve and enhance the natural and built environment the council is directed to Chapter 7 of RSES Environment and Climate, and to the guiding principles for Green Infrastructure (Section 7.7), Biodiversity and Natural Heritage (Section 7.5), Ecosystem Services (Section 7.6) and Landscape (Section 7.8). - As the role of Green Infrastructure (GI) and Ecosystem Services in supporting biodiversity and enhanced quality of life is highlighted, in line with RPOs 7.21 and 7.22 of the RSES it is recommended that local authorities promote a GI and an eco-system services approach in development plan preparation. - RPO 7.26 supports the development of guidance for assessment of proposed land zonings to achieve appropriate riparian setback distances that support the attainment of high ecological status for waterbodies, the conservation of biodiversity and good ecosystem health, and buffer zones from flood plains. - RSES emphasises that good heritage management should be incorporated into spatial planning to promote the benefits of heritage led urban regeneration in historic towns, through the protection of the historic urban fabric, the reuse of historic buildings and the enhancement of places of special cultural or natural interest. - The built and natural heritage should be recognised as key resources that will play a positive role in driving economic development in terms of tourism potential. Section 9.7 of the RSES and its related RPOs provides guidance in this regard which should assist in developing plan policy in this area. - As the importance of Access to and delivery of Information and Communication Technologies (ICT) is recognised. Section 8.6 and related RPOs 8.25 and 8.26 underline that digital infrastructure is key to continued growth, supporting businesses and enhancing communities including the delivery of the National Broadband Plan. - Section 10.3 deals with future energy networks including roll out of Smart Grids and Smart Cities and reinforcement of the Greater Dublin Area's transmission network (RPOs 10.19 to 10.24 refer) as part of Eirgrid's Development Strategy. - The council's commitment to support nature-based solutions, the circular economy and renewable energy and to integrate policy and measures into the CDP is noted. The following Sections and RPO's should assist in formulating policy, in this area - The Guiding Principles for Sustainable Urban Drainage Systems (SuDs) set out in Chapter 7 Environment & Climate, - Section 10.4 and RPOs 10.25, 6.23 and 7.37 relating to waste management and the circular economy and bioeconomy. - RPO's 7.35-7.40, 10.20 and 10.22 relating to renewable energy. - It is recommended that the need to identify risks and ensure the resilience of critical infrastructure, as set out in RPO 7.43 of the RSES is considered by the council. <p><u>Theme 7 – Making it happen: Infrastructure, Energy and Communications.</u></p> <ul style="list-style-type: none"> - Provision of water, wastewater, waste management, energy and telecommunication infrastructure are vital to ensure the continued sustainable development of Kildare and for the quality of life for its citizens. | |

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| <ul style="list-style-type: none"> - RSES recognises that the sustainable growth of the Region requires the provision of services and infrastructure in a plan led manner to ensure that there is adequate capacity to support future development. - Information contained in Chapter 5 – MASP, Chapter 8 Connectivity and Chapter 10 - Infrastructure will assist the Planning Authority in developing related policy. - While the Council endeavours to work closely with Irish Water and all key energy providers to ensure the timely provision of infrastructure, early engagement with the relevant agencies is recommended to ensure that water and air quality, noise and waste management accord with relevant EU and national legislation. <p><u>Other Issues /Miscellaneous:</u></p> <ul style="list-style-type: none"> - Early engagement with relevant bodies (OPW, DHPLG, NPWS, EPA and IW) is recommended regarding SEA, AA and SFRA. - The style and legibility of the Plan should ensure that the information contained is clear and accessible for future users. - Officials of the Assembly are available to discuss matters raised in this submission and will be throughout the duration of the Plan process. | |
| <p>CHIEF EXECUTIVE’S OPINION:</p> <p>The comprehensive submission received from EMRA which draws the Council’s attention to a number of key areas that must and will be addressed as part of the review of the Kildare County Development Plan 2017-2023 (the Plan) is acknowledged and the content noted.</p> <p>First and foremost, the Council acknowledges the population targets as set out for Kildare in the NPF and RSES as well as the additional population allocation for Maynooth with respect to NPO 68 and designation as a Key Town in the MASP area. The Council also notes the publication of the Housing Supply Target Methodology for Development Planning (Dec 2020) in this regard. The settlement hierarchy set out in the County Development Plan (as varied) will be reviewed and updated to align with the overall targets for County Kildare which will take account of a range of factors including the level of existing and planned social, community and physical infrastructure and access to high quality public transport. In this regard survey work has been commenced with respect to the county’s rural settlements which will provide an evidence base to inform the emerging Settlement Strategy.</p> <p>A significant number of submissions received as part of the pre-draft consultation related to the importance of achieving compact growth, a key theme which underpins both the NPF and RSES through the sequential development of land, the use of infill and brownfield sites, increased densities and phasing as appropriate. These issues have also come through very strongly in the EMRA submission and in response to the requirements of the NPF and RSES, the Draft Plan will prioritise the inclusion of objectives to ensure sustainable, compact growth which supports modal shifts and promotes a reduction in private modes of transport while all the time being cognisant of infrastructural investment and priorities.</p> <p>The Draft Plan will provide a particular focus on the future development of Maynooth and Naas as the only two Key Towns in Kildare. The additional population allocation for Maynooth pursuant to NPO 68 will provide significant opportunities for the future sustainable development of Maynooth.</p> <p>The world, as we know it, has faced significant and unprecedented challenges over the past year in particular, as a direct result of the Covid 19 pandemic. We have witnessed an obvious surge in the use of open spaces, amenities including our blueways and greenways and with that a greater appreciation</p> | |

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| <p>of our biodiversity, hedgerows, trees and green infrastructure. A parallel increase in walking and cycling has also been witnessed. The Draft Plan policies will further encourage and prioritise investment in the social and community infrastructure to support our growing population. Universal access and design will be key to achieving these goals.</p> <p>In recognition of our built, natural and archaeological assets the Draft Plan will continue to promote the protection and include objectives to enhance these very valuable and irreplaceable aspects of the environment.</p> <p>Towns across the County and indeed, across Ireland, have witnessed an unprecedented change in relation to how citizens shop and a move to online shopping and the closure of many businesses has affected the hearts of our towns and villages. Planning policy has much to do to rejuvenate and revitalise our town centres and to this end the Draft Plan will be particularly focusing on ways to bring life back to our towns and to make these spaces attractive for people to live in and to shop in once more. The Draft Plan will include objectives to support accessible, sustainable transport in our towns and villages which will further add to the attractiveness of these areas.</p> <p>Kildare is very fortunate to have excellent access to our airports, ports, strategic national road and rail infrastructure. This has served to attract employment at all levels in the County and through the plan-making process the Council will continue to work with key partners to improve the attractiveness of Kildare as a county in which to invest and do business. In particular, the Draft Plan will fully support the planned expansion and electrification of the DART into and through the County.</p> <p>It is imperative that the Draft Plan aligns the location of identified strategic employment sites with the Settlement hierarchy and acknowledges that the integration of transport and land use is critical, in developing a future development strategy for the County. Increased employment densities, smart specialisation, clustering, co-working spaces and hubs will also be key components, in accordance with NFP and RSES policies.</p> <p>In acknowledging the challenges and pressures for one off housing in County Kildare while cognisant of commitments and obligations in relation to Climate Change, the Draft Plan must strike a better balance between urban and rural living. The Draft Plan will address and promote a more sustainable way of living where there is less reliance on private modes of transport with more convenient access to social, community and physical infrastructure. The concept of serviced sites has come through in a number of submissions. The Draft Plan will consider this and all other similar concepts as we review the current rural housing policies in conjunction with the preparation of a 'Small Towns and Villages Strategy'.</p> <p>Underpinning the future development of our county are the infrastructural services provided by a number of stakeholders including Irish Water, the NTA, TII and various energy providers. The Council will continue to engage with these and all other service providers to continually improve services and infrastructure provision to support the future development of the County.</p> <p>Fundamental to the above is a requirement to meet our Climate Change Target of net zero emissions by 2050. To this end the Draft Plan will include a set of measurable and achievable targets to monitor the Plan's progress in that regard.</p> | |

CHIEF EXECUTIVE'S RECOMMENDATIONS:Growth Strategy

To ensure that the Draft Kildare County Development Plan CDP aligns with the National Planning Framework and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region (2019), in addition to the Housing Supply Target Methodology for Development Planning (Dec 2020) .

To implement the standardised methodology for land use zoning that sets out a tiered approach to land use zoning (noting NPO 72a and Appendix 3 of the NPF)

To include objectives within the Draft Plan to facilitate sustainable, compact growth taking account of growth enablers and an asset-based approach (Section 3, Section 9, RPO's 3.2 and 3.3 and Table 3.1)

To align the Settlement Hierarchy of the Draft Plan with infrastructural investment and priorities (RPO's 4.1 and 4.2 and Appendix A of the RSES).

To specifically address the role of Maynooth and Naas as Key Towns (RPO's 4.26, 4.27, 4.33-4.36 (Maynooth) and 4.48-4.54 (Naas) in the Draft Plan

Metropolitan Area Strategic Plan:

To include objectives in the Draft Plan that focuses on the delivery of strategic development areas in Leixlip and Maynooth as set out in Table 5.1 of RSES along key public transport corridors, which have capacity to deliver sustainable compact growth (Table 5.1, Section 5.7 of the MASP and RPO's 5.4 and 5.5 of the RSES refer).

To include objectives in the Draft Plan in relation to appropriate residential densities having regard to the settlement hierarchy and the principles of sequential development and compact growth. Table 4.3 "Settlement Typologies and Policy Responses" of the RSES particularly references the provision of higher densities in core strategies being applied to higher order settlements such as Dublin City, Regional Growth Centres and Key Towns. However, it further notes that there should be a graded reduction in residential densities for Self-Sustaining Growth Towns, Self-Sustaining Towns, towns and villages that are commensurate to the existing built environment. (RPO's 5.4 & 5.5).

National and Regional Population Targets:

To include an objective in the draft plan to address the requirements of NPO 68 of the National Planning Framework to provide for **up to** 20% of the phased population growth targeted in Dublin City and suburbs in Maynooth as Kildare's Key Town in the MASP area and in so doing to demonstrate that the requirements of NPO 9 and other NSOs such as compact growth can be achieved at locations on high capacity existing or planned public transport corridors.

Theme 1 - Healthy Placemaking; People and Places

To include objectives in the Draft Plan that highlight the role of built heritage in creating a sense of place (RPO's 9.24 – 9.30)

To include objectives in the Draft Plan to encourage regeneration (Section 9.3) which directly address the revitalisation of town centres, to introduce a greater diversity of daytime and night-time uses, while encouraging sustainable modes of transport/travel.

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| <p>To include objectives in the Draft Plan that relate to the future sustainable growth of rural areas (Section 4.8) and RPO's 4.80 and 4.81 as they relate to rural housing provision.</p> <p>To include objectives in the Draft Plan that support a mix of housing to meet diverse future needs (RPO 9.1), housing types and tenures (RPO 9.3).</p> <p>To outline a monitoring framework in the Draft Plan for each of the identified objectives in the Draft CDP.</p> <p><u>Theme 2 - Economic Opportunity: Innovation, Enterprise, and Employment</u></p> <p>To include objectives within the Draft Plan that;</p> <ol style="list-style-type: none"> align strategic employment with the Settlement Hierarchy, consider the integration of transport and land uses (Section 8.3, RPO's 8.1 & 8.3) have regard to Section 6.3, Guiding Principles for the location of strategic employment and investment prioritisation that include access to suitable locations, serviced sites, connectivity, skilled labour force and local strength have regard to RPO 5.6 in the provision of increased employment densities promote smart specialisation and clustering and Smart Towns (Section 10.3) encourage co-working spaces and digital hubs (RPO 6.31) <p>To include objectives in the Draft Plan to develop the low carbon and circular economy (RPO 6.23) including the identification of a Decarbonation Zone (s).</p> <p>To include objectives in the Draft Plan to support the development of natural and cultural assets (RPO's 6.15 & 6.8)</p> <p>To include objectives in the Draft Plan to support the development of flagship greenways in the Region (RPO's 7.24, 7.25 and RPO 5.7) as part of a Strategic Network including the Grand Canal and Canal Loop Greenway.</p> <p>To ensure that the Draft CDP aligns with the Retail Planning Guidelines with respect to significant retail development and includes objectives to set out the level of retail provision in the county, consistent with the retail hierarchy for the region (Table 6.1 of RSES).</p> <p><u>Theme 3 – Climate Action: Environment, Climate Change and Adaptation.</u></p> <p>To include objectives within the Draft Plan that</p> <ol style="list-style-type: none"> support the roll out of smart grids and future energy networks enabling the promotion of renewable energy sources (RPO's 10.3 & 10.19) address issues relating to water quality, flood risk, extreme weather events and the role of green solutions for better water management (Sections 7.3 & 7.4) - include measures to assess and monitor progress on carbon reduction targets (RPO 3.6 of RSES). <p><u>Theme 4 – Sustainable Mobility: Movement and Transport.</u></p> <p>To include objectives within the Draft Plan to</p> <ol style="list-style-type: none"> support the planned expansion and electrification of DART services to Maynooth, Hazelhatch and Celbridge and the delivery of bus connects, core bus corridors and orbital routes and improved interchange facilities. | |

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| | <ol style="list-style-type: none"> 2) Support the delivery of rail and bus projects set out in tables 8.2 and 8.3 (of the RSES) and similarly with the transport infrastructure projects identified within the MASP (RPO 5.2 and pg. 108). 3) Emphasis sustainability mobility within the Key Towns of Maynooth (RPO 4.33) and Naas (RPO 4.48). 4) support the delivery of new & enhanced public transport infrastructure in Naas & Sallins, including Park & Ride and interchange facilities (RPO 4.52) 5) promote a reduction in car-based commuting, (RPOs 5.2, 5.3, 8.7, 8.8 and 8.9 & Fig 5.3). 6) support modal shifts towards more sustainable modes of transport and to prepare Local Transport Plans to help achieve modal shifts. 7) Facilitate and encourage an increase in electric vehicles use, including measures for more recharging facilities and prioritisation of parking for EV's in central locations. <p><u>Theme 5 – Creative Places: Social, Community and Cultural Development.</u></p> <p>To make provision within the Draft Plan</p> <ul style="list-style-type: none"> - To liaise with the Council's Communication's Team to consider how best to actively engage and promote participation of minority groups. - To include objectives to support the creation of healthy and attractive placemaking (RPO's 9.14 to 9.17) - To support the role of the Local Economic and Community Plan (LECPs) in planning for social infrastructure to meet current and future population needs. <p><u>Theme 6 – Enhanced Amenity and Heritage: Landscape and Green Infrastructure.</u></p> <p>To include objectives within the Draft Plan to</p> <ol style="list-style-type: none"> 1) promote the creation of green infrastructure throughout the county and as part of the development management process. 2) to achieve appropriate riparian setback distances (RPO, 7.21, 7.22, 7.24 & 7.26) 3) facilitate and encourage the use of digital infrastructure (Section 8.6 and related RPOs 8.25 and 8.26). 4) related to waste management and the circular economy and bioeconomy (Section 10.4 and RPOs 10.25, 6.23 and 7.37) 5) To include objectives relating to renewable energy (RPO's 7.35-7.40, 10.20 and 10.22) <p><u>Theme 7 – Making it happen: Infrastructure, Energy and Communications.</u></p> <p>To take account of all aspects of Chapter_5 as it relates to connectivity and infrastructure relevant to County Kildare.</p> |

3.3 National Transport Authority

| Sub. No. 3 | Name: National Transport Authority |
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| <p><u>1. Guiding Principles</u></p> <ul style="list-style-type: none"> • The NTA recommends that the preparation of the Development Plan should be guided by and include land use policies and objectives as set out in the Transport Strategy. • The development of lands, within or contiguous with existing urban areas should be prioritised over development in less accessible locations, particularly in the larger urban areas. • Residential development should be carried out sequentially. Lands which are, or will be, most accessible for walking, cycling and public transport, including infill and brownfield sites, should be prioritised. • Larger scale, trip intensive developments, such as offices and retail, should primarily be focused into central locations in urban areas. • Town centres should be accessible, attractive, vibrant and safe, as places to work, live, shop and engage in community life. • Strong emphasis that all planning considerations should promote walking, cycling and public transport. • The strategic transport function of national roads should be maintained and protected in accordance with national policy; • For all major employment developments and all schools, travel plans should be conditioned as part of planning permissions and be carried out in a manner consistent with existing NTA guidance. <p><u>2. Integrated Implementation Plan 2019-2024</u></p> <ul style="list-style-type: none"> • The NTA published its Implementation Plan 2019-2024, which sets out a range of transport projects that will be delivered or commenced during the life of the Plan. • The full suite of schemes is available in the NTA's Integrated Implementation Plan 2019-2024. The next Government Capital Investment Programme and Greater Dublin Area Transport Strategy will also frame investment in the County over the period of the Development Plan. <p><u>Bus Investment:</u></p> <ul style="list-style-type: none"> • BusConnects Dublin, which commenced in 2018, is a comprehensive package of measures that aims to revise the current bus system in the Greater Dublin area. The following would be relevant to the preparation of the Kildare Draft County Development Plan. • A complete redesign of the network of bus routes; ☐ The development of Core Bus Corridors (CBCs); Of particular relevance to Kildare are the following: <p>Radial CBC's:</p> <p>Lucan – City Centre;</p> <p>Tallaght – Terenure;</p> <p>Oribtal CBC's</p> <p>Maynooth – Tallaght;</p> <ul style="list-style-type: none"> • Improved Interchange Facilities (in particular Liffey Valley and Tallaght); and • Improved Bus Stops and Shelters. <p><u>Light Rail Investment</u></p> <ul style="list-style-type: none"> • Network Development – Luas to Lucan; and • Fleet and Network Enhancement. | |

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| Sub. No. 3 | Name: National Transport Authority |
| <p><u>Heavy Rail Investment:</u></p> <ul style="list-style-type: none"> • DART Expansion Programme; (electrification of Kildare Line to Hazelhatch-Celbridge and the Maynooth Line to Maynooth); • DART+ West to Maynooth will be the first project as part of the Expansion Programme; • Network Development; and • Station Improvements and Other Enhancements. <p><u>Integration Measures and Sustainable Transport Investment:</u></p> <ul style="list-style-type: none"> • Delivery of the Greater Dublin Area Cycle Network Plan (2013); • Improved Cycle Parking; • Identification/Enhancement of a Strategic Pedestrian Network; • Traffic Management Schemes; • Safety Schemes; and • Integration Projects, including Real Time Passenger Information and Integrated Ticketing. <p><u>3. Movement at Inter-Settlement level</u></p> <ul style="list-style-type: none"> • Recommends that an assessment of inter-settlement travel patterns across the County and to key settlements in neighbouring counties is undertaken. • The CDP should examine commuting patterns between the Kildare towns, and the interdependencies of the towns in both the north and south of the County and also to towns in neighbouring Counties as well as Dublin City. This can be used in the formulation of land use policies, which then affect more sustainable travel pattern outcomes. <p><u>4. Movement at Settlement Level – Local Transport Plans (LTP)</u></p> <ul style="list-style-type: none"> • Recommends that Local Transport Plans are prepared for the higher order settlements in the County. • The Athy ABTA is an exemplar of the application of the ABTA/LTP process as outlined in the NTA/TII document Area Based Transport Assessment. • The NTA look forward to the replication of the ABTA/LTP process in association with the delivery of all LAPs in the County. <p><u>5. Provision of Public Transport Services in Rural Areas</u></p> <ul style="list-style-type: none"> • Recommends that the rural economy and the rural social fabric should be supported through the provision of better local connectivity and connectivity to services and commercial activities located in cities and towns. • Urban-generated development in rural areas needs to be managed in such a way so as to safeguard the integrity of rural areas. • The NTA has recently launched the Connecting Ireland: Rural Mobility Plan. • The plan aims to improve mobility in rural areas. • The Connecting Ireland: Rural Mobility Plan will be led by the NTA but delivering it will take a partnership approach with transport operators and local authorities. The NTA intends to | |

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| | <p>engage with local authorities and the public over the course of 2021 with a view to have a final Draft plan by the end of the year.</p> <ul style="list-style-type: none"> • The NTA continues to provide rural transport services through the Local Link Rural Transport Programme. The key priorities of this programme continue to be directed at addressing rural social exclusion and the integration of rural transport services with other public transport services. • The NTA will develop and expand the Local Link Rural Transport Programme: • It is recommended that the Development Plan acknowledges the role rural transport services can perform in providing for social and economic connectivity between small villages/rural areas and larger towns. Policies and objectives to support the role of rural transport, in particular, the Connecting Ireland plan should be included in the Development Plan. <p><u>6. Strategic Road Network;</u></p> <ul style="list-style-type: none"> • In order to protect the strategic transport function of the national roads, including motorways, the NTA recommends that development objectives of the County Development Plan should be in accordance with the DOECLG Spatial Planning and National Roads Guidelines (2012), and that this should be referenced in the Development Plan. <p><u>7. Parking Standards</u></p> <p><u>Car Parking</u></p> <ul style="list-style-type: none"> • All non-residential development proposals should be subject to maximum parking standards. In locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied – of particular relevance to the larger urban areas. <p><u>Cycle Parking</u></p> <ul style="list-style-type: none"> • The Development Plan should include specific policies on cycle parking in the urban realm and in private developments. The NTA recommends the Standards for Cycle Parking and Associated Cycling Facilities for New Developments document issued by Dun Laoghaire Rathdown County Council in 2018, which includes comprehensive guidance on the design of cycle parking. <p><u>8. Accessibility</u></p> <ul style="list-style-type: none"> • Enabling universal access and facilitating and promoting universal design should be a key consideration in the development plan, as it relates to transport policies and objectives. • Objectives which promote universal design in the external built environment such as providing separate pedestrian entrances, the provision of dropped curbs and tactile paving will provide a safer and more attractive environment for all. <p><u>9. National Transport Authority Guidance Documents</u></p> <ul style="list-style-type: none"> • The NTA recommends that the preparation of the Development Plan is informed by the following NTA guidance, • The National Cycle Manual; |

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| <ul style="list-style-type: none"> • Permeability Best Practice Guide; • Achieving Effective Workplace Travel Plans: • Guidance for Local Authorities; • Workplace Travel Plans: A Guide for Implementers; • Toolkit for School Travel; and • Guidance Note on Area Based Transport Assessment (NTA and TII). | |
| <p><u>10. Development Plan Indicators – Mode Share</u></p> <ul style="list-style-type: none"> • It is recommended that the Development Plan includes sustainable transport indicators, including mode share, for the purpose of monitoring the efficacy of policies and development objectives against a range of sustainable development indicators. • The NTA would be happy to work with Kildare County Council on the development and analysis of sustainable transport indicators, in conjunction with the OPR. | |
| <p>CHIEF EXECUTIVE’S OPINION:</p> <p>The comprehensive submission received from the NTA which draws the Council’s attention to a number of key areas that must and will be addressed as part of the review of the Kildare County Development Plan 2017-2023 (the Plan) is acknowledged and noted.</p> <p>The role of road, rail and sustainable modes of transport cannot be underestimated in terms of how the county works. The significant investment in infrastructural projects that have taken place to date and that are planned for the county are all very welcome and add to the attractiveness of Kildare as a place in which to live, work, do business and recreate.</p> <p>Climate Change and the adaptation and mitigation interventions required in future land use plans will very much be to the fore of the Draft Plan and in our efforts to reach net zero emissions by 2050. To achieve this the Draft Plan must encourage, facilitate and provide the necessary infrastructure to create a modal shift in favour of more sustainable modes of transport including public transport, cycling and walking. Integration between sustainable modes of transport and proposed land uses is particularly important. Universal access and design will be prioritised in order to benefit all parts of our community.</p> <p>A body of work needs to be undertaken to determine the degree to which out commuting from the county is taking place and what the Plan can do to identify, address and reduce the level of out commuting. This will to some degree be addressed through the development of co-working hubs which should also assist in rejuvenating our towns in particular.</p> <p>The Council is supportive of the NTA’s continued provision of rural transport services especially through the Local Link Rural Transport Programme which reaches out to those in communities who are heavily reliant on such means of transport for a variety of purposes including retail, amenity and social. High quality public transport connections and services to our towns and villages in particular is therefore exceptionally important.</p> <p>It is accepted that the Draft Plan must address the use of private modes of transport particularly. In this regard the Plan will revisit the current car parking standards to discourage the use of the car where possible and to make other more sustainable, accessible modes of transport more readily available. This will require a significant cultural shift but one which the Draft Plan must address, particularly in</p> | |

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| Sub. No. 3 | Name: National Transport Authority |
| <p>areas that are already well served by sustainable, accessible modes of transport or where there are plans to improve the sustainable mode offering.</p> <p>In order to discourage people away from private modes of transport the cycling infrastructure within the county must continue to be improved and the Council will continue to be supportive of any measures to improve the cycling network and to implement such measures/schemes as a priority.</p> <p>In order to achieve all of the above the Draft Plan will include a set of measurable and achievable targets throughout the Plan in order to track progress in achieving our Climate Change goals through the modal shift.</p> <p>CHIEF EXECUTIVE’S RECOMMENDATIONS:</p> <p><u>Guiding Principles</u></p> <p>To align the CDP and LAPs with the relevant NTA Transport Strategy for the GDA</p> <p>To include an objective to require the preparation of Local Transport Plans/Area Based Transport Assessments to inform future development strategies for larger settlements in County Kildare.</p> <p>To adopt the sequential approach to land use zoning and to have regard to the accessibility of sites to high quality public transport.</p> <p>To include objectives in the Draft Plan that promote walking, cycling and public transport.</p> <p>To include objectives in the Draft Plan to maintain and protect the strategic function of national roads in accordance with the DOECLG Spatial Planning and National Roads Guidelines (2012)</p> <p>To include objectives in the Draft Plan that require sustainable travel plans for all major employment developments and schools</p> <p><u>Integrated Implementation Plan 2019-2024</u></p> <p>To include objectives to support the delivery of transport projects in the NTA Implementation Plan 2019-2024 that will be delivered or commenced during the life of the Plan.</p> <p>To support bus, light rail and heavy rail investment programmes as they relate to Kildare.</p> <p>To support sustainable transport investment in relation to, inter alia, cycling, pedestrians, traffic management and safety schemes.</p> <p><u>Movement at Inter-Settlement level</u></p> <p>To investigate the feasibility of undertaking an assessment of inter-settlement travel patterns and analyse commuting patterns, in conjunction with the NTA.</p> <p><u>Provision of Public Transport Services in Rural Areas</u></p> <p>To include policies/objectives in the Draft Plan that acknowledge the role rural transport services can perform in providing for social and economic connectivity between small villages/rural areas and larger</p> | |

| Sub. No. 3 | Name: National Transport Authority |
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| <p>towns and in particular to support the role of rural transport and to reference the '<i>Strengthening the Connections in Rural Ireland</i>'.</p> <p><u>Parking</u></p> <p>To include maximum parking standards and to consider doing so on an area wide basis with reference to their proximity to high quality public transport corridors/hubs.</p> <p><u>Cycling</u></p> <p>To include objectives in the Draft Plan on well-designed cycle parking</p> <p><u>Accessibility</u></p> <p>To include objectives in the Draft Plan to ensure universal access</p> <p><u>Monitoring</u></p> <p>To include sustainable transport indicators</p> | |

3.4 Transport Infrastructure Ireland

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| Sub. No. 4 | Name: Transport Infrastructure Ireland (TII) |
| <p><u>1. MANAGING EXCHEQUER INVESTMENT AND STATUTORY GUIDANCE:</u></p> <ul style="list-style-type: none"> • The M/N7 corridor is a strategic core road in the national roads corridor network of national significance providing access to the midlands and southwest of the country. The M/N9 is a designated comprehensive route, which also provides access to the south/southeast of the country including providing access to international markets for freight and tourist traffic through Rosslare Euro-port. The Council will be aware that the national primary road corridor is identified as part of the TEN-T Comprehensive Network. The M4 to the west is also a designated comprehensive route, which provides a strategic access route to the west. Such designations have repercussions and action requirements for policies and objectives which should be considered in the preparation of the new County Development Plan. • In addition to the M7/N7, M9/N9 and M4, the national secondary roads, the N78 and N81, provide important regional and inter-regional connectivity within and through County Kildare. • It is of particular importance that policies and objectives are drafted, which allow the network of national roads to continue to play their intended strategic role. • There is a critical need to manage these assets in accordance with national and regional policy as outlined in Smarter Travel (DTTAS, 2009), (SFILT) Investing in our Transport Future (DTTAS, 2015), the provisions of the Section 28 DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), Project Ireland 2040 and the Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy (EMRA RSES). • TII requests that the County Development Plan reflects the foregoing provisions of official policy and national objectives in relation to spatial planning and national roads. <p><u>2. DEVELOPMENT AND CORE STRATEGY</u></p> <ul style="list-style-type: none"> • The Authority requests that the Council consider the implications of land use policies on the strategic national road network in the area as a criterion in determining the future land use zoning strategy to be outlined in the Draft Development Plan and the respective Core Strategy. • Policies and objectives in identified urban growth areas can be developed and adopted in order to avoid undermining the strategic transport function of national roads. • In accordance with Government policy, the Authority supports practices aimed at concentrating development in established urban areas and designated development centres subject to development being framed within a coherent integrated land use and transportation strategy. • The Authority recommends that residential, retail, and employment objectives especially zoning objectives should guide developers to design for sustainable transportation requirements at the earliest stages of development design. • An integrated approach to the design of development areas should include a set of principles and criteria designed to ensure a high standard of access by public transport, foot and private | |

| Sub. No. 4 | Name: Transport Infrastructure Ireland (TII) |
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| | <p>car so that the variety of residential, enterprise and employment zones/areas can be easily accessible by all modes of transport and all sections of society. This will be particularly relevant to Maynooth and Naas identified as Key Towns in the EMRA RSES while ensuring the complementary objective of supporting the improvement, and protection, of the EU TENT network and the strategic function of the M4 and M/N7 respectively.</p> <ul style="list-style-type: none"> • The Development Plan should have regard to the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) by ensuring that the capacity on national roads is utilised appropriately and that such roads can continue to perform their intended function into the future. • The Council is also advised that any costs such as land acquisition, additional road infrastructure and environmental mitigation measures arising to the national roads network to accommodate local development proposals will be borne by the local authority and will not be funded by TII and thus should be integrated within future local development contributions schemes. • The co-ordination of land use planning and transportation will be a critical to achieving the complementary objectives of compact urban growth while safeguarding the strategic function of the M4, M/N7 and M/N9 strategic road corridors. <p><u>a Development at National Road Junctions</u></p> <ul style="list-style-type: none"> • It will be important for the Council to exercise particular care in their assessment and management of development proposals in the Development Plan relating to the zoning of locations at or close to junctions on the national road network where such development could generate significant additional traffic, thereby potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users. • The Council should have regard to Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines. • Planning authorities, in considering proposals for zonings adjacent or close to existing or planned national roads/motorways and junctions, should give special attention to the preferences expressed in the Retail Planning Guidelines for locating developments that attract many trips within established towns and district centres. • TII notes the requirement under RPO 4.35 for a cross boundary joint LAP to be created between Kildare County Council and Meath County Council to provide a co-ordinated planning framework for the Maynooth area. TII welcomes consultation with the Council in relation to such proposals where there may be implications for the national road network. • It is the Authority's opinion that the Council should continue to undertake appropriate Area Based Transport Assessment and/or Strategic Transport Assessment (STA) to support the preparation of the Draft County Development Plan, particularly, in relation to areas of planned development which have an interface with the national road network. |

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| <ul style="list-style-type: none"> TII welcomes and commends the recently prepared Draft Athy Local Area Plan which demonstrated the above approach. <p><u>b. Access to National Roads</u></p> <ul style="list-style-type: none"> The DoECLG Spatial Planning and National Roads Guidelines also advise, Section 2.5 refers, that development plans should make it clear that the policy of the planning authority will be to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 50kph apply. It is requested that this official policy provision is reflected in the Development Plan. Consistent approach to development management issues be coordinated on national roads by local authorities, whereby cross boundary issues apply i.e., where adjacent functional areas share a common stretch of national road, in the interest of consistency and transparency. <p><u>c. 'Exceptional Circumstances'</u></p> <ul style="list-style-type: none"> Where the planning authority proposes to exercise a less restrictive approach to the control of development accessing national roads, this should be plan led, done in consultation with and subject to the agreement of TII in accordance with the provisions of Section 2.6 of the DoECLG Spatial Planning and National Roads Guidelines. <p><u>3. TRANSPORT PLANNING AND NATIONAL ROAD SCHEMES;</u></p> <ul style="list-style-type: none"> The Authority is developing/progressing road schemes and improvements within County Kildare, details of which should be considered for incorporation into the review of the County Development Plan. Related to the foregoing, the Authority requests the inclusion of policies and objectives in the Development Plan that provide for the following: Objectives providing for development of the relevant national road schemes. A policy to protect routes of national road schemes free from adverse development that may compromise the development of route options or the construction of preferred routes or add to the overall costs associated with proposed schemes. <p><u>4. OTHER SPECIFIC POLICIES AND OBJECTIVES</u></p> <p><u>a. Road Safety</u></p> <ul style="list-style-type: none"> The Road Safety Authority's Road Safety Strategy, 2013 – 2020, builds on existing road safety interventions. The design of development proposals must address the functionality and safety of the road needs. Two processes specifically address these design concerns: Road Safety Impact Assessment (RSIA) and Road Safety Audit (RSA). | |

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| Sub. No. 4 | Name: Transport Infrastructure Ireland (TII) |
| <p><u>b. Traffic and Transport Assessment (TTA)</u></p> <ul style="list-style-type: none"> • The Authority recommends that planning applications for significant development proposals should be accompanied with a TTA to be carried out by suitably competent consultants, which are assessed in association with their cumulative impact with other relevant developments on the road network. • The Council are requested to reference the TII Traffic & Transport Assessment Guidelines (2014) in the Draft Development Plan relating to development proposals with implications for the national road network. <p><u>c. Service Areas</u></p> <ul style="list-style-type: none"> • The Authority would welcome the provisions of the TII Service Area Policy (2014) and the DoECLG Guidelines reflected in the Draft County Development Plan. <p><u>d. Signage</u></p> <ul style="list-style-type: none"> • TII has also issued the Policy on the Provision of Tourist & Leisure Signage on National Roads (March 2011) and the Planning Authority is also referred to Section 3.8 of the DoECLG's Spatial Planning and National Roads Guidelines which indicates a requirement to control the proliferation of non-road traffic signage on and adjacent to national roads. The Authority would welcome the provisions of the TII Policy and the DoECLG Guidelines incorporated into the new Development Plan. <p><u>e. Noise</u></p> <ul style="list-style-type: none"> • The Council is requested to refer to the requirements of S.I. No. 140 of 2006 Environmental Noise Regulations in the Draft Plan. <p><u>f. Safeguarding national road drainage regimes</u></p> <ul style="list-style-type: none"> • National road surface water drainage regimes are constructed with the objective of disposing of national road surface water, it is important that capacity in the drainage regime is retained to address this function. • Having regard to the extensive national road and motorway network in Kildare, TII would welcome consideration of a new Objective included in the Development Plan outlining that: 'The capacity and efficiency of the national road network drainage regimes in Kildare will be safeguarded for national road drainage purposes.' <p><u>g. Renewable Energy</u></p> <ul style="list-style-type: none"> • In relation to Solar Energy development proposals, TII recommends that an objective is included in the Plan requiring the submission of Glint and Glare Assessments with relevant applications where there may be implications for the safety and efficiency of the strategic national road network. • The TII would welcome consideration being given to including an objective in the Development Plan, in relation to renewable energy and in relation to safeguarding the national road network, | |

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| <p>indicating that it should be demonstrated that an assessment of all alternative grid connection route options has been undertaken prior to any proposals being brought forward for grid connection utilising the national road network.</p> <p>5. CONCLUSION</p> <ul style="list-style-type: none"> • Having regard to the foregoing, the Authority recommends that the development objectives included in the Draft Development Plan reflect the provisions of the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012) which indicates the importance of developing an evidence-based approach at development plan stage for proposals with implications for the on-going safe and efficient operation of national roads. <p>CHIEF EXECUTIVE’S OPINION:</p> <p>The comprehensive submission received from the TII which draws attention to a number of key areas that must and will be addressed as part of the review of the Kildare County Development Plan 2017-2023 (the Plan) is acknowledged and noted.</p> <p>The role of the national road network in Kildare is acknowledged while it adds to the attractiveness of Kildare as a county in which to live, work, do business and recreate, the Council also acknowledges the critical need to manage these assets in accordance with national and regional policy as outlined in Smarter Travel (DTTAS, 2009), (SFILT) Investing in our Transport Future (DTTAS, 2015), the provisions of the Section 28 DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), Project Ireland 2040 and the Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy (EMRA RSES).</p> <p>Climate Change and the adaptation and mitigation interventions required in future land use plans will very much be to the fore of the Plan and in our efforts to reach net zero emissions by 2050. To achieve this, the Draft Plan must encourage, facilitate and provide the necessary infrastructure to create a modal shift in favour of more sustainable modes of transport including public transport, cycling and walking which must transcend all aspects of our way of life in Kildare. Integration between sustainable modes of transport and our proposed land uses is particularly important. Universal access and design will be prioritised in order to benefit all parts of our community.</p> <p>The Council, through the plan-making process is committed to continuing to undertake Area Based Transport Assessments as appropriate and the Council welcomes the positive comments that have been provided with respect to the Draft Athy Local Area Plan in that regard.</p> <p>In order to achieve all of the above the Draft Plan will include a set of measurable and achievable targets in order to track progress in achieving national Climate Change goals through local and regional interventions.</p> <p>CHIEF EXECUTIVE’S RECOMMENDATIONS:</p> <p>To include policies and objectives in the Draft Plan to safeguard the strategic role of national roads and their associated junctions and to preserve known routes for national road schemes and keep them free from development.</p> | |

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| | <p>To include objectives in the Draft Plan to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 50kph apply or as otherwise agreed with TII.</p> <p>To include objectives that require the design of sustainable transportation, where appropriate, as part of all planning proposals through the Development Management process.</p> <p>To include objectives and measurable targets that increase modal shift to sustainable and accessible transport throughout the county; particularly in Maynooth and Naas as Key Towns in the region.</p> <p>To include objectives in the Draft Plan to promote compact urban growth. In accordance with NSO 1 of the NPF and RPO 2 of the RSES.</p> <p>To promote the location of developments that attract many trips within established towns.</p> <p>To undertake Area Based Transport Assessment and/or Strategic Transport Assessment (STA) to support the preparation of the Draft County Development Plan and Local Area Plans where appropriate.</p> <p>To include objectives in the Draft Plan to control the proliferation of non-road traffic signage on and adjacent to national roads.</p> <p>To include objectives in the Draft Plan to safeguard the capacity and efficiency of the national road network drainage regimes in Kildare.</p> <p>To include an objective in the Draft Plan to require the submission of a Glint and Glare Assessment as part of any solar energy development proposal where there is likely to be any impact on the national road network.</p> <p>To include an objective in the Draft Plan to require the assessment of all alternative grid connection route options prior to any proposals for grid connection utilising the national road network.</p> |

4.0 Issues raised in Non-Statutory Submissions, Chief Executive's Opinions and Chief Executive's Recommendations

The Chief Executive's opinion and recommendations are set out below in response to the issues raised in the public consultation in line with the key themes raised in the Issues Paper.

4.1 Healthy Placemaking: People and Places

Statutory Authorities

All acknowledge that healthy placemaking is a key consideration in the development of the strategic objectives of the County Development Plan. Objectives must be consistent with National and Regional Policy along with other relevant plans, strategies and Guidelines. Specific reference made to:

- National Planning Framework (NPF)
- Eastern Midlands Regional Economic and Spatial Strategy (RSES)
- Metropolitan Area Strategic Plan (MASP)
- National Disability Inclusion Strategy 2017-2021” and the ratification by Ireland in 2018 of the United Nations Convention on the Rights of Persons with Disabilities.
- The Planning System and Flood Risk Management Guidelines (2009).
- Draft Meath County Development Plan 2020;
- Urban Design Manual – A Best Practice Guide (2009);
- Re; National Positive Ageing Strategy;
- Apartment Guidelines (2020)
- Social Housing Strategy 2020.
- Building Height Guidelines (2020).

In brief:

OPR: Core Strategy & Settlement Strategy, Compact Growth & Zoning, Rural Development.

DCHG: Wetlands & Waterways, Hedgerows

EMRA: Settlement Compact Growth, Compliance with Settlement Strategy of the RSES,

OPW: Flood Risk

Dept. of Tourism, Culture, Arts, Gaeltacht: Vernacular Buildings & Settlements, Architectural Conservation Areas.

Department of Education: Population Growth, Zoning, Infrastructure & Services

An Taisce: Zoned Land, Rural Development, Compact Growth, Infrastructure.

Meath County Council: Maynooth & Maynooth Outer Orbital Route (MOOR), Kilcock & Local Distributor Road.

Dept. of Public Health: Housing

HSE: Compact Growth, Housing, Environmental Noise

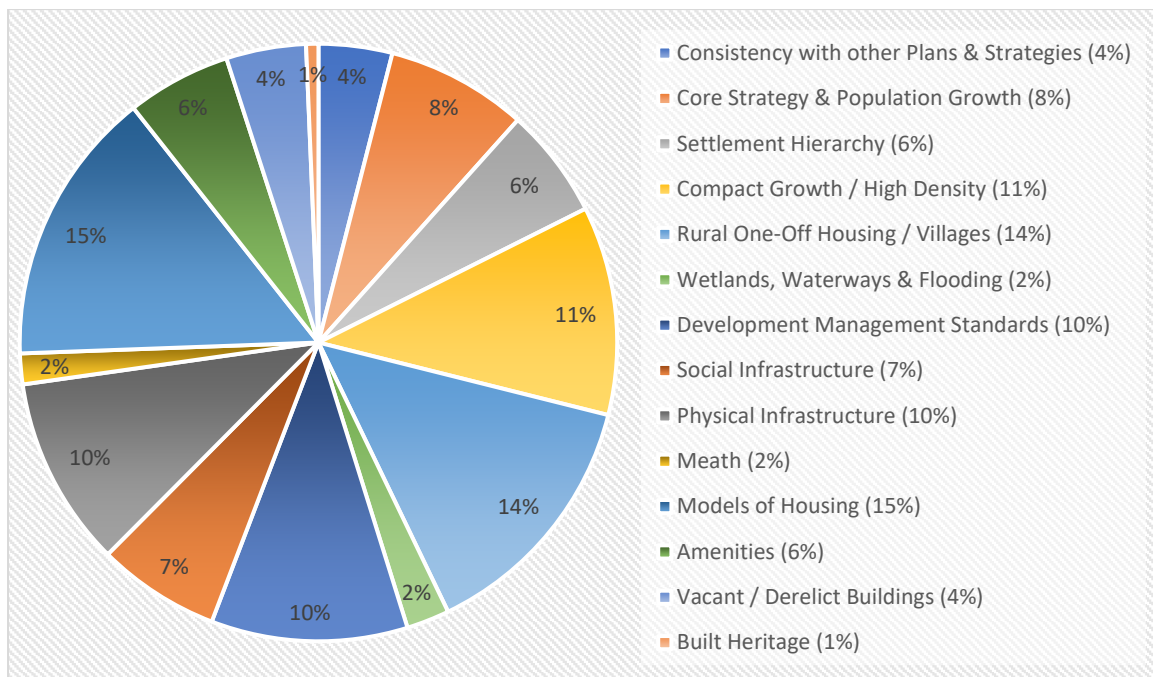


Fig 1 – Breakdown of submission type received in relation to ‘Theme 1 – Healthy Placemaking’

ISSUES

Consistency with other Plans and Strategies

Submission Nos. 016, 033, 057, 273, 278, 300, 303, 304, 305, 306, 307, 312

- (a) The promotion of compact growth shall be in line with the NPF and RSES
- (b) The hierarchy of settlements in the CDP to be revisited and determined in accordance with the settlement hierarchy, and the guiding principles and typology of settlements in the RSES
- (c) The Metropolitan Area Strategic Plan sets out details identifying several strategic areas along key public transport corridors, which have capacity to deliver sustainable compact growth
- (d) The need to align population, employment and housing growth, promote sustainable growth in the right locations, deliver higher densities, facilitate compact growth, and an appropriate mix of housing for communities is all outlined in the RSES
- (e) Have regard to the objectives as set out in the Draft Meath CDP, specifically in relation to Maynooth and Kilcock
- (f) Support ‘mixed tenure’, which is supported by national policies such as the Social Housing Strategy 2020
- (g) The CDP should be aware of the disconnect between CSO and NPF growth figures
- (h) The NPF / RSES have underestimated population growth and therefore the 50% headroom should still apply. The figure used in the Kildare Housing Strategy is more appropriate, which should be used in the new Core Strategy
- (i) The CDP should be in accordance with the Apartment Guidelines (2000) and Building Height Guidelines (2018)
- (j) The RSES directs that ‘local authorities shall apply an evidence driven asset-based approach to the consideration of all settlements

(k) The promotion of cluster type developments in towns/villages is to counteract rural off-off housing as outlined in the NPF

CHIEF EXECUTIVE'S OPINION

Consistency with other Plans and Strategies

Since 2015, Ireland has been a signatory to the United Nations Sustainable Development Goals which frame national agendas and policies to 2030. There are 17 goals in total which include '*Climate Action*', '*Good Health and Well-being*', and '*Sustainable cities and communities*'.

The National Planning Framework (NPF) includes 10 '*National Strategic Outcomes*' which very closely align with the UN Goals and they include; '*Transition to a Low Carbon and Climate Resilient Society*', '*Strengthened Rural Economies and Communities*', '*Sustainable Mobility*' and '*Compact Growth*'.

With respect to the location of the Kildare in the EMRA region, the Regional Spatial and Economic Strategy in turn aligns with the NPF and its 16 '*Regional Strategic Outcomes*' include '*Support the Transition to Low Carbon and Clean Energy*', '*Sustainable Travel Patterns*', '*Compact Growth and Urban Regeneration*', '*Healthy Communities*' and '*Integrated Transport and Land Use*'.

The Draft CDP will be informed by the sustainable '*National Strategic Outcomes*' and '*Regional Strategic Outcomes*' NPF and RSES policy documents which set out key concepts for proper planning including compact growth, the alignment of projected population with housing, employment and the necessary, supporting social, community and physical infrastructure in appropriate, sustainable locations.

The settlement hierarchy in the current CDP will be reviewed and updated and will be informed by the level of existing and proposed social, community and physical infrastructure assets in the rural settlements and nodes. Naas and Maynooth will be designated as Key Towns in accordance with the RSES.

In relation to the overall population and housing targets for Kildare, the Draft Plan will have regard to the NPF Roadmap, the RSES, the '*Housing Supply Target Methodology for Development Planning*' and the recently published Housing Needs Demand Assessment (HNDA) Toolkit.

The Draft CDP will have regard to the policies and objectives of the Draft Meath CDP with respect to both Maynooth and Kilcock, due to the geographical location of the Meath County Council administrative area relative to both towns.

CHIEF EXECUTIVE'S RECOMMENDATION

Consistency with other Plans and Strategies

The Draft CDP will have regard to the NPF Roadmap, the RSES, the '*Housing Supply Target Methodology for Development Planning*' and the HNDA Toolkit in determining the quantum of future housing for Kildare over the plan period and in identifying suitable locations for such housing, where it promotes the concept of compact growth and sustainable planning.

Core Strategy & Population Growth

Submission Nos. 033, 099, 164, 186, 191, 198, 201, 227, 229, 267, 268, 273, 274, 278, 307, 308, 312, 314, 316, 317, Public Meetings

- (a) Direct population and growth into the key towns of Maynooth and Naas, and towns in the Metropolitan Area with good road/rail infrastructure, such as Leixlip
- (b) The Core Strategy should consider the following; the natural growth of population, net migration, no. of persons in each household, obsolescence of existing housing stock, household formation (through separations/divorce)
- (c) The disconnect between CSO and NPF growth figures may result in the CDP failing “to ensure continuity of supply of zoned residential land”
- (d) Variation No. 1 of the Kildare County Development Plan 2017-2023 greatly understates the quantum of residential development needed in Athy. Falling household sizes need to be considered. The 50% headroom does not take account of the phasing of residential land, as occurs in locations such as Kildare Town
- (e) Strong and detailed policies are needed, to ensure that the right development happens in the right place and that future housing development occurs along existing public transport corridors such as Rail and Bus and that park and ride facilities be provided along these routes
- (f) Towns in the North East of the county act as feeder towns with residents leaving their town centres to work, shop and socialise elsewhere. This needs to be reversed
- (g) Celbridge is a suitable location where additional residential growth can take place, particularly to the south of Celbridge, close to the rail infrastructure
- (h) Maintaining headroom levels of 50% or greater over a 9 -year period would provide an improved chance of matching actual delivery with the needs of the growing population in the county
- (i) Ensure that appropriate population targets are clearly set and align with regional policy
- (j) The proposed population figures are outdated and will frustrate the delivery of affordable housing. Please ensure that a sufficient quantity of social housing is built to meet the needs of the expected population growth
- (k) The level of growth proposed for Kill in terms of housing is considered to be inadequate and should be addressed
- (l) The full potential of the Naas Canal Harbour and the North West Quarter is not being realised
- (m) The CDP should build in greater flexibility with respect to housing targets
- (n) Consider additional lands for housing in Castledermot

CHIEF EXECUTIVE’S OPINION

Core Strategy & Population Growth

The Planning and Development (Amendment) Act 2010 introduced a requirement for an evidence based ‘Core Strategy’ to form part of all Development Plans. The purpose of the Core Strategy is to set out the medium to longer term quantitatively based strategy for the spatial development of the area of the planning authority and in so doing, to demonstrate that a development plan and its policies and objectives are consistent with the ‘National Strategic Outcomes’ of the ‘National Planning Framework’ and the ‘Regional Strategic Outcomes’ of the ‘Regional Spatial and Economic Strategy’ for the EMRA region, of which Kildare is a part.

The Core Strategy of the Draft CDP, which will fully align with the RSES policy document, will set the vision for the strategic direction of the County to the end of the Plan period in 2029. The Draft CDP must ensure that development occurs at appropriate locations throughout the county and will be particularly encouraged where it occurs along or in close proximity to public transport corridors, either existing or planned, in the interests of sustainable development.

It should be noted that Section 5.7 of the RSES states that '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.

The Draft CDP will address this population redistribution being attributed to Maynooth. Maynooth, through the Draft CDP and LAP must demonstrate its ability to accommodate compact growth around a high capacity planned and existing public transport network.

CHIEF EXECUTIVE'S RECOMMENDATION

Core Strategy & Population Growth

To align the Core Strategy and population targets of the Draft CDP with the NPF Roadmap and the RSES.

To prepare a Housing Needs Demand Assessment to inform the Housing Strategy for the Draft Plan.

Settlement Hierarchy

Submission Nos. 001, 005, 029, 033, 057, 164, 173, 193, 199, 206, 268, 270, 273, 274, 277, 286, 300, Public Meetings

- (a) The CDP should revisit and update the categorisation of settlements in the settlement hierarchy.
- (b) Maynooth and Naas are identified as Key Towns in the RSES and this should be reflected in the CDP.
- (c) Clane should be upgraded from "Small Town" to Self-Sustaining Town as identified in the RSES.
- (d) A Housing Need Demand Assessment should identify and prioritise Maynooth, Naas and Leixlip for additional growth.
- (e) If the land zoned in the smaller settlements cannot be delivered without new investment in enabling infrastructure, then the housing allocations should be released and allocated elsewhere. The CDP should maximise the provision of housing.
- (f) Sallins and Naas should be amalgamated into one settlement.
- (g) Celbridge should be recognised as a 'Self-Sustaining Town' subject to improvements in physical and social infrastructure.
- (h) The designation of Newbridge as a self-sustaining growth town (like Athy and Kildare) does not reflect its full potential.
- (i) Celbridge should be given a higher ranking in the next Settlement Strategy as a Self-Sustaining Growth Town.

(j) Towns should grow at a sustainable level appropriate to their position in their hierarchy as set out in Tables 4.2 and 4.3 of the RSES.

(k) We need a stronger designation in the Settlement Hierarchy for Athy and Newbridge.

(l) Kildare town is a location which can be identified as a national 'Tourism Hub' and where facilities can be sustainably developed in the town. A national tourism hub located in Kildare Town should be centred on the town side of the motorway to develop a walkable centre, where the majority of the main heritage and retail attractions are located. The National Tourism Hub identified in the current KCDP is unsuitable.

(m) Ardclough should be defined as a Rural Settlement in the Settlement Hierarchy.

CHIEF EXECUTIVE'S OPINION

Settlement Hierarchy

The Settlement Hierarchy of the Draft CDP will continue to align with the RSES, particularly in relation to Maynooth and Naas which are identified as Key Towns.

In relation to 'self-sustaining growth towns', 'self-sustaining towns', towns and villages' and 'rural' settlement typologies, the RSES provides characteristics associated with the above typologies and leaves the determination of which settlement best fits the various typologies to the respective local authorities.

As part of the review of the Settlement Hierarchy, an audit of the existing and proposed social, community and physical infrastructure in the settlements and nodes will be undertaken. This process will help to determine which areas should continue to remain in the Settlement Hierarchy based on their level of service provision and which areas should perhaps be considered to be omitted from the Settlement Hierarchy. Appendix 3 of the NPF should also be noted in this regard which highlights that serviced lands or lands that are serviceable during the life of the Plan may be considered for development during the plan period.

CHIEF EXECUTIVE'S RECOMMENDATION

Settlement Hierarchy

To consider Table 4.2 (Settlement Hierarchy) of RSES in developing Kildare's settlement hierarchy.

To consider the quantum of social, community and physical infrastructure that either exists or is planned throughout the county as an evidence base method towards informing the placing of our towns/villages/nodes in our settlement hierarchy.

Compact Growth/High Density

Submission Nos. 005, 014, 018, 040, 045, 056, 058, 070, 072, 073, 089, 109, 131, 134, 137, 145, 147, 162, 164, 166, 193, 200, 201, 202, 211, 229, 262 269, 273, 274, 278, 286, 316, Public Meetings

(a) The challenge of delivering higher densities to facilitate compact growth, and an appropriate mix of housing for communities, is recognised.

(b) Consolidated urban forms should be provided for in the CDP.

(c) Support the regeneration of Kildare's towns and villages to achieve compact growth.

- (d) The CDP should support the reuse and repopulation of town centre spaces, such as under used buildings and brownfield spaces where there is potential for regeneration.
- (e) Promotion of '10 / 15 minute' towns/cities, which encourage more permeability and more cycling and walking.
- (f) Higher residential densities and bold innovative designs, which encompass mixed uses should be encouraged.
- (g) High quality estate developments and more compact developments, such as 'living over shop' should be encouraged.
- (h) The key town of Maynooth and the commuter towns of Celbridge, Kilcock and Leixlip are strategically located within the Dublin Metropolitan Area and can facilitate compact growth.
- (i) Consider higher density around transportation nodes such as train stations and bus interchanges in larger towns.
- (j) Ensure lands proximate to town cores in settlements such as Celbridge are prioritised for development.
- (k) The development of Naas must be allocated around the centre of the town rather than focusing on the northwest quadrant.
- (l) Promote Kill as a compact town with specific reference to National Policy Objective 6 of the NPF.
- (m) Compact development should be focused around KDAs.
- (n) Compact Development was explained as a planning concept which promotes short distances between services and amenities. Urban layout with amenities close together.

