# **Summary of Submissions/Observations received on the Issues Paper**

	Received from	Issues Raised
1.	Office of the Planning	The OPR is obliged to evaluate and assess plans, as per Section 31AM of the P&D Act.
	Regulator	Issues Paper and Consultation Strategy
		<ul> <li>The OPR agrees that it is essential for the plan to respond to the challenges arising from the impacts of the Covid-19 pandemic, Brexit and Climate Change.</li> </ul>
		<ul> <li>The Issues Paper is commended for being concise, thematic, including key achievement and using infographics.</li> </ul>
		<ul> <li>The variety of methods used to inform and engage the public is commended (FAQs, virtual meetings, social media, and youth photographic competition). The youth engagement is particularly positive.</li> </ul>
		Core Strategy & Settlement Strategy
		<ul> <li>The NPF, RSES and SPPRs in Section 28 Guidelines will be key determinants in making the Core Strategy.</li> </ul>
		<ul> <li>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).</li> </ul>
		<ul> <li>The Ministerial Circular and S28 Guidelines Housing Supply Target Methodology for Development Planning specify that 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</li> </ul>

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.

#### Metropolitan Area Strategic Plan (MASP)

• 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.

# **Compact Growth and Zoning**

- Compact growth is a key NSO of the NPF. 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: 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'. (See Appendix 3 of NPF).

#### **Local Area Plans**

• It is important that the preparation of a joint local area plan with Meath Co. Co. is prioritised for Maynooth. 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 issues 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.

#### **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.
- 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.
- The planning authority is commended on progress made on blueways, greenways and local area plans which are informed by local transport strategies.

- It is recommended that modal shift targets are included in the plan.
- 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.

#### **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.

#### 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.

#### **Summary**

The OPR advises particular attention should be drawn to the following:

- A significant proportion of the county's future homes will need to be allocated to the designated key towns and larger settlements, consistent with RSES and MASP. 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 categorisation and positioning of settlements in the hierarchy should be revisited having regard to the asset based approach outlined in the RSES.

- 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.
- The preparation of a Maynooth LAP with Meath County Council should be prioritised and should be informed by a local transport plan in consultation with TII and NTA.
- 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.
- Policies and implementation measures to encourage infill/brownfield development in the MASP and county's towns should be specific, targeted and measurable.
- 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.
- 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

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		should include targets for modal shift over the plan period aligned to specific implementation and monitoring measures.
		<ul> <li>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).</li> </ul>
2.	Department of Culture, Heritage	Notification under Section 11(2) OF THE Planning and Development Act 2000 (as amended).
	and the Gaeltacht	Nature Conservation
		The observations are intended to assist Kildare County Council in meeting its obligations in relation to nature conservation, European sites, biodiversity and environmental protection in the process of reviewing and preparing the new Kildare County Development Plan.
		Government policy on nature conservation
		<ul> <li>We are in the midst of a national and global biodiversity crisis and currently Ireland's progress in achieving the 20 UN Biodiversity targets is at an insufficient rate.</li> </ul>
		<ul> <li>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 and is a signatory to the UN Convention on Biological Diversity Strategic Plan for Biodiversity 2011-2020.</li> </ul>
		<ul> <li>Covid-19 pandemic has highlighted the role biodiversity plays in maintaining our physical and mental health.</li> </ul>
		<ul> <li>A County Development Plan that has biodiversity embedded in its core policies will help build a county that is a healthy place for its people and visitors.</li> </ul>

• The elected members of Kildare County Council declared a Climate and Biodiversity Emergency in June 2019. The new CDP should reflect this commitment.

#### Nature conservation within the CDP

- The Department is aware of the recent positive steps by the Council to promote conserve and enhance biodiversity within the county. These include the approval by Council members of Kildare County Council becoming a partner to the 'All Ireland Pollinator Plan', production of the Kildare Pollinator Action Plan 2019-2022, ecological audits of council controlled parks and long-term commitment to habitat mapping in towns and villages.
- The CDP should ensure that Government policy on biodiversity can be achieved in Kildare.
- It is imperative that Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA) in relation to the CDP are integrated with the plan-making process and to apply the precautionary principle. The Council should ensure that ecological expertise is available to it in these undertakings.
- Where development projects arising from the CDP are not subject to EIA, assessment of the impacts on biodiversity will best be facilitated through the preparation of an Ecological Impact Assessment (EcIA). The Department recommends including an objective in the CDP in this regard.
- Surveys carried out for the preparation of EIAR, NIS or EcIA generate biodiversity data and the Department encourages the Council to include an objective to ensure that this data is made available to the National Biodiversity Data Centre (NDBC) on an ongoing basis.
- Objective 1 in the NBAP is to 'Mainstream biodiversity into decision-making across all sectors'. As
  outlined in the Regional Spatial and Economic Strategy (RSES), KCC should include objectives in the
  CDP to implement and monitor the actions as set out in the NBAP as the conservation of biodiversity
  is an essential component of sustainable development.