CHIEF EXECUTIVE'S OPINION

Compact Growth/ High Density

Compact growth and urban regeneration feature as a Regional Strategic Outcomes of 'Healthy Placemaking', one of the key principles of the RSES. These are defined as promoting the regeneration of our towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and driving the delivery of quality housing and employment choice for the Region's citizens.

A large number of submissions highlighted the need for compact growth in the interests of sustainable development through a variety of means including higher densities at key, sustainable locations, regenerating under used buildings and brownfield spaces, living over the shop in our urban centres, prioritising the development of land proximate to town centres.

All of the above result in a more efficient use of land where necessary, supporting social, community and physical infrastructure are either in place, planned to be provided or have the scope to be provided, reducing the need for urban sprawl, thereby lessening the pressure for the provision of services on our rural areas.

The concept of 10-15minute towns (the time differed between submissions) was also highlighted in relation to compact growth which seeks to locate necessary social and community facilities in particular within a 10 minute walking distance of a persons' home which reduces the need to use private modes of travel thereby having a positive knock on effect on the environment and climate change.

CHIEF EXECUTIVE'S RECOMMENDATION

Compact Growth/ High Density

The Regional Strategic Outcome of '*Compact Growth and Urban Regeneration*' will inform the drafting of the emerging CDP through the promotion of development in areas that are already adequately serviced (in relation to social, community and physical infrastructure) or where there are plans to provide for such infrastructure over the life of the Plan.

Rural one-off housing / Villages

Submission Nos. 001, 010, 014, 021, 029, 031, 044, 073, 082, 089, 095, 097, 098, 109, 127, 145, 147, 148, 149, 150, 175, 179, 188, 196, 202, 203, 206, 209, 217, 229, 271, 274, 278, 300, 303, 304, 305, 306, 309, 310, 311, Public Meetings

- (a) Strong policies are needed to protect against urban generated housing in the open countryside and to proactively address town/village decline. Areas under strong urban influence should be identified.
- (b) The sensitive rehabilitation of disused vernacular houses should not be subject to the Rural Housing Policy for housing, and vernacular settlements should be protected by means of Architectural Conservation Area designation.
- (c) An objective or policy to promote serviced sites should be adopted in the CDP. These serviced sites should be in appropriate locations in settlements and villages, which have the appropriate infrastructure.
- (d) Adopt policies, which support and provide for serviced sites in towns and villages, as an alternative to one-off rural housing.
- (e) Develop clusters of houses in locations with good transport links and good access to social and community infrastructure.
- (f) Policies RH9 and RH10 should be reviewed and removed from the CDP.
- (g) Provide individual serviced sites for the workforce of large employers at the edge of towns. There is also a need to provide individual sites for the indigenous population of Kildare, which would help alleviate pressure for housing in the countryside.
- (h) Additional housing / Serviced sites should be provided in rural settlements, specifically Ballyshannon, Rathcoffey, Calverstown, Coill Dubh, Cooleragh and Brannockstown.
- (i) Adopt a policy in the rural housing chapter, which outlines how previously sterilised land is to be treated.
- (j) A genuine social and economic requirement for rural housing is needed and should be supported in the CDP.
- (k) Rural housing is not sustainable, has unintended consequences such as high levels of car usage, isolation as people age and is not compatible with many climate and biodiversity goals.
- (l) Consider including Clonuff (which has its own wastewater treatment system) to be within the Broadford Rural Settlement.
- (m) Seeking to extend the Rural Settlement boundaries at Rathcoffey, Calverstown Nurney and Maganey/Levistown.
- (n) The promotion of Prosperous for additional housing.
- (o) Request that lands within the curtilage of the village of Killeel be considered for housing
- (p) Serviced sites should be provided for those with a local need.
- (q) The new plan should define 'local demand' to include the demand for self-build houses within the rural hinterland.

- (r) Provide for cluster type developments (less than 10 units) outside village boundaries to be sold as serviced sites, with one access point.
- (s) There should be a very stringent criteria that must be demonstrated to prove a genuine requirement for rural housing.
- (t) The affordability challenge creates a demand for rural one-off housing. A way to address this is to make living in settlements more attractive and affordable.
- (u) Restrict rural development to towns, villages, and settlements. Use the Rural Regeneration Fund to develop a schedule of towns and villages as part of a regeneration and development programme.
- (v) The Councils rural housing policy should reflect the Flemish Decree.
- (w) No further land should be zoned in the Ballymore Eustace area before 2027 and any developments needed should be delivered in a phased manner to facilitate local need.
- (x) KCC is seeking to find a healthy balance between rural development and development in towns.

CHIEF EXECUTIVE'S OPINION

Rural one-off housing/ villages

A number of submissions have highlighted the issue of rural one-off housing, particularly from the point of view of this type of housing being unsustainable, owing to the high dependency of private modes of transport to access social, community and employment facilities and poor access to sustainable modes of transport. Added to these the impact on the quality of the groundwater systems by virtue of the number of individual septic tanks and wastewater systems and the cumulative impact of these systems on our groundwater and aquifers cannot be underestimated nor can the increased cost to our public services including our postal services for each new additional dwelling in rural areas.

In order to meet our climate change targets of net zero emissions by 2050 there is a clear need to make provision for more sustainable options to rural living to reduce the levels of one-off housing in our countryside, at a time also when our serviced towns and villages are showing signs of decline and dereliction.

A number of suggestions have been made including the rehabilitation of disused vernacular housing not being subject to the rural housing policy and the promotion of serviced sites in proximity to existing or planned social and community infrastructure which was highlighted in a large number of submissions received.

As part of the review of the current CDP the proposed suggestions will be considered as part of a review of the rural housing section which will also have regard to RPOs 4.80 and 4.81 of the RSES, which read as follows;

RPO 4.80 – 'Local authorities shall manage urban generated growth in Rural Areas Under Strong Urban Influence (i.e. the commuter catchment of Dublin, large towns and centres of employment) and Stronger Rural Areas by ensuring that in these areas the provision of single houses in the open countryside is based on the core consideration of demonstrable economic or social need to live in a rural area, and compliance with statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements'

RPO 4.81 – *‘In rural areas outside the Rural Areas Under Strong Urban Influence local authorities shall encourage sustainable growth in areas that have experienced decline or stagnation, facilitate the provision of single houses in the countryside based on siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements’.*

CHIEF EXECUTIVE’S RECOMMENDATION

Rural one-off housing/ villages

To review the rural housing policies and objectives of the current CDP and to prepare a Small Towns and Villages Strategy for County Kildare having regard to NPO 18b of the NPF and RPO’s 4.80 and 4.81 of RSES in particular and to make provision for serviced sites in our towns and villages in order to provide a sustainable and feasible alternative to rural living.

Wetlands & Waterway; / Flooding

Submission No. 002, 007, 038, 049, 109, 136, 186

- (a) Natural Water Retention Measures should be examined and incorporated into flood risk management objectives.
- (b) Reporting of previously culverted water courses and development proposals requiring culverting should document stream habitat loss and provide compensatory habitat.
- (c) Promote the removal of historic infilling along watercourses.
- (d) Clear commitments and strategic objectives regarding flood risk should be part of the CDP. Reference should be made to the Planning System and Flood Risk Management (Guidelines) and associated circulars and appendices.
- (e) Avoid increasing flood risk elsewhere.
- (f) Policies for retaining natural features like riparian habitats, hedgerows, and mature trees should be included and should include minimum setbacks from any riparian habitats, streams, and other wetlands, etc. etc.
- (g) Natural overflow areas should be introduced, which would help in the maintenance of watercourses.
- (h) Sustainable drainage systems should be encouraged.
- (i) Refuse planning permission for housing and industrial development which would adversely impact existing wetlands.
- (j) Riparian areas should have appropriate zonings to achieve setback distances that support the high ecological status of waterbodies.

CHIEF EXECUTIVE’S OPINION

Wetlands & Waterways/ Flooding

A Strategic Flood Risk Assessment will be prepared to inform the Draft CDP with respect to the identification of areas at risk of flooding and policies and objectives that should be included with respect to flooding including nature based solutions such as swales, wetlands, woodlands, boglands, green roofs, green walls, tree and hedgerow planting. The potential of sites to result in an increase in flooding elsewhere and natural water retention measures that must be an integral part of all future developments will be considered as part of the SFRA.

In relation to riparian buffer zones it is noted that these zones will differ between water bodies having regard to the site conditions related to each. Inland Fisheries Ireland have published a valuable new guideline “Planning for Watercourses in the Urban Environment” which adopts a simple ‘4 step’ approach to watercourse protection in planning. The implementation of this guidelines through the Draft Plan should not only protect watercourses and their associated riparian zones in urban areas, but also shall provide other benefits important for the wellbeing of people living nearby. The guidelines also include a useful graphic relating to riparian buffer zones as a guide to determining the extent of same relative to the characteristics of the receiving environment. These guidelines will inform a series of policies and objectives in the Draft Plan.

CHIEF EXECUTIVE’S RECOMMENDATION

Wetlands & Waterways/ Flooding

To include a series of objectives in the Draft Plan with respect to the ‘Planning for Watercourses in the Urban Environment’ Guidelines by Inland Fisheries Ireland as it relates to the extent of riparian buffer zones.

Development Management Standards for New Developments

Submission Nos. 002, 018, 033, 073, 074, 089, 095, 107, 109, 110, 120, 123, 125, 130, 131, 134, 135, 136, 137, 162, 164, 166, 174, 186, 188, 193, 201, 221, 226, 274, 280, 285

- (a) A Noise Impact Assessment is to be carried out for any development proposals, which have the potential to give rise to significant noise impacts.
- (b) The new CDP should align with Apartment Guidelines in relation to car parking provision to ensure schemes are viable.
- (c) Provide housing that is attractive, practical and viable.
- (d) Development Management Standards should include universal design guidelines to address such issues as outdoor spaces, signage, transport etc etc, which help to create attractive living environments.
- (e) The current Development Management Standards of the existing KCDP must be amended to include a reduction in car parking requirements, house size, private and public open space.
- (f) Provide passive solar heating, solar panels and other renewable forms of energy in all new housing developments and industrial developments.
- (g) Rainwater harvesting and grey water reuse should be provided in all new housing developments and industrial developments.
- (h) Incorporation of sufficient communal, well-planned, suitably screened spaces in all new apartment complexes for: waste separation; airing laundry (rather than balcony spaces); Secure bicycle lockups; Create storage space for sports equipment.
- (i) Sustainable drainage systems should be encouraged.
- (j) Refuse planning permission for solar/wind farms and other similar developments.
- (k) As Resident Associations are established in new housing estates, the money that has been vested through KCC should be made available to the newly established RA. KCC should adopt a more proactive position on communications surrounding estate taking in charge/completion. Policies should be adopted to encourage new residents to form residents’ associations.

- (l) Urges KCC to update their Taking In Charge policy facilitating partial TIC of residential estates. A robust bonds system should also be implemented.
- (m) High density housing needs to have facilities for recycling, drying washing, charging EVs, children playing, etc.
- (n) New development standards is required for air quality. Major new development should be net carbon Zero. There should also be a commitment to achieve net zero carbon emissions in buildings.
- (o) New housing developments should be conditional on high standards of landscaping, mature trees and hedges being built into the design as much as possible, planting of native trees, wildflower areas, community gardens, orchards and native hedgerows (instead of wooden fences). Laurel and cypress hedging should be banned. New developments should also include a playground suitable for children with disabilities, and an area suitable for teenagers. Generous minimum standards for green spaces should also be adopted for all new developments.
- (p) Improved publicly accessible open spaces should be provided in all residential developments. Universal accessibility should be central to any design and development of public spaces.
- (q) All housing development should have a good percentage of affordable houses.
- (r) Adopt crime prevention measures as part of any new development.
- (s) Tackle health inequality” as a strategic goal in the Development Plan. No-fry zones adjacent to schools, with the exclusion zone set at 1km. .
- (t) Comply with the ‘Sustainable Residential Development in Urban Areas’ Guidelines.
- (u) Council managed estates to be required to install community composting.
- (v) Encourage and facilitate mixed use developments which incorporate living and working opportunities.
- (w) Green Walls such as the one at the Primary Care Health Centre on the Maynooth Road in Celbridge should be encouraged.
- (x) Minimum requirement for public open space be set at 10% of the site. Carry out an audit of actual parking demand for each use. No policies or objectives in the new Plan should restrict apartment development including duplex units as this would be contrary to Apartment Guidelines (2020) and Building Height Guidelines (2018).
- (y) The quantum of open space for schemes which are predominantly apartments should be reduced to 10% compared to 15% for developments with more housing.
- (z) All hedgerows should be retained and be subject to appropriate long term management in any new development. Where removal is necessary, that the same length of native hedgerow be planted.
- (aa) Opposed to any structure exceeding 4 storeys in any urban area in Kildare.
- (bb) The council should proactively support the provisions of the Building Height Guidelines 2018 and provide a greater mix of typologies.

CHIEF EXECUTIVE’S OPINION

Development Management Standards for new Developments

A wide range of issues were highlighted that relate to the ‘Development Management’ section of the Plan which broadly cover the following areas;

-Standards; a reduction in car parking, house sizes, private and public open space standards

-measures to address climate change including new developments to have net zero carbon emissions, incorporation of SUDS, provision of solar heating, solar panels and other forms of renewable energy, rainwater harvesting and grey water reuse, the use of landscaping including green walls and the retention of mature trees and hedgerows as part of development proposals

-design of housing and particularly high density housing and apartment complexes to include areas for living and working, areas for recycling, drying, washing and age appropriate amenity areas.

In addition to the above are measures to address crime prevention, universal design and accessibility.

The quality of our residential homes and spaces between them is paramount to the quality of our lives. A high quality living environment with access to amenity spaces, social and community infrastructure contributes to our sense of well being and results in healthy placemaking, a key RSO in the RSES.

In reviewing and updating our current Development Management standards, the Draft CDP will have regard to key Section 28 Guidelines including '*Sustainable Residential Development in Urban Areas*', '*Apartment Guidelines*' and the RSES as they relate to Development Management standards.

CHIEF EXECUTIVE'S RECOMMENDATION

Development Management Standards for new Developments

To review and update the current Development Management standards, having regard to key Section 28 Guidelines including '*Sustainable Residential Development in Urban Areas*', '*Apartment Guidelines*' and the RSES.

Social Infrastructure

Submission No. 011, 014, 018, 035, 073, 076, 089, 127, 135, 162, 166, 193, 196, 197, 234, 269, 278, 285, Youth Workshop, Public Meetings

(a) The inclusion of buffer zones and land use designations that support education development adjacent to existing and established schools.

(b) School sites required to meet current needs or planned population growth, as may be identified by the Department of Education, should be explicitly supported by means of an appropriate zoning provision and/or by a Specific Local Objective on the subject site in the relevant Plan.

(c) Permit schools, both permanent and temporary in as many zoning categories as possible.

(d) That the capacity of existing schools and any planned schools, as published by the Department of Education, be considered as "supporting infrastructure and facilities" and be given high priority when assessing the suitability of lands for residential development.

(e) A sequential approach to town development is imperative and should be guided by existing social infrastructure.

(f) An Post will be seeking new sites capable of accommodating modern delivery operations.

- (g) Insufficient social infrastructure in Kilcock to cope with existing demand never mind the expansion.
- (h) Capacity of social infrastructure (existing and proposed) to be taken into account when providing for additional population
- (i) A matrix of infrastructure should be prepared and managed by the Council that encompasses soft infrastructure, using an inter-agency approach.
- (j) Build communities with facilities; allowing people to be within walking distance to most facilities, including schools. Housing developments must be delivered in tandem with accessible primary and secondary schools as well as affordable childcare.
- (k) Maynooth requires a community sports amenity centre.
- (l) Childcare facilities, public parks and community centres be imposed as planning conditions for developers.
- (m) Celbridge should be subject to improvements in social infrastructure, specifically playgrounds and youth outdoor amenities.
- (n) The following amenities should be provided - Public leisure centre, swimming pool, additional recreation areas, social and community infrastructure, community playing fields in each town/village and additional community centres should be provided.
- (o) Complete a Social Infrastructure Assessment prior to giving the go ahead for development on any KDAs.
- (p) Residential opportunities should be availed of where zoned open space (Zoning Objective F); community and education (Zoning Objective E); and neighbourhood centre (Zoning Objective D) are all located within convenient walking distance.
- (q) Potential for the development of a centre of sporting excellence and outdoor pursuits south of Pipers Hill in Naas.
- (r) Better facilities required for teenagers, for example skate parks. Nothing in the small towns and villages, Maximum age for children in playgrounds is 12 and they are not suitable for teenagers.
- (s) Not enough bins on streets. Refuse being thrown and left around. Dog litter also an issue on streets. This is especially a problem in Clane.
- (t) Not enough community sports facilities. Schools, GAA and soccer clubs have their own facilities. Accessibility to basketball and tennis courts is limited as they are on school property.
- (u) Most teenagers in Kildare Town and surrounding areas i.e., Monasterevin and Nurney go to Newbridge to use facilities or hang out.
- (v) A number of issues were raised in relation to Maynooth: the current lack of key amenities such as a community centre, doctors and swimming pool.

CHIEF EXECUTIVE'S OPINION

Social Infrastructure

The availability of accessible social and community infrastructure to any community is paramount. It enhances quality of life and naturally promotes walking, cycling and sustainable modes of transport.

The submission received from the Department of Education has been noted in particular which requests that land be designated to support the development of educational facilities adjacent to existing schools and that supporting land use zoning objectives be incorporated into the Plan. It is also requested that as many land use zonings as possible would permit

educational facilities, both permanent and temporary in as many zoning categories as possible.

KCC has and will continue to work with the Department of Education in determining appropriate sites for development to meet the anticipated educational demands of our population at both primary and secondary level. While the CDP can include overarching supportive policies and objectives in this regard the Local Area Plans would provide for more sitespecific land use zonings for our towns and villages.

It should be noted that a Social Infrastructure Audit (SIA) is undertaken as part of the suite of evidence based documents to inform emerging Local Area Plans. The SIA identifies the location, capacity and type of service present and/or required for the future. Where shortfalls in social infrastructure are identified, objectives are included in the LAPs and lands can be zoned to provide for same, where appropriate.

CHIEF EXECUTIVE'S RECOMMENDATION

Social Infrastructure

To include an objective in the Draft CDP to continue to work with the Department of Education in order to assist in identifying suitable sites to accommodate the future educational requirements of our citizens at appropriate, accessible and sustainable locations.

To include an objective to prepare a Social Infrastructure Audit as part of the preparation of the mandatory Local Area Plans in County Kildare. The SIA should identify the location, capacity and type of social and community infrastructure present and/or required for the future. Where shortfalls in such infrastructure are identified, objectives should be included to support the provision of that infrastructure and to zone lands to provide for same.

Physical Infrastructure

Submission Nos. 005, 014, 017, 018, 033, 073, 076, 089, 136, 166, 191, 193, 195, 196, 198, 199, 200, 207, 226, 229, 234, 268, 269, 270, 275, 278, 285, 307, 308, 314, Public Meetings

- (a) Infrastructure investment and priorities must be aligned with the spatial strategy to meet projected growth (ref Chapter 4 of the RSES and RPO's 4.1 and 4.2).
- (b) A sequential approach to town development is imperative and should be guided by existing physical infrastructure.
- (c) The aim of the MASP is to unlock development capacity by identifying the sequencing of enabling infrastructure and directing investment to deliver development.
- (d) Insufficient physical infrastructure in Kilcock to cope with existing demand never mind expansion.
- (e) Osberstown WWTP is near capacity and is not capable of taking greater demand.
- (f) Capacity of infrastructure (existing and proposed) to be taken into account when providing for additional housing / population.
- (g) A matrix of infrastructure should be prepared and managed by the Council that encompasses hard infrastructure, using an inter-agency approach.
- (h) Greater emphasis should be placed on quality pedestrian and cycling infrastructure. A cycling infrastructure project that would strategically link high population areas Leixlip, Celbridge and Maynooth should be proposed.

- (i) Adopt the school streets scheme and make footpaths and cycle lanes safer; Walking and cycling need to be promoted and schools should be fully accessible to pedestrians and cyclists.
 - (j) Celbridge should be subject to improvements in physical infrastructure.
 - (k) The importance of the Celbridge/Hazelhatch train station is noted along with its constraints.
 - (l) Provide active travel infrastructure and promote car free days.
 - (m) An audit of roads, footpaths, pedestrian crossings and access points to graveyard, parks, heritage sites and public buildings throughout the county should be undertaken to identify obstacles that limit the use of this infrastructure and facilities for those with physical limitations.
 - (n) A sequential approach should be taken when identifying land for development which would promote sustainable mobility and compact growth.
 - (o) Amending public realm to accommodate cycling and walking will help return vibrancy to our towns.
 - (p) Increase permeability through housing estates for pedestrians and bicycles and attract people to use active modes of travel for short journeys (less than 5km) by providing high quality infrastructure.
 - (q) Design healthy streets and town centres that enable and prioritise more active travel and ensure that the re-designs include walking and cycling.
 - (r) Plan for future link roads e.g., Clane road & new Lucan road and Clane road with Maynooth road. Also, divert traffic from town centres, specifically Naas.
 - (s) Serviced sites on the edge of the built-up area of town centres should be prioritised and developed in advance of sites further away. The council should make efficient use of serviced zoned land.
 - (t) Fresh investment in enabling infrastructure may be necessary so that the level of development planned for smaller settlements in the KCDP 2017-2023 can be provided for.
 - (u) The current Development Plan highlights that it is committed to “ensuring that Kill continues to develop a strong employment base.” This ambition is further reinforced through the provision of a new roads’ objective to the north of Kill, which is to provide for commercial and industrial traffic in this area.
 - (v) Major infrastructure is now in place or under construction in Naas, and consists of the following:
 - M7 Osberstown Interchange (directly serving the Naas Northwest Quadrant) and the R407 Sallins Bypass.
 - M7 Naas to Newbridge Motorway Widening Scheme.
 - Upgrade of Osberstown WwTP.
 - Enabling infrastructure (roads and services) within the NWQ (total cost c.€53m).
- The above should be noted in any new CDP.
- (w) Development should follow available infrastructure (reference to Kildare town).
 - (x) An SIA will be carried out for Maynooth to list the infrastructure against the population and projected population.
 - (y) Provide a cycling route on the Grand Canal.

CHIEF EXECUTIVE'S OPINION

Physical Infrastructure

The NPF and RSES policy documents both provide strategic direction to Kildare with respect to the quantum and location of employment and housing over the plan period. Aligned with the projected growth of the county is the accompanying infrastructure necessary to enable growth. Identifying the sequencing of enabling infrastructure and directing investment to deliver development is key to the county's success as a place in which to reside, do business and recreate.

NPO 73c of the NPF is particularly noteworthy in this regard and reads as follows; *'Planning authorities and infrastructure delivery agencies will focus on the timely delivery of enabling infrastructure to priority zoned lands in order to deliver planned growth and development'*.

The provision of additional housing and population must take into account the capacity of existing and/or planned infrastructure. In line with Appendix 3 of the NPF, consideration may only be given to the zoning of lands where such lands are either serviced or serviceable during the life of the Plan. In developing the Core Strategy, Settlement Hierarchy and policies and objectives for the emerging CDP, the infrastructural priorities of the TII, NTA, Irish Water and other service providers will be considered in order to inform the emerging policies being cognisant of the need to promote compact growth and sustainable development.

Another key theme relates to pedestrian and cycling infrastructure and the importance of developing this infrastructure as a means of linking people with social and community infrastructure but also linking population centres with each other (in the case of cycling) which could also be considered in the context of connecting the blueways and greenways in particular.

Walking and cycling in the context of schools was also highlighted and suggestions were put forward to make footpaths and cycle lanes wider and also improve the quality of the public realm in order to accommodate more sustainable modes of transport and to help restore vitality and vibrancy to our towns.

Permeability through housing estates was also acknowledged as an important feature in providing easy, accessible links between population and social and community facilities in particular (with respect to walking and cycling) which would provide safe routes to children travelling to/from school settings.

The Draft CDP will consider existing and proposed physical infrastructure with respect to the towns and villages throughout our county which will inform the development of both our Core Strategy and our Settlement Strategy.

The sustainable movement of people around Kildare's towns and villages is key to addressing climate change by reducing the need to use private modes of transport, it enhances the sense of place, builds resilient communities and contributes to healthy placemaking all of which will be supported through the policies and objectives of the Draft CDP.

CHIEF EXECUTIVE'S RECOMMENDATION

Physical Infrastructure

To align our Core Strategy, our Settlement Strategy and the various policies and objectives of the Draft CDP with the proposed infrastructural improvements of statutory bodies including the TII, NTA and Irish Water and to only consider the zoning of land in areas that are either serviced or serviceable during the life of the Plan in accordance with Appendix 3 of the NPF.

To include objectives in the Draft CDP that support walking and cycling improvements in our towns and villages particularly where they link people and social and community infrastructure, especially schools.

To include objectives in the Draft CDP that promote the provision of permeability of walking and cycling through existing and new developments.

Meath

Submission Nos. 005, 016, 056, 073, 229

(a) A priority for the Key Town of Maynooth is the preparation and adoption of a Joint Local Area Plan with Meath.

(b) The CDP should have regard to the objectives as set out in the Draft Meath CDP, specifically in relation to the delivery of the Maynooth Outer Orbital Route (MOOR) and the development of the Kilcock Environs.

(c) Requested that the land use zonings of adjoining lands in Meath are considered as part of the preparation of the zoning maps for the settlements of Maynooth and Kilcock as part of the Draft KCDP2023-2029.

(d) Oppose any growth of Maynooth beyond the Kildare/ Meath boundary.

(e) The proposal within MCC's "Maynooth Environs" to construct a section of the Maynooth Outer Orbital Route remote from the town, should be opposed.

(f) Kilcock needs a cross border LAP to include Meath.

CHIEF EXECUTIVE'S OPINION

Meath

Having regard to the geographical location of Maynooth and Kilcock with respect to both the Meath and Kildare administrative areas development for both towns is part overseen and managed by two different administrative areas. To this end it is considered reasonable and appropriate that the policies and objectives of the Draft Meath County Development Plan are considered and align with the policies and objectives of the Draft CDP for Kildare as much as possible, in the interests of consistency.

CHIEF EXECUTIVE'S RECOMMENDATION

Meath

The Draft CDP will have regard to the policies and objectives of the Draft Meath CDP particularly as they relate to the Maynooth Outer Orbital Route (MOOR), the development of the Kilcock Environs and the development of the Maynooth Environs.

Models of Housing

Submission Nos. 017, 018, 024, 026, 033, 058, 069, 070, 072, 073, 074, 084, 089, 095, 107, 109, 127, 133, 134, 135, 137, 162, 166, 175, 181, 186, 190, 191, 193, 196, 197, 211, 221, 229, 239, 257, 270, 280, 285, 289, 298, 299, 300, 301, 314

(a) Support 'mixed tenure', which is supported by national policies such as the Social Housing Strategy 2020.

(b) A variety of house types, tenures and typologies for all ages should be included in any proposal for a large-scale development. A Design Statement should also be included.

(c) 'Universal Design' Principles to ensure housing can meet the needs of the occupants regardless of their age, size, and disability.

(d) Create Marinas to provide Residential Berths.

(e) Provide refuge accommodation to women and children. Step Down Supported Accommodation is required to ensure that families requiring longer term support from Teach Tearmainn have a safe space to live.

(f) The key towns (Naas and Maynooth) are well placed to provide a greater mix of apartments and houses.

(g) Provide every town and village with a centrally located independent elderly housing facility near a day care centre. Incorporate planning for ageing in relation to housing, public transport and social & health services (e.g. McAuley Place in Naas is a good example).

(h) Provide accommodation for older and disabled people including independent and semi-independent living at locations that are proximate to services and amenities.

(i) Provide for the subdivision of large houses or amalgamation of smaller houses within established areas to provide independent, semi-independent, or nursing home accommodation. Universal Housing Design, which facilitates lifelong living, especially for older people in their own homes should be provided, for example 3 storey multigenerational housing should be considered where the older people live on the ground floor and families on the top two floors. The rear garden could be divided in two.

(j) Prioritisation of disabled people to be considered in relation to the allocation of accessible social housing.

(k) There is a need for better designed nursing homes that incorporate adequate outdoor spaces. Regarding the transition from independent living to nursing home care both forms of accommodation to be provided on a co-location basis. Housing design needs to consider specific needs of residents with Dementia.

(l) There is a need for step down, convalescent and transition care as well as specialist long term dementia care.

(m) The Development of Centres of Excellence would provide a range of care from Home Care, Day care, Independent Living, Primary and Acute care, Short and Long-term Care all, co-located on the one site. Day centres should be located close to Gerontology Centres.

(n) Training Facility for Healthcare Assistants should be established in association with the HSE.

(o) Minimise the number of one bed units.

(p) Housing for Older Persons (over 55 years) in Kildare should be provided for. 10-15% of residential land in each housing estate should be set aside for this age cohort.

(q) Adopt policies to provide for the housing needs of the over 65 age group. Adaptation of existing houses should be sought before being required. Provide a good mix of house types and tenures.

- (r) Single people's housing need should be considered and provided for.
- (s) Smaller Homes/Houses' should be provided for.
- (t) Sheltered housing, retirement villages and policies in relation to the development of nursing homes should be adopted as part of the CDP.
- (u) Environmentally and climate change friendly affordable housing is needed. Look at the initiative by Fingal County Council at Dun Emer, Lusk, which should be copied.
- (v) Provide planned ageing communities within urban and rural locations. A Wellness and Retirement Village model should be provided.
- (w) Support low cost and eco-friendly alternatives to housing.
- (x) Building/attaching granny flats to homes in both urban and rural areas.
- (y) Provide additional housing for members of the traveller community.

CHIEF EXECUTIVE'S OPINION

Models of Housing

The submissions with respect to 'Models of Housing' highlighted a wide range of issues that mainly related to the elderly though housing for the disabled, refuge accommodation and traveller accommodation were also highlighted.

In relation to housing for the elderly, a wide range of housing types were requested to be considered as part of the Draft CDP including independent and semi-independent living, nursing home care, retirement villages, sheltered housing and granny flats. Co-location of particular types of elderly care was also put forward including for independent living and nursing homes. The most recent suite of LAPs prepared for towns in County Kildare address Age Friendly requirements and also life-long homes.

Housing with respect to all of the above as with all other house types should be such that it is located in an area that is either serviced or serviceable, that is proximate to social and community services and in particular where it promotes sustainable modes of transport. The Draft CDP will support various housing types where they are in accordance with the principles of proper planning and sustainable development.

The request for a mix of housing type and tenure was also highlighted as needing to be addressed in the Draft CDP. In this regard it should be noted that a 'Housing Needs Demand Assessment' will be prepared which will inform the housing mix, type and tenure requirements for Kildare over the plan period.

Design statements were also highlighted as a necessary part of plan making. Low-cost, eco-friendly design solutions should also be considered as part of this process. The Draft CDP will be fully supportive of the preparation of Design Statements which should accompany all planning applications

CHIEF EXECUTIVE'S RECOMMENDATION

Models of Housing

To include objectives in the Draft CDP that require a mix of housing types and tenures which are informed by the outcome of the 'Housing Needs Demand Assessment'.

To include an objective in the Draft CDP to require the submission of a design statement for certain planning applications which shall demonstrate how a particular proposal addresses

planning policies (either CDP or LAP) in particular in relation to urban design. Design statements should clearly describe how proposals relate to sites and provide contextual analyses in that regard.

Amenities

Submission Nos. 018, 032, 047, 048, 049, 058, 060, 072, 109, 130, 198, 202, 211, 226, 234, 258, 274

- (a) Provide attractive, interesting and well used public realm and open spaces for people to enjoy. Open up existing green open spaces.
- (b) Public amenities such as urban parks, open spaces, community allotments, basketball courts and playgrounds need to be provided within close walking / cycling distance of residential developments.
- (c) Requests that the proposed CDP for 2023-2029 continues to include the current provisions of Chapter 13.10.3 GI 27 (ref local biodiversity).
- (d) Request for House Sparrows Nests in all new Housing Developments.
- (e) Greater protection should be afforded to hedgerows, especially native plant species. Install and enforce a sufficient planning bond to deter developers from damaging or removing hedgerows. The destruction of any hedgerow or tree must be subject to licence, even in urban areas.
- (f) Requests for the continued protection of Donaghcumper as a public amenity which enhances biodiversity and protects heritage.
- (g) Developers to include multiple areas for community gardens and orchards within new estates.
- (h) The county lacks outdoor facilities and amenities that suit all ages and abilities. A policy needs to be adopted for the provision of serviced open green spaces of meaningful size in every town and village.
- (i) Celbridge needs more parks, public green spaces, amenities, and bins.
- (j) Promote the reduction of mown grass and the return of grassland with diverse local species. Remove herbicides and other pesticides in the management of Council spaces.
- (k) Reduce further threats to bats and other nocturnal wildlife in our towns by installing appropriate street lighting.
- (l) Protect green spaces along both sides of the river Liffey.
- (m) Protect existing mature trees, hedges, meadows etc.

CHIEF EXECUTIVE'S OPINION

Amenities

A number of submissions have highlighted the importance of the availability and proximity of amenity spaces to the public. In this regard a Kildare Open Space and Recreational Strategy is currently being prepared. A significant amount of research has been undertaken as part of this Strategy thus far in relation to identifying the quantum of existing types of amenity spaces throughout the county and the identification of open space requirements. This Strategy, when complete, will inform the Draft CDP with regard to the type, quantum and location of various types of amenity spaces which should be sufficient to meet the amenity requirements of our county over the short, medium and longer term.

The provision or facilitation of community allotments, community gardens and orchards support local food production and should be supported, particularly where they are appropriately located and limit the use of private modes of transport.

CHIEF EXECUTIVE'S RECOMMENDATION

Amenities

To have regard to the findings and recommendations of the 'Kildare Open Space and Recreational Strategy' when preparing the Draft CDP particularly in relation to the quantum and location of amenity spaces.

To include an objective in the Draft Plan to support community allotments, community gardens and orchards particularly where they are appropriately located and limit the use of private modes of transport.

Vacant/derelict buildings

Submission Nos. 073, 109, 175, 180, 193, 196, 197, 202, 221, 229, 232, 274, 280

(a) There are currently six properties in the whole county on the vacant sites register. If this register was actively managed and the vacant site fee collected, these funds could be put to great use.

(b) Specific policies to tackle dereliction in towns and villages should be adopted.

(c) Support the change of use of vacant commercial space into residential use.

(d) The Derelict Sites Act (1990) and the Urban Regeneration and Housing Act (2015) should be enforced by the council.

(e) The renovation of vacant or derelict houses should be considered by KCC for the provision of social housing and housing for the elderly.

(f) Opportunities to regenerate areas and reuse/renew vacant or underused assets should be availed of.

(g) Derelict buildings should be purchased and retrofitted by the council.

(h) Provide incentives for the revitalisation of vacant or derelict properties for town centre living.

CHIEF EXECUTIVE'S OPINION

Vacant/derelict buildings

In 2020, a survey was undertaken of c. 250 sites in each of the LAP towns in Kildare in relation to the Vacant Sites Register. A number of notices were issued to landowners towards the end of 2020 with respect to lands that were considered to be vacant in accordance with the '*Urban Housing and Regeneration Act 2016*'. An appeals process is available to any landowner on whom a notice was served. Once that appeal process is complete, valuations may take place on those parcels of land that are considered to be vacant and levies will be payable accordingly.

CHIEF EXECUTIVE'S RECOMMENDATION

Vacant/derelict buildings

To include an objective in the Draft CDP to maintain and update where appropriate County Kildare's Vacant Sites Register

Built Heritage

Submission Nos. 010, 039

- (a) The council should Include objectives to carry out climate change risk assessments for historic structures and sites within the county.
- (b) The CDP should Include objectives to develop resilience and adaptation strategies for architectural heritage.
- (c) There shall be a presumption against the demolition of vernacular buildings where restoration or adaptation is a feasible option.
- (d) Development proposals affecting vernacular buildings will be required to be accompanied by a detailed measured survey, photographic record and written report carried out by a professional with appropriate conservation expertise.
- (e) Facilitate appropriate, high-quality design solutions for adaptations of vernacular buildings and where it is proposed to extend a vernacular house, the design, scale, footprint, and materials should be sympathetic to the existing building and its setting.
- (f) Promote the protection and maintenance of the character and setting of vernacular buildings, farmyards, and settlements.
- (g) Promote the protection and maintenance of thatched buildings and maintain an up-to-date record of thatched buildings.
- (h) Any development in the vicinity of Castletown House and its Demesne shall be sensitive to its protected status.

CHIEF EXECUTIVE'S OPINION

Built Heritage

The importance of protecting our built heritage is recognised throughout the current CDP with the Record of Protected Structures and the associated policies and objectives as set out in Chapter 12 (and Appendix 3 of the CDP) being noted in this regard. The RPS is a live document and additions and deletions are considered on a rolling basis pursuant to Section 55 of the Planning and Development Act 2000 (as amended) as the need arises.

The submission from the Department has been noted which requests that climate change assessments are undertaken with respect to historic structures and sites in the county. It is considered reasonable and appropriate to include such an objective in the Plan.

Section 12.6.1 of the current KCDP includes a series of policies in relation to vernacular architecture and it is considered that these address the concerns highlighted in the submissions received with respect to same. The most relevant policies in this regard include reference to the following:

- the protection, retention and appropriate revitalisation of vernacular structures,
- the resistance of the demolition of thatched cottages and farmhouses and to instead encourage their sensitive reuse,
- the preservation of the character and setting of vernacular buildings including gates, piers and courtyards,

To include and enhance, where necessary, similarly worded policies/objectives in the Draft Plan.

A number of Statements of Character (SoC) for Architectural Conservation Areas in Naas, Athy and Maynooth have been or are currently being prepared and integrated into the relevant LAPs as appropriate. Further SoCs will be prepared to inform LAPs and the Draft Plan to ensure vernacular

buildings, where they contribute to the character of areas and/or where they are rare examples of structure type are afforded appropriate protection.

CHIEF EXECUTIVE'S RECOMMENDATION

Built Heritage

To include a series of policies and objectives in the Draft Plan that recognise the importance of the County's built heritage and to encourage the sensitive restoration and continued use of these structures.

To include an objective in the Draft Plan to continue to review and amend on an ongoing basis the Record of Protected Structures and make additions, deletions and corrections as appropriate over the period of this Plan.

To include an objective in the Draft Plan to undertake climate change risk assessments with respect to protected structures and sites throughout County Kildare.

To include objectives in the Draft CDP that reflect the current policies identified in the CDP as they relate to vernacular architecture and to strengthen such objectives as necessary.

CHIEF EXECUTIVE'S ADDITIONAL RECOMMENDATION FOR THEME 1 'HEALTHY PLACEMAKING'

In relation to all of the recommendations in the '*Healthy Placemaking*' theme, the CDP will include targets against which to measure progress in order to ensure that we can achieve net zero emissions by 2050.

4.2 Economic Opportunity: Innovation, Enterprise and Employment

Statutory Authorities

A large number of submissions refer to Retail, Employment, Tourism, Protection/Regeneration of Town Centres and Accessibility as key considerations in the development of the strategic objectives of the County Development Plan. A number of submissions from Prescribed Bodies and Statutory Authorities/Agencies also highlight that objectives must be consistent with National and Regional Policy along with other relevant plans, strategies and Guidelines. Specific reference is made to the following:

- National Planning Framework (NPF)
- Retail Planning Guidelines for Planning Authorities, 2012.
- Local Economic Community Plans (LECP)
- National Disability Inclusion Strategy 2017-2021
- Local Link Rural Transport Programme Strategic Plan 2018-2022.

In brief:

Failte Ireland: Tourism, Ireland's Ancient East, town centres.

Dept of Transport: Town Centres and Retailing, Accessibility for all abilities to public transport and within town centres, Rural transport links.

OPW: Tourism / Signage

Dept. of Public Health: Broadband, Working from home or in hubs.

HSE: Establish E-Working Centres, Rejuvenate Small Towns and Villages

GSI: Incorporate Geology into Culture and Tourism.

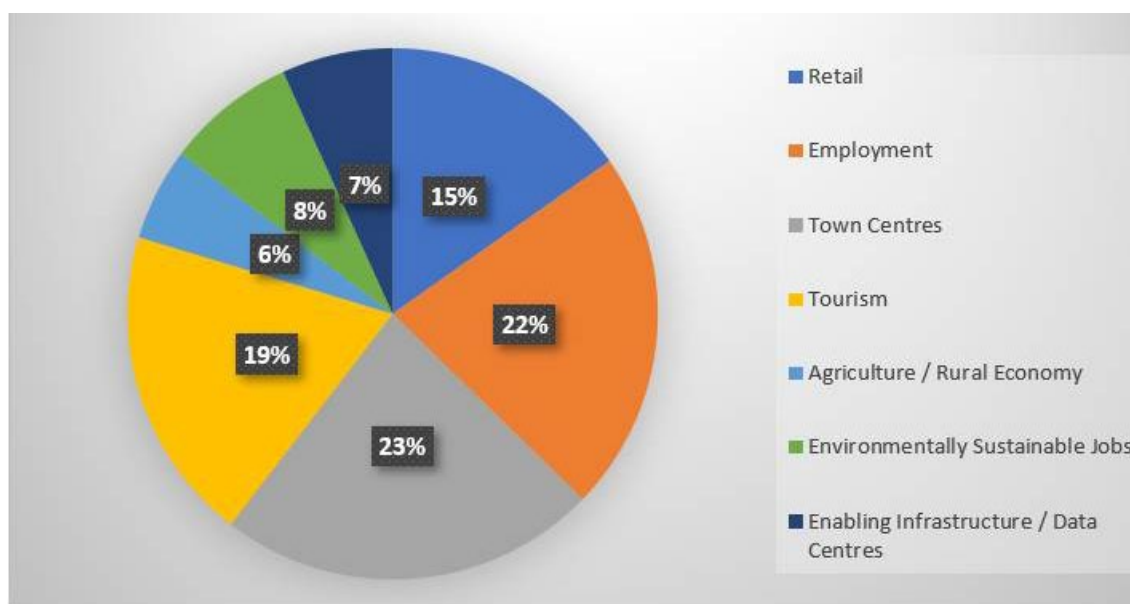


Fig 2 – Breakdown of submission type received in relation to 'Theme 2 – Economic Opportunity'

ISSUES

1. Consistency with other Plans and Strategies

- (a) NPF – Several objectives noted in OPR and EMRA submissions.
- (b) RSES - Several objectives noted in OPR and EMRA submissions.
- (c) Retail Planning Guidelines for Planning Authorities, 2012

- (d) Local Economic Community Plans (LECP)
- (e) National Disability Inclusion Strategy 2017-2021
- (f) Local Link Rural Transport Programme Strategic Plan 2018-2022

2. **Retail**

Submission Nos. 035, 036, 042, 045, 063, 073, 075, 086, 089, 094, 096, 118, 119, 144, 184, 204, 217, 220, 229, 238, 241, 246, 249, 318, public meeting

- (a) Retail Provision in the county to be consistent with regional retail hierarchy in RSES and RPG's
- (b) Promote Post Office facilities new and existing in suitable locations. Noting increasing deliveries due to online shopping
- (c) Protect and promote on street shopping/local stores in towns. Retail proposals over 1,000m² (gross) should be prohibited outside of town centres. Clearly identify town centres on maps. Not enough services in town centres. Develop incentives to bring life back to the towns
- (d) Pilot a town which limits the number of chain/franchise outlets
- (e) Support and facilitate the further expansion and evolution of the Kildare Village Outlet Centre. Promote and encourage major enhancement and expansion of the retail offer and town centre functions of Kildare Town, including the Kildare Tourist Outlet Village. Encourage and facilitate innovation in the County's retail offer and attraction, by being proactive and responsive to changing retail market trends and consumer behaviour in a post COVID-19 and post Brexit environment. Encourage and facilitate retail innovation, to ensure the County enhances its competitiveness as a retail and tourism destination
- (f) Support development of additional retail stores at suitable locations to cater for projected/planned population growth. Updated Retail Strategy for Kildare and Greater Dublin Area required. The Retail Hierarchy in the current Plan will require to be updated to be consistent with RSES. Support local retailing and click/collect facilities. Recognise that the design of modern retail is dictated by retailers' requirements. Retain Policy R24 and promote enhancement of the retail offer in Athy
- (g) Zonings should reflect current land uses
- (h) Needs to be supports for sustainable businesses in town centre. Rates are too high

CHIEF EXECUTIVE'S OPINION:

Retail

The OPR and EMRA submissions reference the need for consistency with the national and regional policies in relation to retail. In this regard it should be noted that the CDP will be consistent with both the '*Retail Planning Guidelines for Planning Authorities*' (2012) and the '*Regional Spatial and Economic Strategy*' as they relate to retail, particularly the regional retail hierarchy as set out in Table 6.1 in the RSES where Levels 2, 3, 4 and 5 relate to County Kildare.

A number of submissions received relate to the impact the Covid 19 pandemic has had on the County's towns and villages, where there is a recognised need to bring life back into our urban areas, supporting the local retail offering and limiting chain/franchise outlets. In this regard there were numerous requests to locate larger retail stores (greater than 1000sqm gross) within town centres. The Plan must do all it can to ensure that our towns and villages are revitalised, so that more and more people see urban living as a more attractive and sustainable option. There have been noticeable improvements in the public realm of our towns over the past number of months

and such improvements along with committed investment will further enhance the attractiveness of our towns into the future.

There is also a recognised need to be more proactive and responsive to changing retail market trends and consumer behaviour. The Draft Plan must ensure that Kildare continues to adapt to a changing retail environment, all the while promoting sustainable development in order to retain Kildare's attractiveness as a county in which to shop and do business.

There is a recognition that the population of County Kildare is projected to increase and there is a request for a parallel increase in retail and service provision at appropriate locations to meet this projected need. This is in accordance with proper planning and sustainable development and will be particularly encouraged through both the CDP and Local Area Plans.

A specific submission was noted in relation to the further expansion of the Kildare Tourist Outlet Village in Kildare Town. In this regard policy R25 of the current CDP encourages and facilitates such expansion in accordance with the 2012 Retail Planning Guidelines and where it can be demonstrated that there would be no capacity impacts on the national motorway and regional and local road networks. These considerations will also be taken into account in the review of the CDP along with the designation of Kildare Town as a Level 3 centre in accordance with Table 6.1 of the RSES.

There was also a request to retain policy R24 of the CDP as it relates to the level of retail expenditure leakage from the town of Athy. In this regard it should be noted that while a similar policy will be considered for inclusion in the new CDP, a number of policies and objectives have been included in the Draft Athy LAP which is due to be adopted later in 2021 which addresses this very issue in recognition of Athy's geographical location in relative proximity to other key retail centres both within and outside the county.

CHIEF EXECUTIVE'S RECOMMENDATIONS:

Retail

To ensure that the retail section of the CDP is consistent with the *'Retail Planning Guidelines for Planning Authorities'* (2012) and the *'Regional Spatial and Economic Strategy'* in particular with the regional retail hierarchy as set out in Table 6.1 of the RSES and with the RSES guiding principles for the location of trip intensive development.

To include objectives in the Draft Plan to promote the revitalisation of our towns and villages throughout Kildare including 'living over the shop', re-use of retail for other uses, consider a better balance between apartments and services in town centres, encourage infill/brownfield development, re-use vacant/ derelict buildings.

To include objectives in the Draft Plan that support the adaptation of an ever-changing retail environment in accordance with national and regional retail planning policy

To facilitate the provision of retail services at appropriate locations to support an increase in the population of County Kildare in accordance with the principles of proper planning and sustainable development

To consider the retention of policy R25 of the CDP as it relates to the expansion of the Kildare Village Retail Outlet Centre

To consider the retention of policy R24 of the CDP as it relates to the level of retail expenditure leakage from the town of Athy.

3. Employment

Submission Nos. 017, 018, 035, 058, 069, 089, 109, 127, 130, 131, 135, 136, 143, 146, 161, 162, 166, 175, 186, 191, 193, 198, 200, 202, 221, 234, 259, 274, 280, 294, 297, 301, 313, 315, 318 & public meeting & youth workshop

- (a) Deliver housing in higher tier towns where there is access to existing or planned employment with good access to public transport
- (b) Promote smart specialisation, collaboration with other bodies / institutes, and clustering policies. Focus on MASP / Eastern part of Region to develop clustering networks
- (c) Opportunities for Naas and Maynooth to act as Economic Drivers
- (d) Identify locations for strategic employment locations using an evidence-based assessment i.e., in key locations with access to high quality public transport
- (e) Recognise the importance of skills and innovation, research / technology, co-working spaces, and digital hubs as drivers of future growth and to support smart towns and villages. Promote environmentally sustainable jobs and remote working
- (f) Promote Post Office facilities in suitable locations. Noting parking requirements at depots to cater for fleet and staff parking
- (g) Provide better education opportunities for young people; expand the youth reach service; develop links between apprenticeship and education
- (h) Lands for employment uses could be considered at Rathcoffey
- (i) Need for industrial and commercial land in North Kildare incl. Maynooth & Naas. Review available greenfield lands suitable for industrial development
- (j) Include a local labour clause for developers to employ locals as part of their project to provide opportunities for long term and young un-employed
- (k) Logistics, distribution, and Storage development to be located along N7 closest to Dublin to prevent sprawling deep into the county
- (l) Reduce motorway building line constraints to ensure a compact and sustainable urban footprint on lands zoned for employment / commercial uses
- (m) Kildare needs to divert from dependency on Dublin based employment and provide employment for youth within the county
- (n) Consider a high-quality research and development park on underutilised lands close to motorway interchanges
- (o) Zonings should reflect current land uses

CHIEF EXECUTIVE'S OPINION:

Employment

The Regional Spatial and Economic Strategy (RSES) identifies Maynooth and Naas as the County's two Key Towns. This acknowledgement in the regional hierarchy provides a particular opportunity for both towns to build upon their current employment base and act as economic drivers for further growth. While five submissions referenced the need for additional industrial and commercial land in both Maynooth and Naas, two others (including the OPR) requested that locations be identified for strategic employment using an evidence-based assessment, at locations with access to high quality public transport. The OPR submission in particular has been noted in this regard and as part of the review of the CDP it is intended to undertake an evidence based assessment to inform the location of strategic employment sites throughout the county having regard to the Guiding Principles of the RSES as set out in Section 5.3 and Table 5.1 with regard to Maynooth and Leixlip and Section 6.4 of the RSES as it relates to all other areas of the county.

The promotion of smart specialisation and clustering have been raised in nine submissions and reflects key economic principles of the RSES as set out in section 6.3 of same. Furthermore, 18 submissions referenced the importance of co-working spaces, digital hubs, smart towns and villages, environmentally sustainable jobs and remote working. The CDP will support the above where they are in accordance with the principles of proper planning and sustainable development, particularly in relation to the location of co-working spaces which should be located where sustainable modes of transport are either existing or planned and, where available are easily accessible.

Motorway building lines and motorway interchanges have also been referenced in submissions received. In the case of the former, there is a request to reduce the motorway building line to ensure a sustainable urban footprint. As part of the review of the CDP, the current motorway building line will be reviewed in consultation with TII and if appropriate, revised accordingly. In the case of the latter, there is a request for a high-quality research and development park on underutilised lands close to motorway interchanges. Further development around motorway interchanges however may undermine the carrying capacity of our road network and would be contrary to TII policy guidance. In this regard, the Draft Plan will be informed by the appropriate Section 28 guidelines as they relate to protection of the carrying capacity of motorways and associated interchanges.

The request for logistics, distribution and storage development along the N7 is noted. However, care would need to be taken to ensure that the carrying capacity of the national road network would not be compromised as a result of such development or that the development of sites would not further exacerbate the level of sprawl already in existence along the N7.

CHIEF EXECUTIVE'S RECOMMENDATIONS:

Employment

To include objectives in the Draft Plan that support employment growth in both Maynooth and Naas, Kildare's only two Key Towns as identified in the RSES.

To undertake an evidence based assessment to inform the location of strategic employment sites throughout County Kildare having regard in particular to Section 5.3 and Table 5.1 of the RSES with regard to Maynooth and Leixlip and Section 6.4 of the RSES as it relates to all other areas of the county.

To include objectives in the Draft Plan that promote smart specialization and clustering in accordance with the economic principles as set out in Section 6.3 of the RSES.

To include objectives in the Draft Plan that promote co-working spaces, digital hubs, smart towns and villages, environmentally sustainable jobs and remote working at appropriate locations where they are in accordance with the principles of proper planning and sustainable development and have access to accessible, sustainable modes of transport.

To consult with TII with respect to the requirements regarding motorway building lines

4. Town Centres

Submission Nos. 006, 015, 034, 035, 036, 058, 063, 069, 072, 073, 075, 086, 089, 109, 119, 127, 136, 144, 162, 166, 184, 193, 197, 198, 200, 202, 204, 211, 217, 221, 229, 241, 242, 249, 299, 300, 312, public meeting & youth workshop

- (a) Encourage Infill / Brownfield Development in the MASP and County's Towns. Revitalise urban centres and re-use vacant / derelict buildings. Must be specific and measurable.

- (b) Important policy developments since last plan adopted in relation to accessible and integrated public transport. Must be fully accessible for people with disabilities to allow them access to services in town centres. Should also be a universal design approach to the built environment, including footpaths, roads, pedestrian crossing points and bus stops/shelters. Refer to National Disability Inclusion Strategy 2017-2021.
- (c) Accessibility to urban centres: Integrate rural transport services with other public transport services. Make it easy to get to town centres. Local link Rural Transport Programme Strategic Plan 2018-2022.
- (d) Promote Post Office facilities in suitable locations including accessibility and parking requirements.
- (e) Town centre should be designated as a development zone with incentives for the creation of “living over the shop”.
- (f) Promote the “10-minute” town.
- (g) Encourage re-use of retail for other uses.
- (h) Too many apartments and not enough services in town centres.
- (i) Discourage HGV’s from using the town centre.
- (j) Improve public realm, cultural spaces, market spaces, green spaces, cycling and pedestrian infrastructure in town centres.
- (k) Commercial developments to be located close to the town centre.
- (l) Expand town centre in Celbridge.
- (m) Convert derelict town centre sites into remote working hubs to boost local economy.
- (n) Need to be supports for sustainable businesses in town centre. Rates are too high.

CHIEF EXECUTIVE’S OPINION:

Town Centres

While much of the concerns have been addressed above under the ‘Retail’ heading, there are particular issues that relate specifically to town centres and include a universal design to all aspects of town centres including the built environment but also the space between buildings and access to these buildings and spaces. The CDP fully supports an easily accessible urban environment which will benefit all users of these spaces and form the basis on which to attract further users and investment. The concept of the ‘10-minute’ town has been raised on a number of occasions across a number of themes in this report. In some cases, it has been referred to as the ‘15-minute’ town. In either case, the concept remains the same, to encourage easy and convenient access to as many services and facilities as possible within a 10/15 minute radius of a person’s home. It promotes the concept of compact growth and fully aligns with the NSOs and NPOs of the NPF and the RPO’s of the RSES. The Draft Plan will be fully supportive of this concept which is already supported through a number of policies/objectives in the current CDP and it will be further emphasised to align with the RSES.

The quality of the public realm, cultural spaces, market spaces, green spaces, cycling and pedestrian infrastructure in town centres was referenced on a number of occasions. The Draft CDP will fully support any measure to improve all of these key attributes that make town centres welcoming and attractive spaces to be in and which in turn encourage users and investment.

CHIEF EXECUTIVE’S RECOMMENDATIONS:

Town Centres

To include objectives in the Draft Plan to require a universal design approach to the built environment where possible including footpaths, roads, pedestrian crossing points and bus stops/shelters.

To reference the 'National Disability Inclusion Strategy 2017-2021' and the 'Local Link Rural Transport Programme Strategic Plan 2018-2022' in the Draft CDP.

To include objectives in the Draft Plan to support the concept of the '10-minute' town where services/facilities can be easily accessed within a 10 minute walking distance of a person's home, where possible.

To include objectives in the Draft Plan to support the improvement of the public realm, green spaces, cycling and pedestrian infrastructure in town centres.

5. Tourism / Recreation

Submission Nos. 012, 015, 020, 037, 056, 069, 073, 089, 102, 109, 138, 139, 141, 166, 180, 185, 186, 194, 196, 197, 198, 202, 203, 211, 217, 221, 229, 232, 234, 239, 277, 280 & 294

- (a) Natural / cultural assets and the built heritage will play a key role in developing the tourism & leisure sector. Create open spaces around historic sites. The role of Forests, Greenways, Blueways, and Peatways are highlighted as opportunities to develop tourism and recreation facilities. A tourism plan should be developed, and greenways should be promoted. Develop eco-tourism links between boglands, canals and greenways.
- (b) Objectives should be included for (i) Ireland's Ancient East, (ii) Destination Experience Development Plans (DEDP) and (iii) the Thoroughbred County DEDP, (iv) Destination Towns and (v) The Curragh Masterplan.
- (c) Support the development of quality tourist accommodation at key locations in key towns and highlight key assets including accessibility.
- (d) Geology to be part of any tourism initiative.
- (e) Maynooth College, Connolly's Folly, Carton House, and Castletown should be grouped and promoted as grand houses of North Kildare.
- (f) A new theatre is also suggested for Celbridge.
- (g) Protect Carton House and Rivers Rye and Lyreen in Maynooth for tourism and recreation. The Plan should recognise the importance of Carton House as a tourism facility of National and International significance.
- (h) Develop community gardens and link to walking trails as a tourist attraction.
- (i) Ensure wind / solar farms do not detract from tourism plans.
- (j) Examine the feasibility of providing a tourist office in one or both key towns. Establishment of a county museum should be investigated.
- (k) The only circular boating route (links Royal Canal, Shannon, and Grand Canal) which passes through Kildare needs to be promoted as a tourist route.
- (l) Develop services i.e., casual trading license along Grand Canal Greenway and other greenways / tourism destinations.
- (m) Installation of proper cycling infrastructure between greenways and nearby towns / villages. Provide links to other amenities / tourist destinations.
- (n) Promote responsible, sustainable, and environmentally friendly tourism.
- (o) Umeas Peatlands Park to be supported with provision of links to the Barrow Blueway. Recognise Monasterevin as the Blueway arrival town with link to Rathangan.
- (p) Uniting Coillte and Bord na Mona lands has the potential to form a National Park.
- (q) Protect key tourism assets with potential for national tourism like Kildare Town.
- (r) Establish a tourism destination centre around equine and military events.

CHIEF EXECUTIVE'S OPINION:

Tourism/Recreation

Kildare is fortunate to be located where both the Grand Canal and Royal Canal run through it. It's also home to a rich river system and peatland areas and collectively these offer significant tourism and recreational potential. Opportunities to build on our natural assets has been recognised in a number of submissions with the development of eco-tourism links between boglands, canals and greenways being highlighted in 17 submissions.

The development of the Umeras Peatlands Park was particularly referenced where links could be provided to the Barrow Blueway. It should also be acknowledged however that there was some opposition to the development of the proposed park due to the impact that the development of the park may have on nearby properties.

One suggestion was that Coillte and Bord na Mona lands should be explored for their potential to form a National Park type facility. The Draft CDP will further investigate the potential of this proposal in conjunction with both Coillte and Bord na Mona.

A great deal of work has been undertaken to date with regards to the sustainable development of a number of blueways and greenways in Kildare, in particular and the suggestion of linking these assets with our peatlands is welcome. Further opportunities will be explored in this regard. There are other elements that would also benefit from such developments and linkages, not least the enhancement of our biodiversity through the development of green infrastructure links in particular but also sustainable travel and tourism in promoting the use of walking, cycling and public modes of transport to explore the natural assets of our county. The spin off potential from the careful development of these assets cannot be underestimated and could greatly enhance Kildare's towns and villages through increased footfall and expenditure at a time when they need to be revitalised. The possibility of locating tourist services and facilities along these greenways and blueways could also be explored where these are provided in an accessible, sustainable manner and where they would complement the offering of nearby service centres.

One particular submission highlighted that the only circular boating route linking the Royal Canal, Shannon and Grand Canal, passes through Kildare and that this should be explored as a tourist route. The CDP will support this boating route which would also add to our overall tourism offering.

The historical, archaeological and geological importance of the Curragh Plains has also been highlighted and will continue to be protected and enhanced through the policies and objectives of the CDP. It should be noted that a Management Plan is currently being prepared for this very unique landscape.

The world-renowned equine industry in Kildare has also been highlighted and it too will continue to be supported through the policies and objectives of the new CDP.

There have been specific requests for tourism related development throughout the county which include a county museum, a new theatre in Celbridge and new tourist centres in various locations. The CDP will support the provision of tourist related facilities where these can be provided in an accessible and sustainable manner.

The protection of our built environment throughout the county and particularly the larger houses and structures in North Kildare have been highlighted also. The wealth of Kildare's built heritage is recognised in the current CDP. The number of structures already listed on our Record of Protected Structures and the Plan's accompanying policies and objectives is testament to this. The new CDP will continue to protect our built environment at all levels across the county.

CHIEF EXECUTIVE'S RECOMMENDATION:

Tourism/Recreation

To include objectives in the Draft Plan to support the development of the County's peatlands, blueways and greenways in an accessible, sustainable manner and to explore how to integrate these valuable assets to maximise the tourism and amenity potential that they offer.

To include an objective in the Draft Plan to support the development of the Umeras Peatlands Bog and to explore what links could be created between it and nearby blueways and greenways, whilst ensuring that nearby properties would not be negatively affected.

To include an objective in the Draft Plan to explore the possibility of developing a National Park on lands owned by Coillte and Bord na Mona in consultation with both stakeholders.

To include an objective in the Draft Plan to explore the potential of locating tourist services and facilities along our greenways and blueways where these could be provided in an accessible, sustainable manner and where they would complement the offering of nearby service centres.

To include an objective in the Draft Plan to support the only circular boating route in Ireland that links the Royal Canal, Shannon and Grand Canal where it passes through Kildare

To continue to include policies and objectives in the Draft Plan that protect and enhance the unique landscape of the Curragh Plains and all its associated history.

To continue to include policies and objectives in the Draft Plan that protect and enhance the world-renowned equine industry in Kildare.

To include an objective in the Draft Plan to investigate the need for a new county museum and other tourist related facilities where these can be provided in an accessible and sustainable manner.

To continue to include policies and objectives in the Draft Plan to protect the built environment at all levels across the county.

To include objectives in the Draft Plan to support new and existing Visitor Experiences including St. Brigid, Shackleton Visitor Experience, Arthur's Way, thoroughbred county, festivals and events

To include objectives in the Draft Plan to support the marketing and promotion of County Kildare as a visitor destination with an integrated marketing plan, aligned with Ireland's Ancient East and Tourism Ireland plans.

To include objectives in the Plan to support and develop the tourism and hospitality industry

To include objectives in the Plan to support sustainable tourism i.e. leave no trace

6. Agriculture / Rural Economy

Submission Nos. 089, 100, 109, 134, 193, 203, 291, public meeting & youth workshop.

- (a) Indigenous sectors such as small-scale enterprise, agriculture, the equine industry, food & rural enterprise are important to the county. Support employment which enhances the environment.
- (b) Limiting the floor area for small businesses in rural areas to 200m² and requiring the re-use of buildings does not encourage new enterprises and inhibits the expansion of existing enterprises. Encourage commercial enterprises to enhance their premises. See table 10.3 in CDP.

- (c) Importance of extractive industry is noted in RSES and should be recognised in the plan. Important for supply of construction materials.
- (d) Agriculture and bloodstock industry important in Kildare, helps maintain existing rural services. Commercial / retail developments that provide services to farmers should be encouraged with an emphasis on the bloodstock industry.

CHIEF EXECUTIVE'S OPINION:

Agriculture/ Rural Economy

There is a recognition that indigenous sectors including small-scale enterprise, agriculture, the equine industry, food and rural enterprises are important to Kildare and should be appropriately encouraged. The Draft CDP will encourage the development of indigenous industries particularly at this time where many businesses are struggling to survive.

There were concerns in several submissions in relation to the limited floor areas for small businesses in rural areas which, it was considered, would not encourage new enterprises to develop and would inhibit the expansion of existing enterprises. In the interests of sustainable development however and in acknowledging the requirement to meet net zero emissions by 2050 the CDP must strike the balance between the extent of rural development in generally poorly serviced areas that is considered acceptable, the impact any such development would have on the service offering of nearby, serviced towns and villages and the need to promote sustainable development.

The importance of the extractive industry in Kildare was highlighted particularly in relation to the supply of construction materials. The CDP will include policies and objectives related to the extractive industry both during and post on site operations.

CHIEF EXECUTIVE'S RECOMMENDATION:

Agriculture/ Rural Economy

To include objectives in the Draft Plan to support the indigenous sectors in Kildare including small-scale enterprise, agriculture, the equine industry, food and rural enterprises

To include objectives in the Draft Plan related to the extractive industry both during and post on site operations.

7. Environmentally Sustainable Jobs

Submission Nos. 012, 058, 072, 073, 109, 131, 134, 144, 186, 229, 280, 299 & 308.

- (a) Sustainable rural based enterprises should be supported i.e., sustainable timber products. Opportunities exist to develop the low carbon and circular economy. The Plan should assist in accelerating a shift from fossil fuels to a range of low and zero-carbon sources including renewable energy and secondary heat sources, and to support the development of green technologies.
- (b) Consider a green energy / circular economy hub / climate action training centre on the old Bord Na Mona site in Newbridge.

CHIEF EXECUTIVE'S OPINION:

Environmentally Sustainable Jobs

The need for sustainable rural based enterprises was highlighted particularly in relation to sustainable timber products and the need to move the focus away from fossil fuels in favour of low

and zero-carbon sources including renewable energy and secondary heat sources and to support the development of green technologies.

Kildare is committed to meeting our climate change target of net zero emissions by 2050. To this end the CDP, through its policies and objectives will fully embrace any innovation to reduce its carbon footprint which is fully aligned with the guiding principles of the RSES.

The suggestion that a green energy/circular economy hub/climate action training centre be considered for the old Bord na Mona site in Newbridge is noted. The CDP, through its objectives, will investigate, in consultation with Bord na Mona, the feasibility of providing such a use at the former Bord na Mona site in Newbridge.

CHIEF EXECUTIVE'S RECOMMENDATION:

Environmentally Sustainable Jobs

To include policies and objectives in the Draft Plan that support sustainable rural based enterprises particularly those that help in achieving climate action goals to move away from fossil fuels in favour of low and zero-carbon sources including renewable energy and secondary heat sources and to support the development of green technologies.

To include an objective in the Draft Plan to investigate, in consultation with Bord na Mona, the feasibility of developing a green energy/circular economy hub/climate action training centre at the old Bord na Mona site in Newbridge.

8. Enabling Infrastructure / Data Centres

Submission Nos. 041, 051, 089, 120, 135, 136, 143, 193, 202, 221 & 308.

- (a) Digital infrastructure is key to continued growth, supporting businesses and enhancing communities including the delivery of the National Broadband Plan.
- (b) Policies to support provision of data centres should be included in the Plan. Note requirements / distance from supporting infrastructure and existing transmission lines and substations i.e. 3km and 3km. Reference also made to supporting policy in RSES and requirement to be consistent with same. Naas mentioned as a potential location.
- (c) CDP should cap the number of data centres as they are a big consumer of electricity. Concern regarding use of energy around data centres and impact on environment, climate change targets and water services.
- (d) Infrastructural shortfalls hinder economic development such as the rail network, lack of childcare, schools. An audit should be undertaken to identify infrastructural deficits.

CHIEF EXECUTIVE'S OPINION:

Enabling Infrastructure/ Data Centres

There is a recognised need for digital infrastructure to support businesses and enhance communities. A number of submissions were received which supported the provision of data centres in line with supporting policies in the RSES, however this has also been met with a certain level of opposition. Where data centres are to be provided it was suggested that the number of such centres be capped due to their impact on the environment as large consumers of electricity and water services. While the CDP must align with the RSES and consider sites for data centres at suitable locations it will be imperative that such facilities would explore the provision of renewable sources of energy to fuel their operations.

It was also highlighted that infrastructure shortfalls hinder economic development and that an infrastructural audit should be carried out. The CDP will, through its policies and objectives, fully

support the preparation of an infrastructure audit that considers the level of infrastructure both existing and planned to support a growing population and economy in the interests of achieving a compact and sustainable society.

CHIEF EXECUTIVE'S RECOMMENDATION:

Enabling Infrastructure/ Data Centres

To include objectives in the Draft Plan that require data centres to consider the use of renewable sources of energy to fuel their operations in whole in the first instance or in part where this is not possible and where it has been demonstrated not to be possible.

To include an objective in the Draft Plan to undertake an infrastructural audit of existing and planned infrastructure to support a growing population and economy in order to inform the development strategies for our larger towns and villages in accordance with Appendix 3 of the NPF.

CHIEF EXECUTIVE'S ADDITIONAL RECOMMENDATION FOR THEME 2 'ECONOMIC OPPORTUNITY'

In relation to all of the recommendations in the '*Economic Opportunity*' theme, the CDP will include targets against which to measure progress in order to ensure that we can achieve net zero emissions by 2050.

4.3 Climate Action: Environment, Climate Change and Adaptation

Statutory Authorities

All acknowledge that climate change is a key consideration in the development of the strategic objectives of the County Development Plan. Must be policy led. Must include targets and monitoring. Specific reference made to:

- Climate Action Plan 2019
- Kildare's Climate Change Adaptation Strategy 2019-2024
- Biodiversity Climate Change Sectoral Adaptation Plan 2019
- DCENR (2015) White Paper on Energy – Irelands Transition to a Low Carbon Energy Future 2015-2030
- Just Transition
- County Kildare Biodiversity Plan (2009-2014)
- Climate Change Sectoral Adaptation Plan for the Built and Archaeological Heritage (2018).
- National Biodiversity Action Plan

In 2019, the Minister of Communications, Climate Action and Environment committed to raise the amount of electricity generated from renewable sources to 70% by 2030 with no generation from peat and coal in the Climate Action Plan.

In brief:

OPR: Flood Risk and Renewable Energy (specifically wind).

DCHG: Biodiversity; Peatlands; Hedgerows;

EMRA: Integrated Climate Policy required; Decarbonisation; Renewable Energy; Water and Floodrisk; Carbon reduction targets;

Dept of Transport: Sustainable Mobility Policy Framework (will replace Smarter Travel and National Cycle Policy Framework).

OPW: Flood Risk

Dept. of Tourism, Culture, Arts, Gaelt: Vernacular building, materials.

An Taisce: Fossil fuels, Renewable energy; Reuse of existing buildings.

Dept. of Public Health: EV charging; Re-wilding; Re-forestation; Blue Green areas;

HSE: Sustainable Development principles; Renewable Energy Strategy

Eirgrid: Renewables

GSI: Geothermal resources

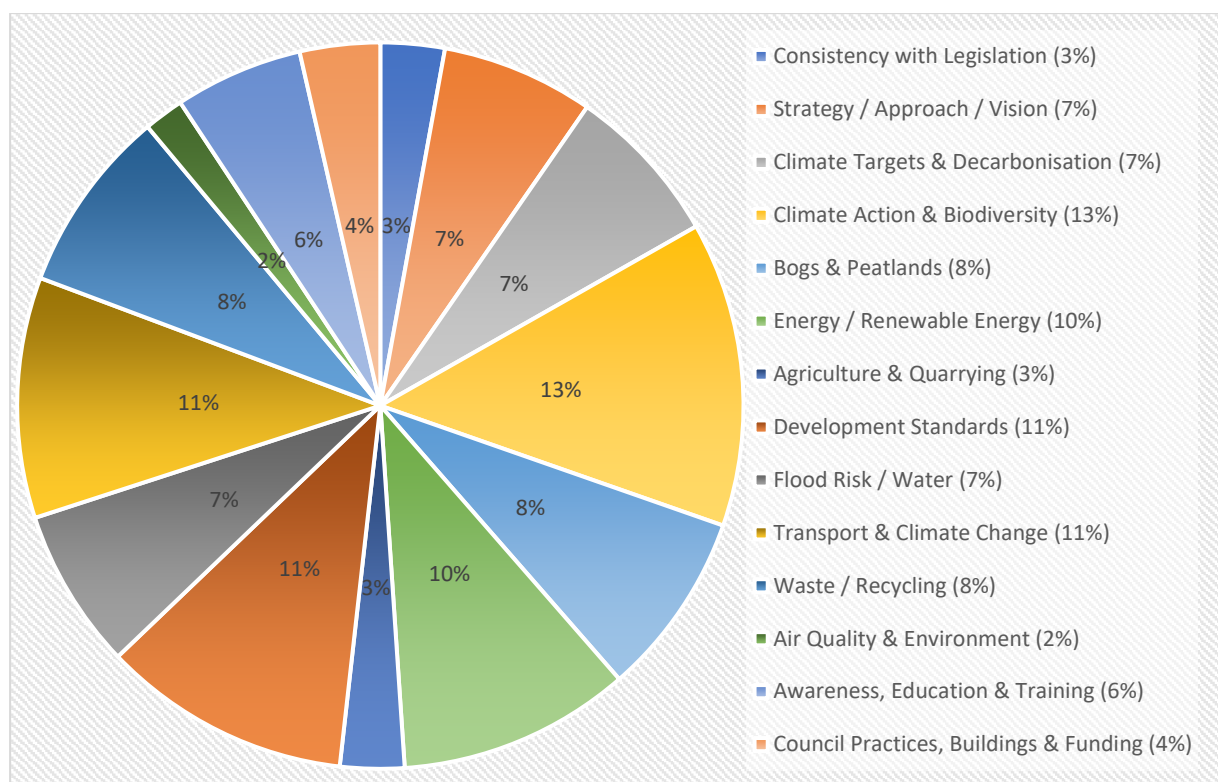


Fig 3 – Breakdown of submission type received in relation to 'Theme 3 – Climate Action' ¹

Issues

1. Consistency with Legislation

Submission Nos: 018, 019, 061, 071, 105, 185, 186, 234

- The Climate Action Plan 2019 sets out a roadmap by the Government, aiming for at least 70% of Ireland's electricity to be generated from renewables by 2030, The CDP should reflect and amplify the objectives and ambition in the Climate Action Plan, Climate Adaptation Plans and SECAP.
- The Climate Action and Low Carbon Development (Amendment) Bill 2020 provides for more compact development, greater use of sustainable transport options, restricting development in areas that are at risk of flooding and protecting natural landscape and biodiversity.
- The Department of Communications, Energy and Natural Resources (2015) White Paper on Energy – Ireland's Transition to a Low Carbon Energy Future 2015-2030 – should be relied upon for policy formulation.
- The Plan must be aligned with UN Policy on Sustainable Development 2015.
- The CDP is an opportunity to meet the targets of the Kildare Climate Adaptation Strategy.
- The Plan should acknowledge the Covenant of Mayors

¹ For the purposes of preparing the pie chart the following issues were grouped together under new headings; 'Energy', 'Renewable Energy', 'Wind Energy' and 'Solar' under '**Energy/ Renewable Energy**' and 'Flood Risk' and 'Water' were combined together also.

CHIEF EXECUTIVE'S OPINION

Consistency with Legislation

The Kildare County Development Plan 2023-2029 will play an important role and be in place at a crucial time as it relates to meeting the ambitious targets set by the Government for 2030, in light of national commitments made in the Climate Action Plan 2019 and subsequent Climate Action Amendment and Low Carbon Development (Amendment) Bill 2021. Climate Action is an overarching and cross-cutting theme of the Draft Plan and must inform core and settlement strategies, and all policies and objectives for the built and natural environment, in particular in relation to energy, transport and infrastructure. To align with the NPF (which was prepared having regard to the UN Policy on Sustainable Development 2015) and RSES, the Draft Plan will include policies and objectives to influence County Kildare's transition to a low carbon and climate resilient society.

The Kildare Climate Adaptation Strategy 2019-2024 addresses the increasing risks associated with climate change by focusing on Mitigation and Adaptation to 'climate-proof' Kildare County Council's plans and activities. This Strategy is currently the primary instrument at local level to ensure the following: that a proper comprehension of the key risks and vulnerabilities of climate change is attained; to bring forward the implementation of climate resilient adaptation actions in a planned and proactive manner; and to ensure that climate adaptation considerations are mainstreamed into all plans and policies and integrated into all operations and functions of the local authority. The Strategy includes a number of goals, objectives and actions that are particularly relevant to the County Development which these will be integrated into the Draft Plan accordingly.

Kildare County Council will also, on enactment of the Climate Action Bill, commence the preparation of a Climate Action Plan which will incorporate a Sustainable Energy Climate Action Plan.

Kildare County Council is a signatory of the EU Covenant of Mayors, which brings together local governments across the EU that have voluntarily committed to implementing EU climate and energy objectives. Signatories of this endorse a shared vision for 2050: accelerating the decarbonisation of their territories, strengthening their capacity to adapt to unavoidable climate change impacts and allowing their citizens to access secure, sustainable and affordable energy. The Draft Plan will acknowledge this important commitment and set out a series of tangible steps to a low carbon county. The Draft Plan will also identify Kildares 1st, in a potential series of designated Decarbonisation Zones, which is an area spatially identified by the local authority, in which a range of climate mitigation measures can co-exist to address local low carbon energy, greenhouse gas emissions and climate needs. The range of policies and projects developed are specific to the energy and climate characteristics of the spatial area covered by the DZ

CHIEF EXECUTIVE'S RECOMMENDATION

Consistency with Legislation

The Draft Plan will include climate action as an overarching and cross-cutting theme to align with policies and objectives contained in the NPF, RSES and national legislation.

The Draft Plan will include policies and objectives to support the National Climate Action Plan 2019 and the Kildare Climate Change Adaptation Strategy 2019-2024, in the transition to a low carbon and climate resilient economy and society.

2. Strategy/Approach/Vision

Submission Nos: 014, 058, 073, 109, 135, 167, 175, 186, 196, 202, 205, 221, 223, 226, 229, 230, 234, 274, 280

- a. The plan must support the transition to a low carbon, climate resilient and environmentally sustainable region.
- b. Change reference from 'Climate Change' to 'Climate Breakdown' or Climate Emergency', acknowledge there is a climate emergency, KCC should give practical credibility to its declared climate and biodiversity emergency.
- c. The plan should reflect the current situation regarding climate, nature degradation, wildlife loss, pandemics, and the rapid social and economic change; The biodiversity, climate and health crisis(s) are all linked and so are the solutions.
- d. Climate needs to be central to the CDP with clear measurable objectives and accountable reporting with communities at its core; All chapters/ measures/ strategies should be assessed against climate considerations; Protection of the environment must come first; All actions should prioritise high impact on carbon emissions reduction and nature and biodiversity recovery; there should be a sustainable and measurable vision with targets and KPI's (PM); a low carbon sustainable county (PM); Decisions made by KCC should outline how environmental considerations have been assessed; Need to develop a criteria list to measure every element of the Plan against so as to achieve climate-proofing.
- e. Set a key goal to contribute to our share of the national commitment to protect 30% of the Earth's lands and seas by the end of the decade; Kildare needs to conserve 30% of its land in line with Ireland's commitment; we should have a target of setting aside 30% of available land for biodiversity.
- f. This plan can reach out to the community and remind us that each choice has a profound impact not just locally, but globally; transformative change must have local communities at its centre.
- g. Prioritise nature-based solutions to the challenges presented by growing urban populations and the impacts of climate change; Ensure that Green Belts are maintained between major centres of development in the County; Nature based solutions bring many benefits which include improving physical and mental health as well as economic opportunities.
- h. Include a climate resilient Kildare policy to promote and support development initiatives that demonstrate climate adaptation measures particularly targeted at the employment/accommodation link and make access to affordable housing close to employment more achievable; Limit rural housing as it requires a major investment in travel times, hinders land efficiency and contributes to difficulties in introducing alternative energy options; Adopt a strict policy of merging residential, commercial and industrial development into defined areas limiting sprawl.
- i. The most up to date climate projections should be considered in all zoning decisions.

CHIEF EXECUTIVE'S OPINION

Strategy/Approach/Vision

It is a National Strategic Outcome (NSO 8) of the NPF to transition to a low carbon and climate resilient society. Furthermore, 'Climate Action' is one of three key principles on which the RSES is founded. Whilst the Government's declaration of a climate and biodiversity emergency in 2019 is

acknowledged, it is considered appropriate for the purposes of this Development Plan that the terminology 'climate action' is used to align with the NPF and RSES in this regard.

It is acknowledged that the Irish Government is a signatory to the One Planet Summit's 'High Ambition Coalition for Nature and People' which is committed to the protection of 30% of land and sea by 2030 as well as the promotion of nature based solutions to address the climate crisis. The Draft Plan will in this regard acknowledge the role of biodiversity, nature based solutions and green infrastructure in mitigating and adapting to climate change in its draft policies and objectives.

Climate action will also be a key consideration in determining the core and settlement strategies of the Draft Plan as regard will be had to achieving compact urban growth, providing sustainable mobility and strengthening rural areas whilst transitioning to a low carbon and climate resilient society. The CDP Team will continue to work with the Climate Action Regional Office (CARO) in the formulation of appropriate land use policies and objectives in this regard.

CHIEF EXECUTIVE'S RECOMMENDATION

Strategy/Approach/Vision

The Draft Plan will include climate action as an overarching and cross-cutting theme to align with policies and objectives contained in the NPF, RSES and national legislation.

(See below for targets)

3. Climate Action Targets and Decarbonisation

Submission Nos. 014, 018, 044, 058, 068, 073, 109, 125, 140, 167, 186, 202, 203, 217, 221, 229, 230, 234, 293, Public Meeting

- a. Emissions targets: The CDP must include targets to reduce emissions by 50% by 2030 and to be carbon neutral by 2050; reduce CO₂ and other GHGs by 40% by 2030 as per Kildare's Adaptation Strategy; Ensure measurable targets for GHG emissions are included; It should be a primary objective of the Plan to break dependence on fossil fuels and reduce greenhouse gas emissions and include targeted and timetabled policies in this regard; deliver 7% per annum reduction in carbon emissions.
- b. Must include specific actions and identify who/how/when in relation to targets and actions; Must include key indicators for monitoring progress; Goals need to be SMART, Specific, Measurable, Achievable, Relevant and Time-based.
- c. Each local authority has a part to play in Ireland's Future climate ambitions and central to achieving this is 70% renewable electricity by 2030; ESB is working towards at least 40% reduction in domestic GHG emissions by 2030; the plan must lock in targets for emissions which should be ambitious, adequately resourced, and regular updates on progress should be publicly available.
- d. Target industry with the highest emissions first; Carbon polluters should pay; Identify where carbon emissions arise from and then target these.
- e. KCC should have an ambitious decarbonising strategy in the CDP with a lead decarbonization zone identified; there should be low carbon town Local Area Plans, increase the number of decarbonisation zones after the pilot; Consider the

designation of the first 'low carbon town'; like Portlaoise; The Upper Liffey catchment is proposed as a decarbonising zone to bring a climate action focus to the region.

- f. Include an objective to use the new guide for local authorities to develop CO₂ baselines to provide measures of where we need to get to, progress and achievements.
- g. KCC can influence carbon stocks by the treatment of bogs, hedgerows, trees, building construction, modes of transport; We should begin to understand carbon as a key metric of all development so that a whole life carbon approach is taken.
- h. Clear metrics should be identified to measure how KCC protects and enhances the environment.
- i. Across all aspects of the plan, anything which increase carbon emissions or further unsustainable lifestyles needs to be addressed and reduced or replaced.

CHIEF EXECUTIVE'S OPINION

Climate Action Targets and Decarbonisation

The Council is obliged to meet national and regional climate action targets and the Draft Plan will incorporate policies and objectives that to meet these. A wide range of measures will be required, across all aspects of the plan, to include (but not limited to) renewable energy, active travel and public transport. Underpinning all of the above is a requirement to meet our Climate Target of net zero emissions by 2050. To this end, it is considered appropriate to include in the Plan a set of measurable and achievable targets to order to monitor the Plans progress in that regard which will be informed by the preparation of the SECAP and Kildare Climate Action Plan later this year.

Decarbonising Zones, as set out in Action 165 of the Climate Action Plan 2019, must be capable of delivering outcomes in terms of emission reductions that meet the Governments targets of on average 7% per annum reduction in overall greenhouse gas emissions from 2021 to 2030 (a 51% reduction over the decade). They are viewed as a vehicle to harness the range of technologies, initiatives and people power required to deliver outcomes that strive to meet the Government carbon emission targets. By 30th April 2021, all local authorities are required to put forward a candidate Decarbonising Zone (DZ) to the Department of Housing, Local Government and Heritage (DHLGH). The Draft Plan will include policies and objectives to support the Decarbonisation Zone.

CHIEF EXECUTIVE'S RECOMMENDATION

Climate Action Targets and Decarbonisation

The Draft Plan will incorporate climate action mitigation and adaptation measures in compliance with national and regional planning guidance and relevant legislation.

The Draft plan will include a measurable and achievable set of targets in order to monitor the Plans progress, for example to prepare a Sustainable Energy Climate Action Plan (SECAP) for County Kildare to provide a basis for the inclusion of measurable targets on renewable energy and climate change mitigation and adaptation, in particular wind energy production and potential resource in megawatts.

4. Climate Action and Biodiversity

Submission Nos. 002, 017, 048, 058, 061, 067, 068, 069, 073, 089, 109, 123, 127, 134, 143, 144, 162, 175, 186, 189, 193, 194, 196, 198, 202, 205, 217, 221, 226, 229, 230, 233, 234, 258, 274, 299, 300, Public Meeting

- a. The Plan should align with the **National Biodiversity Action Plan**.
- b. The Kildare Biodiversity and Heritage Action Plan 2009-2014 should be reviewed and updated; Support **Biodiversity Plans** developed by Heritage Officer; KCC needs a Biodiversity Officer / experts in Biodiversity.
- c. and an environmental officer in each MD.
- d. The plan should adopt a '**Climate and Biodiversity First**' approach with criteria to measure every element of the plan; Addressing climate breakdown and biodiversity loss needs to underpin every single part of the plan, criteria should be established against which every element of the plan is considered; Climate change and biodiversity loss must be central tenets of the CDP with clear measurable objectives and accountable reporting, more so than NPF or RSES objectives; the new CDP needs to be underlain by climate change and biodiversity principles and actions, set clear objectives regarding obligations and commitments to new targets for recovering natural environment, wildlife and biodiversity; Promote coordinated spatial planning to conserve and enhance biodiversity of habitats and species.
- e. **Greater protection of Biodiversity is required:** Adaptation goals, objectives and actions relating to biodiversity contained in the Biodiversity Climate Change Sectoral Adaptation Plan 2019, as well as Kildare's Climate Change Adaptation Strategy 2019-2024 should be included in the CDP; Continue to protect biodiversity and promote opportunities to improve biodiversity; adopt and implement positive biodiversity actions; Any conflicts with climate change mitigation and the halting of biodiversity loss should be identified and removed at Development Plan stage.
- f. **Biodiversity loss:** The plan should recognise the importance and opportunity for restoring natural places and recovering lost biodiversity. Biodiversity recovery is critical, addressing biodiversity loss must underpin all parts of the plan; identify biodiversity space / National Park with wild spaces; risk to biodiversity is one of the main environmental issues facing the county.
- g. **Trees:** Better tree protection measures are needed; developers should not be allowed remove mature trees as replacements do not have the same carbon capture; better enforcement/larger penalties required for tree felling; trees are important for wellbeing; native tree planting is needed; any tree losses should be mitigated by new planting schemes and enforced by KCC; Community tree planting should take place; tree planting or a contribution in lieu should be a standard condition of development.
- h. **Woodland:** An ambitious tree planting programme is needed; Woodland expansion; reforestation to aid carbon sequestration; increase broadleaf forestry; more urban tree/shrub planting is needed for biodiversity; a native woodland expansion is required to rescue, manage and expand existing woodlands to increase coverage; An audit of native woodland and a ban on clearing forest is required with all publicly owned native woodlands identified; The extensive woodland at Castletown Estate is an example of where there's opportunity to improve management. An environmental stewardship grant for the planting of new native woodland or the expansion of existing woods is suggested; a funding scheme to allow for the opening

up of private land to the public is suggested; plant pocket forests on any available public land.

- i. **Hedgerows:** better protection is needed, developers should be required to retain existing hedgerows; and native hedgerow to be planted where new hedgerow is required to be removed, KCC hedgerow cutting should be less aggressive; all hedgerows should be mapped in Kildare; hedgerow cutting should be banned from February to September and should be done every two to three years only.
- j. **Bonds** should be used to protect trees and hedgerows.
- k. Promote and protect **Green infrastructure**; set aside areas for environmental preservation, set aside areas for re-wilding.
- l. Promote sustainable management of strategic natural assets such as wetlands, peatlands, uplands, woodlands, and farmlands in an integrated manner.
- m. **Open Spaces/Blue ways/green ways;** the plan could identify large scale biodiversity space for nature, create new green corridors; Identify and protect green infrastructure.
- n. Within new developments, guidelines should be set for native pollinator-friendly species to be used in landscaping.
- o. **Allotments/ Community gardens** should be implemented, Promote local food production.
- p. **Native species** planting should be required in new developments.
- q. Reduce **Pesticides**, the Council should not use them.
- r. **Invasive species:** A comprehensive action plan is needed.
- s. Less cutting of grass on roads verges, along watercourses, parkland and green spaces.
- t. **Increase Pollinators/Promote National Pollinator plan** across the county; land from Wavertree to M7 should be used as a flowering meadow for pollinators/community gardens; greater emphasis should be placed on the rear and valuable habitats in the county and not list pollinating insects that are under threat; include pollinator friendly planting in public spaces; Promotion and adoption of the National Pollinator Plan; Within new developments, guidelines should be set for native pollinator-friendly species to be used in landscaping; target 90% of roundabouts to contain pollinator friendly plants and all by pass roads; we need to protect bees;
- u. Minimal intervention areas should be promoted to strengthen bee populations; conserve insect life; map and monitor endangered species.
- v. Protect those parts of our environment that are most useful as carbon sinks and habitats for biodiversity.
- w. Managing and restoring to good status designated and proposed NHAs and SACs.
- x. **Dark spaces:** lack of dark spaces is affecting biodiversity, investigate lighting that's suitable for nocturnal creatures; Investigate use of energy efficient lighting; public buildings should not be lit up all night, but with motion sensor lighting; investigate using motion sensor lighting on motorways; street lights should have a mechanism to dim when there's no movement or a cap to direct light down to the footpath or road only; Lighting should be low lux or only used during certain times so that fauna behaviour is minimally interrupted.

CHIEF EXECUTIVE'S OPINION

Climate Action and Biodiversity

Government policy on nature conservation is clearly set out in the National Biodiversity Action Plan 2017-2021 (NBAP) and Ireland is fully committed to halting the loss of biodiversity and the degradation of ecosystem services as set out in the EU Biodiversity Strategy to 2030. The Council recognises that there is a global biodiversity crisis.

The critical relationship between climate and biodiversity is referred to in a high number of submissions. Numerous submissions have called for the protection, preservation, enhancement, promotion, and improvement of biodiversity within the County. While the current County Development Plan contains policies to protect the natural heritage and biodiversity of the County, the Draft Plan will seek to build on the existing policies to protect and enhance biodiversity to address biodiversity loss and provide greater protection.

The submission from the Department of Culture, Heritage and the Gaeltacht (002) is noted in which it is recommended that adaptation goals, objectives and actions relating to biodiversity contained in the Biodiversity Climate Change Sectoral Adaptation Plan 2019, as well as Kildare's Climate Change Adaptation Strategy 2019-2024, should be included in the CDP. The Draft Plan will reflect this.

The submissions specifically address the important role of trees, woodlands, hedgerows, green infrastructure, open spaces, allotments, native species, invasive species, use of pesticides, pollinators and impact of lighting. Trees and hedgerows are recognised as assets not only in terms of biodiversity but also for their aesthetic value and for their part in climate action by acting as carbon sinks. The Draft Plan will include policies to address the foregoing issues and to encourage greater tree planting in the county and to retain existing trees and hedgerows where appropriate. An objective to prepare a Green Infrastructure Strategy, to align with RPO 7.23 of RSES, within the lifetime of the Plan will also be included.

CHIEF EXECUTIVE'S RECOMMENDATION

Climate Action and Biodiversity

Develop policies and objectives within the Draft Plan that reflect the objectives of the National Biodiversity Action Plan 2017-2021, or subsequent plans.

Adaptation goals, objectives and actions relating to biodiversity contained in the Biodiversity Climate Change Sectoral Adaptation Plan 2019, as well as Kildare's Climate Change Adaptation Strategy 2019-2024, will be included in the Draft Plan.

Ensure that the Development Plan provides for appropriate protection of trees and hedgerows, where possible, recognising their value to our natural heritage, biodiversity and climate action and encourage tree planting in appropriate locations.

To include an objective in the Draft Plan to prepare a Green Infrastructure Strategy which aligns with RPO 7.23 of the RSES.

To include policies and objectives in relation to allotments, native species, invasive species, pollinators and impact of lighting.

See also response to 'Enhanced Amenity' theme.

5. Bogs/Peatlands:

Submission Nos. 002, 061, 068, 073, 129, 135, 136, 165, 179, 185, 186, 189, 194, 196, 197, 198, 202, 229, 230, 233, 258, 299, Public Meeting

- a. To plan should support the aims of **the National Peatlands Strategy** and implementation of National Raised Bog Special Areas of Conservation Management 2017-2022; The plan should incorporate the principles of Just Transition.
- b. **NPF and RSES:** The potential for utilising the extensive Bord na Móna landholding to support renewable energy generation is specifically called out in the NPF. The future use of Bord na Móna's cutaway bogs can make a significant contribution to national policies and objectives across a range of sectors including renewable energy, industrial development and job creation in rural areas, ecosystem services and biodiversity as well as tourism, amenity and recreation; RSES recognises the importance of peatlands in our landscape for amenity, economic benefit and value to biodiversity, Need to develop a long-term strategic plan for former industrial peatlands with a clear objective to support this.
- c. **Designated peatland areas and landscapes should be protected;** Better protection and rehabilitation of boglands is required to combat climate change; support re-wetting peatlands; Clarification is sought on whom is responsible for any interference caused by bog re-wetting to adjacent land and/or housing; bog restoration and conservation projects should be implemented; other uses should only be considered where experts conclude it will give better results for climate and biodiversity goals; there should be an audit of bogs and wetlands, with a water quality assessment and a ban on any further draining of intact wetlands; The value of peatlands is vital in terms of climate resilience, i.e. biodiversity, carbon storage and alleviation of flooding; The Bog of Allen should become an area of conservation as a lot of rare species live there. Energy developments should be planned in areas that do not interfere with bog diversity conservation.
- d. **Uses:** The CDP should consider all beneficial uses of Peatlands including energy, commercial, social and environmental; Considering the peatland resource in the county that is now considered either cutaway or cutover there needs to be a balance regarding development for renewable energy and conservation; Do not allow wind farms on bogs; Wind and solar farms on peatlands should include conditions that ensure carbon sequestration and biodiversity value are maintained and enhanced; Support the phaseout of peat extraction for horticultural use.
- e. Designate a network of peatlands across the Midlands to form **a National Peatlands Park**; There is potential for a National Park by uniting Coillte woodlands, Bord na Mona boglands and the canal walkways. There would be benefits for carbon sequestration, water absorption/flood prevention and biodiversity; Support the development of **Peatways** and other green linkages as these have enormous potential at Lullymore and Lullybeg and in Umeras for biodiversity, heritage, tourism, and wellbeing.
- f. **Peatlands act as a carbon sink** and KCC need to create a programme to establish how much carbon is stored in the County's peatlands and use this as baseline for future monitoring and to measure success of restoration projects and this would be in line with carbon accounting under land-use, land-use change and forestry (LULUCF); The plan should include provision to restore the carbon sequestration of

bog lands and support the development of other carbon capture and storage technologies; KCC should map the carbon sequestration of soils in Kildare.

CHIEF EXECUTIVE'S OPINION

Bogs/ Peatlands

The bogs of County Kildare are a special asset and aspect of the landscape that contribute to the County's heritage, economy, amenity and ecology in a significant way. The current CDP contains policies and objectives specifically for boglands in BL1 to BL7 (Chapter 10).

The National Peatlands Strategy 2015 (DAHG) guides the Government's approach to peatlands management and conservation. The 'National Raised Bog Special Areas of Conservation Management Plan 2017-2022' sets out a roadmap for the long-term management, restoration and conservation of protected raised bogs in Ireland. The Draft Plan will have regard to these strategies in formulating policies and objectives in relation to bogs.

The NPF notes some of Ireland's cutaway bogs are '*suitable to facilitate the generation of energy, most notably wind/biomass. Considering the significant amount of peatlands in the ownership of semi-State bodies, a medium to longer-term strategic national land use plan for peatlands in State ownership will be prepared in order to manage their most appropriate future use, building on the existing National Peatlands Strategy and other national policy related to peatlands conservation and management.*' Furthermore, the RSES recognises the importance of peatlands in our landscape for amenity economic benefit and value to biodiversity (as per RPO, 7.27, 7.28 and 7.29) and offers employment opportunities as former industrial peatlands (4.84). In this regard, it is noted that the DAHG has recommended that the Draft Plan include an objective to support the development of a long-term plan for the former industrial peatlands within the County.

Many of County Kildare's bogs are Special Areas of Conservation (SACs) or Natural Heritage Areas (NHAs) (see maps V1.13.1 and 2 in Chapter 13 of the current CDP). The Draft Plan will include policies to ensure these designations remain in place. The bogs also are a significant element of the Landscape Character. The Draft Plan will include policies and objectives in relation to landscape sensitivity and suitability of certain developments within landscape character areas, to include but not limited to wind and solar farms.

Concern has been expressed in some submissions to the impact of solar and wind energy developments within peatlands and the potential for impacts on biodiversity and carbon sequestration. It is recommended that the Draft Plan will contain policies and objectives requiring an Ecological Impact Assessment to be submitted for any such proposals.

The submissions which refer to the role of peatlands for peatways and parklands are noted. The Draft Plan will include policies and objectives in support of such initiatives where appropriate sensitive design is achieved.

The Council recognises the importance of peatlands in the context of their carbon sequestration properties and their value in climate adaptation through the storage of water and the protection and promotion of important habitats and biodiversity. The Council endorses and supports the use of peatlands as carbon sinks and this will be reflected in development plan policy to enable their sensitive and managed restoration. The contribution of the LULUCF (land use, land use change and forestry) in delivering on the national climate neutrality objective by 2050 is acknowledged. It is

understood that the role of LULUCF will be strengthened to assist in meeting emission reduction targets to 2030 in line with, and as part of, the European Green Deal. The Draft Plan will be supportive of such measures.

CHIEF EXECUTIVE'S RECOMMENDATION

Boglands/ Peatlands

The Draft Plan will include a series of objectives to support the development of a long-term strategic plan for the former industrial peatlands within the County, having regard to the National Peatlands Strategy 2015 (DAHG) and the 'National Raised Bog Special Areas of Conservation Management Plan 2017-2022'.

The Draft Plan will include a policy and objective requiring an Ecological Impact Assessment to be carried out and submitted with any planning application for energy infrastructure projects (e.g. wind and solar developments) on bog lands.

The Draft Plan will continue to afford NHA and SAC status to the bogs of County Kildare, as currently reflected in maps V1.13.1 and 2 in Chapter 13 of the current CDP.

6. Energy

Submission Nos. 018, 105, 109, 114, 140, 175, 186, 193, 202, 203, 280

- a. There needs to be a Kildare Energy Agency; to support energy transition.
- b. **Sustainable Energy Communities** should be supported to enable communities develop innovative, locally-based solutions to energy poverty.

7. Renewable Energy Strategy

Submission Nos. 012, 014, 018, 020, 105, 109, 114, 140, 144, 166, 176, 185, 186, 202, 203, 239, 258, 274, 280, Public Meetings

- a. A Renewable Energy Strategy is required to achieve national targets by 2030, Engage with neighbouring LA's in EMRA, with a steering group, use methodology set out in "SEAI's Local Authority Renewable Energy Strategy" [2013]; wind, solar and AD plants should be facilitated; A study should be undertaken to identify areas suitable for renewable energy development.
- b. New technologies should be supported; provide for innovation and trials in the energy sector; small wind farms and solar panels should be added to council lands; Promote alternative energy sources.
- c. The Government is targeting increased electricity generated from renewable sources indicatively comprising at least 3.5 GW of offshore renewable energy, up to 1.5 GW of grid-scale solar energy and up to 8.2 GW of onshore wind capacity.
- d. Gas networks Ireland indicates that the Plan should include reference to 'Renewable gas and Anaerobic Digestion (AD) and that there should be a presumption in favour of applications for anaerobic digestion plants provided planning and environmental criteria are satisfied, the AD process captures GHGs; renewable gas can help Kildare reduce its carbon emissions.
- e. **Combined Heat and Power** and Micro CHP should be included in the Plan, benefits include reduced energy costs, reduced O2 emissions, lower carbon taxes.

- f. **District Heating** Policy should be included; to use waste heat from industrial, electrical generation; Geothermal resources should be considered; install district heating; invest in local district heating using geothermal technology.
- g. **Hydropower:** KCC should work with other bodies to develop pilot projects on hydropower or wind energy that may be feasible on lands owned by the Irish Water, e.g., at Ballymore Eustace.
- h. **Local Community Renewable energy** projects should be included / enabled e.g., promoting solar energy by communities throughout the County; The CDP should compel Grid Networks Ireland to ring-fence grid capacity for communities; CDP should provide public land for community owned renewable energy projects; CDP should insist that a proportion of all renewable energy projects should be in community ownership; KCC should compel Grid Networks Ireland to ring-fence some grid connection capacity for communities in Co. Kildare to give local communities breathing space to develop their renewable energy (RE) projects under the Renewable Energy Support Scheme; Communities should be encouraged to develop their own energy plans which could comprise of alternative energy, waste recycling and surface water management.
- i. A critical analysis of biomass fuelled power stations is required.
- j. CDP should limit the number of Data Centre and supply their own renewable energy.
- k. Ban the use of coal and retrofit carbon capture to all industrial processes.
- l. a collaboration of experts is needed for flood risk and renewable energy production.

8. Wind Energy

Submission Nos. 012, 030, 038, 105, 109, 114, 129, 140, 193, 194, 202, 229, 293

- a. A **Wind Energy Strategy** is needed; it can support the transition to a low carbon society as well as increased awareness of climate change; prepared in accordance with the Section 28 Guidelines; A regional approach with neighbouring LA's, having regard to landscape character, in accordance with draft Guidelines, and to take into account the conservation needs of the County; the strategy should be prepared by an inter disciplinary team to address this in a holistic manner.
- b. The **onshore target** for wind energy generation of 8.2GW by 2030 (established in the Climate Action Plan) should be specifically referenced in the Plan. on shore wind developments have an extremely important role in developing viable sustainable renewable energy mix and need to be supported by KCC.
- c. Clear supportive policies in favour of wind energy are required.
- d. Kildare should adopt a clustered approach to wind energy and avoid a dispersed small cluster approach which can have a disproportionate impact.
- e. Small scale wind energy schemes should be encouraged.
- f. Wind **farms** should not be built on bogs as they are important habitats for endangered birds and they are important climate, flooding and water quality buffers via carbon storage; if wind/solar farms are built on bogs there should be conditions ensuring carbon sequestration and biodiversity value are maintained and enhanced; For reasons relating to the Climate Action Plan, nature conservation areas should not be automatically excluded; wind energy developments will have to extend into slightly more sensitive landscapes; short term business interests to build solar/wind farms on bog lands suitable for rewetting should not be allowed; KCC should be cautious when

considering areas for renewable energy so as not to constrain any areas which may have renewable energy potential, particularly wind generation.

- g. A 'Renewables-Enabling Map' showing preferred locations for FlexGen gas turbine plant and synchronous condensers could be included in a Kildare Wind Energy Strategy.

9. Solar

Submission Nos. 140, 176, 179, 202, 239, 280

- a. CDP to include supportive policy; solar farms should have a 40-year life; there is currently no policy regarding solar farms; promote and encourage solar in smaller communities and public buildings.
- b. The CDP should support PV panel technology; The roofs of domestic and industrial buildings should be used for solar energy production using PV panels.
- c. There should be panning guidance for solar farms.

CHIEF EXECUTIVE'S OPINION

Energy

KCC has employed an Energy Officer to *inter alia* find ways of improving energy and developing Sustainable Energy in communities across County Kildare. There is a network of communities that feed into the process. There are 18 sustainable energy communities in Kildare with 4 very advanced. The Draft Plan will support the Energy Officer and the Sustainable Energy Communities initiative.

The 2019 National Climate Action Plan provides a roadmap of what must be achieved and how 70% of all electricity is to come from renewable energy sources by 2030. To achieve the 70% target, the CAP earmarks a target of 3.5GW off-shore wind and a doubling of existing on-shore wind from circa 4GW to 8.2GW by 2030.

The submissions received in relation to a renewable energy strategy and wind energy strategy are noted. In this regard, it is intended to carry out a Sustainable Energy Climate Action Plan to inform the Draft Plan. The SECAP is envisaged to cover a five-year term to tackle Kildare's energy efficiency and CO₂ emission reduction targets, as well as Kildare's ambitious climate change adaptation strategy. The SECAP will inform policies and objectives to be included in the Draft plan. In addition, the Draft Plan will be accompanied by a Wind Energy Strategy which will be prepared in accordance with the Draft Wind Energy Development Guidelines (2019).

The current CDP acknowledges the potential of *inter alia* hydro energy, bio energy and geo thermal. It is considered that these policies should be expanded to include CHP, district heating and community renewable energy projects. In relation to renewable energy infrastructure projects, it is considered essential to include objectives in the Draft CDP that address the impact that solar and wind farm developments may have on flora, fauna and their respective habitats having regard to policies SE2 and WE3 of the current CDP.

RPO 7.35 of the Eastern Midland Regional Assembly's RSES refers to Strategic Energy Zones. It states that EMRA shall, in conjunction with local authorities in the Region, identify Strategic Energy Zones as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. The Strategic Energy Zones for the Region will ensure all environmental constraints are

addressed in the analysis. A regional landscape strategy could be developed to support delivery of projects within the Strategic Energy Zones. The Draft CDP will include an objective in this regard.

CHIEF EXECUTIVE'S RECOMMENDATION

Energy

To prepare a Sustainable Energy Climate Action Plan (SECAP) for County Kildare to provide a basis for the inclusion of measurable targets on renewable energy and climate change mitigation and adaptation, in particular wind energy production and potential resource in megawatts.

The Draft Plan will include a Wind Energy Strategy, prepared in accordance with the Draft Wind Energy Development Guidelines (2019).

To include objectives in the Draft CDP that address the impact that solar and wind farm developments may have on flora, fauna and their respective habitats having regard to policies SE2 and WE3 of the current CDP.

To support the Eastern Midland Regional Assembly's identification of Strategic Energy Zones, in accordance with RPO 7.35 of RSES.

10. Agriculture and Quarrying

Submission Nos. 061, 066, 089, 109, 127, 203, 229, 280

- a. Harness agri/equine sector in mutually beneficial activities for climate adaptation; Work with agriculture to develop value added agriculture that is environmentally friendly; Shift agricultural production to foods that produce less methane and CO₂. Increase forestry and reduce pasture; Collaborate with the regenerative farming movement and identify how Kildare agriculture stakeholders can move more towards supporting biodiversity. Provision of education perhaps through KWETB.
- b. Better education within our horticulture and landscape sectors.
- c. Quarrying should be restricted in line with Climate Action goals and phased out completely; resources extracted should be prohibited from the export market, Quarries should be at least 1km from the nearest dwelling; Quarrying should be phased out as it is environmentally damaging; Kimeens Quarry has substantially been restored and should be used by developers of proposed 180 units in Ballymore Eustace as a destination for all clean waste soils in the interests of sustainability.

CHIEF EXECUTIVE'S OPINION

Agriculture and Quarrying

It is an objective of the current CDP (AG2) to encourage the development of environmentally sustainable agricultural practices to ensure that development does not impinge on the visual amenity of the countryside and that watercourses, wildlife habitats and areas of ecological importance are protected from the threat of pollution. It is considered that similar policies and objectives would be appropriate for the Draft Plan.

CHIEF EXECUTIVE'S RECOMMENDATION

Agriculture and Quarrying

To include policies and objectives in relation to agriculture, horticulture and quarrying to address visual amenity, watercourses and biodiversity.

11. Development Standards for Climate Action

Submission Nos. 010, 012, 014, 018, 033, 061, 069, 073, 089, 109, 114, 125, 127, 136, 144, 175, 176, 186, 193, 197, 202, 217, 229, 230, 232, 234, 274, 280, 299, 300, 308

- a. **Historic and Vernacular structures:** The Plan should include objectives to carry out climate change risk assessments for historic structures and sites in the Local Authority's functional area; and recognise the inherent sustainability of vernacular buildings, traditional materials, their retention, and careful rehabilitation. Promote well-informed energy upgrades to vernacular buildings, but ensure measures taken do not have a detrimental impact; Restore derelict buildings; Existing buildings should be repurposed and redeveloped as much as possible; the embodied carbon footprint of existing buildings must be maintained, and this should be calculated as part of planning applications that propose demolition.
- b. **Urban regeneration:** focus on this to achieve more climate resilient communities; Support development of brownfield sites rather than greenfield; provide 'above shop' accommodation; Well-designed places and buildings can improve resilience to climate change impacts; Planning applications including those to regenerate developments should include a condition to adopt a climate friendly / renewable energy element.
- c. **Residential development:** Pursue a housing model which is self-containing in terms of energy requirements to reduce the overall carbon/environmental footprint, for any new estate or development, that trees and hedges and a herb garden are planted for the residents. Fencing or walls should be designed to permit wildlife to freely pass through; Incorporate passive solar heating and renewable energy into housing developments; require passive solar heating/panels/ renewable energy in all new housing developments; transition from fossil fuels in domestic dwellings require some considerations in house design; Use planning conditions to utilise roof space for solar panels; Caution against overly prescriptive development standards linked to climate action, Encourage generating energy at the point of use, increase solar/PV on-houses and solar and/or community wind turbines on public and commercial properties.
- d. **Encourage energy efficient design;** Include an objective to support the use of methods and materials in the construction industry that have low to zero embodied energy and CO2 emissions (Consistent with the RPO 7.41 of the RSES); the Plan should focus on/ pursue low carbon and sustainable building methods and materials, think adaptation and mitigation in designs and plans; Green and Biophilic Design should be encouraged among all new developments.
- e. **Sustainable construction:** Think Zero Energy Buildings, not Near Zero; developments should be looked at holistically to identify opportunities for solar, wind or district heating; Timber should be acknowledged as a sustainable material; The construction waste hierarchy should be employed: reuse, renovate, demolish.
- f. **Domestic retrofitting:** Incentivise residents to retrofit homes/ become more energy efficient as there are many benefits; retro fit public buildings to reduce carbon footprint; retrofit buildings to use zero carbon. Gas Networks Ireland recommends

homeowners located near gas network to upgrade home from oil to gas using a 'fabric first' approach; the plan should provide guidance on retrofitting; Stop the use of fossil fuels in domestic heating; All new rural houses should have heat pumps.