- Department recommends that biodiversity considerations are integrated into all sections of the CDP and are taken into account when zoning for lands.
- The incorporation of advise from a professional Ecologist early in the spatial planning processes is recommended by the Department.
- The review of the current CDP's policies and objectives should take place with a view to streamlining and strengthening policies and ensuring that they are consistent with current EU and National plans, reports, guidance documents and case law relating to biodiversity (i.e. policies and objectives must be biodiversity-proofed).
- Natural heritage objectives are clear and robust, and there is an objective to protect, preserve and enhance biodiversity both within and outside protected sites. A target of no net loss of biodiversity target in relation to development policies and objectives in accordance with the NBAP.

#### Climate change and biodiversity

• The Department advises 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 Council should enhance the role of the natural environment to promote climate adaptation through promoting green infrastructure (including bogs and peatland areas).

#### (i) Peatlands

- The Department highlights the importance of peatland habitats within the county in relation to climate action and in supporting biodiversity.
- The National Planning Framework 2040 (NPF) and the Regional Spatial and Economic Strategy (RSES) recognise the need to develop a long-term strategic plan for former industrial peatlands (see RPO 4.84

and RPO 7.29) and are committed to the preparation of a comprehensive after-use framework for peatlands that will involve all stakeholders. The Department recommends a clear policy objective is included in the draft CDP which would support this aim.

• It is recommended that the draft CDP include an objective to support the aims of the National Peatlands Strategy and the implementation of the National Raised Bog Special Areas of Conservation Management 2017-2022.

# (ii) Wetlands and Waterways

- The Department recommends that the potential role of Natural Water Retention Measures should be examined and incorporated into flood risk management objectives.
- The Department encourages a move away from maintaining green field runoff rate through use of Natural measures. For larger developments such as Strategic Housing Developments (SHDs), the Department recommends the inclusion of a report of the SUDS measures considered in principle and detailed reasons why natural measures were not considered as part of the planning application.
- Discourage culverting of water courses and encourage reopening of previously culverted water courses. Where possible ecologically friendly box culverts should be used in preference to piped culverts. A development proposal requiring culverting should also document stream habitat loss and provide compensatory habitat. The CDP should promote the removal of historic infilling along watercourses.
- Appropriate riparian setback distances support the attainment of high ecological status for water bodies, the conservation of biodiversity, good ecosystem health and provide buffer zones for flood plains. The Inland Fisheries Ireland Document 'Planning for Watercourses in the Urban Environment' should be consulted in relation to formulating objectives and policies for riparian zones in the CDP.

# (iii) Hedgerows

Growing view that hedgerows represent a significant carbon sink. The Department suggests that the
Council include the objective that all hedgerows be retained and subject to appropriate long term
management in any new development and where removal is necessary that the same length of native
hedgerow be planted.

## **Green Infrastructure (GI)**

• Clear distinction is made between GI and greenways, blueways and peatways within the CDP. The Department recommends that such proposals for greenways, blueways and peatways are subject to route / site selection processes to ensure that impacts to biodiversity and nature conservation issues are avoided.

#### **Invasive Species**

• The Department encourages the inclusion of objectives in relation to the containment and control of invasive species in the CDP with reference to the requirements of the EC (Birds and Natural Habitats) Regulations, 2011-2015.

# **Removal of Barriers to Fish Migration**

• The National Barrier Programme (NBP) has created a national geodatabase of 'potential' barriers to fish passage. The Department recommends that this issue is considered in the CDP. There is scope for barrier removal particularly within the River Barrow SAC. The foregoing is in line with National Policy Objective 59 (Enhance the conservation status and improve management of protected areas and protected species by integrating policies and objectives for the protection and restoration of biodiversity in statutory development plans) of the National Planning Framework and also the EU Biodiversity Strategy for 2030.

# Nitrogen deposition

- 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.
- 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).

# **Light pollution**

• The Department encourages the use of a Light Pollution Strategy within the CDP, which should include identifying dark sky areas which need protecting and include street lighting policy and development lighting policies. The colour of the spectrum produced by LED installations should be considered when specifying and installing exterior lighting.

# Monitoring the impacts of the CDP on biodiversity

- The Department advises that particular attention should be paid to the requirements of Article 10 of the Strategic Environmental Assessment (SEA) Directive (2001/42/EC), whereby Member States are required to monitor the significant environmental impacts of the implementation of plans. The Department would welcome a clear and specific monitoring plan to be included with the Strategic Environmental Report that would clearly outline how it is proposed to record the impacts of CDP implementation on biodiversity, both in terms of biodiversity loss and enhancement during the lifetime of the CDP.
- The Department would also welcome the publication of Strategic Environmental Reports on the Council's website.