- g. **Roof top technologies:** Green roofs should be promoted and explored for mitigation of water run-off; stipulate green roofs or solar roofs as a requirement for all new buildings; Consider bio-solar roof tops.
- h. Review **Development Contribution Scheme** to incentivise climate adaptation.
- i. All developments should document their carbon action and energy efficiency at planning stage.
- j. Implement SUDS; ensure sustainable drainage works.
- k. High speed broadband to facilitate working from home.
- l. to protect water quality **nature-based solutions** should be chosen over hard engineering; Promote rainwater harvesting.
- m. **Major development** should be net zero and should include detailed energy strategy to demonstrate how the target will be met within the framework of the energy hierarchy; Look for carbon measurement through planning control for private development an approach that is similar in principle, to the requirement for mobility management plans in large scale retail and commercial development; Ensure that KCC suppliers have adopted and develop greener processes for the production of aluminium, cement, steel and other materials; target housing and industrial sectors where most carbon comes from;

CHIEF EXECUTIVE'S OPINION

Development Standards for Climate Action

The submissions received in relation to how new developments should be considered in relation to climate action is acknowledged. The following sub-topics are particularly noted:

- Retaining and restoring historic/vernacular structures,
- Facilitating urban regeneration,
- Mitigating new residential developments,
- Implementing energy efficient design,
- Sustainable construction materials and methods,
- Domestic retro-fitting,
- Roof top technologies,
- Nature based solutions, and
- Major developments

It is considered appropriate that the Draft Plan will include supportive policies and objectives in relation to the foregoing.

The Development Contribution Scheme is not a matter for the Draft Plan.

CHIEF EXECUTIVE'S RECOMMENDATION

Development Standards for Climate Action

To include climate action appropriate development management standards for new developments in relation to restoration works to historic/vernacular structures, new residential developments, energy efficient design, sustainable construction, domestic retro-fitting, roof top technologies, nature based solutions and major developments.

12. Flood Risk

Submission Nos: 007, 014, 048, 073, 134, 136, 166, 193, 195, 202, 221, 229, 274, 280

- a. The Potential impacts of climate change include increased rainfall intensities, increased fluvial flood flows and rising sea levels. The Council needs to consider impacts of flood risk such as avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences, specifying minimum floor levels, and setting specific development management objectives.
- b. The CDP must de-zone or down-zone lands categorized in 'Flood Zone A' of 'Flood Zone B' applying the sequential approach. Where the zoning of recognised flood prone areas is retained, a detailed Justification Test in accordance with the Flood Risk Assessment & Management Guidelines must be carried out.
- c. It is important that building does not take place where there is flood risk.
- d. Protect flood plains; provide managed flood plains. Flood plains and rainfall should be considered.
- e. Implement Nature based solutions / natural flood management solutions.
- f. A flood risk audit should be undertaken of all sewage and wastewater infrastructure.
- g. Legal counsel be made available for county councillors when they are considering proposed zonings.
- h. Use up to date flooding maps.
- i. A nature first approach should be taken in terms of flood risk; Use lakes and water bodies to attenuate flood waters.
- j. SuDS must be considered; Suds must be utilised where appropriate to manage flooding.
- k. A multi-disciplinary team should be established to address these issues.
- l. An assessment should be carried out to identify areas at risk and best international practice.
- m. Flood risk at Hazelhatch: Models in the "Hazelhatch Further Study" predict an extraordinary level of previously unmapped flooding to occur at a high frequency in the Celbridge / Hazelhatch Station, car park and nearby area. However, the CFRAM report indicate the same lands are immune to 1,000-year flood events. The level of flooding modelled in the "Hazelhatch Further Study" is flawed. Unresolved flood issues were cited as one of the reasons preventing development at this major transport hub. Since the arterial drainage of the Shinkeen watercourse in 2001, all land between the Station and Primrose Gate to the east of the Shinkeen is protected from flooding by the Shinkeen, not threatened by it.
- n. Issues in relation to flood risk and surface water deficiencies in Prosperous. In this regard an accompanying appendix which undertakes an analysis on surface water drainage, flooding, foul water drainage, water supply and roads infrastructure has been noted.

Submission from the OPW in relation to Flood Risk:

- a) There must be a sequential approach to managing flood risk
- b) Guidelines on the Planning System and Flood Risk Management (DHPLG/OPW, Nov 2009) issued under Section 28 of the Planning Acts; a three-stage assessment process, 1) Flood Risk Identification, 2) Initial Flood Risk Assessment, 3) Detailed Flood Risk Assessment; Implementation of CFRAM & FRMPs

- c) The OPW request that the council has full regard in the preparation of the Plan to the proposed development of flood relief schemes in Athy, Clane, Leixlip, Maynooth and Newbridge and the ongoing design, planning and implementation of flood relief schemes in Lower Morell and Naas, to ensure that zoning or development proposals support and do not impede or prevent the progression of these measures, and that a specific objective to do this is included in the Plan
- d) to maintain flood relief schemes completed under the Arterial Drainage Acts 1945-1995, including schemes in Maynooth (Lyreen Meadowbrook), Morell Johnstown, Rye Water (Leixlip), Shinkeen Stream (Hazelhatch) and Turnings (Morell). The council will also need to maintain any food relief schemes implemented under its powers and the OPW requests that the Plan has full regard to the protection, and the need for maintenance of these schemes
- e) The council might also consider a register of key flood risk infrastructure in the Plan where it would not otherwise be readily identified or protected from interference or removal.
- f) Flood maps including those for potential future scenarios taking account of the possible impacts of climate change are available on www.floodinfo.ie and can be obtained in GIS format from the OPW via email at flood_data@opw.ie
- g) Consider Climate change impacts on flooding
 - Increased rainfall and fluvial flows
 - Avoid development in flood zones
 - Provide space for flood defences
- h) Specify minimum floor levels and set specific development management objectives
- i) Include different scenario flood maps taking account of different degrees of climate impact.
- j) Consideration should be given in zoning land for development to ensure that access requirements are preserved for the maintenance of Arterial Drainage Schemes and Drainage Districts.
- k) Applications for development on land identified as benefitting land may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas.
- l) Flood zones are defined ignoring the presence of flood defences (section 2.24 of the Guidelines). This is particularly important in the context of land that benefits from some degree of protection from embankments that were constructed to protect agricultural lands.
- m) In such areas, it is strongly recommended that land should only be zoned for development in accordance with the definition of appropriate development as set out in the guidelines.
- n) While a development may not be prone to flood risk itself, it can increase flooding up or down stream, due to increased run-off from additional drainage or increased paved areas or due to loss of storage.
- o) In line with the Guidelines, proposed new development needs to avoid increasing flood risk elsewhere.
- p) The preparation of the Plan should take account of the opportunities for natural water retention measures to reduce run-off and provide other benefits such as to water quality and biodiversity.
- q) This can include area around existing developments, as well as within existing and proposed development in the form of Sustainable Urban Drainage Systems (SuDS)

CHIEF EXECUTIVE'S OPINION

Flood Risk

A Strategic Flood Risk Assessment will be carried out in accordance with the EU Floods Directive and the 'Planning System and Flood Risk Guidelines' which constitute Section 28 Guidance. The draft SFRA will inform policies and objectives of the Draft Plan and will have regard to the advice of the OPW and the OPR. The SFRA is an important tool when considering appropriate zoning objectives in the Draft Plan.

In response to the issue of flood risk at Hazelhatch, Kildare County Council and the OPW are satisfied that the Hazelhatch AFA Further Study is robust and delivers an accurate representation of the existing flood risk in Hazelhatch and its environs. The hydraulic model has been tested for sensitivity and calibrated with real life events. This study provides the certainty required to enable the Council to deliver a flood relief scheme with the aim of protecting existing residential and commercial properties in the Hazelhatch catchment from flooding.

CHIEF EXECUTIVE'S RECOMMENDATION

Flood Risk

The Draft Plan will be accompanied by a Strategic Flood Risk Assessment, prepared in accordance with Section 28 Guidelines and the advice from the OPW and the OPR.

13. Water

Submission Nos. 073, 089, 175, 194, 197, 198, 202, 229, 280

- a. The plan must ensure rivers and waterways are free from pollution; To protect water quality, the plan should ensure best practice in agriculture and industrial practice; Tributaries of the River Barrow SAC and River Liffey must be protected from contamination. The CDP should include a policy on the use of clear span structures on fisheries waters in consultation with Inland Fisheries Ireland; River systems and their connected streams/drains require on-going maintenance and upgrading, including increasing fish stock levels, improving drainage to them, and potentially in-river hydro-generated electricity.
- b. Reduce or carefully manage dredging of rivers.
- c. The plan should minimise waste of water.
- d. Protection of aquatic ecosystems requires that river systems be protected on a catchment basis. Preventing runoff from degraded peatlands would reduce the pollution from the leaching of dissolved and solid carbon, nutrients, and other pollutants. There needs to be increased scrutiny of the drainage of peat soils particularly in relation to forestry applications to prevent runoff into the Barrow River SAC.
- e. To protect water, the following measures are suggested: Reduce flow of contaminants; use nature-based solutions; water harvesting infrastructure; Enforcing the correct protection of water courses on agricultural land/ of discharge licenses from commercial buildings/ the correct use and maintenance of septic tanks; More water quality testing; Utilise SuDS; Creating interdisciplinary teams including experts in hydrology, ichthyology, ecology, botany, entomology, engineering, building and planning, to address this issue.

CHIEF EXECUTIVE'S OPINION

Water

It is an objective of the current CDP to maintain, improve and enhance the environmental and ecological quality of the county's surface and groundwaters by implementing the programme of measures set out in the River Basin management Plan(s) (WS10) and to protect groundwater in the county from risk of pollution (WS11). It is considered appropriate that these policies be retained in the Draft Plan.

CHIEF EXECUTIVE'S RECOMMENDATION

Water

To include policies and objective to maintain, improve and enhance the environmental and ecological quality of the county's surface and groundwaters and to protect ground water in the county from risk of pollution.

14. Transport and Climate Change

Submission No. 017, 043, 056, 058, 061, 069, 070, 073, 089, 096, 102, 123, 127, 136, 166, 176, 192, 193, 196, 200, 202, 203, 207, 230, 234, 258, 280, 300, Public Meeting, Youth Workshop

- a. The plan should encourage efficiency in areas of transport and in developing towns and villages while supporting research and innovation in supporting energy security in more rural villages and towns.
- b. **Car dependency:** Must reduce car dependency (), commuting is a big environmental issue, ensure new developments are within walking/cycling distance of public transport services, public parking policies should be reviewed in the context of urban renewal and active travel; traffic is a big environmental issue; SHDs are being granted in towns with no mass public transport; encourage car sharing schemes.
- c. **Active Travel** reduces carbon footprint and measures should be put in place to facilitate this, such as bicycle parking outside cafes and shops; More / better cycle lanes in our towns; by providing separated cycle lanes throughout the county; must make walking routes safe, especially to schools; all businesses must provide bicycle parking.
- d. Improved **public transport** can help reduce carbon; Transport must be planned, delivered, and administered in an integrated manner on the hierarchy of walking, cycling and public transit; Improve public transport; public transport must be a priority.
- e. Switch all ground transport to electric and filtered biofuels.
- f. More **EV charging points** are needed in apartment blocks; prioritise EV infrastructure; should be rolled out in every town and village.
- g. Traffic free zones in towns; no-idling campaign particularly around school zones.
- h. **Industry and Transport:** Compressed Natural Gas (CNG) provides a carbon neutral alternative to diesel for HGVs. Companies with large energy requirements can lower carbon emissions by converting to gas, particularly to industries with high thermal heat requirements; Additional infrastructure is needed as Gas Networks Ireland seeks to deliver 37% biomethane through the gas network by 2050. Renewable gas injection points and Bio-CNG re-fuelling stations are vital to ensure delivery of this target.

- i. Public lands could be used for planting of biofuel crops. DCC, ESB and IW fleet of vehicles could consider using biofuels and using their own land banks to produce this type of fuel; Adopt a BioEnergy with Carbon Capture and Storage (BECCS) approach.

CHIEF EXECUTIVE'S OPINION

Transport and Climate Change

Climate Change and the adaptation and mitigation interventions required in future land use plans will be very much to the fore of the Draft Plan, in Kildare's efforts to reach net zero emissions by 2050. To achieve this, the Draft Plan must encourage, facilitate and provide the necessary infrastructure to create a modal shift in favour of more sustainable modes of transport including public transport, cycling and walking, which must transcend all aspects of our way of life in Kildare.

Integration between sustainable modes of transport and proposed land uses is particularly important. In preparing the Core Strategy and Settlement Strategy for the Draft Plan, transport and land use planning will be integrated to achieve and promote sustainable settlement patterns.

It is noted that submissions have been received in relation to Compressed Natural Gas as an alternative to diesel and the requirement for CNG fuelling stations. The Draft Plan will include a policy in this regard.

CHIEF EXECUTIVE'S RECOMMENDATION

Transport and Climate Change

To include a set of measurable and achievable targets throughout the Plan and Local Area Plans in order to track progress in achieving our Climate Change goals through the modal shift.

To include objectives which will influence people's travel behaviour and choices towards more sustainable options by working closely with relevant organisations in improving and accessing public transport facilities.

To include objectives in the Draft Plan that promote and enable walking, cycling and public transport.

To include development management standards for walking, cycling and the provision for electric charging points in all new developments.

To include a policy in relation to Compressed Natural Gas as an alternative to diesel.

15. Waste/Recycling

Submission Nos. 017, 061, 069, 089, 109, 130, 134, 166, 175, 189, 193, 196, 197, 198, 200, 202, 203, 221, 230, 233, 274, 299, Youth workshop

- a. More bins/recycling centres are needed; implement segregated public waste bins; recycling facilities are needed within apartment buildings; plastic and drinking can return banks should be encouraged; more recycle bins are needed on the streets.
- b. A Municipal District level Recycling Strategy is required; a county wide network of multi-material recycling centres, bring centre and re-use centres should be developed.

- c. Recycling facilities should be limited to properly managed civic amenity sites or only under licence at shopping centres/other establishments with CCTV.
- d. The circular economy should be adapted and encouraged throughout the county; Establish a Library of things to reduce the need for production. The Council should establish a centre like the Rediscovery Centre to host social enterprises focusing on sustainability.
- e. The Civic Amenity Centre permitted for in Celbridge should be delivered.
- f. Appropriate bring centre sites should be identified to eliminate fly tipping and noise nuisance by bottle banks in Ballymore Eustace.
- g. Improvements are needed to address illegal dumping; Collaboration is needed between KCC and Community groups to combat illegal dumping through the use of CCTV.
- h. Encourage 'Empty beverage Container' refund scheme; encourage recycling initiatives; Reward businesses that have plastic-free options.
- i. Decrease the need for transport waste and recycling waste to other jurisdictions.
- j. Litter management must be focused on waste reduction; Reducing waste at source, so promote **reduce** and **reuse**; take into account a Circular Economy approach and support the development of circular economy; provide space in apartment buildings for separation of waste; More public segregated bins; more recycling facilities for metals, electrical items, batteries; provide communal areas for leaf composting; KCC to support the creation of climate action hubs in the county to include 'Library of Things' and Repair Cafes; Facilitate collaboration to minimise waste; provide public water fountains in open spaces.
- k. Businesses should be encouraged to use bio-degradable packaging and online shopping should cut down on the amount of packaging used.
- l. Communities should be encouraged to reduce waste loads and dispose waste in a more environmentally friendly way; Facilitate community composting.
- m. It is now vital for additional strategic waste treatment capacity in the east region to cater for growth and additional waste in an environmentally sound and circular manner, see NSO 9.

CHIEF EXECUTIVE'S OPINION

Waste/Recycling

The current CDP contains policies in relation to waste management and litter and it is considered that these policies and objectives should be enhanced with a greater emphasis placed on recycling and reducing waste. Of note is objective WM10 which is to encourage waste prevention, minimisation, reuse, recycling and recovery as methods of managing waste.

CHIEF EXECUTIVE'S RECOMMENDATION

Waste/Recycling

To include an objective in the Draft CDP to encourage waste prevention, minimisation, reuse, recycling and recovery as methods of managing waste, similar to WM10 in the current CDP.

16. Air Quality/ Environment in General

Submission Nos. 109, 202, 230, 259, 280

- a. Air quality monitoring and reporting should be carried out throughout the County; air quality must be addressed in the plan.
- b. Significant environmental issues are pollution of waterways, depletion of water resources & soils, plastic pollution, air pollution, noise, and light pollution. Reducing air pollution is the main action that needs to be taken, which can be reduced by embracing technologies which filter and capture pollutants.
- c. The main environmental issues facing the county are risk to biodiversity and pollution.
- d. Target Sundays as car-free days in town centres during summer months.

CHIEF EXECUTIVE'S OPINION

Air Quality/ Environment in General

In relation to polluting emissions into the air, policy PC 10 of the current CDP should be noted where all future development must be in accordance with the EU Ambient Air Quality and Cleaner Air for Europe Directive. It is considered appropriate to include similarly worded policies in the Draft CDP and to strengthen these where possible.

CHIEF EXECUTIVE'S RECOMMENDATION

Air Quality/ Environment in General

To include objectives in the Draft CDP that relate to noise and air pollution, that reflect those policies as set out in Section 7.6.7 of the current CDP and to strengthen all such policies where possible.

17. Climate Action Awareness/Education/Training

Submission Nos. 018, 073, 089, 109, 123, 125, 130, 134, 196, 198, 200, 202, 226, 229, 280, Youth Workshop

- a. The County Kildare Chamber of Commerce has established the **Kildare Sustainability Council** to help businesses become more sustainable; The plan should be bold while ensuring the business community is engaged in the process; Carbon credits are available for organisations and businesses that implement biodiversity measures.
- b. People need to be educated about climate change and this should be done through schools or using social media as a tool; Develop new skills in green procurement, carbon accounting, carbon management and energy management; more education required about air pollution.
- c. More awareness is required in the business community.
- d. to work with BNM to deliver a Research Institute on the St. Conleth's site in Newbridge to conduct R&D targeting climate adaptation projects.
- e. KCC needs a Biodiversity officer.
- f. CDP should support researched citizen science projects (e.g., Transition Year).
- g. To educate about light pollution and impacts on biodiversity.
- h. Educate horticulture and landscapers.
- i. A Climate Action Forum for young people should be created.
- j. KCC must facilitate the set-up of local Climate Action and Sustainability groups and make funding available to them directly.
- k. Develop a one-stop-shop on the Council's website for environmental information.

- l. KCC could promote construction methods with a smaller ecological footprint (e.g., cob houses, log houses, etc.)
- m. The Council should support community groups and climate action projects by providing advice and funding.
- n. Liaise with NUIM to progress a centre of excellence in circular research.

18. KCC Practices/Buildings/Funding

Submission Nos. 018, 061, 073, 089, 175, 196, 202, 203, 221, 229

- a. KCC should aim to be a Local Authority Climate Action and Biodiversity Leader.
- b. KCC should carry out a carbon audit for its existing building stock and retrofit with more insulated building fabric and sustainable technology / green energy infrastructure.
- c. **Green procurement** for all public contracts, KCC should implement Green Procurement; KCC to ensure sustainability is a major factor for all funding applications.
- d. KCC to produce a list of sustainable practices to be implemented in homes and businesses and link the progress to local property tax/commercial rate.
- e. Refurbish Council housing, recycle, reuse initiative.
- f. KCC to introduce a sustainability competition for estates/towns.
- g. Payments to Residents Associations for grass cutting should be conditional on not using glyphosate/pesticides, herbicides.
- h. Examine potential to deliver more municipal swimming pools using alternative energy resource, potentially through a PPP.
- i. **Public Buildings:** All public buildings should be carbon neutral by 2030; Develop and implement an energy management programme for all public buildings.
- j. KCC's carbon emissions should be monitored, recorded, and published annually.
- k. KCC should create a solar farm.
- l. Lands in public ownership (significant in Ballymore Eustace) should be considered for rewilding, woodland development, renewable energy, biodiversity, and outdoor recreation / amenity; Include allocation of land for rewilding across the county focusing on native species.
- m. **Grants:** Community grants for Tidy Towns should give extra weight to environmentally friendly initiatives; Provide grants to green/sustainable businesses; Reduce rates for 'not for profit' businesses, e.g., community supported agriculture; Biodiversity grants should be provided.

CHIEF EXECUTIVE'S OPINION

Climate Action Awareness/Funding

The role of the County Council is acknowledged when it comes to climate action awareness within the community. The County Development Plan has a particular function in relation to setting out the overall strategy for the proper planning and sustainable development of the County.

Green procurement is a matter more appropriately addressed in the Kildare County Council Corporate Plan.

KCC pursue all relevant funding streams as they relate to objectives of the KCDP. A significant number of URDF and RRDF funding has been allocated to towns across County Kildare.

CHIEF EXECUTIVE'S ADDITIONAL RECOMMENDATION FOR THEME 3 'CLIMATE ACTION'

In relation to all of the recommendations in the '*Climate Action*' theme, the CDP will include targets against which to measure progress in order to ensure that we can achieve net zero emissions by 2050.

4.4 Sustainable Mobility: Movement and Transport

Statutory Submissions

OPR: Transport and Land use plans; Sustainable settlement and transport strategies relating to climate change.

TII: National Roads, Core Strategy, Access, Safety, S. 28 Guidelines.

NTA: Aligning with NTA Policy; Bus, Rail, Sustainable Transport Investment, Rural Areas, standards for new developments, Guidance documents, indicators.

EMRA: Integrated transport and land use; Compliance with RSES; Sustainable Settlement Patterns

Dept of Transport (006): Policy Review,

Meath County Council (016): Kilcock and Maynooth

Dept. of Public Health (017): Transport and travel

HSE (018): Sustainable and Active travel; Accessibility.

An Taisce (014): Modal shift; Active travel; Mobility

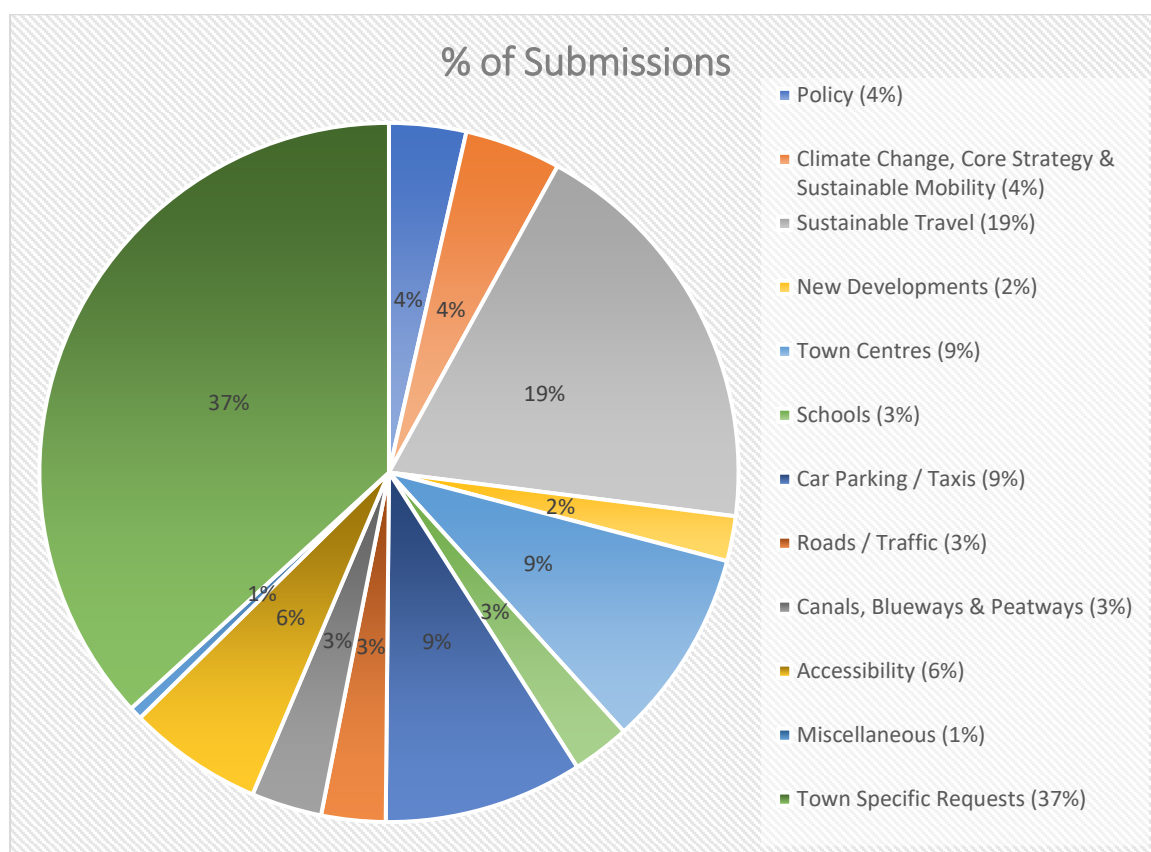


Fig 4 – Breakdown of submission type in relation to 'Theme 4 – Sustainable Mobility'²

² For the purposes of preparing the pie chart the following issues were grouped together under new headings; 'Public Transport', 'Rail Transport/Electrification/Dart+/Bus', 'Active Travel/Modal Shift', 'Cycling', 'Park and Ride' under '**Sustainable Travel**'; 'Naas', 'Celbridge', 'Newbridge', 'Maynooth', 'Kilcock', 'Leixlip/Confey', 'Ballymore Eustace' under '**Town specific requests**'; 'Accessibility', 'Permeability', 'Public Rights of Way', under '**Accessibility**'; 'EV charging points' to be considered under '**Car parking/taxis**'.

ISSUES

1. Policy

Submission Nos. 006, 014, 043, 071, 108, 109, 166, 182, 214, 217, 221, public meeting

- a. The CDP must align with the Transport Strategy for the Greater Dublin Area, which is being reviewed by the NTA; and NTA's Connecting Ireland Plan³.
- b. The Department of Transport (DoT) is preparing a Sustainable Mobility Framework to address active travel and public transport, to replace "*Smarter Travel, A Sustainable Transport Future 2009-2020*" and the "*National Cycle Policy Framework*"; DoT is also preparing an all-Ireland strategic rail study and the CDP should support the outcomes of that study; Policy should be based on 5 key goals of Smarter Travel Framework.
- c. The CDP must comply with the National Cycle Policy Framework (a part of Smarter Travel – A Sustainable Transport Future) and the Greater Dublin Area Cycle Network Plan (2015), especially the Rural cycle route map.
- d. The Design Manual for Urban Roads and Streets (DMURS) must be implemented.
- e. The plan should have regard to 'A Framework for Improved Health and Wellbeing 2013-2025' and 'Get Ireland Active'.
- f. The 10/15-minute Town Model should be implemented (PM⁴)

CHIEF EXECUTIVE'S OPINION

Policy

The policy documents from the National Transport Authority and the Department of Transport which are referred to in the submissions will be instrumental in determining the sustainable mobility policies and objectives of the Draft Plan. The promotion of sustainable public transport, the achievement of a modal split, the reduction of car dependency and the facilitation of active travel will be critical to achieve strategic outcome of the NPF and RSES, in particular compact urban growth and a transition to a low carbon and climate resilient society. The Draft Plan will also acknowledge the Government's 'Healthy Ireland' initiative, particularly as it relates to the promotion and facilitation of active travel and healthy placemaking.

It is agreed that the 10-15 minute Town Model is a good example of how Kildare's towns and villages should be planned to ensure that all amenities are within a reasonable walking distance of residential neighbourhoods. An evidence based approach is employed in the preparation of Local Area Plans (e.g. Leixlip, Athy and Naas) and this encapsulates the fundamental mechanisms and interventions required for the achievement of a comprehensive and meaningful transition towards a model of sustainable movement in Kildare's towns and is perhaps one of the most critical components needed to realise the future vision for 10-15 minute Town Model. This is primarily because the creation of sustainable integrated communities (one of the Key Themes of the NPF and RSES) can only be achieved by providing residents with a realistic and convenient alternative to the private car which links all key destinations in the town.

The Design Manual for Urban Roads and Streets (DMURS) is also acknowledged as an important document that offers a holistic approach to the design of urban streets in towns, suburbs and villages. The Draft Plan will require all new urban developments to be compliant with DMURS.

³ *Strengthening the Connections in Rural Ireland: Plans for Restructuring the Rural Transport Programme* (NTA)

⁴ PM refers to Public Meetings

CHIEF EXECUTIVE'S RECOMMENDATION

Policy

To include a series of objectives to address the requirements of the National Transport Authority (NTA), the Department of Transport guidelines and strategies and relevant Section 28 Guidelines.

To liaise with the NTA to develop a programme to deliver on the objectives of "Strengthening the Connections in Rural Ireland Plans" for Restructuring the Rural Transport Programme.

The Draft Plan will require all new urban developments to be compliant with DMURS.

2. **Climate Change, Core Strategy and Sustainable Mobility**

Submission Nos. 018, 040, 044, 061, 143, 164, 182, 186, 191, 199, 200, 201, 202, 276, 308

- a. **Climate Change/Future proofing:** New transport developments must be future proofed to ensure they are compatible with climate change policies; Facilitate a mindset shift for the County towards a mass transit sustainable mobility system integrated into a compact spatial planning framework for housing and commercial development; Aim for maximum impact on the national transition to net zero carbon by 2050; Support electric public transport; adopt a pedestrian and cyclist first approach to planning; the plan should encourage energy efficiency in transport.
- b. **Location of Future developments:** New developments, including housing, should occur along public transport corridors/links; in particular where DART and LUAS services will be provided within Kildare; Higher density residential developments should be considered within a 1km radius of Hazelhatch train station with the DART+ programme; providing potential on quality rail corridor for sustainable community development adjacent to employment in Co. Dublin; establishing a context for masterplans or framework plans ensures sites near public transport are developed to support the business case for significant public investment in sustainable infrastructure; Employment and sustainable transport must be considered in tandem; new development should be focused on sequentially preferable lands which are accessible to town centre and public transport links; restrict future out-of-town retail centres; the CDP should Promote Transit Orientated Development (TOD) with mixed-use high-density development at key rail nodes and along key rail corridors; The M7/J9a Millennium Park Interchange has been constructed inter alia with the purpose of facilitating the development of Naas and the North West Quadrant in an environmentally friendly and sustainable manner.

CHIEF EXECUTIVE'S OPINION

Climate Change, Core Strategy, and Sustainable Mobility

Climate Change and the adaptation and mitigation interventions required in future land use plans will be very much to the fore of the Draft Plan, in Kildare's efforts to reach net zero emissions by 2050. To achieve this, the Draft Plan must encourage, facilitate and provide the necessary infrastructure to create a modal shift in favour of more sustainable modes of transport including public transport, cycling and walking, which must transcend all aspects of our way of life in Kildare.

Integration between sustainable modes of transport and proposed land uses is particularly important. In preparing the Core Strategy and Settlement Strategy for the Draft Plan, transport and land use planning will be integrated to achieve and promote sustainable settlement patterns. The Draft Plan will acknowledge the role of rail-based development to align with the Metropolitan Area Strategic Plan (MASP), to consolidate compact urban growth and to align with the strategic outcomes of the NPF and RSES.

CHIEF EXECUTIVE'S RECOMMENDATION

Climate Change and Core Strategy

See recommendations of Climate Change Theme

To adopt the sequential approach to land use zoning in formulating local development strategies for towns in County Kildare and to have regard to the accessibility of sites to high quality public transport.

3. Public Transport

Submission Nos. 017, 018, 043, 044, 058, 069, 070, 089, 102, 106, 109, 112, 126, 134, 135, 136, 142, 161, 174, 180, 182, 186, 189, 192, 193, 196, 198, 202, 211, 221, 308, Public Meeting, Youth Workshop

- a. Prepare a **County level Transport Strategy** to frame and support local transport strategies; Develop **Local Transport Plans** with the NTA to provide sustainable transport provision in our main towns and surrounding areas; Public Transport usability and accessibility for all should be at the centre of all transport plans; Develop an integrated, user friendly, and highly connected public transport network; Examine existing public transport links within the county with a view to promoting and facilitating improvements where feasible; should make sustainable travel safe, enjoyable, easy to use and accessible to all; KCC must liaise with NTA; Work with the NTA and other stakeholders to drive a human centred approach to the provision of transport infrastructure; A multi-disciplinary team is needed.
- b. **North East Kildare:** A Transport Strategy is needed for the North East of the County; there are gaps in sustainable transport options within and between the towns of north east Kildare; there should be more interconnected transportation links in North Kildare between NUIM, Intel, Hazelhatch etc; There is a public transport disconnect between the north eastern key towns of Maynooth, Celbridge and Leixlip to the central settlements of Naas and Newbridge.
- c. **Inter-county public transport:** Effective links are required across the county / linking all towns; An improved rural public transport network is required; there's a lack of safe transport options between towns especially between the smaller towns and villages; A Sustainable Mobility Plan is required to ensure connectivity based on settlement hierarchy/regularity/journey times; public transport linkages needs to be better to reduce commuting; Clusters and well-planned villages can support transport links cycleways, local bus services, such as Carragh, Straffan, Sallins and Rathcoffey are positive examples.
- d. **Public Transport and Active Travel:** A connected network of walking/cycling routes with transport hubs / rail links should be implemented where possible; Prioritize the Public Transport and Active Travel schemes with an emphasis on high capacity modes which are carbon efficient; Better active travel and public transport links provided with schools and open spaces and sports clubs; medical centres; Seek opportunities to link recreational sites and our towns with public and active transport routes; An audit should be carried out of bus stops/shelters/paths for intercity bus and train stations; There should be direct accessible public transport links and cycle infrastructure between rail stations and towns,
- e. **Using Public transport:** This should be attractive, an easy option, frequent, comfortable, sustainable; should be age-friendly; Increased use of public transport should be encouraged; there's not enough public transport; An affordable transport system is vital and free public transport for all will have to be a consideration in the future; Liaise with NTA on reduced fare charges for South Kildare Commuters.

CHIEF EXECUTIVE'S OPINION

Public Transport

The NTA is currently reviewing the 'Transport Strategy for the Greater Dublin Area' in conjunction with Kildare County Council and other stakeholders. The Draft Plan will align with this Strategy to ensure a co-ordinated approach to the development of, and movement throughout, the region. It is agreed that objectives should be included in the Draft Plan requiring the preparation of Local Transport Plans/Area Based Transport Assessments to inform future development strategies for larger settlements in County Kildare.

In relation to the towns of north-east Kildare, the need for improved public transport and active travel options between the larger settlements is acknowledged. The Draft CDP will align with the Transport Strategy for the Greater Dublin Area, which is being reviewed by the NTA and includes the towns of north-east Kildare within the context of the GDA region.

The importance of inter-county public transport between our towns and villages, and the relationship between public transport and active travel, is acknowledged and it is agreed that the Draft Plan should contain policies and objectives to investigate the feasibility of better service provision with the relevant agencies (NTA, Local Link, etc.).

CHIEF EXECUTIVE'S RECOMMENDATION

Public Transport

To include a series of objectives, actions and most importantly targets to promote the sustainable development of County Kildare through the creation of an appropriately phased integrated transport network that services the needs of communities and businesses.

To include objectives to support the provision of sustainable modes of transport by spatially arranging activities around existing and planned high quality public transport systems

To include objectives which will influence people's travel behaviour and choices towards more sustainable options by working closely with relevant organisations in improving and accessing public transport facilities.

To include objectives in the Draft Plan that promote and enable walking, cycling and public transport.

To investigate the feasibility of undertaking an assessment of inter-settlement travel patterns and analyse commuting patterns, in conjunction with the NTA.

4. **Rail Transport, Rail Electrification / DART + / Bus**

Submission Nos. 018, 033, 043, 044, 069, 070, 089, 102, 108, 109, 123, 130, 135, 136, 142, 143, 162, 175, 182, 195, 196, 198, 202, 232, 234, 239, 274, 276, 280, 300, 308, Public Meeting, Youth Workshop

- a. **Policy:** The CDP should support Iarnród Éireann's Accessibility Programme, Customer Information Services (CIS) and Sustainable Interchange Programme which aims to improve mobility options at train stations; The CDP should also support ongoing investment in rail infrastructure, to expand heavy rail as a high capacity frequency mode choice, and Iarnród Éireann's revised rail freight strategic plan.
- b. **Electrification / DART:** The plan should include provision for a further expansion and enhancement of the DART network in County Kildare and potential future electrification of intercity routes, including potential DART Underground Project; Dart + will benefit Maynooth and Leixlip; the DART+ programme to Hazelhatch and

Celbridge must be prioritised; there is potential for new DART stops at Ballyoulster and Kill; expand DART+ beyond Maynooth; to Kilcock; to the south of the County; there should be a 10 year strategy for this corridor addressing potential; to Sallins, Newbridge, Kildare, Monasterevin and Kilcock; extend electrified line from Hazelhatch to Kildare Town; deliver DART service throughout the County to increase capacity and frequency; the plan should promote and support the upgrading of the Kildare rail line and provision of DART services as far as Kildare Station in co-operation with NTA, Frequency of trains stopping at Monasterevin needs to be increased; Newbridge should be included within the short hop zone; Should the rail hub at Celbridge Hazelhatch be developed by KCC in conjunction with SDCC, or should the current location be abandoned due to flood risk data?.

- c. **New Links:** There should be a light rail link from Sallins to Naas; and from Houston to Kildare/Monasterevin; A railway link should be provided from Newbridge to Maynooth, and from Newbridge to Dublin City Centre; there's a good economic rationale for a new station in Maynooth; the Athy/Waterford rail link should be upgraded;
- d. **Using the train:** The train should be more affordable to use; Examine with Irish Rail more customer friendly train station locations; improved capacity; more bike spaces should be provided on trains; train stations must be accessible for the disability sector; Develop new rail stations in line with emerging spatial planning policy; Is there potential to add new stations to existing train lines?
- e. **Using the Bus:** Seek to address urban congestion with particular emphasis on facilitating improved bus transport movement and reliability and improved links to bus and railway stations; Promote and support development of town bus services for the Key towns; A greater framework of bus terminals is needed in the north east of the County; Improve bus stops/shelters/real time passenger information; provide space for bus terminals/stops in towns and villages; public and private bus stops should be shared; bus spaces should be provided in towns with tourism attractions; Exploit Local Link to reduce car dependency; develop electric shuttle bus.
- f. **Bus routes:** The Plan should identify new routes; trial bus links between and in towns; Better bus links between Maynooth, Leixlip, Celbridge, Kilcock (as well as Blanchardstown and Tallaght) are needed; connect Celbridge to Leixlip/Confey/Louisa Bridge using a bus services; Quality bus corridors should be provided on the N4 and N7; increased bus capacity is required, especially between Clane and Dublin, and Clane and Maynooth; A generous bus service should be provided from rural parts of the County to Naas General Hospital and Maynooth University; link Celbridge to Ardclough with a bus link;
- g. **Rural Bus Link** should be extended to additional rural areas, like Caragh Village; support elderly through provision of transport weekly to community facilities / meals on wheels; continue to deliver new routes for local link to reduce rural isolation and provide greater connectivity; provision of age-friendly linkages to major health facilities, social services etc.

CHIEF EXECUTIVE'S OPINION

Rail Transport, Rail Electrification and Bus Transport

There are 3 rail lines traversing the County:

- The Dublin to Sligo line that passes through Confey, Leixlip, Maynooth and Kilcock;
- The Dublin to Waterford line that passes through Hazelhatch, Sallins, Newbridge, Kildare Town and Athy;
- The Dublin to Westport/Ballina route that passes through Newbridge, Kildare Town and Monasterevin.

The importance of rail based travel to County Kildare is acknowledged and it is agreed that the Draft Plan should contain policies and objectives to work with Irish Rail to realise the electrification of these lines and to improve existing services and facilities at train stations.

In relation to bus infrastructure and connectivity, it is acknowledged that bus services are a crucial component of the County's mobility infrastructure. The Draft Plan will include policies and objectives to work with bus service providers to improve existing services, routes and facilities.

CHIEF EXECUTIVE'S RECOMMENDATION

Rail Transport, Rail Electrification and Bus Transport

To include a series of objectives in the Draft Plan to support the delivery of the electrification of the railway lines including DART + West and South and the delivery of bus connects, core bus corridors and orbital routes and improved interchange facilities.

To support bus, light rail and heavy rail investment programmes as they relate to Kildare.

To include policies/objectives in the Draft Plan that acknowledge the role rural transport services can perform in providing for social and economic connectivity between small villages/rural areas and larger towns and in particular to support the role of rural transport and to reference the '*Strengthening the Connections in Rural Ireland*'.

5. Active Travel and Modal Shift

Submission Nos. 014, 017, 018, 044, 058, 067, 071, 089, 106, 108, 109, 127, 136, 142, 174, 175, 186, 192, 196, 202, 207, 217, 221, 223, 280, Public Meeting, Youth Workshop

- a. A focus on **active travel** is required; focus on enabling active travel rather than promoting it; focus on attracting people to use active travel for short journeys; Recognise and promote the economic advantages of active travel; Must recognise hierarchy of rights for road users: pedestrians, cyclists, public transport, electric vehicles and other road users; Policy must try to reduce car dependency; traffic won't improve because cycling infrastructure is not good enough.
- b. **Education/Training Promotions:** Promote safe cycling / road safety campaign; Public awareness campaign to promote walking and cycling; Sustainable and active modes of travel can be achieved by educating people to think foot first, cycle next, public transport next and car last; Develop a standardised framework for publicly funded programmes designed to increase physical activity; There should be a commitment to publish models of proposed cycle and walking routes on the KCC website to create greater awareness and information to facilitate consultation.
- c. **Modal shift:** A modal shift is required; Sustainability targets must be timetabled and resourced; set targets for modal share for cycling and sustainable transport; A multi-disciplinary team is needed to promote active travel; Include a policy that focuses on how a person uses a transport system from start to end, to support behaviour change resulting in the required modal shift; the transition of existing infrastructure to more sustainable modes of transport are required;
- d. **Walking and Cycling:** Pedestrians and cyclists should be prioritised over cars and more zebra/pedestrian/cycle crossings provided; there needs to be a greater emphasis on safe walking routes and cycleways; investment is needed in footpaths and cycling lanes; a quality audit of pedestrian and cycling facilities should be carried out in towns and villages more sheltered walkways should be provided; traffic light priority for active travel; with reduced pedestrian waiting time to 30 seconds to ensure adequate time to cross the road, people are not encouraged to walk or cycle

as roads feel scary; Expand pedestrian and cycle infrastructure within towns as well as regionally; include policies to deliver cycleways and walking ways throughout the county; Road space should be reallocated to walking and cycling.

- e. A **mobility plan** for the county that prioritises active travel and public transport is required, which should include a network of safe, segregated cycle routes that are suitable for people of all ages; For existing neighbourhoods, objectives should be set for the retrospective implementation of walking and cycling facilities in consultation with stakeholders.

CHIEF EXECUTIVE'S OPINION

Active Travel and Modal Shift

In order to discourage people from private modes of transport and reduce car dependency, walking and cycling infrastructure within the county must continue to be improved and the Council will continue to be supportive of any measures to improve the cycling network and to implement such measures/schemes as a priority. In accordance with the requirements of Regional Policy Objective 8.1, and the obligation to demonstrate consistency with the guiding principles expressed in the Transport Strategy for the RSES, and in particular the behavioural change, interventions promoted to encourage and support a shift to sustainable modes of transport will be included in the Draft Plan.

CHIEF EXECUTIVE'S RECOMMENDATION

Active Travel and Modal Shift

To include a set of measurable and achievable targets throughout the Plan and Local Area Plans in order to track progress in achieving our Climate Change goals through the modal shift.

To include in the Draft Plan a series of modal shift targets which will assist in measuring the outcomes of infrastructure measures promoting sustainable transport in the County.

Support modal shifts towards more sustainable modes of transport and to prepare Local Transport Plans to help achieve modal shifts.

6. Cycling

Submission Nos: 016, 018, 027, 043, 058, 061, 067, 069, 070, 073, 102, 106, 108, 109, 142, 143, 144, 166, 174, 202, 207, 214, 217, 223, 229, 234, 280, Public Meeting, Youth Workshop

- a. KCC should develop a **Strategic Cycling Plan** with targets, monitoring and reporting; link with neighbouring LA cycle infrastructure, Government has mandated that cycle network plans be drafted by every local authority.
- b. **Cycling networks** are needed around the county to link towns & Villages with amenities (e.g. The Curragh) and where people live, work, play; new cycle routes should be included in the plan with targets for delivery; there are many instance of cycle paths for certain distances which bottleneck and then they suddenly stop; Rural cycling networks should be supported to develop rural tourism; Cycle networks should be identified for Kilcullen, Rathangan, Monasterevin and Castledermot; a cycling infrastructure project to link Leixlip, Celbridge and Maynooth should be proposed.
- c. **Design** is key when implementing routes – no more painted verges, need to be ambitious with cycle lane design and designed by those who understand the need of cyclists; quality designed lanes should encourage children to cycle; an audit should be carried out to deliver safe cycling routes to all schools.

- d. More **investment** is needed in cycling infrastructure; ensure future cycle lanes are segregated from roads/pedestrians, are well lit and signposted etc. **More safe cycle lanes**, cycle friendly towns; especially near schools on all roads segregated lanes within and to all towns; protected cycle way networks; provide safe bicycle parking at public transport sites and in towns; E-bikes; E-scooters; bike sharing scheme; Provide high quality protected cycling facilities that enables Cycling for All; KCC should issue CPO's for cycle lanes between housing estates and schools; the Dutch design of cycle lanes on roundabouts should be encouraged; Allow cyclists turn left on red lights; Cycle lanes only go so far, i.e. 2 mins from school, then you are back onto sharing roads with cars; surface cycle tracks with red wearing course should be provided in the interests of road safety and legibility; Allow contra-flow cycling in one-way streets; ensure that cycling becomes a real safe option for 0-15km trips; Identify top 5 cycle routes in each self-sustaining town and deliver them to allow safe cycling.
- e. **Bike parking** options should be safe, secure, well -lit and sheltered; Adequate bike parking at all villages, major buildings, shopping areas, and schools, including at locations that are not owned by the council at Kilcock Railway station; Cargo bike parking should be considered; Upgrade all school bicycle sheds; Investigate bike share schemes in key towns and identify key strategic bicycle share dock locations.
- f. **Signage:** Council should invest in cycle and walking friendly signage; signposting system for destination routes; signage for 1.5m passing margin for cyclists; on smaller routes signage alerting motorists to active travel users would be beneficial.

CHIEF EXECUTIVE'S OPINION

Cycling

The Greater Dublin Area Cycle Network Plan (2023) sets out the National Transport Authority's plan for a cycle network throughout the Greater Dublin Area, comprising of an Urban Network, Inter-Urban Network and Green Route Network for the seven Local Authority areas in the GDA. The Cycle Network Plan aims to ensure that cycling as a transport mode is supported and enhanced in order to achieve strategic objectives and reach national goals for cycle usage. The large number of submissions that refer to cycling, cycling routes, infrastructure, bicycle parking and facilities required to promote cycling are acknowledged. Cycling is a sustainable and healthy mode of transport with benefits for wellbeing, communities and the environment. In order to encourage people to choose cycling as a viable method of transport, it is agreed that the Draft Plan should actively support, promote and enable this mode of transport.

In support of the modal shift, the Draft Plan will also make provision for other supporting infrastructure such as cycle parking facilities, including cycle stands at train stations, schools' campuses and other recreational attractions.

CHIEF EXECUTIVE'S RECOMMENDATION

Cycling

To include objectives in the Draft Plan to align with the National Cycle Policy Framework and the Greater Dublin Area Cycle Network Plan (2015).

To include a set of measurable and achievable targets in the Draft Plan in order to track progress in achieving our Climate Change goals through the modal shift (See also recommendation re modal shift targets above in sub-section on Active Travel and Modal Shift).

To include a series of objectives in the Draft Plan for the delivery of supporting cycling infrastructure such as cycle parking facilities at locations such as (but not limited to) train stations, schools campuses, hospitals, primary care units and other recreational attractions.

To include objectives in the Draft Plan on well-designed cycle parking.

7. **New developments:**

Submission Nos: 014, 018, 166, 186, 189, 202, 221

- a. Large employment/industrial sites must be required to implement sustainable and active travel modes; Mobility management plans must be mandatory during the development management process; new large developments should promote public and active modes of transport; Ensure bike parking and showering facilities are provided at places of employment to encourage staff to cycle; set limits for commercial car parking on sites that are within walking /cycling distance of amenities.
- b. Ensure all new developments are fully permeable for walking and cycling; sustainable transport option should be implemented for all new housing and school developments before and during development; planning conditions should require cycling lanes and footpaths to be installed; and covered bike parking facilities; should consider micro mobility such as E-bike parking; EV charging points must be required by condition of permission for all residential and commercial projects; implement principles of Crime Prevention Through Environmental Design .

CHIEF EXECUTIVE'S OPINION

New developments

The submissions received which refer to requirements for new developments are noted, for example requiring permeability for walking and cycling, provision for electric charging points and obligations for large commercial/industrial premises to implement and support sustainable and active travel modes.

CHIEF EXECUTIVE'S RECOMMENDATION

New developments

To include development management standards for walking, cycling and the provision for electric charging points in all new developments.

To include objectives in the Draft Plan that require sustainable travel plans for all major developments, including large employment schemes and schools.

8. **Town Centres:**

Submission Nos. 014, 018, 035, 043, 058, 067, 073, 089, 102, 108, 109, 127, 136, 142, 166, 175, 193, 196, 200, 202, 207, 214, 217, 221, 229, 234, 262, 274, 275, 280, Public Meeting

- a. There should be a '**Walking and Cycling First**' approach when investing in our town centre infrastructure, with more accessible / widened footpaths and cycling, and traffic separation in urban areas, especially near schools; public realm should be age-friendly; create pedestrian zones in town centres, more public space with options for markets;
- b. There should be more '**shared spaces**' in town centres to reduce car dominance; Remove cars from streetscapes; restrict vehicular access; Prevent cars from entering

historic town and village centres; shared cycle and pedestrian paths should only be used in exceptional lower volume traffic areas; design **healthy streets** to promote active travel; the built environment must be reshaped to facilitate walking and cycling, better enforcement is needed to prevent footpaths and cycle tracks being used as car parks ; provide space for eMobility in town centres; air monitoring should be carried out; There should be public transit priority within towns where bus ways are given priority; KCC should consult with An Post when designing public realm projects as access s required.

- c. There should be reduced **HGV traffic** through town centres, reduce traffic in general through towns; Focus on road developments that allow us to reclaim town centres; traffic through our towns is too high.
- d. **Speed limits:** Should be reduced in our towns; 30kph should be the default speed limit in urban areas which should be demarcated and enforced; or 20kph; vehicle speeds should be monitored and enforced; greater traffic calming measures are required; Low traffic neighbourhoods in larger towns should be promoted; more one-way systems; implement car-free zones/street around the County all to provide more space for people; is there an opportunity to reconsider the use of some roads in our towns (PM); traffic should be directed to outer routes and new link routes.
- e. The Council should actively develop **co-working hubs** and spaces within towns and villages to reduce the need to travel.

CHIEF EXECUTIVE'S OPINION

Town Centres

Ensuring that our town centres and public realm are pedestrian friendly, accessible and permeable is crucial in maintaining vibrancy and vitality. How the urban structure has developed in Kildares varied settlements has implications on permeability and consequently the walkability of a town. The more permeable and connected a town's network of streets and paths are, the easier it is to move around a settlement and the more likely that this movement will be made by sustainable means (i.e. on foot or bicycle). It is agreed that the Draft Plan should include policies and objectives in relation to urban design guidelines to achieve healthy streets, achieve accessibility for all and promote active travel. The submissions referring to co-working hubs are noted and this is considered further under the theme of Economic Opportunity.

Many submission have been received that refer to the need to reduce traffic, including HGV traffic, through our town centres. The reduction of HGV traffic through town centres will require alternative routes to the provided, such as Relief Roads. The Draft Plan will include a suite of new road objectives to facilitate this.

Submissions referring to speed limits are also noted. National speed limits are a matter for the Department of Transportation. Local authorities have the power to introduce bye-laws to set special speed limits in designated areas, however this is not a matter that is dealt with in a County Development Plan. Speed limits are enforced by An Garda Síochana.

CHIEF EXECUTIVE'S RECOMMENDATION

Town Centres

To include a series of objectives in the Draft Plan to protect and enhance the primacy and character of the town centre through pedestrian and cycle friendly public realm interventions.

To include objectives to carry out walkability surveys in towns and villages to inform public realm proposals and to create age friendly and universally accessible town centres that promote active travel.

9. **Schools:**

Submission Nos. 018, 109, 136, 174, 175, 186, 202, 221, 274

A target should be included for providing safe travel to school and for enabling new measures to support active travel to school; A target should be set for all schools to encourage alternatives to the car; better bus facilities should be provided at schools; Implement school streets and school zones, which benefit from the government's proposed Safe Route to Schools programme; Introduce a Green Schools Programme and expand the Schools Street programme; provide car drop-off space at school entrances; eliminate parking outside schools / introduce bus alternatives; establish more Bike and Ride facilities especially near schools;

CHIEF EXECUTIVE'S OPINION

Schools

Many submissions referred to traffic associated with school journeys and the need to provide safe and direct walking and cycling infrastructure to enable children to walk or cycle to school. Submissions also refer to car parking, drop-off facilities and providing infrastructure to cater for school buses. The Department of Transports' new initiative (in conjunction with NTA) 'Safe Routes to School' is noted in this regard, which is open to all schools in Ireland for active travel funding and delivery. The Draft Plan will include policies and objectives to specifically address sustainable mobility access to schools.

CHIEF EXECUTIVE'S RECOMMENDATION

Schools

To include objectives in the Draft Plan to support the Department of Transport's new initiative (in conjunction with NTA) 'Safe Routes to School'.

To include objectives in the Draft Plan to enable active modes of travel to existing and proposed school sites.

10. **Traffic Studies:**

Submission Nos. 089, 109, 174

The CDP should include a policy making it mandatory for traffic **studies** to be carried out for LAPs; systematic survey of car transport should be carried out; a Road Audit should be carried out to identify most dangerous junctions/roads for cyclists.

11. **Car Parking/Taxis**

Submission Nos. 018, 042, 043, 061, 064, 089, 102, 109, 127, 142, 166, 175, 193, 202, 217, 239, 262, 274, 280

- a. **Car parking** should be discouraged / reduced in town/village centres; Public parking policies should be reviewed in the context of urban renewal, transition to low carbon society; Adequate disability parking bays must be provided throughout the county; removal of parking from Main Street, Sallins has had a detrimental impact on the community; cost of parking should be higher to discourage all day parking;

Large surface car parks should be avoided in preference for multi-storeys; multi-storey parks should have EV charging; brownfield sites should be identified for multi-storey parking and zoned to protect for this purpose; car parks should be levied if they do not provide an equivalent number of bike stands; Kildare Village has requested that provision could be increased having regard to its unique nature and regional and national catchment;

- b. **Car-pooling:** Incentivise car-pooling; encourage car-pooling at motorway junctions; incentives should be given to employees to use alternatives to the car; work with industry to encourage car sharing schemes; request employers to consider staff transport schemes; establish a 'Public Transport Initiative' to pilot alternatives; Promote the smarter travel workplace initiative; Encourage and support the roll out of car share schemes to lessen private car ownership.
- c. Review location of **taxi ranks** across the County in conjunction with age friendly programme.

12. EV Charging Points

Submission Nos. 035, 073, 089, 096, 102, 108, 109, 114, 127, 142, 143, 166, 175, 186, 193, 198, 202, 221, 229, 232, 274, 280, 301

- a. More EV charging points are needed throughout the County/ an ambitious roll out is required; Significant investment is needed in eVehicle infrastructure. Charging points should be provided as a ratio of population at convenient locations; at car parks, GAA Clubs; on-street and for electric bikes and scooters; Integrate solar power with EV charging in public car parks; Establish and communicate a methodology that will allow the best access and uptake of charging points; Adopt an EV policy for the Council's own fleet and investigate access for EV buses only.

CHIEF EXECUTIVE'S OPINION

Traffic, Car parking/Taxis, EV Charging Points

While a number of Local Transport Plans (Area Based Transport Assessments /Strategic Transport Assessments/Strategies) have been prepared to inform Local Area Plans in County Kildare, it is agreed that the Draft Plan should include a policy requiring the preparation of Local Transport Plans/Area Based Transport Assessments to inform future development strategies for larger settlements in County Kildare.

The location and quantum of car parking will also be re-considered and the Draft Plan will include maximum parking standards and consider doing so on an area wide basis with reference to site locations, their proximity to high quality public transport corridors/hubs etc. The Draft Plan may also be supportive of car-pooling, however the role of a Local Authority in enforcing this is restricted.

The provision of electric vehicle charging points for new developments and at appropriate locations (including, but not limited to, town centres, at public buildings, in car parks etc.) is acknowledged and it is agreed that the Draft Plan should include policies and objectives in this regard.

CHIEF EXECUTIVE'S RECOMMENDATION

Traffic, Car parking/Taxis, EV Charging Points

To include a series of objectives within the Draft Plan to require the provision of electric vehicle charging points for new developments, including but not limited to, residential, commercial and industrial developments.

Facilitate and encourage an increase in electric vehicles use, including measures for more recharging facilities and prioritisation of parking for EV's in central locations.

To include maximum parking standards and to consider doing so on an area wide basis with reference to their proximity to high quality public transport corridors/hubs.

13. Park and Ride / Bike and Ride/ Park and Stride

Submission Nos. 018, 044, 058, 069, 089, 102, 109, 114, 142, 174, 175, 182, 193, 198, 202, 274, 280

- a. **Strategy:** Iarnród Éireann is currently engaging with KCC and the NTA to develop a Park and Ride Strategy. The CDP should support the implementation of this Park and Ride Strategy when it is agreed by all parties. Provide park and ride facilities; Provide them as an incentive for commuters to travel by public transport, near public transport to encourage train and bus use; park and ride options need a critical mass.
- b. **Park and Stride:** provide 'park and stride' facilities close to amenities; near public transport, DART etc.
- c. **Locations:** Monasterevin is an ideal location for park and ride; these should be located outside of towns, close to motorway exits with bus connections; consider these at larger private spaces such as at racecourses, motorway service stations; at the edge of Maynooth town to encourage people to use public transport and relieve congestion and emissions in town centre; should be investigated at the Ring Road in Naas, in Naas where traffic exits the M7 to avail of the rail network.

CHIEF EXECUTIVE'S OPINION

Park and Ride/Bike and Ride/Park and Stride

The NTA has engaged with KCC to develop a Park and Ride Strategy and it is agreed that the Draft Plan should have regard to this strategy and encourage the location of such facilities at appropriate locations.

CHIEF EXECUTIVE'S RECOMMENDATION

Park and Ride/Bike and Ride/Park and Stride

Promote a reduction in car-based commuting, (*RPOs 5.2, 5.3, 8.7, 8.8 and 8.9 & Fig 5.3*).

To include policies and objectives to support the NTA Park and Ride Strategy and to support the provision of such facilities at appropriate locations.

14. Roads Objectives

Submission Nos. 016, 089, 102, 117, 219, 231

- a. A specific road objective is suggested at Rathangan Demesne between the R401 and the R414 with walking and cycling provided for
- b. The Draft KCDP should refer to the provision of the link between the M3 (Junction 4 Clonee/R157 Dunboyne – Maynooth Road and the M4 (at Lucan / Leixlip)
- c. Prioritise delivery of Relief Road in Athy
- d. All Tier 1 and Tier 2 towns should have outer and inner relief routes protected for delivery
- e. An inland port at Cherryville should be delivered
- f. Improvement to the R403 between Celbridge and Barberstown is required

- g. Rural lighting to be improved; Absence of a footpath from Newtown Crossroads heading towards Nurney

15. Motorways

Submission Nos. 089, 175, 180

- a. Identify appropriate locations for sustainable motorway service stations; Consider a 'shared vehicle' lane on the motorways, e.g. M7 dedicate one lane to buses and cars with 3 or more persons in the car.
- b. Develop footpaths and cycle paths to main roads/motorway junctions to access inter-city public transport which by-passes many towns e.g. from Castledermot to M9 J4.

CHIEF EXECUTIVE'S OPINION

Roads Objectives and Motorways

An important part of the Draft Plan will be the inclusion of a list of Priority Road and Bridge Projects and Regional Roads identified for Improvement. It is agreed that such a list should be included in the Draft Plan. Policies and objectives will also be provided in relation to public lighting.

It is acknowledged that motorways have an important role to play in the economic development of the county and the state. Transport Infrastructure Ireland (TII) operates, maintains and improves the national primary and secondary road network in Ireland. KCC will continue to engage with the TII to develop the motorway network through the county. Policies and objectives to be included in the Draft Plan will also align with the Spatial Planning and National Road Guidelines, DECLG (2012).

CHIEF EXECUTIVE'S RECOMMENDATION

Roads Objectives and Motorways

To include a suite of policies and objectives for the provision of priority road and bridge projects, in addition to Regional Roads identified for improvements.

To include a suite of policies and objectives to align with the Spatial Planning and National Road Guidelines, DECLG (2012).

16. Canals/Blueways/Greenways

Submission Nos. 018, 037, 102, 106, 119, 175, 180, 206, 210, 224, 301

- a. Ardclough area needs wider and safer bridges and car parks for those using the canal; Connect Celbridge to the greenways on the Royal and Grand Canals; There are road safety issues at the Blueway/Barrow Way adjoining public roads as they are too narrow with inadequate visibility on approaching bridges; Housing and self-catering accommodation here will reduce the need for car based journeys as it is within cycling distance of Hazelhatch train station
- b. Connect towns by Green/Blue/Brown ways segregated from the roads; These should be thriving connections, tourist destinations; Provide safe commuting route along the Royal Canal Greenway to Dublin City Centre; extend Dublin Bike Scheme along Royal Canal; The 12th Lock to Hazelhatch section along the Grand Canal requires attention and is the missing link between South Dublin County Council border and Kildare County Council section along this greenway route; Develop new green routes for walking and cycling alongside roads or through adjacent fields to encourage sustainable travel and support biodiversity; Pedestrian and cycle routes should be provided through green spaces.

CHIEF EXECUTIVE'S OPINION

Canals/Blueways/Greenways

It is acknowledged that these important piece of green infrastructure provide an opportunity to promote and enable active travel in our urban and rural environments. The Draft Plan will include policies and objectives to continue to support the provision of blueways and greenways where appropriate, in consultation with the relevant statutory authorities. This topic is also considered under the theme 'Enhanced Amenity' where a number of the Chief Executives recommendations are set out.

CHIEF EXECUTIVE'S RECOMMENDATION

Canals/Blueways/Greenways

See 'Enhanced Amenity' for recommendation.

17. Accessibility

Submission Nos. 018, 043, 058, 061, 069, 070, 102, 142, 186, 234, 239, Public Meeting

- a. Accessible transport must be integrated in the Plan to ensure inclusiveness for all, Universal access must be promoted to the highest levels in all new and existing community facilities, physical infrastructure; Public realm / streetscapes must be accessible for all; there should be a standardised template for accessibility in development of streetscapes; lower all kerbs connecting walking and cycle paths to street level; Create space and footpaths accessible and safe for use by all ages and abilities; An accessibility audit should be conducted throughout County Kildare;
- b. All future shared spaces for pedestrians and cyclists should have a tactile line in the centre of the path for vision impaired.
- c. Work with Irish Waterways to remove Kissing gates which are inaccessible for wheelchair users.

18. Permeability

Submission Nos. 014, 018, 058, 073, 102, 106, 109, 142, 202, 207, 226, 229

- a. Increase permeability/safe routes, between housing estates and within towns; Include retrofitting of existing residential, commercial, and retail areas to increase permeability by foot and bike. Consider how any new developments can be best utilised by pedestrians and cyclists i.e. cycle-proof all developments, Eliminate rat running by filtered permeability; the plan should include permeability studies; a network of cycle and walking routes can promote connectivity; coordinate with residents to overcome obstacles when delivering permeability. A hierarchy of goals would be useful, i.e. Climate action takes precedence over fears of anti-social behaviour.

CHIEF EXECUTIVE'S OPINION

Accessibility and Permeability

It is agreed that universal access must be a key priority for the public realm, for public transport and in the design of new developments. It is recommended that policies and objectives be included in the plan that ensures universal access/access for all. The submissions referring to the design of shared spaces and the requirement for a tactile lines is noted and an objective should be included in the plan accordingly. The submissions referencing kissing gates along the canals are also noted. Whilst the removal of these features may have implications on built heritage, it is agreed that

universal access should be provided adjacent to such features. An objective should be included to liaise with Waterways Ireland in this regard.

Permeability refers to the extent to which an urban area permits the movement of people by walking or cycling. Well-designed permeable neighbourhoods allow people to walk or cycle through areas safely and conveniently, and in a manner which confers a competitive advantage to these modes over motorised forms, particularly the private car. By providing connections to existing public transport services, access to these services will be improved and increased levels of use may be expected.

CHIEF EXECUTIVE'S RECOMMENDATION

Accessibility and Permeability

To create age friendly and universally accessible town centres that promote active travel.

To include policies and objectives requiring inclusive design principles to be employed when designing walking and cycling infrastructure.

To liaise with Waterways Ireland to investigate the feasibility of providing universal access adjacent to existing Kissing gates along the Canals.

To include an objective in the Draft Plan to improve permeability, in line with the NTA's 'Permeability Best Practice Guide'.

19. Public Rights of Way:

Submission Nos. 018, 180, 186

Bring forward proposals for the creation of new public rights of way to promote walking and enjoyment of the natural environment; A policy should be included to support the development of off-road public footpaths and looped walks through fields and woodlands around each town and village with assistance of landowners; Ensure state-owned land is made available for walking and cycling trails;

CHIEF EXECUTIVE'S OPINION

Public Rights of Way

Section 10(2)(o) of the Planning and Development Act 2000 (as amended) sets out a mandatory requirement that development plans 'shall include objectives for the preservation of public rights of way which give access to seashore, mountain, lakeshore, riverbank or other place of natural beauty or recreational utility, where public rights of way shall be identified both by marking them on at least one of the maps forming part of the development plan and by indicating their location on a list appended to the development plan'. Section 14 of the Act provides a procedure for the inclusion of rights of way in a CDP which requires notification to be issued to all landowners and a mapping exercise to be carried out.

CHIEF EXECUTIVE'S RECOMMENDATION

Public Rights of Way

The statutory obligations pursuant to Section 10(2)(o) of the Planning and Development Act, 2000 (as amended) are noted and the issue of the preservation of public rights of way will be addressed appropriately in the Draft Plan.

20. Naas

Submission Nos. 014, 025, 034, 036, 040, 045, 046, 050, 053, 054, 059, 062, 063, 069, 075, 076, 077, 078, 079, 080, 081, 085, 086, 087, 091, 092, 093, 094, 096, 104, 115, 118, 121, 142, 153, 154, 155, 156, 157, 158, 159, 160, 169, 170, 178, 184, 187, 190, 192, 202, 204, 208, 212, 213, 215, 216, 220, 225, 228, 235, 236, 237, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 260, 263, 264, 265, 275, 281, 282, 283, 289, 294, 298, 308, 319, 320

- a. Objects to the Inner Relief Road. The Naas Inner Relief Road proposed in the previous plan should not appear in the new County Plan because it was rejected by the Naas Municipal District Councillors in June 2019. An outer ring road objective for Naas should be given priority in the County Development Plan.
- b. Include a road objective to complete the last section of the IRR through undeveloped lands between Blessington and Tipper Roads, through Naas Racecourse farmland and onto the Naas-Dublin Road at Fishery Lane Roundabout.
- c. A relief road in Naas should be developed to remove HGVs from the town; Walking and cycling should be safe around Naas. A pedestrian/cycle route only through the racecourse to the Gallops is suggested; Direct cycling paths and safe pedestrian routes should be developed so children can get to school independently; Make Naas a one-way street system by not letting bus routes travel in both directions; a safe cycle lane and street widening project can be created on Main Street.
- d. Suggested road projects: A spur from M7/M9 should connect to Naas-Kilcullen Road and to the Ballymore Road.
- e. Bus/transport interchange requested at the depot at KCC yard (Naas) beside 'Hedderman's' car park.
- f. There should be a segregated cycle and walking track between Caragh and Millenium Park, via Halverstown Cross (to access Grand Canal Greenway).
- g. An updated transport strategy is needed for Naas; The CDP should include an objective for a multi-modal interchange in Naas and designate land for this.
- h. The Sunday car-free zone along the Grand Canal should be made permanent.
- i. MTO6.1 of the Naas LAP should be developed as quickly as possible.
- j. Development at the northwest quadrant of Naas proximate to the N7 must be consistent with National policy in relation to spatial planning and the national roads network.

CHIEF EXECUTIVE'S OPINION

Naas

Approximately 80 submissions raised concerns about the Naas Inner Relief Road and the Gallops Avenue.

In this regard, to ensure the ongoing competitiveness, efficient movement of people and sustainable development throughout the county, it is important that the CDP identifies at a strategic level, particular road projects. Taking an evidence-based and plan-led approach ensures routes are maintained free from development and funding can be secured during the lifetime of the Plan. Whilst the identification of a route does not presume a route will be progressed, it retains the alignment as a protected corridor for future examination. Should the route be progressed at any stage in the future it would be subject to a separate statutory procedure which includes for detailed design, rigorous environmental assessment, consultation with the relevant statutory stakeholders and public consultation.

Naas suffers from congestion and it is undisputed in many of the submissions received that new road infrastructure is required to assist in the sustainable, economic and social development of Naas. The crux of the issue is the location of the infrastructure. The Council is cognisant that the previous Naas Inner Relief Road was turned down by democratic vote at the Naas Municipal District meeting in June 2019. Several of the submissions received refer to the proposed Inner Relief Road as being a 30-year-old scheme which is out of date. It is true that the concept of the Naas Inner Relief Road has been around for a number of years, given that the issue of traffic congestion on the Dublin Road has been an ongoing concern requiring a solution. Objectives for the connectivity measure across a number of successive planning documents. However, the issue of the selected route being out-of-date is disputed as repeated analysis by varying independent consultants have proven that a roadway at this location is the most viable and appropriate solution. Across the National Planning Framework there is a requirement for a more evidence-based approach to planning, ensuring the best available data, information and knowledge are used to make decisions. The most recent assessment carried out, was under the non-statutory Naas /Sallins Transport Strategy (2020) which examined possible options and includes a Multi Criteria Analysis (MCA) which teases out options at a very high level. This Strategy was undertaken to provide up-to-date analysis to optimise decisions taken during the land use planning process.

Several submissions recommend the Council to look at putting the connectivity measure to the east of the Racecourse. The Transport Strategy put forward the option of the Gallops Avenue (Alternative Route), located on a corridor to the east of Naas Racecourse. The analysis undertaken shows that this route will provide some benefits, but not to the same extent as the Gallops Avenue. Its impact in relieving congestion on the Dublin Road (R445) corridor is only half that of Option 1 (Gallops Avenue), as in the year period 2023 AM peak scenario the reduction in traffic on the Dublin Road is 14.9% in Option 1 compared to 5.0% in Option (Alt), while in the year 2023 PM the reduction is 28.1% compared to 19.3%.

The study found that the Outer Orbital Road, which is a measure suggested in submissions, is not an optimal solution as it would have limited impact on the town centre. Outer Relief Roads are used by designers to direct longer distance traffic, and in particular Heavy Goods Vehicles (HGVs), away from cities, towns and villages provided they are clearly separated from the urban (DMURS, pg 58). Therefore, a bypass of the town would be beneficial if most of the traffic through the town was "through traffic". However, this is not the case in Naas.

Kildare County Council have an onus to ensure the spending of public money is in the best interests of the county. The promotion and progression of an alternative, inferior option cannot be stipulated in a land use plan when the evidence base is not there to support it.

Several submissions highlighted that the Naas Inner Relief Road has now been rebranded, the Gallops Avenue. The route was given a revised name as it has been reimagined and redesigned. Conscious of the need to minimise adverse impacts, real and perceived, on people and the natural environment in the area, the new proposal the Gallops Avenue, will become an eastern street connection which facilitates increased permeability for pedestrians and cyclists as well as drivers.

Any street connection at this location will need be integrated within the urban fabric so that a sense of place is maintained and prevents severance between adjoining areas. There are many examples in Ireland of streets that carry significant volumes of through traffic at moderate speeds and retain a high place value/levels of connectivity. Successful solutions tend to be designed as boulevards with

well planted medians and verges that provide a buffer between the trafficked carriageway and the surrounding pedestrian environment. It is this design concept that the Gallops Avenue will follow.

Many submissions received referred to the potential of air and noise pollution. The main factors which determine the level of road noise and air pollution are traffic volume, speed, levels of congestion and the proportion of HGVs. The creation of a permeable street network at this location and the wider Naas, which promotes walking, cycling and public transport will lead to reductions in vehicular traffic. Less concentrations of traffic will consequently lead to reductions in noise and air pollution. The redesigned street /boulevard connection with well planted medians and verges will also reduce both noise and air pollutions, while providing a buffer between the carriageway and the surrounding pedestrian environment.

The selection and inclusion of roads projects for the CDP will be based on the evidence available during the plan preparation process. The Council cannot put forward schemes where there is contrary evidence supporting alternatives. Any priority road projects identified in the CDP will undergo a further detailed, standalone statutory process.

The other aspects referred to specifically for Naas are best addressed through the Local Area Plan process.

CHIEF EXECUTIVE'S RECOMMENDATION

Naas

Support the delivery of new & enhanced public transport infrastructure in Naas & Sallins, including Park & Ride and interchange facilities (RPO 4.52)

21. Celbridge

Submission Nos, 019, 022, 037, 106, 119, 189, 193, 196, 210, 217, 234, 280, 300

- a. A transport strategy for Celbridge should be funded and completed; Public transport improvements are required, including shuttle bus to train stations
- b. An additional Bridge Crossing is required, with walking / cycling infrastructure, Pedestrian bridge(s) would be welcome; particularly linking Castletown with Donaghcumper, improved cycling network strategy to improve cycling for local journeys.
- c. Celbridge Village should be pedestrianised with a high-quality two-way cycle lane when the Celbridge-Hazelhatch bridge is delivered; Include bicycle lanes and parking facilities; Provide accessible parking at the edges of the town centre.
- d. Cycle and walking paths, with traffic calming measures, should be provided between Hazelhatch train station and Backweston (and from Leixlip train stations to Backweston) to cater for 1000 staff working at Forensic Science Ireland; Safe cycling route to be promoted between Celbridge and Maynooth; Celbridge and the Grand Canal; Provide proper cycle path / Electric shuttle bus from Celbridge to Hazelhatch; more public transport connections are needed for Hazelhatch;
- e. New Ring Road / orbital route is needed
- f. Detailed proposals for road/street improvements parking in and around the town (37); car parks needed close to town centre/within Donaghcumper estate
- g. The Council are requested to facilitate the installation of directional signage for Castletown on the county's main road network.
- h. Sustainable transport option should be implemented for all new housing and school developments before and during development. No provision is made for the

transport needs of the 500+ students of the planned school on the southern bank of the Liffey.

- i. Castletown Estate should act as a locus of interconnectivity for sustainable transport options, including a cycle way connecting Main Street to the Barnhall & M4 exit and a cycle way between HP and the M4.

CHIEF EXECUTIVE'S OPINION

Celbridge

The current Celbridge Local Area Plan refers to the period 2017-2023. When this LAP is reviewed, a Local Transport Plan/Area Based Transport Assessment will be carried out at the time to address localised traffic issues.

It is acknowledged that it is an objective of the Council through the Celbridge LAP under MTO 3.1 to seek to prepare a Transport Management Plan and Public Transport Strategy for Celbridge. Furthermore, MTO 3.12 and MTO 3.13 also seek to facilitate the construction of a new vehicular river crossing between the Clane Road and Newtown Road within either of the two protected corridors, as indicated on Map 8.1, subject to environmental assessment and to protect from development a route for a potential new road (including a new bridge over the River Liffey) between Clane Road (near the Celbridge North Kildare Educate Together School) and Hazelhatch Park respectively. Notwithstanding, its final route/location, the fundamental requirement for a second river crossing in Celbridge is long established and accepted. Therefore, while it is the intention of the Council that all of the objectives outlined above are achieved where appropriate, the Celbridge to Hazelhatch link will be a hugely significant and critical change in the transport network in Celbridge.

Kildare County Council is currently in the process of assessing options for the Celbridge to Hazelhatch link road (currently at non-statutory public consultation). As part of this project a strategic traffic model in the software VISUM is being developed. This model is fully compatible with TII's National Traffic model. The Celbridge Transport Strategy will be developed in line with the Planning Departments prioritized programme for the delivery of the County Development Plan and Local Area Plans (LAPs).

In relation to the sustainable transport associated with the relocation of schools in Celbridge to the Ballyoulster KDA it should be noted that the development of the residential lands immediately adjacent to the educational zoned lands requires the provision of one of two pedestrian/cycling routes over the River Liffey prior to the occupation of the first 351 housing units at Ballyoulster. A Part 8 application for one of these routes is currently being prepared in consultation with the NTA. The enhanced pedestrian/cycling network would improve permeability between both the existing and proposed residential areas and the town of Celbridge as well as to and from the proposed school site at Ballyoulster.

The other aspects referred to specifically for Celbridge are best addressed through the Local Area Plan process.

CHIEF EXECUTIVE'S RECOMMENDATION

Celbridge

To include an objective to provide a new bridge crossing in Celbridge

22. Newbridge

Submission Nos. 027, 082, 089, 090, 130, 196, 199, 211, 214, 232, 266, 284, 300

- a. A second bridge is needed for a ring road to relieve congestion
- b. Walking and Cycle links between Newbridge-Athgarvan especially for students getting to school and from rural towns into Newbridge and from Milltown; more EV charging points; more cycle lanes.
- c. **Localised changes** to Newbridge proposed are changing Eyre Street to a one way system, bike lanes around the town, Cutlery Road to be one way in other direction etc.; carrying out a feasibility study to address road safety (cycle lanes, walkways, lighting, traffic congestion and dangerous conditions) at 4 specific locations in the town.
- d. A **feasibility study** on the R416 from Milltown to Newbridge to address walking and cycling facilities, lighting, safety at Scoil na Naomh Uilig.
- e. An exemplar new cycle link could be a slightly modified K15 route linking Naas to Newbridge.
- f. Sites proximate to the rail line in Newbridge should be developed on a town centre first approach to realise NPF strategic outcomes.

CHIEF EXECUTIVE'S OPINION

Newbridge

It is an objective of the current CDP to provide an Inner Relief Road with new bridge crossing in Newbridge (Table 6.1), and this is reflected in the Newbridge Local Area Plan also by objective SR05(a). It is considered appropriate to contain policies/objectives in the Draft Plan to reflect this.

Localised issues will be dealt with through the Local Area Plan process, which will be informed by a Local Transport Plan/Area Based Transport Assessment.

CHIEF EXECUTIVE'S RECOMMENDATION

Newbridge

To include an objective to deliver a second river crossing in Newbridge.

To review and reconsider all listed projects in Table 6.1 (Priority Road and Bridge Projects) of the current CDP

23. Maynooth

Submission Nos. 016, 109, 119, 162, 196, 202, 217, 301

- a. Investigate creating a cycle town for Maynooth with NUIM; replace traffic lights with roundabouts; More park & ride and park & stride facilities on the outskirts of the town; safe walking and cycling routes to the train station; safe bicycle parking and storage at train station; cycle and walking routes along canal greenway; Car-free Sunday scheme; Maynooth could have an almost car-free Main St with pedestrian- and cyclist- friendly routes
- b. Complete the Ring Road around Maynooth, Maynooth needs a second exit from M4, the M4 should not be expanded unless for a bus lane
- c. The CDP should refer to transport objectives from RSES e.g. RPO4.33, and objectives from the Draft Meath County Development Plan MOV OBJ 48, MAY OBJ 4, 5, 6 to address the preparation of the joint urban plan of Maynooth.
- d. Maynooth should have a second railway station

CHIEF EXECUTIVE'S OPINION

Maynooth

It is an objective of the current County Development Plan 2017-2023 to provide an Outer Relief route at Maynooth (Table 6.1), and this is also included in the Maynooth Local Area Plan as objective TR02(b). Part of this project has been funded through LIHAF and it is anticipated that this will be constructed during the lifetime of the CDP.

Localised issues will be dealt with through the Local Area Plan process, which will be informed by a Strategic Transport Assessment.

24. Kilcock

Submission Nos. 016, 112, 207

- a. The CDP should contain transport objectives similar to the following from the Draft Meath County Development Plan to address the preparation of the joint urban plan of Kilcock, e.g. KIL OBJ4, 67, 8, 9
- b. A bus stop is needed at North Kildare Sports Club
- c. Identify dedicated cycle networks or alternative ways of enabling cycling in Kilcock

CHIEF EXECUTIVE'S OPINION

Kilcock

The submission from Meath County Council is noted in which it is recommended that the Draft Plan should include transport objectives similar to those included in the Meath County Development Plan as they relate to Kilcock.

Localised issues will be dealt with through the Local Area Plan process, which will be informed by an Area Based Transport Assessment.

CHIEF EXECUTIVE'S RECOMMENDATION

Kilcock

To include policies and objectives in relation to strategic road developments for Kilcock.

25. Leixlip/Confey

Submission Nos. 116, 119

- a. Confey needs a new bridge at the railway station with car park and link to Galway Road
- b. The CDP should acknowledge the need to advance the preparation of a Masterplan and associated transportation studies to expedite the delivery of housing at Confey.

CHIEF EXECUTIVE'S OPINION

Leixlip / Confey

The Leixlip Local Area Plan 2020-2023 identifies two opportunities to cross the railway line at Confey for pedestrian and cycle access. Furthermore, it is an objective of the Local Area Plan to prepare a Masterplan for Confey.

CHIEF EXECUTIVE'S RECOMMENDATION

Leixlip / Confey

To include policies and objectives relating to preparation of a Masterplan for Confey which is to be prepared and integrated into the Leixlip Local Area Plan by way of a statutory amendment to the

Local Area Plan pursuant to Section 20 of the Planning and Development Act 2000 (as amended) as per objective CON 1.1. of the Leixlip Local Area Plan 2020-2023.

26. Ballymore Eustace

Submission Nos. 203

- a. It is vital to retain and enhance the services of Dublin Bus (Bus no., 65) and erect new bus shelters in the village square and at Poulaphouca; Community bus service could be encouraged to and from neighbouring towns.
- b. More footpaths are needed throughout the village at many locations; Road improvements are needed at three locations; too many HGVs use the same route
- c. At Poulaphouca, road safety is a serious concern for residents/pedestrians this must be addressed; Poulaphouca is also key to connecting the Ballymore Eustace 5km loop to the Blessington Greenway
- d. The N81 Road Upgrade project should consider walking routes; providing crossing points; providing safe bus stops; safe cycle lanes.

CHIEF EXECUTIVE'S OPINION

Ballymore Eustace

The submission received referring specifically to Ballymore Eustace is noted, in which road safety concerns are noted. The Draft Plan will include policies and objectives for the future development of Ballymore Eustace, within the context of the Small Towns and Villages Strategy.

In relation to the N81, the Council will liaise with the TII and neighbouring local authorities in any proposals brought forward to upgrade this road.

CHIEF EXECUTIVE'S RECOMMENDATION

Ballymore Eustace

To include policies and objectives relating to public transport and active travel infrastructure in Ballymore Eustace as part of an overall Village Plan.

27. Miscellaneous

Submission Nos. 174, 176

- a. The plan should include reference to Compressed natural Gas (CNG) and a statement of support for the use of gas in transport (which enables fuel switching from diesel to CNG for HGVs and buses) by a presumption in favour of applications for CNG refuelling infrastructure, provided planning and environmental criteria are satisfied.
- b. KCC's transport budget should allocate 10% to walking, 10% to cycling and the remainder 2:1 in favour of public transport over road maintenance

CHIEF EXECUTIVE'S OPINION

Miscellaneous

The Draft Plan will include reference to Compressed Natural Gas (CNG) and support the use of gas in transport and CNG refuelling infrastructure, provided planning and environmental criteria are satisfied.

Budgets are not a matter to be included within a County Development Plan.

CHIEF EXECUTIVE'S RECOMMENDATION

Miscellaneous

To include a policy in relation to Compressed Natural Gas.

CHIEF EXECUTIVE'S ADDITIONAL RECOMMENDATION FOR THEME 4 'SUSTAINABLE MOBILITY'

In relation to all of the recommendations in the '*Sustainable Mobility*' theme, the CDP will include targets against which to measure progress in order to ensure that we can achieve net zero emissions by 2050.

4.5 Creative Places: Social, Community and Cultural Development

Statutory Authorities

A number of submissions from the statutory authorities refer to lack of services, quality of services, social inclusion and equality as key considerations in the development of the strategic objectives of the County Development Plan. The submissions highlights, that objectives must be consistent with National and Regional Policy along with other relevant plans, strategies and Guidelines. Specific reference is made to the following:

- Eastern Midlands Regional Economic and Spatial Strategy (RSES)
- Draft Meath County Development Plan 2021-2027
- Healthy Ireland, A Framework for Improved Health and Wellbeing 2013-2025 County Kildare Access Strategy 2020-2022
- Open Space and Outdoor Recreation in County Kildare 2021-2031
- Department of Education and Skills (DES) Technical Guidance Documents (TGD 25 & TGD 27)

In brief:

EMRA: Planning for diverse needs, Provision of recreation and open space facilities, Social inclusion and local economic development

Department of Education: Provision of school accommodation

Meath County Council: Volume 2 of the Draft MCDP contains a written statement and zoning map for Kilcock

Department of Public Health: Green and blue spaces, play and recreation areas

HSE: Provision of amenities, social inclusion

OPW: Development of an amenity. (Donaghcumper lands)

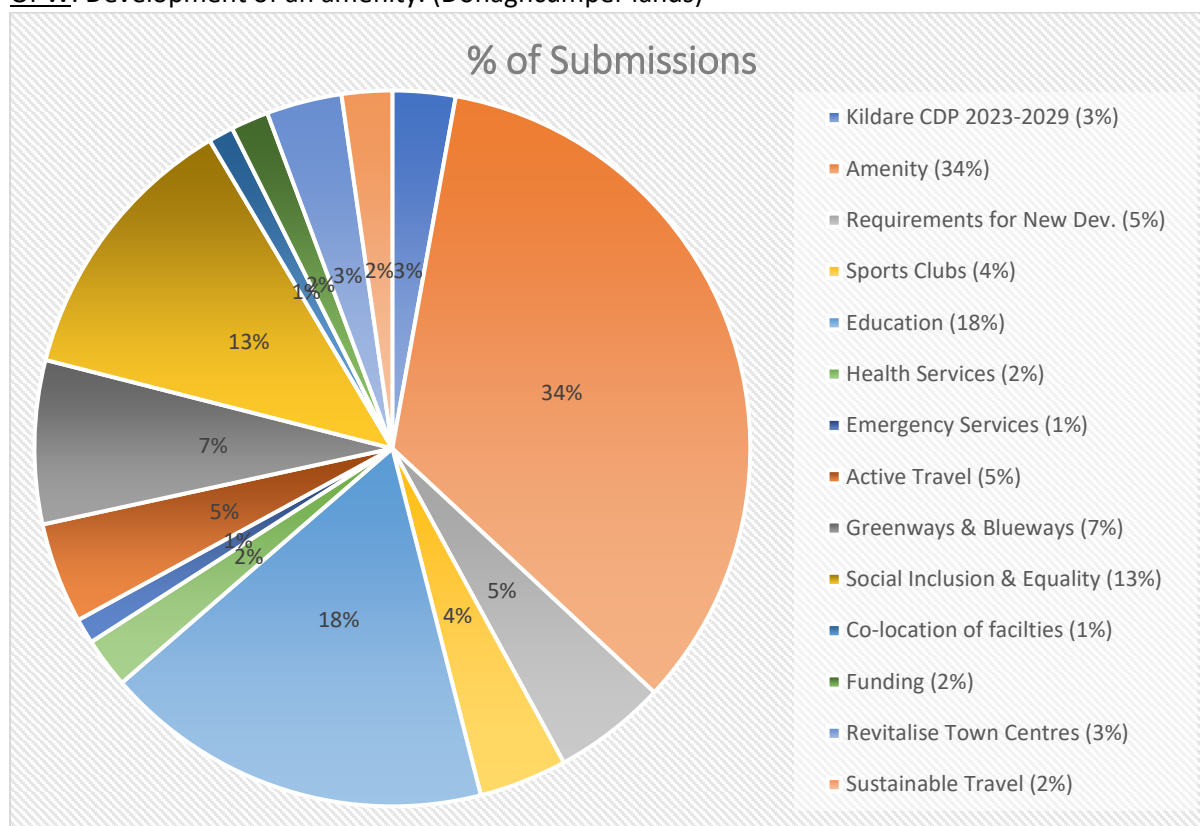


Fig 5 – Breakdown of submission type received in relation to 'Theme 5 – Creative Places'

ISSUES

Kildare County Development Plan 2023 – 2029

Submission Nos. 016, 175, 190, 192, Public Meeting

- a. Vision for Kildare 2030
 - Kildare County **with the social infrastructure that is needed for each town & village** (doctors, public health services, community centres etc.) and land set aside for this infrastructure to be accessible and inclusive.
 - A Kildare with **better open spaces and public realm**.
- b. Volume 2 of the Draft MCDP contains a written statement and zoning map for Kilcock. Note the following relevant objectives for consistency:
 - i. KIL OBJ 9; 'To facilitate the provision of new and enhanced cycling and walking connections to Kilcock Town Centre.'
 - ii. KIL OBJ 10; 'To develop a riverside walk and linear amenity area adjacent to the Rye Water River in accordance with a landscaping and amenity development programme that maintains a facility for vehicular access to the river for periodic cleaning purposes and provides connections for walking routes.'
- c. Suggested wording for the CDP - "development will not occur unless the necessary educational and healthy lifestyle promoting assets/infrastructure is in place".
- d. Develop community plans and access strategies.
- e. The new plan should emphasise greener and cleaner towns.
- f. Enhance the Public Realm team into MD Teams to implement forward planning and district strategies.

CHIEF EXECUTIVE'S OPINION

General

In order to provide for compact and sustainable towns and villages throughout the county a commensurate level of social infrastructure must either exist or be planned in parallel with future population growth.

The submission from Meath County Council has been noted where it highlights objectives that relate to Kilcock within the MCC administrative boundary so that any policies relating to Kilcock within the KCC administrative boundary may reflect these objectives, if appropriate.

CHIEF EXECUTIVE'S RECOMMENDATION

General

To include an objective to prepare a Social Infrastructure Audit as part of the preparation of the mandatory Local Area Plans in County Kildare which identifies the location, capacity and type of service present and/or required for the future. Where shortfalls in social infrastructure are identified, objectives will be included to support the provision of such infrastructure and to zone lands to provide for same.

To include an objective in the Draft Plan that supports the role of the Local Economic and Community Plan (LECPs) in planning for social infrastructure in accordance with the RSES.

2. Amenity

Submission Nos. 005, 017, 018, 027, 032, 039, 044, 048, 058, 069, 071, 072, 076, 082, 089, 094, 096, 102, 108, 109, 113, 116, 119, 123, 126, 127, 130, 131, 134, 135, 136, 143, 162, 166, 171, 180, 192, 193, 194, 196, 202, 203, 204, 208, 217, 221, 225, 226, 232, 234, 239, 246, 274, 275, 280, 299, 300, 301, Public Meetings, Youth Workshop

- As part of the Open Space Strategy a study of old tracks and trails and the use of publicly owned or semi state lands should be undertaken to investigate the feasibility of encouraging walking / cycling.
- Take note of EMRA Guiding Principles RPO's 9.14 to 9.17 when planning the provision of recreation & open space facilities.
- Undertake a **full audit of facilities** to ensure every town and village have meaningfully sized community hubs.
- Prepare social / community infrastructure audits and identify land for community zoning based on the audits.
- Existing facilities need to be mapped and linked to a community assessment, to match scale and size with need.
- Note Sections 6.4 and 9.5 of the RSES & RPOs 9.18 and 9.19 which support the role of the Local Economic and Community Plan (LECPs) in planning for social infrastructure.
- Develop sustainable communities with adequate social and community facilities including sporting facilities.
- Access to clean, healthy, environments like parks, outdoor gym equipment, sports grounds, swimming pools, playgrounds, teen recreation spaces, walking trails and other outdoor facilities to meet residents' needs are important given the expected level of growth in Kildare.
- Need community playing fields in each town and village under the patronship of the local authority. The size and quantity based on population.
- Include a policy to support community groups that provide community facilities.
- Expanded library services, arts centres, community spaces and playing fields are needed.
- Enhance arts, culture, sustainable tourism, improve outdoor recreation and natural heritage.
- Library facilities should be improved (poor resources in many, more likely to use modern facilities with access to computers, printing, quiet areas, and meeting rooms).
- Libraries could be used for public events, could cluster other facilities for teenagers around libraries.
- Bring vacant buildings back into use for the community i.e., halls, community centre etc.
- A mix of formal and natural play spaces should be provided.
- Families should be given a voice in the location and design of local play facilities.
- Community centres should be provided in growing towns and villages.
- Require safe community facilities for the youth in the county.
- Support the development of community supports to assist new citizens.
- Requirement for playgrounds, outdoor spaces for youths and teenagers and additional recreational and cultural meeting places.

- Develop a Sports Centre of Excellence in Kildare.
- Develop an Arts Centre in North Kildare.
- Need for more swimming pools (3 countywide, 2 in N-E Kildare).
- Provide facilities to meet the demands of the growing population in the Naas Municipal District.
- Recognise the importance of green spaces and amenity.
- The current standards for public open spaces are inappropriate.
- Deliver a network of open spaces ranging from local pocket parks to larger well-planned and managed public parks serving a town or group of towns.
- Require more public parks to serve large towns particularly in North Kildare.
- As more people use outdoor spaces, more pathways, seating, bicycle parking, litter bins, dog waste bins and bigger parking areas need to be provided.
- Need more outdoor seating on our streetscapes, recreation, and outdoor areas.
- Need for additional public toilet facilities. Promote the provision of Changing Places in public and community buildings.
- Promote greater interconnectivity of recreational resources in towns and villages.
- Zone areas in our rural areas for community use (e.g. Lackagh/Mountrice Ellistown).
- Working allotments, community gardens and community orchards, should be introduced, using public land, to all towns and villages and even into our larger housing estates.
- Maintain existing places and spaces of significance and open spaces in residential areas.
- Specific provisions for the wider sporting community should be prioritised across the County and a short-term target should be set within the CDP.
- Green spaces and public amenities need to be provided within walking / cycling distance of people's homes.
- Provision of suitable local and accessible play and recreation areas for children and young people.
- Create safe, welcoming spaces for communities to gather.
- Provide attractive, interesting, and well used public realm and open spaces.
- Ensure that services and facilities are physically integrated with residential and employment areas, clustered to optimise accessibility and usage.
- Formulate a strategic policy to tackle the dog waste problem. Provide specifically designed bins at locations with persistent problems and risks to public health.
- Provide burial grounds for all faiths and none. Eco-friendly "natural" burial grounds and columbarium's should also be provided.

Naas

- a. Naas Racecourse area must be preserved for recreational purposes.
- b. Propose a community garden / new park for Jigginstown / Caragh Road location.

Maynooth

- a. Develop a community centre in Maynooth.
- b. A swimming pool is needed for the people of Maynooth and North Kildare.
- c. Address the deficiency of creche places in Maynooth.
- d. Need a performing arts and cultural centre. Suggestion to convert the Fire Station for such a use.

- e. Lack of key amenities such as a community centre, doctors and pool, particularly given the large number of students.

Leixlip

- a. Designate a site of cultural development at The Wonderful Barn.

Celbridge

- a. Inadequate community facilities in Celbridge. Require a theatre, modern gym, and swimming pool.
- b. Provide a publicly supported community centre space.
- c. Provide creative, social and support services for young people.
- d. Lack of amenities at present. Further housing developments should not be granted without the provision of additional social and community infrastructure.
- e. Provide additional public parks and open spaces for Celbridge.
- f. There are opportunities in Celbridge e.g. Castletown/ opening lands beside the river Liffey for parks/ amenity.
- g. Continue the protection of Donaghcumper and allow it to become a public amenity.

Newbridge

- a. Give recognition to the social history of Newbridge.
- b. Newbridge needs a community space and facility for children, young people, families, and older people.
- c. Only one playground in Newbridge which is not up to standard.
- d. Given the size of Newbridge, a play facility is required.
- e. A public indoor swimming pool is needed in Newbridge.
- f. Need for teenager facilities in Newbridge.
- g. Need a facility for the non-sporting creative needs of young people in Newbridge, particularly for mental health purposes.
- h. Need additional changing places in Newbridge.
- i. Vision: That a modern, accessible, and usable shared community open area be developed and created that will provide a sustainable recreational, sporting and environmentally friendly public space for use by all the people in Newbridge.
- j. A shared community park (20 acres) is required in Newbridge to include walking and cycling trail, children's playground, two shared sports pitches, a biodiversity area, and maybe fishing and canoeing facilities.
- k. A cultural quarter focused on the Riverbank with cafe spaces, arts exhibitions and the linear park should be promoted.
- l. Consider extending the Linear Park to the opposite bank and to the north of the River Liffey.
- m. Ensure provision of several both outdoor spaces and indoor places for art in Newbridge.
- n. Encourage and facilitate the events sector in Newbridge, whether professional or community based.
- o. A regional cultural centre of excellence dedicated for use by Youth should be established in Newbridge.
- p. Prioritise the completion of the Public Realm project already designed and planned for Newbridge by the end of 2019.
- q. Make culture and creativity more accessible e.g. old library space and building in Newbridge which does not have public access.

Kildare town

- a. Develop a public leisure centre and swimming pool in North East Kildare and Kildare Town.
- b. A public swimming pool is needed in the Kildare area.
- c. Need to create walkways and parking along roads and pathways leading to the Curragh and adjacent to it.

Ballymore Eustace

- a. The new CDP should identify land for recreational zoning.
- b. The community started to develop walking facilities in the area. The new CDP should facilitate and encourage the expansion of such facilities.

Straffan

- a. Need for playgrounds in Straffan and Rathcoffey.
- b. Need additional recreational facilities in Straffan.

Monasterevin

- a. Support the proposed Umeras Peatlands Park as a local and tourist amenity. The park would be an ideal location given its proximity to public transport (train station in Monasterevin only 3km from the site) with links available for walkers and cyclists on the Blueway (linked to Dublin).

Kilcullen

- a. Dedicated youth facility in Kilcullen is needed.

Castledermot

- a. To develop new recreation open space to support tourism/ economic opportunity. Policy suggestion as follows; The lands to the rear of the ruins of the 13th century Franciscan Friary are now zoned open space and recreation and could be opened up to provide accessible open space around the Friary and developed as public park in the heart of the town. This would create a much more attractive setting for the Friary and could be developed with parking facilities for visitors and generate opportunities for vacant shop units to become a café for visitors, tourists as well as the local community

CHIEF EXECUTIVE'S OPINION

Amenity

A number of submissions acknowledge the preparation of the Open Space and Outdoor Recreation Strategy for County Kildare 2021-2031 with a number requesting that this would include a study of old tracks and trails, to consider the inclusion of publicly owned or semi state lands and to investigate the feasibility of encouraging walking and cycling. The Open Space and Outdoor Recreation Strategy for County Kildare 2021-2031 which is currently being prepared with an expected completion date by Q3 2021 will have regard to all of the above and will inform the relevant objectives of the Draft Plan.

The importance of green spaces and amenities, particularly in close proximity to people's homes where walking and cycling can be encouraged has also been highlighted and is especially important given the Covid 19 pandemic of the past year. It also underpins key principles of the NPF and RSES in relation to compact and sustainable development.

As the need for outdoor spaces increases, consideration must also be given to the provision of high quality, well located seating, well designed and appropriately located bicycle parking, litter/waste bins, toilets/changing facilities in appropriate locations as well as parking areas, while all the while promoting the use of more sustainable modes of transport instead of the private car. The CDP will

encourage these facilities ancillary to the provision of amenity spaces at accessible and sustainable locations, while having regard to the relevant requirements in terms of protection of the environment

There have been numerous requests for a wider and better range of social infrastructure and community facilities including open spaces (in a range of sizes), outdoor gym equipment, sports grounds, sports centres (with a particular request for a Sports Centre of Excellence in Kildare), swimming pools, playgrounds (both formal and natural), teen recreation spaces and walking trails. The Draft CDP will support and make provision for an increase in the quantum of social infrastructure and community facilities in tandem with new development in accessible and sustainable locations.

There have also been requests through a number of submissions for improvements to our library services, provision of Arts Centres (with a particular request for such a centre in North Kildare), community centres, cultural spaces, allotments, community gardens, community orchards and an attractive public realm. At one of the youth workshops during the public consultation it was suggested that vacant buildings be brought back into use for the community. All of the above are noted and agreed. Such proposals would serve to enhance and improve the existing community services and facilities throughout the county. The Draft CDP will encourage all such facilities at appropriate locations particularly where they encourage the use of sustainable modes of transport.

The physical integration of social and community facilities with existing and planned residential and employment areas is a key part to the overall success of new communities and the operation of these facilities in order to encourage ease of movement between such areas.

It should also be noted that the Local Area Plans will, through the preparation of their accompanying Social Infrastructure Audits, provide more detail at a local level in relation to the types and locations of community and social facilities that should be provided in any given town to meet the existing and projected needs of the population of those towns and can zone lands appropriately to accommodate such facilities.

One submission highlighted the need to provide for burial grounds that are eco-friendly in nature. The Draft CDP will include objectives that relate to burial grounds and in so doing will have regard to the specific request as raised in this particular submission.

In relation to standards for open space it was considered that the current standards are outdated. The Draft CDP will be informed by the Open Space and Outdoor Recreation Strategy for County Kildare 2021-2031 that is currently being prepared. The Strategy may make recommendations to amend the current open space standards.

There are specific requests for facilities in a variety of towns and villages throughout Kildare. Having regard to the nature of these requests it is considered more appropriate that the details relating to same would be forwarded to the Local Area Plan team for their consideration as the various Local Area Plans are being prepared. The issue however that is considered sufficiently strategic and that merits further consideration as part of the CDP is that of the perceived need for a swimming pool in North Kildare.

CHIEF EXECUTIVE'S RECOMMENDATION

Amenity

To include an objective to encourage ancillary facilities associated with amenity spaces that are easily accessible, well designed and appropriately located. Such facilities may include seating, bicycle

parking and litter/waste bins. Toilets/changing facilities and parking areas may also be encouraged at appropriate locations.

To include an objective in the Draft Plan that the feasibility of providing a Sports Centre of Excellence in County Kildare will be considered during the life of the Plan.

To include an objective in the Draft Plan to support an increase in the quantum of social infrastructure and community facilities in accessible and sustainable locations.

To include an objective in the Draft Plan to encourage the provision and extension of community facilities including library services, arts centres, community centres, cultural spaces, allotments, community gardens and community orchards at appropriate, accessible and sustainable locations.

To include an objective in the Draft Plan to promote the physical integration of social and community facilities with existing and planned residential and employment areas.

To include an objective in the Draft Plan to consider the provision of eco-friendly burial grounds at appropriate locations.

To review the existing open space standards having regard to the recommendations and outcomes of the emerging Open Space and Outdoor Recreation Strategy for County Kildare 2021-2031.

To include an objective to investigate the feasibility of a regional swimming pool in North Kildare.

3. Requirements for new developments

Submission Nos. 018, 033, 171, 180, 196, 199, 202, 217, 274

- a. Recreational amenities should be incorporated into development proposals e.g., walking trails, water features, wildlife gardens.
- b. New developments need higher standards of public space, particularly playgrounds.
- c. Include, childcare, shops, and pubs with new estate permissions along with other social requirements such as halls.
- d. Housing developments must be delivered concurrently or after development of local infrastructure and amenities.
- e. Delivery of schools and community infrastructure alongside residential development is an essential component of placemaking.
- f. Greater investment is needed in the provision of amenity, sport, and recreation facilities for all ages. This does merit a review of the priorities set out in the Development Contributions Scheme.
- g. Request for reduction in the 15% of open space provision where significant green infrastructure is provided and where there is already Open Space zoning within the footprint of a scheme. A reduced figure of 7.5% open space is recommended.
- h. Nursing homes / residential care facilities should include proposals for gardens and recreational activities.

CHIEF EXECUTIVE'S OPINION:

Requirements for new Developments

Sustainable development has also been highlighted in a number of submissions. In this regard there are specific requests to incorporate recreational amenities into development proposals in the form of walking trails, water features and wildlife gardens. Such suggestions are very welcome and reflect the direction for the overall development strategy for the CDP with respect to its climate change goals, specifically in relation to biodiversity, green infrastructure and natural water retention measures including SuDS. The Draft CDP will be fully supportive of such measures.

The provision of social and community facilities in parallel with new developments is also considered a key part of housing schemes in particular. There are mixed views in terms of the quantum of public open space to be provided with requests to review upwards and others to review downwards the current requirements for the quantum of open space. Community facilities including playgrounds as well as suitably sized schools to accommodate projected population growth are all considered essential components of placemaking, are a key objective of the RSES and will be fully supported through the policies and objectives of the Draft CDP.

A review of the Development Contribution Scheme is also requested to reconsider the levels of expenditure on amenity, sport and recreation facilities in particular.

In relation to nursing homes and residential care facilities a number of submissions request that proposals for such uses would include gardens and recreational activities which will also be supported through the objectives of the Draft CDP and would greatly enhance the quality of life of the residents of these facilities.

CHIEF EXECUTIVE'S RECOMMENDATION

Requirements for new Developments

To include objectives in the Draft Plan to support the integration of features such as walking trails, water features and wildlife gardens into development proposals where possible.

To include objectives in the Draft Plan to require the provision of playgrounds in housing schemes where such facilities are not already provided within easy walking distance of such developments.

To continue to liaise with the Department of Education in relation to the location and expansion of educational facilities throughout the county.

To consider the inclusion of an objective in the Draft Plan to require the provision of suitably sized, well located, well designed and easily accessible gardens and recreational areas as part of development proposals for nursing homes and residential care facilities.

4. Sports Clubs

Submission Nos. 089, 097, 111, 116, 188, 300, Public Meetings

- A more suitable airfield site needs to be identified for the Gliding Club.
- Naas GAA is becoming increasingly landlocked by housing development and is serving a huge membership on an insufficient footprint which must be addressed.
- Provision should be made for sports clubs in towns and villages, and multi-sports campus accommodation.
- Support the development of a second playing pitch and running track for Castledermot GAA.

- Straffan AFC needs a space for a community facility of 5 acres to incorporate a community playground/recreational facility and soccer club.
- Community clubs should be encouraged to use shared facilities.
- The issue of pitches and space is an issue for many clubs across the county.
- Lots of clubs have old buildings that are no longer adequate e.g. Monasterevin.

CHIEF EXECUTIVE'S OPINION:

Sports Clubs

There is a recognised shortfall in the quantum of land that presently exists for a number of our sporting organisations throughout the county. As part of the Open Space and Outdoor Recreation Strategy for County Kildare 2021-2031, consultation has taken place with a number of stakeholders in this regard. The Open Space and Outdoor Recreation Strategy for County Kildare 2021-2031 will inform the emerging amenity and open space policies and objectives in the CDP.

CHIEF EXECUTIVE'S RECOMMENDATION

Sports Clubs

To have regard to the Open Space and Outdoor Recreation Strategy for County Kildare 2021-2031 (due to be finalised in c. Q3 of 2021) which will inform the emerging amenity and open space policies and objectives in the CDP.

5. Education

Submission Nos. 011, 032, 036, 037, 044, 045, 059, 063, 069, 074, 083, 089, 118, 119, 130, 143, 162, 166, 184, 193, 196, 198, 204, 211, 220, 224, 229, 251, 272, 274, 300

- Undertake a full needs assessment to ensure adequate supply of schools and childcare places in Kildare to meet demand.
- Support the provision of school accommodation and the already identified proposed developments of the DES by means of an appropriate zoning and/or by a Specific Local Objective on the subject sites.
- Facilitate the provision of good quality and accessible childcare infrastructure at appropriate locations.
- Include buffer zones and land use designations that support education development adjacent to existing and established schools (to facilitate potential future expansion).
- Ensure educational zones are adequate to incorporate primary, secondary, and childcare as an option with amenity facilities.
- Consider potential synergies with adjacent public (and commercial) facilities in the siting of schools or vice versa.
- Consider school requirements as part of phased development of lands.
- Childcare needs to be factored into the planning of large estates. Childcare facilities, public parks and community centres should be imposed as planning conditions for developers as part of phase one or within the first 50% of houses.
- Include additional levy option to support childcare provision as an alternative to requiring a unit for every 70 dwellings.
- Consider a third level institute at the Bord na Mona HQ.

- A Training Facility for Healthcare Assistants should be established in association with the HSE.
- Support for the urban-design of schools, as per the DES guidelines, in particular measures to facilitate reduced onsite parking and set-down and to support access to off-site public amenities and facilities.
- Note the DES' current Technical Guidance Documents on school site identification and suitability assessment (TGD 25 and TGD 27) on www.education.ie.
- Support the development of wider infrastructure and amenities objectives for schools.
- Invest money in swimming lessons for secondary school students and equip Transition Year students with proper lifesaving rescue skills.
- Support schools that teach through the medium of Irish.

Naas

- a. Include additional education campuses within the Naas environs to encourage students to walk or cycle to school.

Maynooth

- a. Appropriate educational facilities urgently needed in Celbridge and Maynooth. Prefab schools are not appropriate.

Celbridge

- a. Celbridge needs facilities for childcare facilities and schools.
- b. Require 3 new schools in Celbridge.
- c. No permanent school building at Hazelhatch.

Newbridge

- a. Need additional schools in Newbridge.
- b. A new secondary school are urgently required.
- c. Undertake a feasibility study to establish a Research Institute at St. Conleth's Square / Bord na Mona Complex Newbridge (to research how farmland/peatland can be transformed).

Kildare town & Curragh

- a. Need a new secondary school in the Curragh and Kildare Town.

CHIEF EXECUTIVE'S OPINION:

Education

The need for an adequate supply of educational facilities to meet existing and planned population growth in Kildare has been a recurring theme among the submissions received. It should be noted that Kildare County Council has an established and regular link with the Department of Education and Skills in order to ensure that the existing and planned growth for the county is continually provided for with respect to educational requirements in accordance with the Memorandum of Understanding (MoU) with the County and City Managers, Association (CCMA) on the acquisition of sites for new schools. KCC will continue to liaise with the DoES in this regard. While the Local Area Plans have a particular role in relation to the identification of sites for educational purposes it is

important that the Draft CDP would include an overarching policy/objective to support the continued expansion and provision of educational facilities along with their ancillary amenity areas. It has been recognised that it may sometimes prove difficult to provide the required quantum of supporting amenity spaces for educational facilities, particularly where schools occupy central locations in towns and villages. In this regard the Department of Education has put forward the suggestion of exploring synergies with adjacent public (and commercial) facilities in the siting of schools. The Draft CDP would support such an approach where possible as it would provide for a more efficient use of such amenity spaces.

The establishment of a third level institute at the former Bord na Mona headquarters in Newbridge has been suggested in a number of submissions. Other uses have also been proposed for this site under various other themes in this report. It is considered reasonable that the Draft CDP would explore potential opportunities for this central location in Newbridge in consultation with Bord na Mona, through the review of the Newbridge Local Area Plan.

A number of specific suggestions have been put forward for Naas, Maynooth, Celbridge, Newbridge and Kildare Town/Curragh. However, the role of the CDP is to provide strategic direction in relation to the future development of these settlements. Details regarding specific sites are more appropriately addressed through the Local Area Plan process.

CHIEF EXECUTIVE'S RECOMMENDATION

Education

To include an objective in the Draft Plan to support the continued expansion and provision of educational facilities along with their ancillary amenity areas both at primary and post primary level throughout County Kildare.

To include an objective in the Draft Plan to support proposals for educational facilities where the associated ancillary amenity spaces could be shared with nearby existing or planned facilities.

To include an objective in the Draft Plan to explore potential opportunities for the location of further third level institutes in the County.

6. Health Services

Submission Nos. 074, 162, 193, 301

- Develop a Centre of Excellence to provide a range of care from Home Care, Day care, Independent Living, Primary and Acute care, Short and Long-term Care all, co-located on one site.
- There is a need for step down, convalescent and transition care as well as specialist long term dementia care.
- Day centres should be located close to Gerontology Centres.
- Develop a Palliative Care Centre in North Kildare.
- Primary Care Centre required for Maynooth.
- Celbridge needs facilities for medical practices.

CHIEF EXECUTIVE'S OPINION:

Health Services

A number of submissions include requests for various types of healthcare facilities throughout the county including a Centre of Excellence for a range of healthcare, step down, convalescent, transition care, specialist long term dementia care, day centres, palliative care centres, primary care centres and medical practices.

While the CDP does not have a role to play in the construction or operation of healthcare facilities it can, through its policies and objectives support the provision of such healthcare facilities in appropriate locations where they can be easily accessed and where sustainable modes of transport can be promoted, where possible.

KCC welcomes engagement with health service providers to ensure that the medical requirements of our citizens are met and will consider the need to zone lands to accommodate any necessary health care facilities generally through the relevant Local Area Plan processes under which the HSE are a statutory consultee.

CHIEF EXECUTIVE'S RECOMMENDATION

Health Services

To continue to engage with healthcare providers to ensure that the necessary health care facilities are provided to meet the existing and planned population growth of our county and to zone lands accordingly through the relevant Local Area Plan processes.

7. Emergency Services

Submission Nos. 037, 119

- a. Celbridge needs an ambulance and fire brigade. (possibly on the ring road). A 24-hour Garda Station is also needed.

CHIEF EXECUTIVE'S OPINION:

Emergency Services

The suggested need for an ambulance, fire station and garda station in Celbridge has been noted. The role of the CDP is limited in this regard however, the Draft Plan, through its policies and objectives it can support the provision of emergency services in appropriate locations.

CHIEF EXECUTIVE'S RECOMMENDATION

Emergency Services

To support the provision of emergency services in appropriate locations where they are easily accessible.

8. Active Travel

Submission Nos. 017, 018, 033, 113, 192, 202, 207, 211

- Expert guidance is needed on an increased number of well planned, easily accessible walking and cycling routes that consider environmental sensitivity, interconnectivity of recreational resources in towns and villages with housing developments.
- Attract people to use active modes of travel for short journeys (less than 5km) by providing high quality infrastructure (i.e., wider footpaths).
- Dedicated direction arrows on paths need to be replaced and repainted regularly.

- Increase permeability through housing estates and open spaces.
- Shared paths should not be an option for pedestrians and cyclists on main roads.
- Provide a path/cycleway between Newbridge and Athgarvan.
- Lack of cycling routes from residential areas to schools, poorly maintained footpaths, a lack of safe crossing points and a lack of traffic calming measures in Naas.
- Schools should be fully accessible to pedestrians and cyclists from surrounding areas and the promotion of private car use needs to stop.

CHIEF EXECUTIVE'S OPINION:

Active Travel

The submissions highlighting the importance of promoting easily accessible, well designed and safe walking and cycling routes that connect social, community and recreational facilities with housing developments and places of employment are noted. The submissions suggesting that there is a need to support and encourage active modes of travel for short journeys and the need to make housing estates as permeable as possible in order to shorten walking and cycling journey times are all very welcome and fully align with the concept of compact and sustainable growth and healthy placemaking as set out in the RSES. The Draft CDP will be fully supportive of these same concepts through its policies, objectives and where appropriate through the Development Management Standards

CHIEF EXECUTIVE'S RECOMMENDATION

Active Travel

To include objectives in the Draft Plan that promote easily accessible, well designed and safe walking and cycling routes that connect social, community and recreational facilities with housing developments and places of employment.

To include objectives in the Draft Plan to support and encourage active modes of travel in order to encourage the modal shift

To include objectives in the Draft Plan to support and encourage permeable housing developments, for walkers and cyclists in particular.

9. Greenways and Blueways

Submission Nos. 017, 036, 076, 094, 192, 194, 203, 220, 246, 248, 249, 252, 254

- The development of the Naas/Sallins Greenway is welcomed.
- A walking or trail plan for Ballymore Eustace and its environs should be established that will protect rights of way and establish new links.
- Support the planned park in Sallins and the greenway.
- Aim to increase the linkages between Kerdiffstown Park, the planned park at Sallins, the Greenway, and improved utilisation of the canal as a Blueway between Naas and Digby Bridge, ultimately heading for the river Liffey.
- A Greenway instead of the proposed Gallops Avenue route (which prioritises car use) would improve permeability.
- Monasterevin to be recognised as the Blueway 'arrival town'.

- The Blueway between Monasterevin and Rathangan should be recognised as a strategic tourism area in the CDP.
- Recognise the importance of the Barrow Blueway scenic and amenity route.
- Access to green and blue spaces should be available for all residents.

CHIEF EXECUTIVE'S OPINION:

Greenways and Blueways

The suggestion for a walking route in Ballymore Eustace has been raised in a number of submissions received. The Open Space and Outdoor Recreation Strategy for County Kildare 2021-2031 is currently being prepared which is due to be completed by Q3 2021 and will inform the future development strategy for the County.

The support for the Naas/Sallins Greenway and the planned park in Sallins has been noted as too has the suggestion that linkages should be created between Kerdiffstown Park and the planned park at Sallins.

Submissions regarding access to blueways and greenways being accessible for all residents will be fully supported in the Draft CDP.

CHIEF EXECUTIVE'S RECOMMENDATION

Greenways and Blueways

To include objectives in the Draft Plan to consider ways of improving linkages between Kerdiffstown Park and the planned park at Sallins.

To include objectives in the Draft Plan to ensure blueways and greenways will be fully accessible to all

10. Social inclusion and equality

Submission Nos. 005, 018, 023, 058, 069, 070, 072, 113, 127, 130, 141, 166, 171, 186, 197, 198, 202, 203, 211, 232, Public Meetings, Youth Workshop

- Take note of EMRA Guiding Principles & related RPOs for Healthy Placemaking as set out in Section 9.4 of RSES & RPO 9.2 when planning for diverse needs.
- Include the KCC Access Strategy vision.
- Designing age friendly urban environments (street lighting, footpaths, roads, public seating).
- Designate spaces in every village/town for use by both young and older people.
- Ensure that all facilities are accessible to all.
- Explore ways to make communities more inclusive.
- Provide dementia friendly signage.
- Incorporate Alzheimers care into community facilities.
- Open spaces, parks and outdoor dining spaces should be multifunctional and not exclusively used by any one group i.e., suitable for the elderly, disabled and visually impaired communities.
- Ensure inclusion of older people, disabled people, and people for whom English is not a first language.
- Greater connectivity to services for disabled people.
- Conduct an accessibility audit throughout the County.
- Promote the highest levels of universal accessibility in all new and existing community facilities. Promote community gardens using a universal design, accessible to all, approach.

- Promote Kildare as a youth and age friendly county. The development of a dedicated youth facility which would also incorporate KYT and Jigsaw is most desirable as Kildare has a very young population profile.
- Develop a directory or interactive map illustrating details of the accessibility of amenities, public buildings, and recreational facilities throughout Kildare.
- Include objectives to celebrate diversity.
- Towns should be developed from the perspective of our most vulnerable users.
- Include an objective on equality proofing the CDP and all planning related proposals or policies.
- Opportunity to create clusters of liveaboard communities to include basic services reflecting current and projected demand.
- Age friendly buildings should be promoted.
- Need for age-related facilities in each area i.e., playgrounds, swimming pools and community centres/halls.
- Establish consultation processes that seek to hear from diverse voices and understand specific challenges and needs.
- Wheelchair accessible ATMs are required in Newbridge.
- Facilities are not accessible (i.e., tennis courts on school properties are not accessible outside school hours or if you are not a member of a club)
- Child-friendly public spaces are needed that are accessible, inclusive, and conducive to play. The new CDP should reflect the importance of play for children. Playful urban design and landscaping creates an attractive, creative environment for all ages.

CHIEF EXECUTIVE'S OPINION:

Social inclusion and equality

The need for environments that are age-friendly, that are fully accessible to people of all abilities and disabilities and that support social inclusion has been a common theme in a number of submissions received. KCC is particularly mindful of the needs of all of its citizens and to this end has included age friendly and social inclusion policies and objectives in recent Draft Local Area Plan publications including for Athy and Naas. It is intended that similar policies and objectives would be included in the CDP to address the concerns and issues raised in this regard.

CHIEF EXECUTIVE'S RECOMMENDATION

Social inclusion and equality

To include policies and objectives in the Draft Plan to that promote environments that are age-friendly, that are fully accessible to people of all abilities and disabilities and that support social inclusion.

11. Co-location of complementary facilities

Submission Nos. 089, 143

- Need a zoning for complementary facilities such as childcare and retirement centres or childcare and schools.
- Retirement facilities should be convenient for residents to access to allow independent living.

CHIEF EXECUTIVE'S OPINION:

Co-location of complementary facilities

The suggestion of co-locating complementary facilities such as childcare and retirement centres or childcare and schools has been noted however, such uses would normally be permitted within the relevant land use zone e.g. community or educational zoned lands. The CDP would however support the inclusion of an objective to particularly welcome the co-location of such complementary facilities which would enhance the concept of healthy placemaking in particular.

CHIEF EXECUTIVE'S RECOMMENDATION

Co-location of complementary facilities

To include an objective in the Draft Plan that supports the co-location of complementary facilities at appropriate locations particularly where they are centrally located and promote the use of sustainable modes of transport.

12. Funding

Submission Nos. 171, 180, Public Meetings

- The main source of funding is the rural regeneration fund and the urban regeneration fund. KCC need to look at the different funding opportunities (i.e., Funding from Europe).
- Could social Infrastructure be based on per capita funding.
- Include strong policies on development of open space and recreational facilities and capacity building to source adequate resources and capital funding for public open space and recreational facilities.
- Allocate a portion of development levies to funding play spaces in town centres and public parks.

CHIEF EXECUTIVE'S OPINION:

Funding

A number of submissions have referenced funding sources particularly in relation to how funding could be better distributed for the provision of social infrastructure, open spaces and recreational facilities including play spaces and public parks. While the CDP itself does not determine how funding is calculated or where funding is allocated it should be noted that Kildare County Council has had significant success in obtaining funding through a variety of sources including URDF, RRDF and LPT and will continue to seek funding through the various funding streams that become available during the life of the Plan. In relation to how funding could be better distributed to improve open spaces and amenities in particular it is anticipated that the Open Space Strategy which is currently being prepared and expected to be published in Q3 2021 will make recommendations in this regard which would in turn inform the review of the Development Contribution Scheme.

CHIEF EXECUTIVE'S RECOMMENDATION

Funding

To ensure that any recommendations from the Open Space and Outdoor Recreation Strategy for County Kildare 2021-2031 in relation to funding for provision of open spaces and amenities are considered in the review of the Kildare County Council Development Contribution Scheme.

To include an objective to seek funding through the various funding streams that become available during the life of the Plan

13. Revitalise town centres

Submission Nos. 034, 067, 073, 186, 196, 229

- A Town-Centre first policy is a positive framework for ensuring that all communities feel welcome and can equally access services and facilities.
- Acknowledge the importance of outdoor spaces e.g. Poplar Square in Naas and Market Square in Kildare town.
- Town centres need to be walkable and not dominated by cars.
- A one-way system is proposed for Naas town which could provide a larger open space in Poplar Square while returning some parking spaces for those who are less mobile.
- Provide pedestrian space and market/cultural event space.

CHIEF EXECUTIVE'S OPINION:

Revitalise town centres

The revitalisation of our town centres has emerged as a common theme in a number of submissions. In this instance, considerable importance is placed on the provision of outdoor spaces e.g. Poplar Square in Naas and Market Square in Kildare Town as well as the need for town centres to be walkable and pedestrian friendly. The CDP fully supports the revitalisation of our town and village centres particularly where they are easily accessible and promote cycling, walking and sustainable modes of transport. The continued improvement of our town centres through the enhancement of our public realm will continue to encourage increased footfall and contribute to increased local spending.

Particular cognisance will be placed on policy objectives outlined in the National Planning Framework (2018) under National Planning Objectives 6 and 7 and the Regional Spatial and Economic Strategy (RSES) 2019 – 2031 for the Eastern and Midland Region. In this regard, the Draft Plan will be required to apply a tailored approach to urban development with a particular focus on urban and town centre regeneration. It is therefore critical that the Draft Plan sets out a series of objectives and actions to ensure the vibrancy and vitality of Kildares town and village centres, in addition, ensuring that there are no provisions in the Draft Plan would act to further undermine the already fragile state of town and village centres in Kildare.

CHIEF EXECUTIVE'S RECOMMENDATION

Revitalise town centres

To include a series of objectives and actions in the Draft Plan to support the revitalisation of our town and village centres particularly where they are easily accessible and promote cycling, walking and sustainable modes of transport.

To continue to support public realm enhancement measures throughout the county.

14. Sustainable Travel

Submission Nos. 017, 018, 113, 130

- a. Need for age-friendly public transport.
- b. Provide public transport linkages to health facilities and personal social services.
- c. Accessible sustainable transport methods should be encouraged.
- d. Reliance on private car travel should be reduced.

- e. Promotion of the integration of the Rural Transport Programme with other local transport services.
- f. Need better transport in Newbridge.
- g. Adequate road space is needed for electric scooters to travel safely without harming pedestrians.
- h. Every school needs a school travel plan to encourage students to take alternatives to the car and to develop safe walking and cycling routes including providing for disability access.

CHIEF EXECUTIVE'S OPINION:

Sustainable Travel

A separate theme titled 'Sustainable Mobility' (See Section 4.4) addresses the issues raised above in a more detailed manner however in relation to 'Creative Places' it is acknowledged that age-friendly public transport and public transport linkages to facilities and services are key to healthy placemaking. While the CDP itself has a limited role in addressing such issues it will, through its policies and objectives, promote sustainable transport methods at all times.

CHIEF EXECUTIVE'S RECOMMENDATION

Sustainable Travel

To include objectives that support sustainable modes of travel.

CHIEF EXECUTIVE'S ADDITIONAL RECOMMENDATION FOR THEME 5 'CREATIVE PLACES'

In relation to all of the recommendations in the '*Creative Places*' theme, the CDP will include targets against which to measure progress in order to ensure that we can achieve net zero emissions by 2050.

4.6 Enhanced Amenity & Heritage: Landscape & Green Infrastructure

Statutory Authorities

Most refer to Biodiversity, Green Infrastructure, Heritage, Tourism and Amenity as key considerations in the development of the strategic objectives of the County Development Plan. Specific reference is made to the following documents:

- National Planning Framework (NPF)
- Eastern Midlands Regional Economic and Spatial Strategy (RSES)
- (Draft) Heritage Ireland 2030
- Climate Change Sectoral Adaptation Plan for the Built and Archaeological Heritage (2018)
- Government Policy on Architecture 2009-2015
- Guidance Notes for the Appraisals of Historic Gardens, Demesnes, Estates and their Settings (Cork County Council, 2005)
- (Draft) Built Vernacular Strategy
- National Policy on Architecture (pending)
- Catchment Flood Risk Assessment and Management (CFRAM) Programme
- Flood Risk Management Plans (FRMPs)
- County Kildare Biodiversity Plan 2009-2014
- National Biodiversity Action Plan
- National Peatlands Strategy and the implementation of the National Raised Bog Special Areas of Conservation Management 2017-2022
- Guidelines on the Planning System and Flood Risk Management (DHPLG/OPW, Nov 2009)
- EC (Birds and Natural Habitats) Regulations, 2011-2015
- Regulatory framework established under the Forestry Act 2014
- National Landscape Strategy 2015-2025

In brief:

Department of Culture Heritage and the Gaeltacht (DoCHG): Nature Conservation, Biodiversity, Peatlands, Wetlands, Waterways, Green Infrastructure, National Monuments, Archaeology, Burial Grounds

Eastern Midlands and Regional Assembly (EMRA): Green Infrastructure, Heritage, SuDS, Renewable Energy

Office of Public Works (OPW): Flood Risk Management, Heritage

Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media: Climate Change, NIAH, Built Vernacular Architecture, Architectural Conservation

Faite Ireland: Greenways and Blueways, Sustainable Tourism

Department of Public Health: Biodiversity

Geological Survey Ireland (GSI): Heritage

Meath County Council: Heritage, Tara Complex, Tulus Columbanus Walking Route, Consultation with Meath CDP, and Draft CDP regarding Protected Views, Prospects, and Structures.

An Coillte: Forestry, Recreational Facilities, Landscape Character Assessment, Tourism

An Taisce: Biodiversity, Urban Greening, Protection of Heritage (i.e., structures, ACA's, and Landscapes)

Health Services Executive (HSE): Green Spaces, Biodiversity

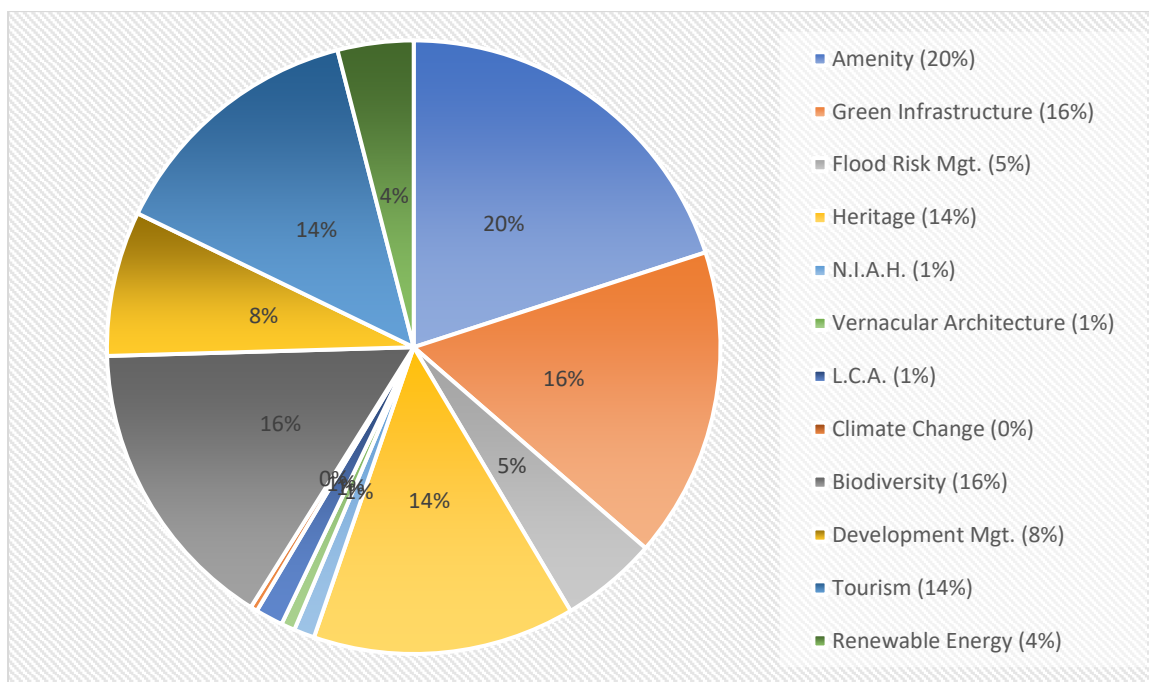


Fig 6 – Breakdown of submission type received in relation to 'Theme 6 – Enhanced Amenity'

ISSUES

1. Amenity

Submission Nos. 012, 013, 018, 024, 027, 028, 032, 033, 034, 036, 037, 039, 049, 063, 071, 072, 086, 089, 094, 096, 097, 101, 102, 103, 106, 108, 118, 130, 131, 136, 137, 142, 143, 144, 155, 162, 166, 177, 180, 184, 185, 186, 190, 193, 197, 198, 202, 203, 221, 225, 235, 242, 256, 261, 292

- Consider developing the **Donaghcumper Demesne as an amenity/green space** such as a Liffey Valley Heritage Park.
- Consider a strategic plan to **open up land at Castletown** for enhanced amenity.
- Facilitate the installation of **directional signage for Castletown** on the County's main roads.
- Potential for a National Park amenity** by uniting Coillte woodlands, Bord na Mona boglands, and the Canal walkways.
- Public **amenity spaces** could be developed **around our rivers**.
- Provide **properly surfaced parking facilities** for the Curragh with sensitively designed and placed physical barriers.
- Maintain the fencing and buildings in the Curragh** camp area.
- Interpretive Centre in a local town** with satellite information points of the Curragh.
- Signage to promote the desired behaviours** of visitors accessing the Plains.
- Removal of kissing gates, parking barriers and poles in car parks** of natural heritage amenities which prevent access of wheelchair users and their vehicles.
- Provide for **outdoor dining spaces** during the summer months by taking up parking spaces.
- Complete **parklands and amenity open spaces** around the county.
- Link Odium's and Oldtown estate in Sallins and the new school in Millennium Park as a **family friendly cycleway**.

- n. Integrate safe routes for children to and from schools using canal pathways and reopening links that allow car free safe routes for commuters, students and walking families or runners, joggers.
- o. Walking routes should be planned through estates linking estates.
- p. Build pedestrian through road from Naas to Sallins.
- q. **Preserve and maintain the Naas and Corbally branches of the canal** for recreational purposes.
- r. Objects to bus route / station developed at the Harbour and along the canal.
- s. Provide designated areas for **general/recyclable/green waste sorting** at a minimum.
- t. Vacant Protected Structures could be used as **Working Hubs**.
- u. Plan for increased usage at the Canal e.g. **extending pedestrian-only access**.
- v. Provide **greater access to amenities**: Explore other sites such as Boora Bog in Offaly; Expert guidance needed on walking and cycling routes; Education to cover information about habitats; Information about active transport.
- w. Provision of **allotments/community supported agriculture** in every town.
- x. A **5km walking trail around the village of Ballymore Eustace** is expected to be delivered in 2021. Support further operation and maintenance of this 5km walk and ensure IW and DCC provide their share of community to the area.
- y. Increased **importance of readily available open green spaces**, including cycle paths and walking linkages between estates.
- z. Ensure lands are made available for the creation of public sports and leisure facilities, multi-use sports fields and flexible outdoor recreation spaces for both individual and group use. Facilities should be fully accessible to people of all abilities. Must be within walking / cycling distance of developments and commensurate with level of new residential development. Improve lighting and walking surfaces
- aa. Enhance and provide further open / green spaces and recreational infrastructure in towns and villages and throughout the county (i.e., walking trails at Moore Abbey and Mullaghreelan Wood, recreation facilities at Donadea Forest Park).
- bb. Remove fencing barriers in upland areas that hinder access. List and map public rights of way and encourage the creation of new ones.
- cc. Pedestrian and cycle routes through green spaces should be a key aspect in design and incorporated along green routes. Routes through peatlands should not be limited to tourist and pedestrian use.
- dd. Maintenance of green areas should also be factored in at design with nature-based solutions explored as much as possible. Also designed to mitigate dumping potential.
- ee. Services are required along greenways, canal walks to cater for users. Service blocks and rest areas should be provided at regular intervals along routes. Promote and support boating and water sport enterprises with infrastructure on greenways and blueways.
- ff. Designated parking required at the Curragh to protect Curragh Plains from cars parking on them. A walking / running and cycling route is proposed on the outer ring to protect inner parts.
- gg. Support and protect the recreational and amenity potential of wetlands. Facilitate public access.
- hh. Improve urban open spaces by limiting car usage / traffic in town centres.
- ii. Provide linkages between new and existing parks, greenways, canals, peatways, and blueways via green corridors.
- jj. New theatre / performing arts space for music, drama and arts needed in Celbridge / North Kildare Area.

- kk. Provision of green spaces, edible hedges, community orchards and incorporation of bee and swift bricks in all new residential estates.
- ll. Naas Racecourse must be preserved for recreational purposes as it forms a “Green Lung” for the town of Naas.
- mm. Public Swimming Pool, Youth Centre and Park needed in Maynooth.
- nn. Provide strategic parkland in a traffic free environment in towns and villages to conserve biodiversity and provide an amenity for all ages.
- oo. Segregated cycle and walking track linking Caragh with Millenium Park.
- pp. Explore possibility of developing a walkway around Ballinafagh Lake, Prosperous.

CHIEF EXECUTIVE’S OPINION

Amenity

The importance and value of amenity and open spaces cannot be underestimated and contributes to healthy placemaking and wellbeing, which have become particularly important during the course of the Covid 19 Pandemic. The issues raised cover a multitude of areas that relate to the improvement and enhancement of our amenity spaces including better signage, proper parking facilities, accessible and safe walking and cycling routes to and around amenity spaces, pedestrian only access to certain amenity spaces, designated areas for waste of all kinds. The Draft CDP, through a series of policies, objectives and actions will support the delivery, upgrade and maintenance of these facilities at appropriate locations. The natural diversity of the landscape, coupled with human interaction in the form of introduced features such as hedgerows, woodlands, archaeological monuments, settlements and buildings, all serve to give Kildare its distinctive characteristic landscape. All development which takes place has the ability to impact on this landscape, positively and negatively. It is essential therefore that the landscape is protected and managed in a sustainable and coherent manner.

The provision of outdoor dining spaces, which may be considered in lieu of existing parking spaces was also suggested. This is reflective of public realm enhancement measures that are already in place in the county, most notably in Kildare Town and Naas. It is proposed to continue the roll out of such measures to other parts of the county as funding and resources permit.

There were specific requests for lands at both Donaghcumper and Castletown in terms of their contribution to amenity and green space however it is considered more appropriate that both be addressed as part of any review of the Celbridge Local Area Plan.

The preservation of the Naas and Corbally branches of the Grand Canal for recreational purposes is noted. The opportunity presented by both branches of the canal is acknowledged and it is proposed to include objectives in the Draft Plan to support and maintain these important amenity assets.

The provision of allotments has also been suggested. The Draft Plan will fully support the provision of such facilities where they can be provided in accessible and sustainable locations.

CHIEF EXECUTIVE’S RECOMMENDATION

Amenity

To include objectives in the Draft Plan that support the improvement and enhancement of the County’s amenity spaces including their associated ancillary infrastructure at appropriate locations.

To include an objective in the Draft Plan to preserve and maintain the Naas and Corbally branches of the canal.

To retain and enhance, where necessary, policy AL 1 of the current CDP, in the Draft Plan to facilitate the development of allotments of appropriate scale at locations where sustainable modes of transport can be encouraged.

2. Green Infrastructure

Submission Nos. 002, 005, 010, 012, 014, 015, 017, 018, 024, 033, 038, 048, 047, 049, 056, 058, 071, 072, 094, 096, 108, 109, 132, 144, 166, 175, 185, 186, 190, 192, 193, 194, 202, 204, 208, 221, 225, 228, 235, 239, 242, 261, 274, 292, 299

- a. Opportunities should be sought to **develop pocket parks in our towns**, creating green corridors and chains in our urban centres. Urban greening plans to be put in place for towns i.e., Naas, Newbridge and Celbridge. Preservation of Urban Green Space is paramount. Encourage woodland features e.g., stepped back areas in housing estates adjacent to motorways.
- b. Designate the **Harbour area in Naas** as a park.
- c. Develop a **landscape plan** for the county linked with greenway and blue way projects.
- d. Resources should be devoted to **ensuring negative impacts are avoided** in sensitive areas. (e.g., River Liffey, Barrow, The Curragh, Bog of Allen).
- e. Create **green traffic routes** for humans but also for flora and fauna that encircle and pass-through towns.
- f. **Naas Racecourse** and surrounding area must be preserved as it forms a “Green Lung” for the town.
- g. Prioritise the completion of the **Grand Canal Greenway** and specifically the 4.6 km section on the Dublin-Kildare border.
- h. Focus on the **preservation, management, and maintenance of the Grand Canal**, e.g. improving the walkways. **Grand Canal overflow near Sallins** is in a poor state of neglect and should be restored.
- i. Propose a **community garden / new park** for Jigginstown / Caragh Road location.
- j. **Liffey Valley Strategic Open Space** should be developed and made accessible.
- k. Greenways and Blueways, need a greater **focus on pedestrian and cyclist facilities**.
- l. Green and Blue Areas should be accessible in a nature-friendly and low-emission way.
- m. Promote access for on and off water-based activities and support blueways.
- n. Supports the integration and communication of multiple strands of cultural and natural heritage, particularly through the **implementation of blue and green infrastructural projects** that holistically deal with all aspects of archaeological, built, and natural heritage.
- o. Continue to designate the **Roseberry / Mouds Bog** area as a special area of conservation.
- p. **Management of peatlands** while enhancing biodiversity of protected habitats including species and the natural landscape, e.g. Pollardstown Fen.
- q. **Map, monitor and action a transition plan** for the rail infrastructure currently in place on Bord na Mona bogs and ESB and CIE rail real estate/ greenways/ tourism.
- r. Include maps and **detailed proposals for potential peatways** through the peatland areas.
- s. Work with Bord na Mona and Umeras Community Development to **transform Umeras Bog and the adjacent Coillte land into a Lough Booratye park**.
- t. The **Curragh’s designation** should be changed so that it is afforded protection by law. Outline a **management and maintenance plan for the Curragh** amenity area.

- u. **Develop a community garden** on the land opposite Caragh Court, Naas.
- v. **Provision of green spaces**, edible hedges, community orchards and incorporation of bee and swift bricks in all new residential estates.
- w. In relation to Green Infrastructure: **plant native woodland schemes**; promote education in long-term management of native continuous cover forestry; support sustainable, locally produced food; retain bogs suitable for rewetting in Kildare; identify small woodland schemes in towns and villages that are not required for children to play.
- x. Clear distinction is to be made between GI and greenways, blueways and peatways in the CDP. Such proposals are recommended to be subject to route / site selection process to ensure that impacts to biodiversity and nature conservation issues are avoided.
- y. Objectives in relation to the containment and control of invasive species in the CDP is encouraged with reference to the requirements of the EC (Birds and Natural Habitats) Regulations, 2011-2015
- z. Key strategic assets and valuable economic resources. The local authority should promote a GI and eco-system services approach in the Plan.
- aa. Development of guidance for assessment of proposed land zonings to achieve appropriate riparian setback distances.
- bb. With respect to forestry, have regard to the regulatory framework established under the Forestry Act 2014.
- cc. Support sustainable rural based enterprises such as forestry.
- dd. Deliver “off-road” improved green infrastructure linkages to schools and education campuses in the county with active residential frontages for passive surveillance.
- ee. CDP to continue including the provision of swift boxes or towers and providing links to the wider Green Infrastructure Network. Also like to see provision for house sparrow nests in all new housing developments.
- ff. Consideration given to the protection of nest sites for birds in solar farm developments.
- gg. A tree strategy should be developed, and small woodland areas should be planted. Promote the planting of native woodland schemes.
- hh. Prohibit planting of laurels as replacement for trees and hedgerows.
- ii. Provision of allotments or community supported agriculture in every town.
- jj. Provision of green spaces, edible hedges, community orchards and incorporation of bee and swift bricks in all new residential estates.
- kk. Encourage enhancement / development of green infrastructure.

CHIEF EXECUTIVE’S OPINION

Green Infrastructure

Much importance has been attributed to green infrastructure, particularly in relation to biodiversity, the enhancement of recreational spaces and its contribution towards a greater sense of well being. This in turn contributes to healthy placemaking, a key theme in the RSES. Kildare is extremely fortunate to have a rich and diverse network of green spaces and green infrastructure networks throughout the county from the villages to larger towns and all of the rural areas in between. Now more than ever there is a greater need to properly consider how all of these spaces can integrate with each other and preserve, enhance and encourage the development of ecosystems along their routes. The Draft Plan will be fully supportive of proposals that consider the natural features of the landscape and identify ways of connecting into existing green infrastructure networks. To this end it is considered appropriate that the Draft Plan would include an objective to prepare a Green

Infrastructure Strategy for the county which takes into account such strategies in neighbouring local authority areas which would align with RPO 7.23 in the RSES. This strategy will also take into account Green Infrastructure Strategies and habitat mapping carried out to date, to inform Local Area Plans.

There is a suggestion made in a number of submissions that a clear distinction be made between Green Infrastructure and greenways, blueways and peatways and will be addressed as part of the Draft CDP.

One particular submission requested that consideration be given to nest sites for birds in solar farm developments. In this regard policy SE2 (Chapter 8) of the current CDP states that it is a policy of the Council to ensure that the assessment of solar energy development proposals will have regard to the need to consider ecology so as to avoid or minimise damage on important species or protected habitats. It is considered reasonable that a similarly worded policy would be included in the Draft Plan.

CHIEF EXECUTIVE'S RECOMMENDATION

Green Infrastructure

To include an objective in the Draft Plan to prepare a Green Infrastructure Strategy which aligns with RPO 7.23 of the RSES.

To include a clear statement in the Draft Plan to differentiate Green Infrastructure (GI) from greenways, blueways and peatways.

To include a similarly worded policy to Policy SE2⁵ of the current CDP in the Draft Plan in relation to the consideration of ecology with respect to solar farm proposals.

3. Flood Risk Management

Submission Nos: 002, 005, 007, 028, 038, 044, 049, 109, 141, 142, 167, 168, 186, 194

- a. **Reference should be made to the guidelines** on the Planning System and Flood Risk Management (DHPLG/OPW, Nov 2009) and associated circulars and appendices.
- b. Include **clear commitments and strategic objectives regarding flood risk and the principles** of the Guidelines.
- c. A **sequential approach** to managing flood risk should be considered at the earliest stage, and where uncertainty exists the precautionary approach should be taken, or a more detailed assessment before decisions are made.
- d. The Guidelines set out a three-stage assessment process:
 - Flood Risk Identification
 - Initial Flood Risk Assessment
 - Detailed Flood Risk Assessment
- e. Kildare adopted the **FRMPs in 2018 and the CFRAM programme** included analysis of flood risk in Allenwood, Athy, Castledermot, Celbridge, Clane, Hazelhatch, Johnstown Bridge, Kilcock, Leixlip, Maynooth, Monasterevin, Naas, Newbridge, Rathangan, Suncroft and Turnings.
- f. Regard the proposed development of **flood relief schemes** in Athy, Clane, Leixlip, Maynooth and Newbridge and the ongoing design, planning and implementation of

⁵ 'It is the policy of the Council to ensure that the assessment of solar energy development proposals will have regard to the need to consider ecology so as to avoid or minimise damage on important species or protected habitats'.

flood relief schemes in Lower Morell and Naas, and include a specific objective to do this in the Plan.

- g. The OPW requests that the Plan has full regard to the **protection, and the need for maintenance** of these schemes.
- h. Consider a **register of key flood risk infrastructure** in the new CDP.
- i. Avoid development in **areas potentially prone to flooding** in the future, providing space for future flood defences, specifying minimum floor levels, and setting specific development management objectives.
- j. Ensure that the **access requirements are preserved** for the maintenance of Arterial Drainage Schemes and Drainage Districts.
- k. It is strongly recommended that land should only be zoned for development in accordance with the definition of **appropriate development** as set out in the guidelines.
- l. Proposed new development needs to **avoid increasing flood risk elsewhere**.
- m. Take account of the **opportunities for natural water retention measures** to reduce run-off and provide other benefits such as to water quality and biodiversity.
- n. Flood Relief works: Attenuation, upgrading and repair of existing infrastructure, high quality design of new infrastructure and co-ordination with public realm/recreational amenity in urban centres.
- o. Site opposite Craddockstown Golf Club is an obvious floodplain. The site is zoned for retail / residential development and the council are asked to urgently review this zoning.
- p. Discourage culverting of water courses and encourage re-opening of previously culverted water courses.
- q. Consistency with RPO's in RSES i.e., relating to waste management and the circular economy and bioeconomy.
- r. Protect and enhance wetlands from infilling. Resist development including land reclamation and control adjacent development by using buffer zones.
- s. Support and protect the recreational and amenity potential of wetlands. Facilitate public access.
- t. Incorporate natural overflow areas for the purpose of land buffering at new development lands.
- u. Support an extensive wildlife reserve area in re-wetted and re-claimed boglands in West Kildare. Strategy for peatland areas should be planned to support nature and biodiversity.
- v. Drain blocking and re-wetting be put in place on peatlands.
- w. Prepare and implement management plans for eight SAC's all wetlands.
- x. Retain bogs suitable for re-wetting.
- y. Develop Corbally Harbour with appropriate supporting services, silting of the Corbally line is necessary to increase water supply and R409 culvert needs to be replaced by a bridge to re-open the Corbally line.
- z. Protect inland waterways and biodiversity.
- aa. The guidelines of the Inland Fisheries 'Planning for Watercourses in the Urban Environment' should be implemented as a policy.
- bb. Protect wetland habitat over 2 ha from unauthorised development such as drainage.

CHIEF EXECUTIVE'S OPINION

Flood Risk Management

In accordance with the Section 28 Guidelines on the '*Planning System and Flood Risk Management*' (2009), a Strategic Flood Risk Assessment (SFRA) is being prepared to inform the Draft Plan. This SFRA will particularly inform the Draft Plan with respect to proposed land use zonings and climate action proposals. In relation to specific development proposals, it is important that nature-based solutions are incorporated, where possible.

CHIEF EXECUTIVE'S RECOMMENDATION

Flood Risk Management

To ensure that the Strategic Flood Risk Assessment that is currently being prepared informs the land use zonings, policies and objectives of the Draft CDP in accordance with the Section 28 Guidelines on the '*Planning System and Flood Risk Management*' (2009).

4. Heritage

Submission Nos: 005, 009, 010, 013, 014, 016, 020, 028, 039, 048, 049, 052, 066, 089, 102, 103, 136, 137, 152, 163, 175, 180, 183, 186, 194, 197, 203, 221, 222, 227, 229, 230, 256, 272, 274, 279, 298, 300

- a. **Heritage Ireland 2030 (Draft)** will set out key principles and policies for conserving and managing Ireland's heritage.
- b. The current planning designations of **Castletown Demesne** are welcomed and needs to be strengthened. The Castletown Demesne should be added to the Record of Protected Structures.
- c. Maintain the protection afforded to the **historic vistas of Castletown** towards the Wonderful Barn and Connolly Folly.
- d. Development in Celbridge, should be **sensitive to the wider environment** of the demesne of Castletown.
- e. **Create a Liffey Valley Heritage Park on disused lands along the Ardclough Road** in Celbridge incorporating the Celbridge Abbey Grounds which is linked via the Rockbridge.
- f. **Protect existing corridors and views along the river Liffey.** Submission includes examples of existing unspoilt views and wildlife corridors.
- g. Include policy (Update PSO 4) to **include river views at Celbridge Abbey** owing to the importance of the abbey and its links to Dean Jonathan Swift and Henry Grattan MP.
- h. **Protect the heritage of Tea Lane in Celbridge.** A conservation plan for this site is being implemented in stages by the community.
- i. **Include the current policies and objective** NH 16, NHO 9, NHO 10 and NH 8 in the new CDP.
- j. **CGS 'Rathcore Spring'** had been omitted from Table 13.4 Sites of Geological importance.
- k. Include a policy objective to **protect geological NHAs.**
- l. **Safeguard the planned C18th landscapes** from incremental residential development. The opportunity for making cultural heritage more accessible and better integrated with wider tourism and recreational opportunities are welcomed.
- m. Include objectives to develop **disaster risk reduction policies** addressing direct and indirect risks to architectural heritage.

- n. **Consider concepts of historic urban landscapes** as a collection of buildings at the various scales of settlement, the origins of Irish cities, towns and villages which give rise to their special characteristics.
- o. Promote the development of **heritage-led regeneration**, to plan for the reuse and conservation of core-built heritage and archaeological sites within urban centres.
- p. **Identify, reuse and repair early urban buildings** and support the development of multi-disciplinary practice between archaeologist and conservation experts.
- q. **Promote best conservation practice** and lead by example through the management and safeguarding of historic properties in the ownership of the Local Authority.
- r. Compile core data information about the built and archaeological evolution of historic places to draw on the readily accessible resources such as historic mapping and databases, i.e., **to inform future development strategies** and progress based on an awareness of the cultural significance of a place.
- s. **To co-ordinate significant infrastructural projects** to the benefit of surviving historic sites to improve their enjoyment, presentation, and enhanced accessibility.
- t. The quarrying of the **Hill of Allen** should be stopped immediately as we are allowing our heritage to be destroyed.
- u. **Irish should be widely visible** on road signs and at cultural events throughout the county. Support use of the language daily and include a policy to draw up a blueprint promoting its use.
- v. Irish should be mentioned in the Culture and Heritage section of the County Development Plan. Emphasis that **Irish is a very important** part of the culture of the county.
- w. **Prepare and promote a heritage trail** for visitors, walkers, schools, and local communities and use the library network as a launch venue.
- x. Promote the continued development of the **heritage trails, the canal and harbour areas St David's Castle, Jiginstown Castle**.
- y. A **Cultural Centre** should be developed in Sallins, capital funding is available from central government for 80% of the development cost. It should be easily accessible to visitors on the new greenway along the Grand Canal.
- z. A **Cultural Centre** should be built to promote the Irish language, music, and culture.
- aa. The architectural and **heritage value of the Curragh Camp** is important. Heritage value is being lost but due to its status as a base it is not protected or listed.
- bb. Both of the National Heritage Areas (NHAs) in Kildare are **raised bogs which must be protected and restored**.
- cc. The importance of the **Poulaphouca settlement** should be recognised and the Route Selection Process for the N81 should also recognise the importance of protecting this settlement.
- dd. Utilise the Celbridge Tourism and Heritage Forum to **enhance the natural and built heritage** and to maximise the benefit of its rich historical assets.
- ee. Ensure **quarries/extraction** doesn't damage the built and natural heritage.
- ff. **Restore Carbury Castle** as it has a rich heritage.
- gg. Preserve & protect sites of significant heritage value.
- hh. Lands connected to the former British Army Barracks, in addition to sites such as Great Connell Priory, Connell Ford & the Slighe Dhála, The Hill of Allen and a number of historical (now closed) cemeteries are **heritage assets which are not afforded the levels of protection due to them**.

- ii. Protect historic urban fabric, re-use historic buildings and enhance places of special cultural or natural interest. This will play a positive role in driving economic development / tourism potential. National Monuments must be maintained, and public access should be provided.
- jj. Wrecks of any date and archaeological objects situated under water should be protected under the Act by making of an underwater heritage order.
- kk. Protect historic graveyards by avoiding extensions and finding alternative locations if additional burial space is required.
- ll. Promote and facilitate appropriate forms of access (including disabled access) to archaeological monuments / wrecks.
- mm. The most significant demesnes and landscapes should be identified to maintain and enhance their special character and significance.
- nn. Designate more ACA's and Special Planning Control Schemes.
- oo. Development levies for Protected Structures should be waived to encourage sensitive re-use and adaptation. A pragmatic approach to the adaptive re-use of protected buildings should be used to encourage viable uses with appropriate zonings provided for same.
- pp. Important views and prospects must be protected.
- qq. Protected views, prospects, and structures in the Meath CDP and Draft Meath CDP should be consulted to support nomination of Tara Complex on the World Heritage Tentative list. Heritage Centres of mutual interest to both KCC and MCC include the development of the Tulus Columbanus walking route.
- rr. Preserve, Protect and Enhance Mass Rocks and Holy Wells.
- ss. Formally designate proposed NHA's in the county i.e., Curragh and Royal Canal. Kingsbog Common an orchid rich grassland of high ecological value to be designated as an NHA.
- tt. Naming of estates should be in both Irish and English and open to the public. Exclusive use of Irish language names is encouraged.
- uu. Heritage sites like Dun Ailinne to be given further protection by protecting the immediate area around the site.
- vv. Agriculture and equine industries also need protection.
- ww. Heritage towns to have a more proactive approach to enhancing heritage i.e., attractive signage, public realm and improving shop fronts.
- xx. Have regard to the unique heritage in Celbridge and protect the historic fabric of the main street.
- yy. Grand Canal overflow at Sallins should be restored for historical, educational, and visual reasons.
- zz. Include the Swift and Vanessa original Bower located on the Liffey Riverbank at Celbridge Abbey to the protected structure list.

CHIEF EXECUTIVE'S OPINION

Heritage

Our rich natural and archaeological heritage is an important component of our society and is recognised throughout the current CDP. There are a number of policies and objectives therein which include the protection of our designed landscapes, preservation of important views, protection of our NHA's, SAC's and SPA's. The Draft CDP will re-emphasise the importance of protecting our natural and archaeological heritage through the review and strengthening of these policies and objectives where required.

There is a specific request in a number of submissions to preserve river views at Celbridge Abbey. This area is current protected by a Historic Designed Landscape objective in the Celbridge Local Area Plan 2017-2023, which recognises its unique and sensitive character. Table 14.5 of the current CDP identifies protected views within County Kildare and a review of these will be undertaken as part of the review of the current CDP.

It was noted that 'Rathcore Spring' has been omitted from Table 13.4 (Sites of Geological Importance) of the current CDP. The merits of including this spring will be considered as part of the preparation of the Draft Plan.

Policies and objectives NH16, NHO9, NHO10 and NH8 are all recommended to be retained which is noted and welcomed.

A number of submissions have highlighted the need for heritage led regeneration and to integrate our heritage into development proposals where possible. Objective AO 3 of the KCDP 2017-2023 seeks the preparation and implementation of heritage led regeneration plans (including the public realm) for the historic core of relevant towns in Kildare. It is considered appropriate to encourage such an approach and this will be expanded to all towns and villages through the policies and objectives of the Draft CDP

Concern has been raised in relation to the impact quarries may have on our heritage. In this regard objective EO3 of the current CDP should be noted which states that it is an objective of the Council *'to ensure that the extractive industry minimises and/or mitigates any adverse visual and / or environmental impacts on the built or natural environment....'*. It is recommended that a similar objective be included in the Draft CDP.

While Kildare does not comprise an official Gaeltacht area it is acknowledged that the Irish language is a part of our cultural heritage and therefore must be protected and enhanced where possible. It should be noted that the current CDP states, with reference to the naming and advertising of new developments, that these *'shall include the use of the Irish language'* (Section 17.4.12). It is recommended that the Draft CDP would include a similar requirement.

CHIEF EXECUTIVE'S RECOMMENDATION

Heritage

To consider the preservation of river views at Celbridge Abbey and inclusion in the "Protected Views of the River Liffey".

To consider the inclusion of 'Rathcore Spring' as a site of Geological Importance.

To retain policies and objectives NH16, NHO9, NHO10 and NH8.

To include objectives in the Draft Plan that particularly encourage heritage led regeneration and that propose the sensitive integration of protected heritage assets as part of all future development proposals.

To include and enhance, where necessary, Objective EO3 of the current CDP or similar in the Draft Plan.

To retain the requirement (as per Section 17.4.12) of the current CDP in relation to the use of the Irish language in the naming and advertising of all new developments.

5. National Inventory of Architectural Heritage (NIAH)

Submission Nos. 010, 196, 234

- a. Protect structures and include them in the RPS where they are of historical/heritage value.
- b. Consider the inclusion of all structures identified by the **NIAH** and recommended in the Record of Protected Structures.
- c. Consider that all such structures be regarded as **Candidate Protected Structures** pending verification by the Council and inclusion in the Record of Protected Structures.
- d. NIAH compiled a record of significant **historic designed landscapes, demesnes, and gardens** throughout the country.
- e. Identify significant historic designed landscapes, demesnes, and gardens for protection under the new CDP.
- f. **Designate Architectural Conservation Areas**, to preserve the character of historic designed landscapes, demesnes, and gardens.
- g. Identify and **protect significant views** to or from such places.
- h. Protect and promote heritage and traditional varieties of plants and trees within our historic designed landscapes, demesnes, and gardens.
- i. **Promote public awareness, enjoyment of and access** to these sites and to seek the co-operation and assistance of other interested parties, including Government Departments and state agencies.
- j. **Promote conservation, renewal and improvement** that enhances the character and setting of historic designed landscapes, demesnes, and gardens.
- k. Require a **detailed appraisal of the potential impacts** of development proposed within or adjacent to these places, or that might affect its setting. A methodology can be found in the Guidance Notes for the Appraisals of Historic Gardens, Demesnes, Estates, and their Settings (Cork County Council, 2005).
- l. Applicants for proposed large-scale developments within these places may be **required to produce 3D Digital Survey Modelling**.

CHIEF EXECUTIVE'S OPINION

National Inventory of Architectural Heritage

The importance of protecting our built heritage is recognised in our current CDP with the Record of Protected Structures and the associated policies and objectives as set out in Chapter 12 being noted in this regard. The RPS is a live document and structures are added on a rolling basis through the procedures pursuant to Section 55 of the Planning and Development Act 2000 (as amended) as the need arises. A structures inclusion on the RPS gives the owners of such properties the ability to apply for funding to assist in the maintenance of these historic structures.

CHIEF EXECUTIVE'S RECOMMENDATION

National Inventory of Architectural Heritage

To include a series of policies and objectives in the Draft Plan that recognise the importance of the County's built heritage and to encourage the sensitive restoration and continued use of these structures.

To include an objective in the Draft Plan to continue to review and amend on an ongoing basis the Record of Protected Structures and make additions, deletions and corrections as appropriate over the period of this Plan.

6. Vernacular Architecture
Submission Nos. 010, 261

- a. **Include vernacular buildings**, in addition to significant buildings which are worthy of inclusion on the RPS.
- b. **Address the incremental damage and cultural loss** of settlements and their settings due to the lack of awareness, vacancy, and demolition.
- c. **Encourage the sustainable reuse of existing building stock**, whether such buildings have protected status, and particularly pertinent to vernacular architecture.
- d. Recognise that **vernacular buildings are characteristic of our local communities**.
- e. Promote the appropriate **rehabilitation, revitalisation, and reuse of vernacular buildings**.
- f. Protect, maintain, and enhance the established character and setting of **vernacular buildings**, farmyards, and settlements, including historic gateways, boundaries, and other features.
- g. **Development proposals affecting vernacular buildings** should be accompanied by a detailed measured survey, photographic record and written report carried out by a professional with appropriate conservation expertise and, preferably, an understanding of vernacular buildings. Early consultation with the Planning Authority is strongly advised.
- h. Facilitate appropriate, high-quality design solutions for **adaptations of vernacular buildings** that consider their vernacular qualities in terms of design, scale, setting and finishes. The use of appropriate vernacular features, building techniques and materials should be explored.
- i. Where it is proposed to **extend a vernacular house**, the design, scale, footprint, and materials should be sympathetic to the existing building and its setting. Extensions should generally be located to the rear and not obscure the form or layout of the existing building; substantial removal of walling is not recommended; connecting the existing building and extension should minimise the number of new openings and ideally use existing openings; sometimes an outbuilding contiguous to a dwelling can be successfully incorporated.
- j. Ensure that **developments proposed within or adjacent to vernacular settlements** respect and enhance their spatial character, building forms, features, details, and materials.
- k. Promote the protection and maintenance of **thatched buildings** (domestic or nondomestic), particularly those with historic layers and roof structures. (010)
- l. To maintain an up-to-date record of **thatched buildings**, promote available grant schemes and facilitate engagement with owners in the maintenance of these buildings.
- m. **Protect vernacular settlements** by means of Architectural Conservation Area designation, promote the reuse of disused or unoccupied buildings within them, and ensure that developments proposed within or adjacent to vernacular settlements respect and enhance their spatial character, building forms, features, details, and materials.
- n. **(Draft) Built Vernacular Strategy** support high quality architecture which respects our collective cultural identity and past traditions of building settlement.
- o. The policy will focus on **five key themes**:

- designing for climate resilience and sustainability;
- designing quality spaces for public benefit;
- respecting our past, shaping our future;
- leadership;
- knowledge and innovation.

CHIEF EXECUTIVE'S OPINION

Vernacular Architecture

Section 12.6.1 of the current KCDP includes a series of policies in relation to vernacular architecture and it is considered that these address the concerns highlighted in the submissions received with respect to same. The most relevant policies in this regard include reference to the following:

- the protection, retention and appropriate revitalisation of vernacular structures,
- the resistance of the demolition of thatched cottages and farmhouses and to instead encourage their sensitive reuse,
- the preservation of the character and setting of vernacular buildings including gates, piers and courtyards,
- the inclusion of vernacular structures on the Record of Protected Structures or within Architectural Conservation Areas where such structures contribute to the character of an area
- appropriately designed proposals for extensions to vernacular buildings so that they do not detract from the buildings character.

To include and enhance, where necessary, similarly worded policies/objectives in the Draft Plan.

A number of Statements of Character (SoC) for Architectural Conservation Areas in Naas, Athy and Maynooth have been or are currently being prepared. Further SoCs will be prepared to inform LAPs and the Draft Plan to ensure vernacular buildings, where they contribute to the character of areas and/or where they are rare examples of structure type are afforded appropriate protection.

CHIEF EXECUTIVE'S RECOMMENDATION

Vernacular Architecture

To include objectives in the Draft CDP that reflect the current policies identified in the CDP as they relate to vernacular architecture and to strengthen such objectives as necessary.

To continue to prepare Statements of Character (SoC) for Architectural Conservation Areas for towns and villages in Co. Kildare.

7. Landscape Character Assessments

Submission No. 012, 016, 186, 203

- The **protection of the significant/unique landscapes in the Ballymore Eustace area** should be strengthened in the Plan particularly lands adjacent to the River Liffey.
- Recognize the sensitivity of landscape features** and that Ballymore Eustace lies in a beautiful river valley and consider the area to be a landscape character area.
- Reconsider LCA designations. Low, medium, and high sensitivity could be associated with various types of renewable energy.
- The LCA of Meath Co. Co. Draft Plan 2021-2027 should be consulted as they would like the support of Kildare Co. Co. for inclusion of the Tara Complex on the World Heritage Tentative list.
- Include a policy highlighting the European Landscape Convention and objectives to implement the objectives and actions of the National Landscape Strategy 2015-2025.

CHIEF EXECUTIVE'S OPINION

Landscape Character Assessments

Chapter 14 of the current CDP recognises the varying landscape character areas that relate to all parts of County Kildare which is reflected through a range of Maps and Tables that are presented in that Chapter. With regard to Ballymore Eustace specifically, this area is identified as being in the 'Eastern Uplands' landscape character area where it has an associated Class 3 high sensitivity area status. In such areas the landscape is recognised as having a reduced capacity to accommodate particular uses without significant adverse effects on the visual amenity and character of the landscape.

CHIEF EXECUTIVE'S RECOMMENDATION

Landscape Character Assessments

To have regard to the landscape character areas of adjacent local authorities when preparing the Draft CDP and to ensure that the Draft Kildare CDP aligns with the landscape character areas of adjacent local authorities where appropriate.

To include a series of objectives in the Draft Plan which ensure that the consideration of landscape sensitivity is an important factor in determining future development uses, particularly in or contiguous to areas of high landscape sensitivity.

8. Biodiversity

Submission Nos. 002, 005, 010, 014, 017, 018, 030, 038, 044, 047, 048, 049, 056, 058, 071, 072, 073, 103, 109, 129, 132, 136, 137, 144, 167, 185, 186, 190, 193, 194, 196, 197, 198, 202, 203, 205, 217, 226, 227, 229, 235, 275, 280

- a. **Employ an Education Officer** to enhance biodiversity and natural heritage.
- b. Support and produce more excellent **biodiversity plans**.
- c. **Protect and promote biodiversity** e.g., preventing destruction of hedgerows / trees in developments, planting native forests on council owned land, provision of wooded areas (look at zoning areas for forestry in towns).
- d. Existing hedgerows should be managed and maintained along public roads and waterways in a biodiversity appropriate manner. Correct management of hedgerow cutting needed.
- e. Where **felling** is necessary the council should plant the same or a greater number of trees elsewhere. Unused land owned by the council could be donated for **community tree planting projects**.
- f. County Kildare needs a **Tree Strategy**. More native tree planting should be encouraged. An inventory of woodlands should be carried out. Small urban copses and woodlands could be created.
- g. **Financial penalties for non-compliance** when removing trees or hedgerow. Permission / licenses should be required for removing hedgerows and trees.
- h. Need biodiversity and **minimal intervention areas**.
- i. Greenways, Cycleways / Walkways and Strategic Open Spaces should **not be to the detriment of existing biodiversity** locations.
- j. Regarding the Strategic Open Space identified in Naas, Kilcullen Rd. The land and the existing significant biodiversity should be **protected and developed for active recreation use**. The potential for Wetlands development is huge.
- k. **Promote rapid reforestation** to improve green space availability.

- l. Community and sports facilities should have **hedgerows at their edges and wild areas in unused patches**.
- m. Implement the **objectives of the Biodiversity Action Plan**.
- n. Encourage **businesses to implement biodiversity plans** for their premises and land. Consider appropriate rates reduction, maybe graded for those making the most efforts, or rates increases for making no effort.
- o. **Adopt new biodiversity objectives:**
 - (1) identify and designate large scale biodiversity space in Kildare for nature, to connect remaining peatlands, create new green corridors and a new national park with wild spaces allowing nature to recover.
 - (2) manage and restore to good status our areas designated as Natural Heritage Areas (NHA and proposed NHAs) and Special Areas of Conservation.
 - (3) To require the planting of native species in all new developments, the preservation of existing hedgerows and the promotion and adoption of the National Pollinator plan across the count.
- p. **Prioritise bogs in existing biodiversity areas** such as the Barrow SAC, the Grand Canal NHA and areas of Coillte forestry so that larger connected biodiversity reserves can be created.
- q. The **proliferation of one-off houses** in rural areas is a concern for a range of reasons biodiversity being one.
- r. **Quarries support important wildlife habitats**, and some are used for illegal dumping which could have serious impacts on ground and surface water.
- s. **Protection of aquatic ecosystems** requires that river systems be protected on a catchment basis. Increase scrutiny of the drainage of peat soils to prevent runoff into the Barrow River SAC.
- t. All roads and motorways should have **underpasses for animal transit**.
- u. **Recover, re-instate and increase natural environments** and ensure that these are linked.
- v. 30% of land should be set aside for nature and rewilding. Consider leaving land untouched for rewilding initiatives.
- w. Encourage re-wetting peatlands, farmers to plant orchards and Beekeeping to help **carbon capture and biodiversity**.
- x. Carry out **biodiversity and tree planting** in the vicinity of the old wastewater treatment plant site in Ballymore Eustace as it sits in the core of the village Liffey linear walk and path.
- y. Protect biodiversity by means of **suitable riparian buffer zones** all along the Liffey and other watercourses. Development of guidance for assessment of proposed land zonings to achieve appropriate riparian setback distances.
- z. **Preserve and protect the biodiversity** of historic gardens, demesnes, estates, and their settings and encourage the enhancement of a range of plant and animal species.
- aa. List the following locations for biodiversity protection:
 - The old disused railway bridge at Rochestown/Mullaghboy.
 - Parts of the old disused Tullow railway line.
 - The Poulaphouca Bridge and valley below.
 - St John's Church and grounds.

- Wetlands below Mountcashel.
 - bb. Lands in public ownership (Ballymore Eustace) should be **considered for rewilding, woodland development, renewable energy, biodiversity, and outdoor recreation / amenity.**
 - cc. The **land from Wavertree to M7 be used as a flowering meadow**, with insect hotels and ponds for pollinators. Include community gardens for growing fruit and vegetables if space allows.
 - dd. Preserve the area between the Naas racecourse and Kingsfurze estate for **uncultivated meadows.**
 - ee. Tributaries to the River Barrow SAC and River Liffey must be **protected from all possibilities of contamination.**
 - ff. Suitably qualified biodiversity staff must be employed by KCC.
 - gg. The Council should be exemplary in implementing biodiversity initiatives. The CDP should include a statement to how KCC will achieve this.
 - hh. An **aerial assessment of each village and town** should be carried out to identify any land that is un-used for biodiversity promotion. Engage with community; Consider swift boxes.
 - ii. It is **not just pollinating insects that are under threat** but a whole host of organisms and habitats, including to mention a few organisms: many other invertebrates, fish, reptiles, mammals, along with various members of the plant kingdom and soil microbes.
 - jj. **Biodiversity Action Plans** are needed for the towns. The **Biodiversity and Heritage Action Plan** must be reviewed.
 - kk. Kildare needs a full time professional Ecologist.
 - ll. **Foster agriculture and industry** where production doesn't contribute to habitat destruction and depletion of resources.
 - mm. **Preserve flora and fauna, biodiversity, heritage** of the Naas and Corbally branches canal area.
 - nn. The Ballymore Eustace water treatment plant has been a major source of pollution. Include an objective to **protect the sources of water (Poulaphouca and Golden Falls Reservoirs) from pollution** and classify it as a vulnerable watershed.
 - oo. Higher levels of wastewater discharge causes pressure on the section of the Liffey running through Ballymore Eustace. Stop any additional development that would add further pressure. Detailed feasibility studies to **manage wastewater discharges to the Upper Liffey** are needed.
 - pp. All hedgerows and trees to be retained, maintained, and protected. Where removal is necessary the same (as a minimum) length of native hedgerow or number of trees to be planted. Permission / licenses should be required for removing hedgerows and trees. Only native tree, grass and shrub species should be used in landscaping.
 - qq. Consider biodiversity when zoning land. Percentage of land to be given over to biodiversity.
- (a) Natural heritage / biodiversity objectives must be clear and robust. No net loss of biodiversity. Formulate a policy for a net gain of 10% Biodiversity. Must include measurable objectives.
 - (b) Objectives in relation to the containment and control of invasive species in the CDP is encouraged with reference to the requirements of the EC (Birds and Natural Habitats) Regulations, 2011-2015.

- (c) It is recommended the CDP considers the issue of potential barriers to fish passage and removal of same particularly in the River Barrow SAC.
- (d) Development of guidance for assessment of proposed land zonings to achieve appropriate riparian setback distances.
- (e) Clear distinction is to be made between GI and greenways, blueways and peatways in the CDP. Such proposals are recommended to be subject to route / site selection process to ensure that impacts to biodiversity and nature conservation issues are avoided.
- (f) Promote biodiversity through pollinator-friendly planting and maintenance in all towns and villages. Support All Ireland Pollinator Plan.
- (g) Green biodiverse space should be designed so that there is at least one within walking distance of homes.
- (h) Consider leaving land untouched for rewilding initiatives.
- (i) Reference made to government policy and commitments on nature conservation. Also noted that elected member of KCC declared a Climate and Biodiversity Emergency in 2019 and the new CDP should reflect these commitments.
- (j) Precautionary principle should be applied when integrating SEA, AA, and SFRA in the plan making process.
- (k) Ecological impact assessments should be required where developments are not subject to EIA. An objective should be included to ensure this occurs to assess the impacts on biodiversity.
- (l) Implement and monitor actions set out in the National Biodiversity Action Plan.
- (m) Wind Farms should not be built on bogs as they are an important habitat for endangered birds. Concern that large wind farms are targeted for Peatland areas. Such developments can lead to landslip, pollution and flooding therefore these areas should be protected in the plan.
- (n) Support an extensive wildlife reserve area in re-wetted and re-claimed boglands in West Kildare.
- (o) Avoid development / infrastructure in areas where there are Marsh Fritillary populations e.g., at Lullymore and Lullybeg. Designate Lullymore / Lullybeg / Glashbaun / Blackriver cutaway bog areas as SAC's.
- (p) Prepare and implement management plans for eight SAC's all wetlands.
- (q) Grassland habitats to be protected from development and managed by scrub control and extensive summer grazing by cattle.
- (r) Kingsbog Common an orchid rich grassland of high ecological value to be designated as an NHA.
- (s) Managing the herbaceous fringe between the hedge and the road is important for biodiversity.
- (t) Provision of green spaces, edible hedges, community orchards and incorporation of bee and swift bricks in all new residential estates.
- (u) Protect the Valley of the River Liffey. Extend SAC from Lucan upstream to Straffan.
- (v) Peatland restoration would benefit from increased linkage between sites via protected nature corridors. Barrow Blueway should be interconnected with habitats in the surrounding communities creating linked cycle and walking routes.
- (w) Bogs need to be preserved as they are an invaluable carbon sink.
- aa. Restore Ballinafanagh Bog and Lake.
- bb. Provide strategic parkland in a traffic free environment in towns and villages to conserve biodiversity and provide an amenity for all ages.
- cc. Adopt and implement positive biodiversity actions i.e., Green Roofs Policy, Rainwater Harvesting, Faun Gateways instead of walls and providing compost space in every town / village while maintaining a database of surveyed biodiversity.

- dd. Support appropriate commercial and industrial development on Bord Na Mona land that can be harmoniously co-located within a biodiverse and ecologically rich rehabilitated peatland landscape.
- ee. Set out strong policies and objectives for protection and recovery of nature and wildlife. Reference made to NH1, NH2, NH3, NH02 AND NH03 in current CDP and how they can be made more robust in terms of protecting and enhancing biodiversity.
- ff. Raise awareness of the negative impacts of artificial lighting on wildlife. Objective that light fixtures to project amount of light needed for personal safety only.

CHIEF EXECUTIVE'S OPINION

Biodiversity

The topic of biodiversity is one that has been highlighted in a significant number of submissions received. The issues raised have been wide ranging and have included reference to hedgerows and trees, the planting of native woodland areas including in urban areas, bogs, quarries, aquatic ecosystems, riparian buffer zones, areas for biodiversity protection, rewilding and a request for biodiversity audits with respect to our towns and villages, all of which are acknowledged.

The current CDP includes a range of policies and objectives that address many of the issues highlighted including Section 13.10.1 (Trees, Woodlands and Hedgerows). It should also be noted that KCC has undertaken a tree planting programme throughout the county and will continue to do so as funding and resources permit.

Policy EI8 (Chapter 10) which requires relevant planning applications to be accompanied by an Environmental Impact Statement along with an Ecological Impact Assessment in certain cases, both of which would evaluate the existence of any protected species/habitats on site.

Objectives GIO4 and GIO5 (Chapter 13) encourage the planting of new woodlands and seek to retain and supplement existing tree, woodland and hedgerow planting on Council-owned lands.

Furthermore, policy BL2 (Chapter 10) references the need to protect and conserve bogland habitats.

The County Kildare Biodiversity Plan consists of a number of practical actions which serve to raise awareness of and enhance the protection, conservation and management of County Kildare's natural heritage. This plan is a non- statutory plan which has been adopted by the members of Kildare County Council. With respect to suggestions regarding the identification of local biodiversity areas, the current KCDP under Objective NHO 1 makes provision for the identification and protection, in cooperation with the relevant statutory agencies and other relevant groups, sites of local biodiversity importance (Local Biodiversity Areas) not otherwise protected by legislation. Furthermore, a series of Local Biodiversity Actions Plans [LBAPS] (10 in 2020) have been prepared by the Kildare County Council Heritage Office in conjunction with LEADER and local communities to set out a plan with practical, clear ideas for projects to enhance their areas for wildlife. The Draft Plan will support the continued roll-out of these Actions Plans and it is envisaged that the preparation of further Local Biodiversity Action Plans will be rolled out in 2021 and into the future, as funding permits.

Kildare County Council also signed up as a Local Authority Partner to the All-Ireland Pollinator Plan. Under the agreement, which will require a cross-directorate approach, Kildare County Council has committed to consider the All-Ireland Pollinator Plan in its policies, plans and management decisions and has committed to undertake a number of actions each year to help pollinators. These actions

include managing pollinator-friendly roadside verges, creating meadows, undertaking pollinator-friendly mowing, planting native hedgerows, reducing/eliminating use of pesticides, erecting signage to indicate pollinator-friendly habitats, promoting and distributing pollinator-friendly guidelines as well as facilitating training on pollinators and how to take action to protect them.

In relation to the importance of bogs as an important carbon sink, it should be noted that the Government funding allocation to Bord na Mona, in November 2020, for its large-scale peatland restoration project of worked out bogs across the wider Midlands, is a very proactive measure to secure the storage of millions of tonnes of carbon to contribute to the delivery of the State's climate obligations. The five bog areas in West Kildare of Ballydermot Bog, Lodge Bog, Ticknevin Bog, Timahoe South Bog and Timahoe North Bog will benefit from the funding for restoration. All restoration will be regulated and overseen by the National Parks and Wildlife Service (NPWS) with Kildare County Council and local communities involved as key stakeholders.

This work complements and reinforces the work of others such as the NPWS in their protection of bogs under SAC designation, the Irish Peatland Conservation Council on the restoration of Lullymore West Bog, Lodge Bog and Kilberry Bog and community efforts.

This all points to the need for clear and appropriate supporting policy at local level to enable peatland restoration works to be undertaken for the purposes of carbon sequestration and to support and enable the relevant sectors/ stakeholders with direct responsibility on peatland management, to account for the carbon storage in line with current (and future) LULUCF Regulations.

In relation to riparian buffer zones it is noted that these zones will differ between water bodies having regard to the site conditions related to each. Inland Fisheries Ireland have published a valuable new guideline "Planning for Watercourses in the Urban Environment" which adopts a simple '4 step' approach to watercourse protection in planning. The implementation of these guidelines through the Draft Plan should not only protect watercourses and their associated riparian zones in urban areas, but they shall also provide other benefits important for the wellbeing of people living nearby. The guidelines also provide advice relating to riparian buffer zones as a guide to determining the extent of same relative to the characteristics of the receiving environment. These guidelines will inform a series of policies and objectives in the Draft Plan.

A number of submissions propose positive biodiversity actions including the reservation of a proportion of land for biodiversity purposes, the installation of green roofs and rainwater harvesting and to support pollinator-friendly planting. All such measures will be encouraged through the policies and objectives of the Draft Plan. Consideration will also be given to including requirements for the reservation of a proportion of land for biodiversity purposes and the installation of green roofs as a Development Management Standard.

Reference was made to NH1, NH2, NH3, NH02 AND NH03 in the current CDP in relation to how these policies and objectives could be made more robust in terms of protecting and enhancing biodiversity. The suggested amendments are noted, and these policies and objectives will be reviewed and enhanced where appropriate.

CHIEF EXECUTIVE'S RECOMMENDATION

Biodiversity

To include a series of objectives in the Draft Plan to support the continued roll out of the preparation of Local Biodiversity Action Plans across County Kildare, as funding and resources permit.

To include a series of objectives in the Draft Plan with respect to the 'Planning for Watercourses in the Urban Environment Guidelines as it relates to the extent of riparian buffer zones.

To include objectives in the Draft CDP to support the continued preparation of Local Biodiversity Action Plans in association with LEADER and in collaboration with local communities.

To include a series of objectives in the Draft Plan to support the Kildare Pollinator Action Plan 2019-2022 "Pollinator Friendly Kildare" or any successor to same.

To review policies NH1, NH2, NH3, NH02 AND NH03 in the current CDP with a view to strengthening these where appropriate to align with the Kildare Biodiversity Action Plan, Kildare Pollinator Action Plan and any Local Biodiversity Action Plans

9. Climate Change

Submission Nos. 010

- a. Include along with objectives and policies the **Climate Change Sectoral Adaptation Plan** for the Built and Archaeological Heritage (2018).
- b. The renewal of the development plans is timely in terms of the global climate change challenges and presents opportunities for the **potential of built heritage** to be fully considered as a central theme.
- c. Identify the **architectural heritage at risk**, directly or indirectly, due to climate change.
- d. Include objectives to carry out **climate change risk assessments** for the historic structures and sites, particularly those in those in the Authority's own remit.
- e. Include objectives to develop **resilience and adaptation strategies** for the architectural heritage in its area.

CHIEF EXECUTIVE'S OPINION

Climate Change

Climate change is arguably the most significant challenge facing society today. Kildare County Council is committed to achieving net zero carbon emissions by 2050 in line with national and international agreements.

In order to meet these targets, the Draft CDP must and will encompass a range of policies and objectives that will reduce our carbon footprint and that relate to and are interwoven with each of the 7 key themes of this report. The Climate Change theme in particular (Section 4) gives a comprehensive overview in relation to the various means by which KCC intends to achieve their climate change targets and recommends a series of policies and objectives in this regard. All targets will be measurable so that Kildares progress in meeting our overall climate change goals can be monitored.

CHIEF EXECUTIVE'S RECOMMENDATION

Climate Change

To include measurable climate change objectives throughout the Draft CDP in order to ensure that we can achieve net zero emissions by 2050.

10. Development Management

Submission Nos. 002, 007, 009, 010, 020, 047, 049, 052, 072, 142, 144, 186, 190, 193, 194, 197, 202, 204, 217, 221, 227

- a. **Mitigate the negative impact** of large ground scrappers and tall buildings in historic urban centres through design criteria and guidance to safeguard the historic built heritage context.
- b. Applications for development on land identified as benefitting land may be prone to flooding, and as such **site-specific flood risk assessments** may be required.
- c. Ensure the **protection of existing mature trees** in new developments. **Tree preservation orders** should be more widely used.
- d. New developments should be landscaped to maximise both recreational and biodiversity benefits.
- e. **Grants for new housing developments** should specify planting of only native plant, tree, and shrub species for the open areas.
- f. Developers **not to clear sites of nature** and replant later but maintain throughout and work with natural heritage.
- g. **Quarries** should not be permitted or operated near the Grand Canal scenic route or any other important tourist amenities.
- h. **Protect Naas from becoming a zone of walled in communities**, hemmed in by roads that cut through open spaces / recreational areas where children play and our elderly walk.
- i. The **air space** over the midland bogs to be kept **free of any development** which could interfere visually, digitally, or electronically posing a risk to the safety of air corps training.
- j. Include clear policy on the use of **clear-span structures on fisheries waters** and discuss these policies with Inland Fisheries Ireland.
- k. Reference the **National Peatland's Strategy** which aims to provide a long-term management framework to optimize the social, environmental, and economic contribution of all peatlands.
- l. Strive for an **increased per capita allocation of green space** in our town centres.
- m. Land must be appropriately zoned and acquired by the state to provide **public parkland and flexible outdoor leisure space** for growing urban communities.
- n. Include specific policy objectives relating to the protection of County Geological Sites (CGSs) from **inappropriate development**.
- o. **Support sustainable infill development** to the town back lands, appropriate in scale and character to that of the historic centre, that transitions and accommodates surviving structures and retains the historic streetscape form particularly within sensitive areas of built and archaeological importance.
- p. Ensure strategic housing developments support rather than detract from the vitality and overall **character of historic town centres** in terms of their scale, connection, and mobility strategies.
- q. **Refuse planning permission** for solar/wind farms and other developments which would contribute to the decline of rare habitats and prime agricultural land. (202)
- r. Install and enforce a **sufficient planning bond to deter developers** from removing hedgerows, trees, or other natural features.

- s. Imposition of archaeological conditions on grants of planning do not create grounds for claims for compensation. It is essential that appropriate archaeological procedures are followed, and this could be facilitated by the planning authority having access to its own professional archaeological expertise.
- t. Developers should carry out an initial archaeological assessment prior to engagement with the department and the PA should emphasise this before advising them to seek pre-planning consultation with the Department.
- u. Archaeological assessments should be carried out prior to any grant of permission where there are implications for elements of the archaeological heritage. Conditions should be imposed allowing for public access to such excavations.
- v. Ecological impact assessments should be required where developments are not subject to EIA. An objective should be included to ensure this occurs to assess the impacts on biodiversity.
- w. Data from surveys carried out in preparation of EIAR, NIS or Ecological Impact Assessments should be made available to the National Biodiversity Data Centre (NDBC) on an ongoing basis and the council should include an objective to ensure this is done.
- x. provision for house sparrow nests in all new housing developments.
- y. Consideration given to the protection of nest sites for birds in solar farm developments.
- z. Only native tree, grass, and shrub species to be used in landscaping. All Ireland Pollinator Plan to be applied throughout the county.
- aa. Naming of estates should be in both Irish and English and open to the public. Exclusive use of Irish language names is encouraged.
- bb. Provision of green spaces, edible hedges, community orchards and incorporation of bee and swift bricks / boxes in all new residential estates.
- cc. Improved active travel and green infrastructure to be incorporated in development standards.

CHIEF EXECUTIVE'S OPINION

Development Management

Many of the issues highlighted in this theme have been addressed in other parts of this report including 'Climate Action' (in relation to trees, hedgerows, biodiversity, active travel); 'Sustainable Mobility' (in relation to active travel), 'Creative Places' (in relation to amenity, requirements for new developments, active travel, greenways, sustainable travel); 'Making it Happen' (in relation to renewable energy) and 'Healthy Placemaking' (in relation to revitalisation of town centres, residential development, protection of our built heritage, sustainable infill development, biodiversity).

In relation to flooding, the Ministerial Guidelines pursuant to Section 28 titled 'The Planning System and Flood Risk Management – Guidelines for Planning Authorities' will inform the preparation of the Strategic Flood Risk Assessment required to be undertaken to inform the emerging CDP.

In relation to the concerns raised regarding tall buildings in historic urban centres, paragraph 2.8 of the Ministerial Guidelines pursuant to Section 28 titled 'Urban Development and Building Heights – Guidelines for Planning Authorities' is noteworthy and reads as follows; 'Historic environments can be sensitive to large scale and tall buildings. In that context, Planning Authorities must determine if increased height buildings are an appropriate typology or not in particular settings'. It is considered reasonable to include an objective that reflects this particular section of the Guidelines.

A particular issue that has been highlighted through a number of submissions is the importance of connecting spaces and communities and in this regard it is considered appropriate and in the interests of proper planning and sustainable development to promote and maximise permeability between developments and amenity spaces, in order to promote walking and cycling in particular.

A number of submissions highlighted the need for an increased per capita spend in the allocation of green spaces and also the inclusion of a bond to deter developers from removing hedgerows, trees or other natural features.

CHIEF EXECUTIVE'S RECOMMENDATION

Development Management

To include an objective in the Draft CDP to promote permeability, where possible and at appropriate locations in order to promote walking and cycling in particular.

To protect our historic town and village centres from buildings, that either because of their height, scale or location would negatively impact on the appearance of our town and village centres.

11. Tourism

Submission Nos. 012, 015, 024, 028, 036, 037, 039, 044, 049, 063, 086, 089, 102, 106, 109, 118, 127, 139, 141, 142, 144, 163, 166, 168, 175, 180, 184, 185, 186, 193, 194, 198, 202, 203, 218, 224, 274, 300

- a. **Promote sustainable tourism**, i.e., tourism that takes full account of its current and future economic, social, and environmental impacts.
- b. Develop a county-wide heritage-based tourism strategy capitalising on heritage, bogs, greenways, SAC's NHA's and SPA's.
- c. **Develop Celbridge Abbey House & gardens and Celbridge Manor Hotel & gardens** for tourism/recreation.
- d. **Identify areas along the canal for amenities** such as bike hire, tea rooms, car parks, boat hire and camp sites to ensure tourists are aware of the enhanced offering. Services are required along greenways to cater for users. Service blocks should be provided at regular intervals along routes. Make them tourist destinations.
- e. The privacy of residents should be protected from **tourism**.
- f. Include a strategy / new section in the CDP relating to **interconnecting the Greenways, Blueways and Peatways**. This is possible at Lullymore / Lullybeg and the Umeras areas and should be recognised as **strategic tourism areas**. Work with Offaly and Laois local authorities to link Monasterevin to Portarlinton and then to Mount Lucas through the bogs and the rest of Offaly.
- g. Support for developments such as Umeras Peatlands Park where **sustainable tourism** can be created that **also supports local biodiversity and wildlife habitats**.
- h. Recognise the **importance of the Barrow Blueway scenic and amenity route** for linking the county from East to West and North and South Kildare. Provide for **stronger protections against industrial development**, particularly windfarms, in the proximity of the canal.
- i. **Identify and support areas along tourist and walking trails** for appropriate development as anchor points with facilities and localised business opportunities.
- j. **Require signage** or displays of the history of the Corbally Branch.

- k. **Extend the Greenway** to Corbally Harbour and **redeveloped the Harbour** as a first phase. Provide access to kayaks and small boats via a slipway. Provide bins, parking and toilets.
- l. Explore the possibility of **restoring Corbally Harbour buildings** to keep the heritage of the canal alive.
- m. **Shore up Corbally Harbour**, entailing making sure the harbour walls are reinforced and that the quay is cleared away and structurally sound.
- n. **Remove the low bridge at Mooney's Bridge** to allow navigation and replace with a higher bridge.
- o. Determine the feasibility of **removing the culvert, building a bridge over the canal and restoring the tow path**.
- p. Support the **development of boardwalks through peatlands** in north west Kildare using the disused Bord na Mona railway lines. These routes could be linked with existing blueways or greenways to create a substantial network of walking routes thus providing a **significant tourist attraction**. The Railway line at Mullaghboy / Rochestown should be protected as a walking route. A stone bridge for the railway lines crosses over the river Liffey and should be protected along with the views from it.
- q. Support provision of tourism infrastructure and visitor services including the provision of tourism accommodation.
- r. List and map public rights of way and encourage the creation of new ones. Provide signposting and way finding on all public rights of way.
- s. Improve facilities and parking areas at tourism destinations such as Castletown House to make them more appealing.
- t. Maynooth College, Connolly's Folly, Carton House, and Castletown should be grouped and promoted as grand houses of North Kildare. Install directional signage on main road network for Castletown.
- u. Strategy for peatland areas to include extensive trails, tourism features and amenity areas connecting with greenways. Creating a positive attraction in the midlands.
- v. Provision of a new national park on Bord Na Mona land where peat cutting has ceased. Transform Umeras Bog into a peatland's nature park.
- w. Heritage towns to have a more proactive approach to enhancing heritage i.e., attractive signage, public realm and improving shop fronts.
- x. Develop Ancient East theme and complete a plan for Green and Blue Ways. Encourage a plan for a Bog of Allen Lake / Reservoir.
- y. The Plan should recognise the key role that Carton plays from a tourism, leisure, and sports perspective. Policy EO55 should be re-affirmed in this regard.
- z. Potential of activity tourism to contribute to economic growth in rural areas i.e., development of greenways, blueways, and peatways.

CHIEF EXECUTIVE'S OPINION

Tourism

County Kildare has a host of assets, both natural and built that either currently attract significant levels of tourism or have the potential to do so. The opportunities presented by these assets are recognised in a number of submissions and include reference to the development of protected structures and their curtilages, the potential connections that could be created between greenways, blueways and peatlands, the promotion of areas along tourist and walking trails for amenity purposes and the development of a county-wide heritage based tourism strategy.

In the context of tourism, the natural environment, landscape, built heritage and attractive towns and villages play a key role. Significant natural attractions include the Curragh plains, the bogs to the west, the rolling hills of the eastern uplands, the waterways of the River Liffey, the River Barrow and the Grand and Royal Canals. The rich architectural and archaeological heritage of the county is also acknowledged with many renowned structures and houses including Castletown House, Carton House, the Wonderful Barn, Moone High Cross and Castledermot Round Tower. These areas have a sustainable and competitive tourism product and have the potential for future tourism growth based on a supply of resources and features around which the tourism product can be built. The relationship between tourism/recreation and the environment must be managed in a way that continues to support local communities and remains viable in the long term. Notwithstanding the decline in tourism revenue in the region due to the catastrophic halt in overseas travel due to the Covid 19 global pandemic, domestic numbers are sustaining and Kildare holds a strong position from which to further develop, promote and expand the tourism industry within the county.

Furthermore, Kildare (with Wicklow) have been identified as one of 10 key destinations by Fáilte Ireland for the development of tourism and this has been endorsed by the broader 'Ancient East' initiative with Kildare identified as a tourism destination of significance.

The protection and enhancement of the tourism product in Kildare is supported through the policies and objectives of the current CDP, notably ECD28 which promotes, protects, improves, encourages and facilitates the development of tourism throughout the county as an important contributor to job creation and ECD 31 which promotes the sustainable development of the tourism sector in appropriate locations throughout the county, acknowledging that Ireland's largest tourist market (i.e. Dublin) is highly accessible through the existing transport system.

A particular suggestion that was highlighted related to the extension of the Greenway to Corbally Harbour and the development of the harbour for amenity purposes. It is considered appropriate to include an objective to investigate the feasibility of this proposal having regard to the detail presented in the submission received.

CHIEF EXECUTIVE'S RECOMMENDATION

Tourism

To include an objective in the Draft Plan to support the identification and development of new tourism infrastructure within the county.

To include an objective to encourage and support start-up enterprises in tourism across Kildare.

To include an objective to support Failte Ireland's goal in developing the 'Ireland's Ancient East' initiative as it relates to the heritage, cultural and natural assets that the eastern region, including Kildare has to offer.

To include an objective in the Draft CDP to work with Waterways Ireland to progress the delivery of the (i) Naas to Sallins Greenway and (ii) Naas to Corbally Harbour Greenway and to develop the harbour itself for amenity purposes.

12. Renewable Energy

Submission Nos. 002, 005, 012, 030, 038, 044, 047, 105, 185, 194, 293

- a. **Consider solar energy as alternative** to wind close to important scenic and amenity areas.
- b. Work with Bord na Mona to **concentrate wind energy on the larger bogs** while reserving 30% solely for biodiversity.
- c. Adopt a **clustered approach to wind energy** and avoid a dispersed small cluster approach which can have a disproportionate impact on the landscape.
- d. Must be consistency with RSES in relation to renewable energy.
- e. Reconsider LCA designations as low, medium, and high sensitivity could be associated with various types of renewable energy.
- f. Wind Farms should not be built on bogs as they are an important habitat for endangered birds.
- g. Concern that large wind farms are targeted for Peatland areas. Such developments can lead to landslip, pollution and flooding therefore these areas should be protected in the plan.
- h. Strategy for peatland areas to be planned to support renewable energy (wind and solar) in suitable places with suitable separation distances.
- i. Consideration given to the protection of nest sites for birds in solar farm developments.
- j. Nature Conservation Areas should not be automatically excluded for Wind Energy Developments.
- k. Support appropriate commercial and industrial development on Bord Na Mona land that can be harmoniously co-located within a biodiverse and ecologically rich rehabilitated peatland landscape.
- l. Importance of peatland habitats is highlighted. A long-term strategic plan for former industrial peatlands is needed as per RSES and a policy should be included to support this. An objective is also needed to support the aims of the National Peatlands Strategy and the implementation of the National Raised Bog Special Areas of Conservation Mgt. 2017-2022.
- m. A 'Low', 'Medium', and 'High' weighting table for landscape sensitivity types be considered for renewable energy development potential. KCC should update the 2017 LCA completed for County Kildare taking account of this recommendation, as we believe it would support developers and eliminate uncertainty surrounding areas un-suitable for renewable energy development at project inception.

CHIEF EXECUTIVE'S OPINION

Renewable Energy

Sections 8.5 and 8.7 of the current CDP relate to wind and solar energy respectively. With respect to wind energy, policy WE3 should be noted which ensures that wind energy development proposals will have regard to a range of factors including visual impact on protected views and scenic routes. It should be noted that KCC is currently preparing a wind energy strategy for the county which will inform the Draft CDP.

A number of submissions related to the future of the Bord na Mona lands. In this regard, BL 4 of the current KCDP makes provision for the Council to liaise with Bord na Móna, the Irish Peatland Conservation Council, Coillte and the National Parks and Wildlife Service of the Department of

Housing, Planning, Community and Local Government to ensure the sustainable use of cutaway bogland, with due consideration given to their ecological and amenity value. In this regard, KCC would support Bord na Mona in formulating a long-term strategic plan for the former industrial peatlands. The current CDP seeks to ensure that a balanced approach is taken to the development of the county's peat resources and the restoration of cutaway bogs, in order to minimise the negative impact on biodiversity and the archaeological and cultural heritage of the county. RPO 7.29 of RSES is also noted in this regard where the rehabilitation and/or rewetting of suitable peatland habitats will be supported.

One particular submission was noted wherein a weighting table was proposed in identifying suitable areas for renewable energy development. In order to meet our Climate Change targets of net zero emissions by 2050 it is imperative that we actively encourage the development of renewable energy in appropriate locations. The Draft CDP will support the identification of sites for renewable energy.

CHIEF EXECUTIVE'S RECOMMENDATION

Renewable Energy

To include an objective in the Draft Plan to support Bord na Mona in the preparation of a long-term strategic plan for the former industrial peatlands.

To include an objective in the Draft Plan to support the aims of the '*National Peatlands Strategy*' and the '*National Raised Bog Special Areas of Conservation Management 2017-2022*'.

To include an objective in the Draft CDP to identify areas that would be considered suitable for energy related development throughout the county.

CHIEF EXECUTIVE'S ADDITIONAL RECOMMENDATION FOR THEME 61 'ENHANCED AMENITY & HERITAGE'

In relation to all of the recommendations in the 'Enhanced Amenity & Heritage' theme, the CDP will include targets against which to measure progress in order to ensure that we can achieve net zero emissions by 2050.

4.7 Making it Happen: Infrastructure, Energy & Communications

Note: Issues raised referring to transport, road, rail, bus or active travel issues are considered under 'Sustainable Mobility'. Flooding is assessed under 'Climate Action'.

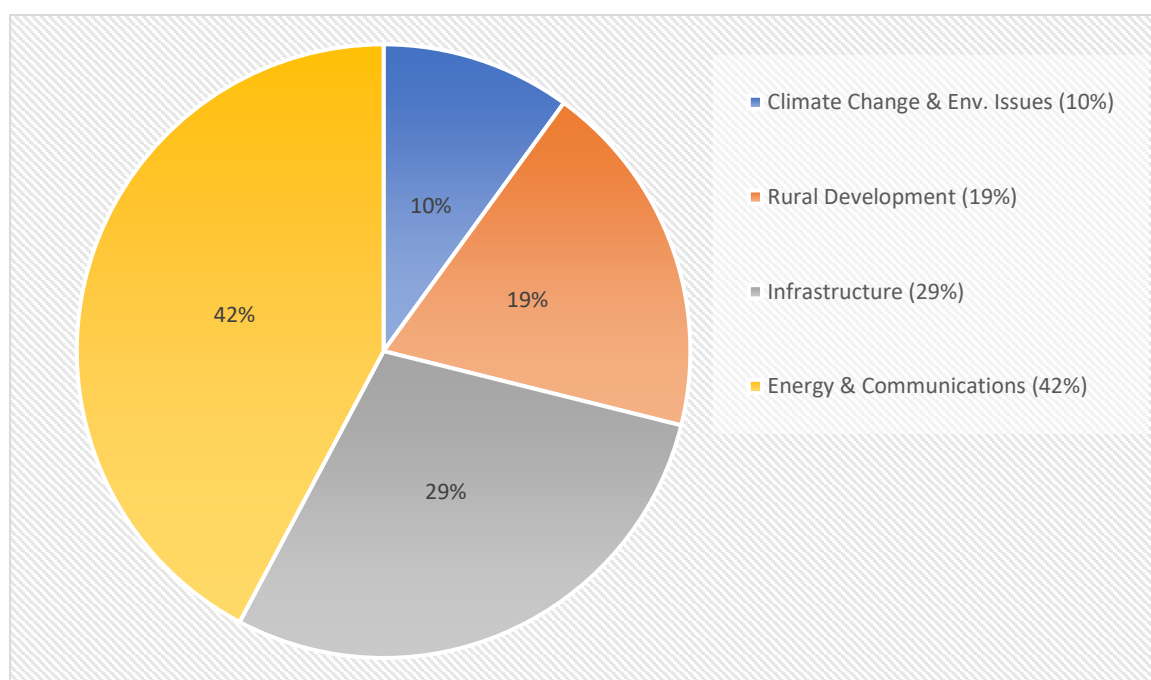


Fig 7 – Breakdown of submission type in relation to Theme 7 – 'Making it Happen'

ISSUES

1) Climate Change and Energy

Submission Nos. 109, 127, 198, 200, 221, 280, 293

- a) Recognise the importance of Sustainable Energy Communities (SECs) in delivering results in relation to our energy related emissions targets and support their development and activities
- b) Plan should seek to designate land for the generation of renewable energy by communities for their own control and benefit
- c) Development of a Kildare Energy Agency should be given serious consideration and we refer here to the excellent recommendations contained in the submission from the Climate Action Linkage Group
- d) Plan should include the development of more, local Civic Amenity sites for waste collection and recycling
- e) Plan should provide for community composting facilities – could be assisted with allotments which need to be provided also
- f) KCC should plan for an extensive programme of retrofitting of Local Authority housing stock aligned with the programmes of the SEAI and local SEC
- g) Raise the bar on recycling as a county
- h) It is concerning that within the County Kildare Climate Change Adaptation Strategy there is no reference to the development of renewable energy as an adaptation action to

mitigate against greenhouse gas emissions or ensure security of electricity supply into the future for the County.

- i) Economic opportunities associated with climate change mitigation depend on the adoption of strategies that will encourage local industries, create jobs and provide an environment with a happier, healthier population that needs lower levels of health and psychiatric care.
- j) Support training in replacement technologies and hence employment in climate change mitigation.
- k) Carry out a review of the county in terms of resilience to climate change. This would identify where we are at risk in terms of sustainability and will help identify threats and opportunities. Opportunities can translate to business and economic opportunity.
- l) Refuse planning permission for solar/wind farms and other developments which would contribute to the decline of rare habitats, such as bogs, fens, marshes, damp meadows wetlands and other prime agricultural land.

CHIEF EXECUTIVE'S OPINION

Climate Change is more comprehensively addressed in Section 4.3 however in relation to the 'Making it Happen' theme, particularly highlighted issues relate to energy targets, allotments and renewable energy, particularly in relation to their impact on habitats.

In order to ensure that we will meet our Climate Change targets of net zero emissions by 2050 we must change the way we live, do business and work. Our Draft CDP must be ambitious if we are to reduce our carbon emissions and in order to do this we the Draft Plan must include clear measurable targets to show how we propose to reduce our carbon footprint, particularly during the period of the next Plan. We need to look at more sustainable ways of living that reduce the need to use private modes of transport and instead promote walking, cycling and public transport. We need to locate our places of employment closer to where we live. The draft Plan must look at ways of revitalising and enhancing the County's towns and using brownfield and infill sites in order to reduce the pressure on our countryside for more housing in unserviced areas.

The Draft CDP must therefore include a number of clear and measurable targets which set out how we propose to change as a county in order to reach our National and European targets of net zero emissions by 2050.

Allotments encourage local food production, reducing air miles for food and therefore contributing towards a reduction in our carbon footprint and so the Draft CDP will be fully supportive of such facilities in accessible and sustainable locations. It should be noted that policy AL1 (Chapter 14) of the current CDP supports allotments where they are situated within or immediately adjacent to the edges of towns and villages or are easily accessible.

In relation to solar/wind farms and their contribution to the decline of rare habitats policies SE2 and WE3 of the current CDP should be noted in this regard. In the case of the former, the assessment of solar energy development proposals will have regard specifically to ecology whereby, in assessing such proposals, it must be demonstrated that damage to important species and protected habitats is avoided or minimised at the very least. In the case of the latter with respect to wind farm developments, the assessment of such proposals has regard to the impact of the proposed development on protected bird and mammal species. The Draft CDP will include similarly worded objectives.

CHIEF EXECUTIVE'S RECOMMENDATION

The Draft CDP will include targets against which to monitor and measure progress in order to ensure that Kildare can achieve net zero emissions by 2050.

To include an objective in the Draft CDP that supports and facilitates the development of allotments/community gardens at accessible, sustainable locations that reflects policy AL1 of the current CDP.

To include objectives in the Draft CDP that address the impact that solar and wind farm developments may have on flora, fauna and their respective habitats having regard to policies SE2 and WE3 of the current CDP.

2) Noise Pollution/Air Quality/Light Pollution

Submission Nos. 002, 018

- a) It is recommended that a Noise Impact Assessment is carried out for any development proposals with the potential to give rise to significant noise impacts. All new developments must also consider the impact of existing noise sources.
- b) Aim to reduce polluting emissions into air and increase the quality of air in Kildare by:
 - Participating in and facilitating – national programmes of air quality monitoring.
 - Working to develop and promote the Air Quality Index for Health,
 - Develop Local Air Quality Management Plans that identify pollution 'hot spots' and aim to reduce pollution through local action on emissions.
- c) There should be measures included to address impact of light pollution

CHIEF EXECUTIVE'S OPINION

In relation to noise pollution, Section 7.6.7 of the current CDP includes a number of relevant policies including a requirement that future developments are designed and constructed to minimise noise disturbance, that noise levels caused by new and existing developments do not exceed normally accepted standards, a requirement that activities that are likely to give rise to excessive noise would install noise mitigation measures and monitors. In relation to polluting emissions into the air, policy PC 10 of the current CDP should be noted where all future development must be in accordance with the EU Ambient Air Quality and Cleaner Air for Europe Directive. It is considered appropriate to include similarly worded policies in the Draft CDP and to strengthen these where possible.

CHIEF EXECUTIVE'S RECOMMENDATION

To include objectives in the Draft CDP that relate to noise and air pollution, that reflect those policies as set out in Section 7.6.7 of the current CDP and to strengthen all such policies where possible.

3) CDP AA / SEA

Submission No. 002

- r) The Appropriate Assessment of the draft CDP should include an assessment of the impacts of nitrogen deposition on Natura 2000 sites. Consideration should also be given to monitoring nitrogen deposition in the Strategic Environmental Assessment (SEA).

CHIEF EXECUTIVE'S OPINION

An assessment of potential impacts of nitrogen deposition will be considered in the Appropriate Assessment in accordance with relevant guidance, as necessary. In the event that potential impacts are identified, consideration will be given to monitoring of nitrogen deposition.

CHIEF EXECUTIVE'S RECOMMENDATION

Where potential impacts are identified with respect to nitrogen deposition as part of the AA process that consideration would be given to the monitoring of such depositions as part of the final AA document.

Rural Development

1) Extractive Industry

Submission Nos. 020, 066

- a) Supports for the continued inclusion of the current Extractive Industry policies and objective EI 6, EI 15 and EI 16
- b) Quarrying has a detrimental effect on people's lives and temporary quarry licenses have often been extended over decades throughout Kildare.
- c) quarrying activity should be restricted in line with Ireland's Climate Action goals and eventually phased out completely.
- d) Quarrying companies with significant land holdings should be required to publish plans for their entire land holdings when applying for planning permissions for new quarry facilities or extensions.
- e) The CDP should prohibit companies from using resources extracted to service the export market in aggregates and other products that result from quarrying activity in Kildare.
- f) BAG proposes a required minimum distance of at least 1km from the nearest residential dwelling for any new or extended quarry facilities.

CHIEF EXECUTIVE'S OPINION

The supports for the retention of the current Extractive Industry policies and objectives EI 6, EI 15 and EI 16 is noted and welcomed.

In relation to quarrying, the Draft CDP will support the extractive industry as it explores new ways of operating and identifying new opportunities such as the rehabilitation of worked out quarries for biodiversity use, amenity and green spaces, all in the interests of tackling climate change.

CHIEF EXECUTIVE'S RECOMMENDATION

To consider the inclusion of policies EI 6, EI 15 and EI 16 of the current CDP into the Draft CDP and to strengthen these where possible/appropriate, particularly in relation to the impact such facilities would have on the residential amenity of nearby properties and the possible inclusion of appropriate buffer zones in this regard.

Protection Groundwater / Rivers

Submission Nos. 020, 056, 109, 198, 202

- a) The aquatic buffer zone (strip of land along a river, stream, or canal) should be increased where use of chemicals, weed killers, slurries, and fertilisers are not permitted. There should be a condition that all new buildings incorporate water harvesting infrastructure.
- b) support the continued inclusion of the current policies RH 9 (vi) in Section 4.13 and WS 11 in Section 7.5 in the new CDP
- c) continued inclusion of the Groundwater Protection Scheme under the Policy / Legislative Context
- d) Greater emphasis should be placed on SUDS drainage, swales, reed beds, hedgerows, trees. This needs to be achieved by a collaboration of experienced experts in hydrology, engineering, building and planning etc.
- e) The County Development Plan should be central to the protection, management and conservation of watercourses, lakes, reservoirs and groundwater. The CDP must recognise that protection of the aquatic environment/habitat not only requires the protection of water quality but also necessitates the protection and maintenance of physical habitat and hydrological processes/regimes.
- f) A policy in relation to aquatic habitat protection should be included in the CDP. The impacts of development when not policy driven or environmentally managed are numerous (destruction of riparian corridors etc.). Open watercourses should be kept open, and not covered over. Riparian /buffer zone must be sufficiently wide to protect the watercourse. Protection of aquatic zones can require riparian/buffer zones of up to 50m
- g) Kildare County Council is urged to acknowledge and address the need for riparian habitat protection. The protection of habitats outside designated areas and a Council commitment to reject proposals that would interfere with natural floodplains would greatly benefit both aquatic and riparian habitats.
- h) The Development Plan should include policies to ensure that developments do not lead to the spread of invasive species. Landscaping proposals etc. should require the use of native species from local stock.
- i) The impacts of poorly designed river/stream crossing structures can be serious in terms of habitat loss. The Plan should include a clear policy on the use of clear span structures where possible on fisheries waters and that IFI should be consulted on any such proposed developments. Stream fragmentation should also be addressed.
- j) The plan should include measures to address water conservation.
- k) All development proposals should have regard to SUDS.
- l) River Management Policies should be an integral part of any County Development Plan process and all waterways within the County should be considered as a natural resource requiring protection and development, such as River Corridor Management Areas, Special Preservation Orders, Special Amenity Areas.
- m) Kildare will come under pressure in relation to: New demands on the Rivers Liffey and Barrow to dump wastewater and extract drinking water; riparian stretches and wetland under threat from development, surface water management and river catchments.
- n) The County Development Plan should ensure that Kildare's water infrastructure has sufficient storage capacity to ensure sufficiency of supply during droughts.
- o) The CDP should also include mandatory water harvesting in all new buildings/developments.
- p) The provision of one-off housing should continue to be strictly restricted to reduce the need to install one-off septic tanks which have the potential to pollute groundwater.

CHIEF EXECUTIVE'S OPINION

Groundwater is protected under EU and National legislation. WS 9 of the current CDP states that it is the policy of the Council to manage, protect and enhance surface water and groundwater quality to meet the requirements of the EU Water Framework Directive. Furthermore, policy WQ2 states that the protection and improvement of all drinking water, surface water and ground waters is ensured through the implementation of the River Basin Management Plan and the associated Programme of Measures. It is anticipated that the Draft CDP would include similarly worded policy statements with respect to the protection of groundwaters.

In relation to riparian buffer zones and consequently the protection of species that would be associated with those buffer zones, policy GI 20 of the current CDP should be noted wherein a biodiversity zone of not less than 10 metres from the top of the bank of all watercourses is required, the exact extent of which would be determined on a case by case basis. It is proposed to include a similarly worded policy in the Draft CDP and to update the riparian buffer zone having regard to any published guidance in that regard. (See also Enhanced Amenity Theme response with respect to Riparian Buffers etc)

The support for policies RH 9 (vi) in Section 4.13 and WS 11 in Section 7.5 in the current CDP has been noted in relation to siting, design, water and drainage policies. These policies will be reviewed and strengthened where possible in the interests of sustainable planning and orderly development.

In order to reduce the pressure on Kildare's valuable water resources, it is important that the Draft CDP promotes sustainable sources of water including rainwater harvesting. Objective WDO4 of the current CDP should be noted in this regard. However, it is considered appropriate to include an objective related to rainwater harvesting in the Draft CDP that more than promotes this type of water source. This will be considered further as part of the preparation of the Draft CDP in relation to suitable targets/requirements that could be applied.

CHIEF EXECUTIVE'S RECOMMENDATION

To include objectives in the Draft CDP that reflect the wording of WS9 and WQ2 of the current CDP with regard to the protection of groundwater.

To include an objective in the Draft CDP in relation to riparian buffer zones which shall consider the wording of policy GI 20 in the current CDP and to strengthen/increase the extent of this buffer zone having regard to any published guidance in that regard.

To include policies in the Draft CDP that reflect and strengthen where possible, policies RH 9 in Section 4.13 and WS 11 in Section 7.5 of the current CDP in relation to siting, design, water and drainage.

To include objectives in the Draft CDP that relate to measurable targets in relation to the various means of water conservation including rainwater harvesting.

2) Forestry

Submission No. 012

- a) Support sustainable rural based enterprises such as forestry and tourism
- b) Have regard to the regulatory framework established under The Forestry Act 2014 and overseen by the Department of Agriculture, Food and the Marine with respect to the forestry sector
- c) Ensure the zoning of sufficient lands with associated objectives for recreational, commercial, tourism and community uses
- d) Support the provision of accessible recreational, community and sporting facilities in the county.

- e) Support the provision of tourism infrastructure and visitor services, including the provision of tourism accommodation at appropriate locations in the Coillte estate.
- f) Promote the use of sustainable timber products

CHIEF EXECUTIVE'S OPINION

Chapters 5 and 10 of the current CDP include a number of policies and objectives which support rural based enterprises including forestry and tourism. It is considered appropriate to review and update both sections of the current CDP and to strengthen existing policies and objectives where possible in order to further support, encourage and facilitate rural based enterprises particularly in sustainable locations where they do not detract from the offering of nearby serviced towns and villages.

CHIEF EXECUTIVE'S RECOMMENDATION

To include objectives in the Draft CDP to support rural based enterprises including forestry and tourism.

3) Agriculture and Bloodstock Industry **Submission No. 203**

- a) The importance of these industries to the area is noted. Commercial / retail development that provides services to farmers should be encouraged to ensure the village remains a focal point in a large farming catchment. Developments with an emphasis on the bloodstock industry should also be encouraged.

CHIEF EXECUTIVE'S OPINION

Chapter 10 of the current CDP includes a number of policies in relation to the equine industry in Kildare including EQ1 where it is the policy of the Council '*to encourage the expansion of the bloodstock industry by protecting the environment and amenity value of rural areas from encroachment by urban sprawl and incompatible development*' and EQ2 to support related activities of an appropriate size and scale. It is considered appropriate to include the equine related policies of the current CDP in the Draft CDP and to strengthen these policies where possible.

CHIEF EXECUTIVE'S RECOMMENDATION

To include policies and objectives in the Draft CDP to support the equine industry and in so doing to consider the inclusion of those policies as set out in Section 10.5.4 of the current CDP and to strengthen these policies where possible.

4) Farm diversification **Submission Nos. 010, 100**

- a) Encourage and facilitate the sensitive reuse of vernacular houses or farm buildings for farm diversification, agri-tourism and rural development, including self-catering accommodation, arts or craft workshops and small-scale manufacturing.
- b) The current plan actively seeks to promote rural development and to provide for employment opportunities outside the boundaries of towns and cities, yet the controls set out in Table 10.3 (Criteria for Assessment of One-off Enterprises in Rural Areas) are highly restrictive and inconsistent with rural development goals set out elsewhere in the plan.
- c) The Kildare countryside accommodates activities which service the local community and/or tourists/day trippers and provides valuable employment opportunities allowing

residents of small towns and other rural areas to work locally without having to commute long distances.

- d) The criteria contained in Table 10.3 discourages new enterprise in the countryside and inhibits the expansion of existing operations and should be omitted.
- e) It is contended that the economic and employment goals underlying the council's rural development policies are more likely to be achieved if the stipulations highlighted above are not included in the new Plan.

CHIEF EXECUTIVE'S OPINION

Policy RE4 of the current CDP encourages diversification and improved competitiveness of the rural economy. It is considered reasonable and appropriate to include a similarly worded policy statement in the Draft CDP. A number of submissions have referenced Table 10.3 titled 'Criteria for Assessment of One-Off Enterprises in Rural Areas'. It has been suggested that this Table is particularly restrictive and inconsistent with rural development goals set out elsewhere in the Plan, that it inhibits the expansion of existing operations and that it should be omitted. As part of the preparation of the Draft CDP Table 10.3 of the current CDP will be reviewed.

CHIEF EXECUTIVE'S RECOMMENDATION

To include an objective in the Draft CDP that reflects policy RE4 of the current CDP with respect to farm diversification and to strengthen this policy as considered appropriate.

To review Table 10.3 of the current CDP

5) Peatlands / Bogs

Submission Nos. 073, 112 ,129, 144, 165, 197

- a) Considering the peatland resource in the county that is now considered either cutaway or cutover there needs to be a balance regarding development for renewable energy and conservation
- b) In favour of the use of rewetted peatlands however, a balanced approach is needed.
- c) Investigate the possibility of using integrated water management systems in boglands
- d) The Panoramic views of the Peatlands in West Kildare (please see attached photograph) should be preserved and not adversely impacted by Wind Farm developments.
- e) By uniting Coillte woodlands, Bord na Mona boglands, and the Canal walkways there is potential for a wonderful amenity that could form a National Park.
- f) Using the bog as a National Park to bring tourists to Ireland and the midlands would be of great economic value to the area. An amenity such as this using natural materials would be a great benefit for carbon sequestration, water absorption / flood prevention, and biodiversity. This would be a more appropriate use rather than putting thousands of tons of concrete and roadways in to facilitate industrial wind turbines.
- g) Protection of air ways above bogs: The Irish Air Corps need to be facilitated in its training network. This requires the air space over the midland bogs to be kept free of any development which could interfere visually, digitally, or electronically posing a risk to the safety of air corps training.
- h) Developments for wind and solar farms on peatlands should include conditions that ensure the carbon sequestration and biodiversity value of the peatlands are maintained and enhanced

CHIEF EXECUTIVE'S OPINION

Chapter 10 of the current CDP includes a series of policies and objectives related to the preservation of boglands including BL3 where it is a policy of the Council to take a balanced approach to the redevelopment of cutaway bogs whilst recognising the potential for a range of economic uses including renewable energy which must be subject to the protection of the environment and landscape character. It is considered appropriate to retain a similarly worded policy statement in the Draft CDP and to consider the use of bogs with respect to meeting climate change targets.

One submission in particular highlighted the need to protect the air space over the midland bogs from development which could interfere in any way with the safety of air corps training. This particular issue will be considered as part of the preparation of the Draft CDP.

CHIEF EXECUTIVE'S RECOMMENDATION

To include objectives in the Draft CDP similar to those listed in Chapter 10 of the current CDP in relation to the preservation of boglands and to strengthen those policies as adopted, particularly where such matters of carbon sequestration can be addressed to help combat the concerns around climate change and to achieve the targets set nationally in this regard.

To consider the protection of the air space over the midland bogs from development which could interfere with the safety of air corps training.

Infrastructure

1) General Comments

Submission Nos. 056, 089, 102, 103, 198, 199, 202, 274, 280

- a) Given predicted growth in the county (1) the plan should ensure housing development is supported by the necessary infrastructure. Over development in some areas and under development in others needs to be addressed. A clear strategy needs to be implemented to disperse housing and development in the county. (2) Preservation of historical town centres needs to be balanced against the need for development. Archaeologists should be engaged to assist in balancing developer led infrastructure. (3) A policy should be implemented to minimise development on greenfield sites until brownfield sites are utilised.
- b) The Plan can support the relevant external agencies in the provision of electricity, gas, water, wastewater, renewable energy, telecommunication and broadband infrastructure by understanding their plans, being aware of their deficiencies and co-operating closely with them to improve these services. Appoint officers responsible for close liaison with them. Include an objective to establish a forum of infrastructural service providers that ensures good communications network, shared use of ducting.
- c) Infrastructural deficits include: Sustainable travel; Sustainable energy provision; Broadband etc. and an action plan developed and some actions completed
- d) The preparation of a Masterplan for Confey, Leixlip and associated transportation studies should be undertaken to expedite the delivery of housing.
- e) It is essential that previous and planned investments in water and wastewater services be used as efficiently as possible.
- f) Development Plan must account for infrastructure such as roads, wastewater and bridges etc. etc. Celbridge with one inadequate river crossing is an example of deficient infrastructure.
- g) Adopt a strategic approach to infrastructural planning coupled with a full programme of capital investment and community support.

- h) Strategic planning should build in long term capacity for growth across the named infrastructure (ie: rather than have to upgrade capacities every few years with consequential added costs and delays.
- i) No further population growth of Celbridge should be permitted without better infrastructure in all its aspects.
- j) CDP should include an objective to establish a forum of infrastructural service providers that ensures good communications network, shared use of ducting.
- k) Supports extract from Issues Paper relating to Telecommunications as well as Section 8.13 (Policies TL1 – TL11 as well as Section 17.11.3 of the CDP)
- l) Supports co-location policy

CHIEF EXECUTIVE'S OPINION

It is imperative that the Draft CDP includes a vision for the strategic growth and development for County Kildare over the life of the next Plan to 2029 and beyond. The NPF and RSES policy documents will inform the Draft CDP in this regard, particularly in relation to housing targets from which our settlement hierarchy will be determined. As part of the CDP review, an assessment will be undertaken in relation to the level of existing and planned infrastructure in our settlements in accordance with Appendix 3 of the NPF, and to only zone land (either in the CDP or through the LAP process) where lands are either serviced or can be serviced during the life of the Plan. Ensuring that the appropriate levels of infrastructure are available to meet the needs of the existing population of the county also provides for an efficient use of local government funding.

CHIEF EXECUTIVE'S RECOMMENDATION

To ensure that the Draft CDP aligns with the NPF, RSES and recent Housing Supply Target Methodology for Development Planning Guidelines issued pursuant to Section 28 in relation to housing targets and infrastructural provision.

2) Water

Submission Nos. 008, 014, 018, 089, 109 127, 162, 167, 219, 280, 296, Public meetings

- a) Submission no. 008 from Irish Water
 - Acknowledge policies and objectives of NPF, RSES, Water Services Policy Statement, Water Services Strategic Plan
 - The following were highlighted in their submission
 - 1) The National Water Resources Plan,
 - 2) Drinking Water Source Protection,
 - 3) The Water Supply Project
 - 4) The Barrow Water Supply Scheme – Area Extension
 - 5) Continue to monitor the performance of the networks
 - Wastewater Collection and Treatment
 - 1) Ringsend Wastewater Treatment Plant
 - 2) Greater Dublin Drainage (GDD)
 - 3) Capacity of Treatment Plants within Kildare County
 - constraints in the sewer networks
 - encourages the inclusion of policies and objectives on the use of Sustainable Urban Drainage Systems and Green Infrastructure in both existing and new development areas
 - River Basin Management Plan

- Suggested objectives/policies for inclusion in the CDP

General policies in relation to Water Services

- To work closely with Irish Water to realize the development objectives of this plan;
- To consult with Irish Water in the development of Plans, SDZs, etc. to ensure: the available capacity of the public water services infrastructure; the need to protect and optimise existing and planned public water services infrastructure; the need for sequential and phased development; the financial and environmental implications of development in sensitive areas.
- Ensure adequate water services are available prior to granting planning permission. Evidence of consultation with Irish Water should be provided prior to applying for planning permission;
- To protect existing wayleaves and buffer zones around public water services infrastructure through appropriate zoning and to facilitate the provision of appropriate sites for required water services infrastructure as necessary;

Water Supply

- To protect both ground and surface water sources;
- To support Irish Water in the development and implementation of Drinking Water Safety Plans.
- To support Irish Water in the development and implementation of the National Water Resources Plan for Ireland's public water supplies;
- To promote water conservation and demand management measures, and to support Irish Water in implementing water conservation measures.

Waste Water Services

- To ensure that the Local Authority provides adequate storm water infrastructure to accommodate the planned levels of growth and to ensure that appropriate flood management measures are implemented;
- To require all new development to provide a separate foul and surface water drainage system and to incorporate sustainable urban drainage systems where appropriate in new development and the public realm;
- To prohibit the discharge of additional surface water to combined (foul and surface water) sewers;
- To support Irish Water in the promotion of effective management of trade discharges to sewers in order to maximise the capacity of existing sewer networks and minimise detrimental impacts on sewage treatment works;
- To ensure that all new developments connect to the public waste water infrastructure, where available, and to encourage existing developments to connect. These will be subject to a connection agreement with Irish Water;

- To refuse residential development, other than single house systems, that requires the provision of private waste water treatment facilities;
 - Strongly discourage single house septic tanks and treatment plants to minimise the risk of groundwater pollution. Where such facilities are permitted, full compliance with the prevailing regulations and standards will be required;
 - To ensure that private waste water treatment facilities are operated in compliance with their waste water discharge license.
- b) Research from Maynooth shows increases in droughts. What are the plans for this? For example is there a plan to build a reservoir to ensure water supply and how can this be included in the CDP?
 - c) Celbridge needs more than just a single water feed as when it ruptured the whole town was left without water as there was no back up supply
 - d) Engage with Irish Water and share your vision
 - e) Investigate Lough Ree Royal Canal route as the source of water for Irish Water's Water Supply Project for the east of the country instead of Parteen as it would be shorter, more sustainable in terms of energy use, canal paths could be opened up for tourism etc.
 - f) Domestic and industrial buildings should be efficient in their water usage and have inbuilt re-usage systems. Also need to encourage domestic rainwater filtration and capture for gardening and car washing etc.
 - g) Irish Water's business model has failed and should be resolved. A more equitable levy scheme is required.
 - h) We are reliant on the Liffey for water supply. The resource of the Barrow in the south has headroom capacity that does not compete with Dublin for supply. This is a consideration for establishing a significant commercial enterprise, such as Pharma.
 - i) Rainwater harvesting and grey water re-use in all new housing and industrial developments should be mandatory. Inform people that water is a valuable resource, not just during drought periods and that our water resources are rapidly dwindling
 - j) Secure the provision of safe secure drinking water and promote the reduction in waste and over use of water
 - k) The CDP must address the security of our water supply so that it provides for Kildare's future needs.
 - l) In relation to water infrastructure, the CDP needs to look at a coordinated water infrastructure plan for Maynooth and the surrounding areas if the current level of development is to continue.
 - m) The CDP must include a suite of integrated policy measures to ensure that the PA's legal obligations under the Water Framework Directive and the operable River Basin Management Plans are achieved.
 - n) KCC need to be able to provide an up to date interactive map showing the changes due to the Liffey Scheme which has had serious consequences for health and the water quality in Golden Falls Lake.
 - o) Concern re pollution of Liffey as it enters Co. Kildare
 - p) Request that Golden Falls Lake become a healthy place for recreational activity.

- q) The discharge of the Ballymore Eustace Water Treatment Plant downstream of the Goldenfalls Reservoir should be kept under surveillance as an increase of the aluminium concentration has been noticed in the water.
- r) Urgent action to be taken to prevent the aesthetic value, tourism and recreational potential of Golden Falls Lake and the River Liffey being affected by Irish Water discharges.

CHIEF EXECUTIVE'S OPINION

KCC acknowledges the significant role that Irish Water has to play in ensuring the available capacity of our public water services infrastructure, the need to protect and optimise existing and planned public water services infrastructure and the need for sequential and phased development to align with the provision of infrastructure. KCC will continue to work with Irish Water to ensure that the citizens of our county can be assured a clean, reliable supply of water at all times and across all networks. In this regard policy WS6 of the current CDP should be noted. It is considered appropriate that a similarly worded objective would be included in the Draft CDP.

Policy WS5 of the current CDP should be noted with regard to wayleaves and buffer zones and the protection of these areas to protect, manage and optimise water supply. It is considered appropriate that a similarly worded objective would be included in the Draft CDP.

The number of one off houses in the Kildare countryside and the cumulative impact of individual septic tank and wastewater treatment systems on the quality of our groundwater and aquifers and consequently the quality of our water system was highlighted as a particular issue. This will be considered further as part of a more comprehensive review of the rural housing policy for Kildare.

CHIEF EXECUTIVE'S RECOMMENDATION

To include an objective in the Draft CDP that reflects policy WS6 in the current CDP in relation to the role that KCC has to play in conjunction with Irish Water to promote the ongoing upgrading and expansion of water supply services to meet the future needs of the county.

To include an objective in the Draft CDP that reflects policy WS5 in the current CDP in relation to the protection of wayleaves and buffer zones to protect, manage and optimise water supply networks in Kildare.

Wastewater

Submission Nos. 014, 016, 018, 065, 119, 144, 166, 172, 200, 202

- a) The CDP must be fully consistent with the PA's legal obligations under the Waste Water Discharge (Authorisation) Regulations (SI No. 684 of 2007).
- b) Circular Letter PD7/09 issued by the (formerly) Department of Environment, Heritage and Local Government sets out the "Combined Approach" and requires that planning permission should not be granted to development proposals where there is insufficient cumulative capacity within the relevant wastewater treatment plant. This underlines the imperative for new development to be channelled to targeted development centres where the appropriate physical infrastructure is planned or present.
- c) The CDP must include policies to provide alternatives to unsustainable urban generated dispersed one-off, including, for example, a serviced site policy.
- d) The PA must ensure that all private wastewater treatment proposals comply with the EPA Code of Practice and other related regulations.
- e) In terms of waste treatment NSO 9 is referenced (waste to energy facilities which treat residual waste that cannot be recycled in a sustainable way to deliver benefits such as electricity and heat production). Considering the growing population and greater

generation of waste it is now vital for additional strategic waste treatment capacity in the mid-east region to cater for this growth / additional waste in an environmentally sound and circular manner.

- f) The CDP must regulate the installation of systems intended to treat wastewaters and improve the quality of discharges to the environment. Integrated Constructed Wetlands (ICW) must be viewed as an adjunct to good agricultural practice and not as a low-cost way of getting rid of farm waste.
- g) Sufficient treatment capacity must be available both within the receiving sewerage systems locally and downstream of waste water treatment plants (WWTPs) over the full duration of the plan in order that the ecological integrity of the ultimate receiving waters is protected. In areas where treatment facilities necessary for development do not exist, planning permissions should either be refused (premature), or an appropriate condition should be used requiring that connections to the sewer will not be permitted until sewage works upgrading is completed and operational.
- h) An audit be undertaken of all sewage and wastewater infrastructure throughout the county.
- i) Sewage flowing along Main Street Celbridge, which must be sorted out
- j) Johnstownbridge is serviced by the adjacent Enfield wastewater treatment plant.
- k) Ensure all wastewater treatment plants can operate effectively
- l) Plan should address legacy deficits of failing wastewater treatment plants in settlements and small rural developments.
- m) Consider using grey water for toilet flushing or composting toilets
- n) Extracts from Eastern River Basin District – Programme of Measures Pilot Studies. The Plans and POMs were finalised in October 2009, but never followed up. “The discharge of Ballymore Eustace Water Treatment Plant located downstream of the Goldenfalls Reservoir should be kept under surveillance as an increase of the aluminium concentration has been noticed in this water.” The study of the health of the fish population was never carried out. Approx. 3.7 tonnes of sludge per month are washed down the slipway discharge to the Liffey at Ballymore Eustace.

CHIEF EXECUTIVE’S OPINION

In accordance with the NPF and RSES the Draft CDP will promote the concepts of compact growth, sustainable development and healthy placemaking with respect to the location of developments in our serviced towns and villages rather than increasing the pressure that is being put on our rural environments in particular with regard to the provision of wastewater infrastructure.

CHIEF EXECUTIVE’S RECOMMENDATION

To align the Draft CDP with the NPF and RSES in relation to the principles of compact growth and sustainable development in order to provide for the efficient use of existing and planned services for the existing and projected population of Kildare.

3) Waste

Submission Nos. 018

- a) Section 10.4 and RPOs 10.25, 6.23 and 7.37 relating to waste management and the circular economy and bioeconomy (RSES)
- b) A Resource Opportunity – Waste Management Policy in Ireland;

- o) The Kildare County Development Plan should implement the Waste Hierarchy as set out in the Waste Framework Directive and place prevention and minimisation at the forefront of any waste policy.
 - a) Disposal of municipal waste to landfill should be a last resort.
 - b) Implement waste prevention measures with local business and community groups. Develop reduction strategies for plastic, food waste and resource use.
 - c) Include community waste prevention demonstration programmes, which provides skills to develop waste prevention within local communities.
 - d) The use of easily accessible public recycling bins should be considered for public areas, paths and green spaces that will allow for adequate waste segregation and will encourage the use of the waste management hierarchy.
 - e) A Reuse Policy should be developed in consultation with the national Procurement service and other relevant bodies and implemented with public bodies in Kildare to ensure that full consideration is given to feasible reuse options before embarking on the purchase of new goods.
 - f) In 2011 Bord na Móna published its long-term land use strategy, Strategic Framework for the Future use of Peatlands. BnM expect to publish a revised edition in the coming months: “Bealach Úr, Bealach Glas - The Future use of our Peatlands”.
 - g) Bord na Móna estate currently supports nationally and regionally significant waste management and resource recovery infrastructure, including landfill, brown waste composting, recovery and recycling of municipal and construction and demolition waste, tyre recycling, and plastic film recycling all of which enable the transition to a more sustainable future and support the circular economy.
 - h) The current focus is on waste prevention, reuse, maximising recycling, and using waste as a fuel instead of fossil fuels; all elements of the circular economy strategy to boost competitiveness, foster sustainable economic growth, and generate new jobs. Given the geographic location, nature and physical characteristics of the estate, there remains significant potential for Bord na Móna to support further resource recovery operations and enable the transition to a more sustainable future.

CHIEF EXECUTIVE’S OPINION

The current CDP includes a number of policies that relate to waste management and with regard to the particular issues highlighted in the above submissions with respect to waste management, policy WM10 in particular should be noted where the Council encourages waste prevention, minimisation, recycling and recovery.

Having regard particularly to our climate change targets of reaching net zero carbon emissions by 2050 it is imperative that we retain this and other similarly worded policies in our Draft CDP in order to reduce our carbon footprint on our environment.

The submission from Bord na Mona has been noted wherein the potential is recognised for resource recovery operations in order to enable the transition to a more sustainable future. The Draft CDP will support all such efforts to address climate change.

CHIEF EXECUTIVE’S RECOMMENDATION

To include an objective in the Draft CDP to encourage waste prevention, minimisation, reuse, recycling and recovery as methods of managing waste, similar to WM10 in the current CDP.

4) Serviced Land

Submission No. 056

- a) The NPF and RSES require that new developments follow a tiered approach and that only serviced lands or land that can reasonably be serviced within the lifetime of the CDP in accordance with Irish Water's capital investment plan, be earmarked for future development.
- b) KCC should not cooperate with MCC's Maynooth Environs proposal to develop un-serviced rural land. If such lands were to be serviced, any supply of drinking water or wastewater services will diminish the capacity of Irish Water to cater for the appropriate growth of Maynooth.

CHIEF EXECUTIVE'S OPINION

The contents of this submission with respect to the tiered approach for all new developments in accordance with the NPF and RSES have been noted and will inform the Draft CDP. In this regard the Draft CDP can only consider the inclusion of lands for development where those lands are either serviced or serviceable during the lifetime of the Plan in accordance with Appendix 3 of the National Planning Framework.

CHIEF EXECUTIVE'S RECOMMENDATION

To fully align the Draft CDP with the NPF and RSES policy documents with respect to the adoption of the tiered approach to zoning lands for future development.

Energy and Communications

1) General

Submission Nos. 018, 203, 211

- a) No clear policy around wind/solar energy – need to ensure that there is not a proliferation
- b) All services in Ballymore Eustace should be placed underground with future capacity considered and appropriate ducting put in place. Where the council undertake footpath upgrades ducting should be provided to put existing services underground. Located in the east Kildare uplands the area may be considered suitable for placement of mobile masts. This should be highly regulated in terms of site, design, visual impacts, and distance from schools / residential areas.
- c) The KCDP should;
 - Promote and facilitate the incorporation of energy efficient design into projects.
 - Develop and implement an energy management programme for all public buildings.
 - Develop new skill sets in areas such as green procurement, carbon accounting, carbon management and energy management.
 - Support and promote the Better Energy Communities Scheme to enable communities around the country develop new and innovative, locally-based solutions to energy poverty.

CHIEF EXECUTIVE'S OPINION

In relation to wind and solar energy there are numerous policies listed in Chapter 8 of the current CDP that relate to both types of energy development. In the case of wind energy proposals these must have regard to, inter alia, the county's landscapes, nature conservation and the cumulative effects of other projects. In the case of solar energy some key considerations when assessing such proposals include the impact developments would have on biodiversity, decommissioning and rehabilitation plans and the design, siting and layout of proposals.

In relation to energy efficient design, Section 8.10 of the current CDP addresses the importance of energy efficiency in new developments to take account of the impacts of climate change which aligns with national objectives and contributes towards a lessening of our carbon footprint.

CHIEF EXECUTIVE'S RECOMMENDATION

To include objectives in the Draft Plan that reflect the existing policies as set out in Chapter 8 of the current CDP and to strengthen these policies where possible.

To include objectives in the Draft Plan that encourage energy efficiency in all new developments and to encourage the retrofitting of existing developments to incorporate energy efficiency measures having regard to Section 8.10 of the current CDP.

2) Renewable energy

Submission Nos. 012, 017, 044, 073, 089, 109, 128, 136, 166, 175, 200, 203, 234, 280, 293

- a) CDP should include policies to mitigate fears of renewable energy projects, including bonds. LA should identify locations for alternative energy sources. Levies on renewable energy projects should be used to deliver valuable amenities in the area
- b) Public buildings should be net contributors of alternative energy to the grid (e.g. solar).
- c) The agri-sector should be encouraged to use energy renewables (e.g. Future Pigs, Nurney).
- d) Employ suitably qualified staff with the necessary expertise to evaluate and explore options in the use of renewable energy sources
- e) Developments should be looked at in a holistic manner to identify opportunities to develop renewable energy provision through solar, wind, or district heating
- f) Local, community renewable energy projects should be encouraged and enabled by Kildare County Council
- g) Recommend the setting up of a Kildare Energy Agency sponsored by KCC with purpose to support and coordinate the energy transition for the County
- h) KCC should carry out a full assessment of County Kildare for renewable energy development potential and zone accordingly to ensure that there is no planning ambiguity surrounding any un-zoned areas. KCC should develop a consistent and transparent renewable energy zoning methodology for the County. The following standard for renewable energy zones should apply: 'No-Go', 'Open to Consideration', and 'Preferred' Areas.
- i) Interdisciplinary teams including experts in renewable energy production and energy efficiency along with ecologists, botanists, entomologists, hydrologists, geologists, engineers, builders, and planners should be formed
- j) should not give positive support to the development of renewable energy at the expense of other considerations
- k) ensure - that a full, and credible, environmental impact study accompanies the request for planning permission, that it shows that the development is sited sensitively with

minimal impact on the local environment, and that there will be ongoing, transparent and reported, efforts to minimise the impact on wildlife – birds, bats, etc.

- l) Benefits to the economy
- m) Emphasis should be placed on micro-generation, energy waste reduction and avoidance of biodiversity loss in the development of renewable sites.
- n) All forms of renewable energy production on both a domestic and community level should be encouraged.
- o) KCC's drive for a more renewable community should not come at the expense of important factors such as biodiversity, heritage etc.
- p) Develop sustainable renewable strategies
- q) Need to understand KCC's energy requirement.
 - o Set targets to meet energy demand and for energy production.
 - o Will KCC be a producer of energy, net neutral or consumer?
- r) The plan should encourage energy efficiency in areas of transport and in new development in towns and villages while supporting research and innovation in supporting energy security in more rural villages and towns.
- s) A study should be undertaken to identify areas suitable for renewable energy development. The council should work with other bodies to develop pilot projects on hydropower or wind energy and may be feasible on lands owned by IW. The area could become a pilot for the development of a CO2 neutral village or a net producer of renewable energy. Recently established Sustainable Energy Communities must be supported by the council.
- t) Renewable energy should be encouraged at the expense of other considerations.
- u) The use of renewable energy sources should be encouraged by making it cheaper and fossil fuels dearer.
- v) KCC should be cautious when considering the zonation of areas for renewable energy development going forward, so as not to constrain any areas which may have renewable energy potential, particularly for wind generation.
- w) KCC should give "positive support to the development of renewable energy within County Kildare" and this should be one of the key ways in which the "Plan can increase the levels of renewable energy production and energy efficiency in the County".
- x) The Office of the Planning Regulator (OPR) has already written to Local Authorities within the EMRA advising them to maximise the output of renewable energy sources in line with national government policies on climate change. We would urge KCC to take cognisance of this guidance when developing the 2023-2029 KCDP
- y) Assign community or energy officer
- z) Support for renewable energy – spatial allocation and planning guidelines for significant wind and solar installations while avoiding significant impact on nature, biodiversity, communities and amenity
- aa) We need to be clear which area of renewables is most sustainable and productive.
- bb) (RSES) RPO's 7.35-7.40, 10.20 and 10.22 relating to renewable energy
- cc) Expand and support the possibilities for local, sustainable energy production, such as personal solar panel, solar farms and wind technology, including house-based wind technology
- dd) With 21 Sustainable Energy Communities in Kildare the council should continue to promote and support them and provide project management expertise to manage and guide them through early projects.

CHIEF EXECUTIVE'S OPINION

The topic of renewable energy has been raised in a number of submissions received from a range of different viewpoints including the identification of locations for alternative energy sources, buildings as net contributors of alternative energy to the grid, district heating, the undertaking of a renewable energy audit for the county, the sensitive location of energy development proposals and the setting of targets to meet energy demands.

There are a number of policies and objectives in Chapter 8 of the current CDP that relate to renewable types of energy. The Landscape Character Assessment in the current CDP which informs Table 14.2 of the CDP gives guidance in relation to the suitable locations of various types of development depending on the sensitivity of the landscape. In this regard it should also be noted that a wind energy strategy is currently being prepared to inform the Draft CDP.

District heating in particular is one area that is not explored in the current CDP. Having regard to the pressing need to identify ways of reducing our overall carbon footprint, district heating is one such method that KCC should promote through the policies and objectives of the Draft CDP. It is considered appropriate to liaise with neighbouring local authority areas in this regard who have seen the successes of district heating with respect to public buildings within their own administrative areas as a way of informing our own policies and objectives in this regard.

One critical component of the Draft CDP will be the introduction of targets against which to measure and monitor progress against the stated objectives with the collective aim of reducing our carbon footprint and working towards achieving our net zero emissions targets by 2050.

CHIEF EXECUTIVE'S RECOMMENDATION

To include objectives in the Draft CDP that relate to the promotion of district heating in consultation with neighbouring authorities.

To include targets against each of the stated objectives in the Draft CDP as a means to monitor progress towards achieving our net zero emissions targets by 2050.

3) Renewable Energy Strategies

Submission Nos. 018, 293

- a) investigate the potential for further renewable energy production in Kildare.
- b) The importance of Access to and delivery of Information & Communication Technologies (ICT) is recognised
- c) (RSES)Section 10.3 deals with future energy networks including roll out of Smart Grids and Smart Cities and reinforcement of the Greater Dublin Area's transmission network (RPOs 10.19 to 10.24 refer) as part of Eirgrid's Development Strategy.
- d) The council's commitment to support nature-based solutions, the circular economy and renewable energy and to integrate policy and measures into the CDP is noted.
- e) KCC failed to produce a Renewable Energy Strategy for the County under the current KCDP (2017-2023).
- f) The new KCDP will need to include policies to encompass this principle of renewable energy and climate change and to deliver the Regional Strategic Outcomes for the Strategy

CHIEF EXECUTIVE'S OPINION

In formulating the policies and objectives related to renewable energy, the Draft CDP will fully align with the RPO's of the RSES in particular.

CHIEF EXECUTIVE'S RECOMMENDATION

To include objectives in the Draft CDP that fully align with the RPO's of the RSES with regard to renewable energy strategies.

4) Wind Energy

Submission Nos. Youth Workshop, 012, 015, 038, ,073, 105, 129, 140, 165, 193, 194

- a) Often opposed
 - b) IPCC require KCC to avoid haphazard siting of windfarms with no integrated plan
 - c) IPCC need to see the development of a strategic windfarm plan which takes into account the conservation needs of the County
 - d) County, Kildare has not contributed significantly to onshore wind development over the past number of decades and this should be addressed
 - e) identify a sufficient quantum of land as being potentially suitable for wind energy, based on what that will likely translate to MW or GW capacities as outlined in the SEAI Methodology for Local Authority Renewable Energy Strategies
 - f) request for a 'Renewables-Enabling Map' showing preferred locations for FlexGen gas turbine plant and synchronous condensers could be included in a Kildare Wind Energy Strategy.
 - g) Landscape Character Assessment:
 - include a map which identifies areas suitable for wind turbines and sensitive areas (such as tourism facilities or assets). The Landscape Character Assessment should be reviewed and updated, referencing the national Landscape Strategy 2015-2025. The Plan should include an objective protecting the integrity of key tourist amenities from negative visual and landscape impacts.
 - h) Technology
 - i) Grid availability
 - j) Guidelines
 - k) Planning conditions
 - l) Partnerships and investment opportunities
 - m) Note National Policy
 - Climate Action Plan (CAP)
 - The Department of Housing, Planning, Community and Local Government (DHPCLG) Section 28 Guidelines 'Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change' (July 2017), actions under Section 28 (1C) of the Act
 - n) Consistent approach with neighbouring LAs
 - o) Apply a regional based approach to Wind Farms
 - p) refer to the Wind Energy Development Guidelines, currently the subject of a targeted review by the Department of Housing, Planning and Local Government. Any future proposed wind energy developments in County Kildare should comply with the guidelines of the day.
 - q) Need for Wind Energy Strategy with clear targets
- a) A windfarm strategy for the county should be completed as soon as possible in consultation with the public. Particular efforts should be made to engage, during the

consultation process, with any communities likely to be particularly affected by having a windfarm located nearby.

- b) Concern raised that the strategy and SEA will be prepared by wind industry consultations who are biased towards industry from whom they source most of their work. If a wind industry consultant prepares the WES and SEA this would be a conflict of interest as they also work for the wind developers. An independent institute or academic institution is recommended to be engaged to prepare the WES and SEA. The council are urged to consider solar energy as alternative to wind close to important scenic and amenity areas in the county where the impact will be minimized and avoid wind turbines in these locations.
- c) Bord na Mona has plans for the biggest windfarm in Ireland at Ballydermot in Kildare/Offaly with between 50-60 turbines depending on the outcomes of local consultations. Bord na Mona's Strategic Plan6 is to also develop a major windfarm on the bogs south of the Mount Lucas (28 turbines) and Cloncreen (21 turbines) windfarms towards Portarlinton (30-50 turbines). In total this would result in between 130 and 200 turbines on Bord na Mona Bogs in the east midlands region.
- d) It is recommended that the council works with Bord na Mona to concentrate wind energy on the larger bogs in County Kildare while reserving 30% of the bogs solely for biodiversity. As a flat county where windfarms have a disproportionate impact on landscape, Kildare should adopt a clustered approach to wind energy and avoid a dispersed small cluster approach which can have a disproportionate impact.
- e) It is recommended the council recognizes the elevated importance of the Barrow Blueway scenic and amenity route for linking the county to from East to West and North and South Kildare. This elevated importance should provide for stronger protections on industrial development, particularly windfarms, in the proximity of the canal.
- f) Statkraft support the objective of KCC to develop a Wind Energy Strategy (WES) for the County and are currently requesting the provision of consultancy services to prepare this Strategy.
- g) The correct spatial planning and development of a WES for Co. Kildare can support the transition to a low carbon society, as well as increase awareness of climate change. In addition, by developing a robust and well-informed plan, KCC will be facilitating rural based enterprises and ensuring employment in rural areas into the future.
 - A wind energy strategy is needed to ensure a balance between creating wind power and biodiversity losses
 - A wind Strategy is required to prevent wind farms in scenic areas and designate areas in the County where turbines are allowed or not allowed. Setback distances should be 10 times the height of the turbine.
- r) Discourage development of wind farms on bogs as they are protected habitats, important for climate.
- s) Not suitable for boglands: landslips, pollution, flooding and court actions against the state by the EU and others (i.e., Derrybrien and Keeperhill)
- t) Any present or future Wind Farm proposals / projects should not adversely affect tourism for the Peatlands and the communities living around them.
- u) Turbine technologies have advanced significantly in the past decade, it is recommended to KCC that the SEAI Wind Atlas or any similar general wind resource data not be used as a constraint when developing and zoning areas for renewable energy development. Wind resource is a variable which should be assessed as part of each individual project.

- v) In relation to landscape, KCC and all Local Authorities should develop consistent Landscape Character Assessment (LCA) criteria and apply it across all Counties. A 'Low', 'Medium', and 'High' weighting table for landscape sensitivity types be considered for renewable energy development potential. KCC should update the 2017 LCA completed for County Kildare taking account of this recommendation, as we believe it would support developers and eliminate uncertainty surrounding areas unsuitable for renewable energy development at project inception.
- w) Onshore wind developments have an extremely important role to play in the development of any viable and sustainable renewable energy mix and this needs to be supported by KCC
- x) When preparing the new Renewable Energy Strategy for County Kildare, the Council should not consider the following potential constraints or facilitators in the process of identifying areas as being potentially suitable for wind energy developments: (1) Grid capacity; (2) Wind Speed; (3) Nature Conservation Areas – should not be automatically excluded.
- y) As decarbonisation and renewable energy ambitions increase in accordance with the Climate Action Plan, wind energy developments will have to extend from the least sensitive landscape areas with the most capacity, into areas of slightly more sensitive landscape

CHIEF EXECUTIVE'S OPINION

The various submissions received in relation to wind energy have been noted. A wind energy strategy is currently being prepared for the county which will inform the Draft CDP. It is envisaged that many of the issues highlighted will be addressed and form part of the emerging wind energy strategy.

CHIEF EXECUTIVE'S RECOMMENDATION

To ensure that the emerging wind energy strategy informs the policies and objectives of the Draft CDP.

5) Gas

Submission Nos. 176. 200

- a) To achieve targets significant infrastructure improvements and changes are required. Additional infrastructure improvements are required as Gas Networks Ireland seeks to deliver 37% biomethane through the gas network by 2050. Renewable gas injection points and Bio-CNG re-fuelling stations are vital to ensure delivery of this target.
- b) Encouraging projects such as upgrading and expanding the gas network, renewable gas production and CNG infrastructure for the transport sector.
- c) Continued support of the gas network can help sustain development in the region and help the county in realising its climate action objectives.

CHIEF EXECUTIVE'S OPINION

Suggestions in relation to renewable gas injection points and Bio-CNG re-fuelling stations are noted. It is considered reasonable that the objectives of the Draft CDP would support the provision of these facilities at appropriate locations and other similar measures which contribute towards lessening our carbon footprint and reaching our target of net zero emissions by 2050.

CHIEF EXECUTIVE'S RECOMMENDATION

To include objectives in the Draft CDP that support measures to reduce our carbon footprint including supporting the provision of measures such as the use of renewable gas injection points and Bio-CNG re-fuelling stations.

To include objectives in the Draft CDP to support the maintenance of the existing gas network and encourage the upgrading and expansion of same where required.

6) Geo-Thermal

Submission Nos. 140, 197

- a) All homes and buildings should be retrofitted where possible. Further investigation into deep geothermal technologies should be explored.
- b) Request for a buffer around dams, reservoirs and embankments constructed for the purpose of electricity generation for safety, site security, consolidation/expansion, protection from inappropriate nearby land uses.

CHIEF EXECUTIVE'S OPINION

Any measures that are proposed to combat climate change and to reduce our overall carbon footprint will be supported through the policies and objectives in the Draft CDP.

The submission received in relation to buffer zones around dams, reservoirs and embankments has been noted and a recommendation to that effect will be proposed for inclusion in the Draft CDP.

CHIEF EXECUTIVE'S RECOMMENDATION

To include objectives in the Draft CDP that support measures to reduce carbon footprints including in relation to the support of geothermal technologies as part of the retrofitting of homes and buildings.

To include objectives in the Draft CDP that provide for buffers around dams, reservoirs and embankments constructed for the purpose of electricity generation.

7) Solar Energy

Submission Nos. Public Meetings, Youth Workshop, 140

- a) In looking at what has worked elsewhere – Claremorris has a disused landfill site as a solar park owned by the community. Have the council considered sites for community energy sites in the plan and could the plan support this?
- b) Glint and Glare Assessments
- c) Solar panels need to be more affordable
- d) Supports the continuation of Policy SE 1 (CDP) which promotes the development of solar energy infrastructure in Kildare.
- e) Given that Solar PV developments can take more than 5 years to develop to construction phase, request that an option be granted as part of planning permission for a longer period, in appropriate circumstances.
- f) Request also that permissions are granted with a lifetime up to a maximum of 40 years. Any concerns re the deterioration of infrastructure could be addressed by way of e.g. a bond and the requirement to provide a Decommissioning Plan, as specified.

CHIEF EXECUTIVE'S OPINION

The suggestion that a disused landfill elsewhere has been developed as a solar park owned by the community is a notable innovative solution. The Draft CDP will further investigate this type of project in order to inform the preparation of the solar energy section.

In relation to the issues highlighted around glint and glare, these considerations form part of policy SE2 (Chapter 8) of the current CDP as it relates to solar energy development. It is considered reasonable to retain such policy statements in the Draft CDP and enhance and reinforce where appropriate.

CHIEF EXECUTIVE'S RECOMMENDATION

To include objectives in the Draft Plan to support solar farm development in appropriate locations.

To include an objective in the Draft CDP that relates to the glint and glare that may be associated with solar farm developments, similar to the wording of policy SE2 (Chapter 8) of the current CDP.

To include an objective in the Draft CDP to explore innovative projects for solar farm development that are in place elsewhere (example of disused landfill developed as a solar park owned by the community).

8) Bio-energy facilities

Submission Nos. 002

- a) Impact of nitrogen deposition on nitrogen-sensitive Natura 2000 sites or Annex 1 habitats outside European sites should be taken into account when considering the location of bio-energy facilities within the county
- b) Objective for safeguarding the national road network for grid connection utilising the national road network.

CHIEF EXECUTIVE'S OPINION

An assessment of potential impacts of nitrogen deposition will be considered in the Appropriate Assessment in accordance with relevant guidance, as necessary. In the event that potential impacts are identified, consideration will be given to monitoring of nitrogen deposition.

The issues in relation to the safeguarding of the national road network for grid connection have been noted and are addressed in the recommendation section below.

CHIEF EXECUTIVE'S RECOMMENDATION

To consider monitoring of nitrogen deposition as part of the AA in the event that potential impacts are identified

To include an objective in the Draft Plan to safeguard the national road network, in relation to renewable energy proposals. Consideration will also be given to including a requirement for proposals for new renewable energy developments to demonstrate that an assessment of all alternative grid connection route options has been undertaken prior to any proposals being brought forward for grid connection utilising the national road network.

9) Electricity

Submission Nos. 019, 140, 073, 127, 198

- a) Sell smart meters cheaply to homeowners & incentivise a 10% reduction in electricity usage
- b) Engage with Eirgrid about Green Energy storage
- c) Reference to Section 8.7 of the CDP in relation to seasonal energy storage technologies
- d) The inclusion of specific policies to support these new technologies should be considered
- e) Green Hydrogen, produced from renewable energy sources, offers potential for large scale seasonal storage of variable renewable energy. Large scale production could make Ireland a net exporter of energy.
- f) Submission no. 019 Eirgrid
 - Review RSES policies relating to Energy (Section 10.3) and include in CDP
 - Be explicit on how government policy documents have informed policies and objectives, e.g. Department of Communications, Energy and Natural Resources (2015) White Paper on Energy – Irelands Transition to a Low Carbon Energy Future 2015-2030, The White Paper, The Climate Action Plan 2019, RSES
 - to develop the electricity grid in a safe and secure way, facilitate the development of grid reinforcements including grid connections and a trans-boundary network into and through the county and between all adjacent counties and to support the development of international connection
 - Projects relating to Kildare
 - Reinforcement of the Transmission Network between Munster and Leinster
 - Reinforcement of the Transmission Network in the Midlands and South-East Regions including Kildare
- g) The Plan should compel Grid Networks Ireland to ring-fence grid connection capacity for community energy projects in the county and that Bord Na Mona lease a small % of their wind turbine sites to Kildare communities for community energy projects as these are listed as public lands.

CHIEF EXECUTIVE'S OPINION

There are a number of policies related to electricity supply and infrastructure in the current CDP, where Section 8.12.2 refers. In particular policy TN3 recognises that the development of secure and reliable electricity transmission infrastructure is a key factor for supporting economic development and attracting investment to Kildare. This policy statement along with others in Section 8.12.2 will be considered for inclusion in the Draft CDP and will be strengthened where possible.

CHIEF EXECUTIVE'S RECOMMENDATION

To include objectives in the Draft CDP that supports the efficient and reliable supply of the electricity supply network to all homes and businesses in Kildare.

To include objectives in the Draft CDP that support green energy storage and other means of storage as appropriate.

10) Data Centres

Submission Nos. 041, 051, 089, 109, 280

- a) Data centres by nature, are land intensive developments and can have differing locational requirements depending on the type of data accessibility speeds they cater for. All data centres have common infrastructure requirements such as:
 - Access to high voltage electricity lines;
 - High powered fibre optic cables;
 - Good site security and accessibility
- b) Proposed Data Centre Policy should allow for suitable, un-zoned sites to be brought forward for delivery due to the confluence of necessary infrastructure in some areas of Kildare which may not be explicitly identified in the Draft Plan through site specific zoning provision as suitable for data centre provision,
- a) Early engagement with stakeholders such as Eirgrid is recommended and any new large scale data centres should be close to existing 220kV stations,
- b) Data centres lead to a wide range of benefits including enhancement of the digital infrastructure, attraction for related industries to locate in Ireland in order to service and interact with data centres and clustering of interconnected entities such as business suppliers and associated organisations such as educational institutions,
- c) Suggestions for supportive policies –
Recognition that lands suitable for the development of Data Centres demand a confluence, or co-location, of required enabling infrastructure (fibre and power requirements, as well as supportive road infrastructure),
- d) Specifically, potential Data Centre location sites should be located within 3 km of a transmission (110/220/400 kV) substation or 2km of an overhead line should be supported. In addition, potential development locations should be within 20km of at least one major backhaul fibre network.
- e) Data Centres and energy demand: A longer term shift to home-working will necessitate the growth of ICT infrastructure in terms of datacentre development and associated infrastructure to support the increased data demands of a distributed workforce. (Note: an increase in demand of c. 30% was noted during the early stages of global lockdowns).
- f) The competitive advantage of Ireland as an appropriate location for data storage facility development coincides with a significant environmental/climate change benefit – namely the lower energy inputs and Greenhouse Gas (GHG) emissions associated with such developments located specifically in northern Europe and Ireland when compared to other locations, due to lesser heating and cooling requirements.
- g) The Plan should identify areas that are well serviced by relevant services, including high voltage electricity, and with ease of access to the national road network, to promote the delivery of data centre development over the new Development Plan period. The availability of supporting infrastructure (in particular high voltage electricity) is crucial, while access from high quality roads infrastructure is also an important consideration, along with access to water services.
- h) Data centres need to be appropriately located and should invest heavily in alternate energy resources and levied/rated accordingly
- i) If Data Centres are to be encouraged the council should ensure that the vented heat is used and not just allowed to seep into our local environments and ensure they use electricity that is generated from sustainable sources.

- j) Require the incorporation of sustainability strategies in all new data centres, such as rainwater reclamation, solar energy and heat recycling. KCC should ensure that the county is getting sufficient value in housing these data centres, through annual levies, contributions to climate change mitigation or biodiversity enhancement in the community.
- k) That Kildare is adequately financially reimbursed for the location of all data centres.
- l) Good landscaping for data centres is essential.
- m) Robust plans for sustainable energy generation in regards to digital infrastructure

CHIEF EXECUTIVE'S OPINION

The growth of the ICT sector has been highlighted in a number of submissions received. The shift in working patterns particularly during the Covid-19 pandemic has resulted in a need to support the increased data demands of a distributed workforce. Data centres have been highlighted as a key contributor to the economy due to their ability to enhance the available digital infrastructure.

It has been highlighted that in order for data centres to operate efficiently they need to be located in areas that are well serviced including in relation to access to high voltage electricity, ease of access to the national road network and access to water services. County Kildare has been identified as a suitable location to meet the necessary demands of such developments.

The contribution that data centres make to achieving our climate change targets is also noteworthy where the energy inputs and greenhouse gas emissions associated with such developments are considered to be low however the electricity demand for such centres is widely accepted to be significantly high. Therefore it is imperative that any data centre proposal would consider all possible means by which to address climate change and ultimately result in developments where net zero carbon emissions can be achieved by 2050 including using alternative energy resources, heat recycling and rainwater harvesting.

The impact data centres would undoubtedly have on our landscape cannot be underestimated and to this end, visual impact considerations and the integration of these centres into our environment, either urban or rural must be seriously considered.

CHIEF EXECUTIVE'S RECOMMENDATION

To include an objective in the Draft CDP to further consider the appropriateness of data centre development in County Kildare in the first instance and where they are considered appropriate, to take account of a range of factors including the land take required, the economic contribution of such developments, energy inputs and outputs, visual impact and climate change adaptation measures.

11) Broadband

Submission Nos. 162, 175, 217, 221

- a) Promote the roll out of more wi-fi hubs in public spaces
- b) We should not be looking to link every household down every boreen, but rather encourage people to live closer to towns
- c) (RSES) Section 8.6 and related RPOs 8.25 & 8.26 underline that digital infrastructure is key to continued growth, supporting businesses & enhancing communities including the delivery of the National Broadband Plan
- d) The CDP needs to address the limitations of broadband services and provide policies in conjunction with the National Broadband Plan to ensure the population can work from

- home successfully and support businesses. The covid-19 lockdowns highlighted discrimination regarding home-schooling and working from home
- e) Accessibility to broadband and broadband speeds are limiting economic growth and development
 - f) Encourages policies consistent with the Department Circular (PL 07/12 of 2012), particularly for broadband capability

CHIEF EXECUTIVE'S OPINION

The importance of a fast and reliable broadband connection is key to supporting businesses and communities. In light of the events of the past year in particular with the Covid-19 pandemic it is of the utmost importance that Kildares broadband infrastructure continues to provide the necessary supports in order to enable the continuation of home-working as one particularly relevant example. There are a number of policies in the current CDP that support the provision of the National Broadband Plan as it relates to Kildare as well as the facilitation of a high capacity ICT infrastructure. The Draft CDP will include similar policies and objectives that reflect the policies outlined in Section 8.14 of the current CDP and will strengthen these where possible.

CHIEF EXECUTIVE'S RECOMMENDATION

To include objectives in the Draft CDP related to broadband infrastructure having regard to the policies outlined in Section 8.14 of the current CDP and to strengthen these policies where possible.

CHIEF EXECUTIVE'S ADDITIONAL RECOMMENDATION FOR THEME 7 'MAKING IT HAPPEN'

In relation to all of the recommendations in the '*Making it Happen*' theme, the CDP will include targets against which to measure progress in order to ensure that we can achieve net zero emissions by 2050.

4.8 Miscellaneous

Submissions Received: 013, 028, 039, 089, 109, 135, 166, 175, 179, 180, 186, 202, 234, 294, 300, 301 & Public Meetings

| Issues | |
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| Style and legibility of the Plan should be considered to ensure it is clear and accessible for all | Noted. This will be considered as the Draft plan is being prepared |
| The number of dog wardens employed by KCC should be increased (2 submissions) | Noted. This comment will be referred to the Environment Department for their consideration |
| <p>Development Management Standards should be dealt with at the end of each section or cross reference sections with the Development Management Standards section.</p> <p>Sub-number or sub-letter lists of points and paragraphs.</p> <p>Include the section title and its number on each page.</p> <p>The use of the prefixes “Seek to” and “contribute to” could be interpreted as meaning the policies and objectives aren’t the primary responsibility of Council.</p> <p>KIO note a rider on the lines of “subject to the availability of financial resources” is added to some policies and objectives. KIO submit that it should be deleted. KCC must strive to secure the financial resources to implement the policies and objectives of the Plan.</p> | Noted. This will be considered as the Draft plan is being prepared |
| The level of agricultural services provided doesn’t reflect the development charges. | This will be considered as part of the review of the Development Contribution Scheme which is a separate process to the preparation of the CDP. |
| <p>KCC representatives to the Regional RSES Authority should be:</p> <p>Nominees from the Strategic Policy Committee on Planning & Economic Development (one each from North, Mid and South Kildare Areas)</p> <p>Must promote the adopted SPC policy positions of KCC.</p> <p>Planning & Development SPC - Ensure that any economic or commercial body, invited to nominate a person on that SPC, should not nominate a person with vested property or fiduciary interests in any part of County Kildare.</p> <p>Voting coverage on LAPs: Deliberate overlapping of MD boundaries in LAP to widen voting requirements to the 40 members, to obtaining a way around a divisive or solid block vote should be discontinued.</p> | <p>This is not a matter for the CDP.</p> <p>The relevant SPCs will feed into the review of the CDP</p> <p>The Local Government Reform Act, 2014 sets the relevant legislation and this cannot be altered as part of the CDP process.</p> |

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| We would like clarity on the distinction between government regulations and guidelines. We understand in having regard to Section 28 Guidelines we apply a comply or explain approach. | Noted. |
| <p>Audit of the previous/current county development plan and a report developed outlining how much of it was achieved, how much was not, and what might usefully be carried over into the new plan</p> <p>A list of objectives from the current plan that are not yet achieved would be worthwhile and presented as a percentage. Objectives need to be outlined in order of priority clearly highlighting those expected to be achieved within the timeframe of the plan.</p> <p>Key Performance Indicators should have 6 monthly checks that can be written into the plan. Policies could be devised that relate to areas of similar circumstance.</p> | <p>A 2-year mid term review was undertaken of the current CDP pursuant to Section 15 of the Planning & Development Act, 2000 (as amended). This review report was circulated to Members in May 2019 and is available for viewing on the KCC website. As part of the preparation of the Draft CDP, all policies and objectives will be reviewed to determine which have now been delivered and which should be carried over to the new CDP.</p> |
| The use of the Irish language should be promoted. | <p>Section 17.4.12 of the current CDP requires that names of developments shall include the use of the Irish Language.</p> <p>The CDP is a land use plan and as such is somewhat limited in its role in the promotion of the Irish language.</p> |
| Create an initiatives and action tracker in tabular format that can be viewed and queried regularly to see updates on actions agreed in full and district council meetings | Noted. This comment will be forwarded to KCC Corporate Services Department for further consideration |
| The structure of the CDP should be improved and include timeframes for achieving objectives, management and feedback loops, Key performance indicators; use of metrics; include much longer term objectives; Regular progress reviews. | Noted. These comments will be taken into account as the Draft CDP is being prepared. |
| <p>Need a transformative vision for Kildare - a strong vision that is meaningful and memorable by the residents of Kildare.</p> <p>The CDP vision should be ambitious and act as a partnership framework to allow community, non-profit/charity organisations, businesses, institutions, investors, etc. to play their part in delivery.</p> <p>Consider the following key goals:</p> <ul style="list-style-type: none"> ○ a competitive economy with world-class services and transport; ○ a county of housing choice with homes that meet our needs and lifestyles; | <p>Agreed. A Vision for the county will be developed in collaboration with our elected members</p> <p>These goals will be considered as the Draft CDP is being prepared</p> |

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| <ul style="list-style-type: none"> ○ a great place to live with communities that are strong, healthy, and well connected; and ○ a sustainable and resilient county that protects the natural environment and has a balanced approach to the use of land and resources. <ul style="list-style-type: none"> ● Critical key objectives: <ul style="list-style-type: none"> ○ Create a County that is supported by infrastructure ○ Work together to grow the county (increasing partnerships to increase the use of public resources such as open space and public facilities) ○ Celebrate our diversity and putting people at the heart of planning (e.g. increasing walkability in towns, better open spaces and improving accessibility between towns.) ○ Give people housing choices ○ A well connected County – develop more accessible and active travel approach to intra-county movements ○ Create the conditions for a stronger County economy (e.g. shift the commuter economy to a localised economy, potentially focus on themes/economic zones, and build on the digital economy to retain people, which then has an indirect benefit to other businesses, shops, cafes, etc.) ○ Value our green spaces and landscape, and increase our biodiversity and environment as well as tackle the widespread illegal dumping/waste. ○ Use our resources wisely and adapt to a changing world (e.g. invest in our Sustainable Energy Communities, increase County resourcing in this area partnered with local groups and community) | <p>These objectives will be considered as the Draft CDP is being prepared</p> |
| <p>In addition to the positive principles set out in the RSES, put the UN Sustainable Development Goals at the core of the planning process.</p> | <p>The 17 UN Sustainable Development Goals have informed the NPF, RSES and will also inform the Draft CDP.</p> |
| <p>There is an imbalance in funding in many areas between the North and South of the County which needs to be addressed.</p> <p>KCC should be pro-active in pursuit of Government Funding, with a dedicated team to apply and pursue such funding.</p> | <p>KCC pursue all relevant funding streams as they relate to objectives of the KCDP. A significant number of URDF and RRDF funding has been allocated to towns across County Kildare.</p> |

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| Keep a register of applications per department and a register of how much funding was not applied for and why. | Appropriate records of such applications are retained. |
| <p>The planning process Will KCC look for different types of submissions at the various stages of planning ?</p> <p>Youth engagement in the process Participants were interested in youth engagement in the early stage consultations and in how the outcomes and photos from the competition will be used to inform the plan. This was in the context of Kildare having such a young population.</p> <p>Government Departments/Agencies in the process Is there a consultation process regarding government departments/agencies?</p> | <p>At this, the 'pre-draft' stage, the submissions are required to be strategic in nature. The next stage of involvement for the public will be at the Draft CDP stage later this year when the nature of submissions would be expected to be more detailed.</p> <p>The Photography Competition for young people is designed to involve them in the planning process. Their photos of gardens, nature, parks and areas of interest to them will be reviewed and prizes awarded. Some of the photos received may also be included in the final, adopted publication of the Kildare County Development Plan 2023-2029. As a means by which to reach as many of our younger citizens in particular as possible, a separate, independently facilitated workshop was held with Comhairle na nOg who represent the views of our younger people. These views have and will continue to be taken into account as the Draft Development Plan is being prepared.</p> <p>There are many forms of consultation undertaken during the Plan making process including with the public (at three different, formal stages), with both statutory and non-statutory agencies and key stakeholders in addition to ongoing engagement with the various KCC Service Departments..</p> |

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| Does national policy dictate over submissions made by the public? | The policies and objectives of the emerging Plan while having regard to the content of all submissions received must be in accordance with the principles of proper planning and sustainable development and must align with European, national and regional legislation and planning policies. |
| More thought should be given to the presentation of the Development Plan on the Kildare County Council website. | Noted, these comments will be considered as we publish the various elements associated with the Kildare County Development Plan. |