# Archaeology

- Attention is drawn to the question of extensions to medieval burial grounds, which can be a cause for concern for a number of reasons. Firstly, they can pose a direct threat to archaeological remains.
   Early-Christian and Medieval graveyards were often larger in extent in the past than they are today.
   Many were enclosed in the nineteenth century, with parts of the original graveyard left outside the later wall. An extension close to or directly outside the graveyard wall will therefore be very likely to disturb burials and other archaeological remains associated with the original graveyard.
- It is therefore very important that policies and objectives in the County Development Plan should state that proposals for extensions which would be so large and/or so close to an existing historic graveyard, that they would endanger archaeological remains or fundamentally alter the amenity of the graveyard, will be discouraged.
- Re: Section 12.3.2 and 12.8 Archaeological Heritage. The following will help in updating the sections dealing with the legal framework for the protection of archaeological remains.
- The National Monuments Acts 1930 to 2014; In terms of protection of monuments and related sites, the most widely applicable protective mechanism is the Record of Monuments and Places (RMP), established under section 12 of the National Monuments (Amendment) Act 1994. There are over 130,000 entries in the RMP, which takes the form of lists and maps for each county in the State.
- The RMP requires notice to be given to the Minister of proposed work at or in relation to monuments and places included in it (generally referred to as "recorded monuments").
- Under the National Monuments Acts the Minister and local authorities must maintain national monuments of which they are owners or guardians (the OPW has day to day responsibility in relation to national monuments owned by or in guardianship of the Minister for Housing, Local Government and Heritage) and, subject to such restrictions as are reasonably necessary, seek to provide public access to such national monuments.

The Planning and Development Act 2000 and the Planning and Development Regulations 2001

- Development Plans are legally required to contain objectives for the conservation and protection of the archaeological heritage (see section 10(2)(c) of the Planning and Development Act 2000). This is separate and additional to mandatory objectives in relation to architectural heritage.
- The Planning and Development Acts and Regulations contain further provisions relating to the protection of archaeological heritage in the course of particular planning cases. These include provisions making it clear that imposition of archaeological conditions on grants of planning permission does not create grounds for claims for compensation. Detailed provisions are also included, which ensure that planning applications for proposed development which would affect sites protected under the National Monuments Acts 1930 to 2014 or archaeological sites in general, are referred to the National Monuments Service.

#### Framework and Principles for the Protection of the Archaeological Heritage

- It is essential that archaeological issues be addressed as part of Development Plans, as such plans sit at the centre of the whole planning and development system.
- There should be an emphasise on the non-renewable nature of the archaeological heritage and the need always to consider its preservation in-situ as the first option, and also the need to carry out appropriate levels and forms of archaeological assessment in advance of development.

Section 12.9.1 The following list of objectives and policies for the protection of the archaeological heritage will help revise existing policies and add some new ones to the list.

It will be an objective of the planning authority to protect in an appropriate manner all elements of the archaeological heritage and other features of the following categories:

• Sites and monuments included in the Sites and Monuments Record (SMR) as maintained by the National Monuments Service (NMS).

- Monuments and places included in the Record of Monuments and Places (RMP) as established under section 12 of the National Monuments (Amendment) Act 1994.
- Historic monuments and archaeological areas included in the Register of Historic Monuments as established under section 5 of the National Monuments (Amendment) Act 1987.
- National monuments subject to Preservation Orders under the National Monuments Acts 1930 to 2014 and national monuments which are in the ownership or guardianship of the Minister for Housing, Local Government and Heritage or a local authority.
- Archaeological objects within the meaning of the National Monuments Acts.
- Wrecks protected under the National Monuments Acts 1930 to 2014 or otherwise included in the Wreck Viewer maintained by the National Monuments Service.
- Archaeological features not as yet identified but which may be impacted on by development.

The planning authority shall protect the archaeological heritage through ensuring preservation in-situ or preservation by record, as appropriate, with preservation in-situ being the first option to be considered and being presumed to be the preferred option. If preservation in-situ cannot be achieved, or can only be achieved in-part, then preservation by record of the archaeological heritage will be required – this will require the full archaeological excavation and recording of the monument/site, in accordance with best professional practice. Where excavation is required this shall also include the preparation of appropriate reports, post-excavation analyses and publications. The costs of assessing and mitigating archaeological impacts will be considered to be part of development costs which are appropriate to be borne by the developer.

Section 12.9.1 Policies: Archaeological Heritage Recommended policies to protect archaeological heritage

- To protect and enhance archaeological monuments and historic wrecks and their settings and amenities, having particular regard to the importance of historic town defences, historic graveyards, national monuments in the ownership of the Minister for Housing, Local Government and Heritage or a local authority and, in general, monuments and historic wrecks which, through their presence in the landscape or seascape, provide tangible evidence of the past.
- To protect historic graveyards, including through the avoidance of extensions to them that would have an inappropriate level of impact on sub-surface archaeological remains or on their setting or amenity and, in that regard, as an alternative to extensions to historic graveyards to endeavour to find alternative locations where additional land for burial is considered necessary.
- To ensure that historic graveyards in the ownership or care of the local authority are managed and maintained in accordance with appropriate conservation standards and that local communities involved in care and maintenance of historic graveyards receive appropriate advice regarding such standards.
- To promote and facilitate appropriate forms of access (including disabled access) to archaeological
  monuments and historic wrecks, including maintaining or developing means of access (by working
  with landowners to secure appropriate access over private lands), providing appropriate, accurate
  signage and interpretive material and providing appropriate forms of virtual access where physical
  access is not possible.
- To ensure that all aspects of archaeological heritage and underwater cultural heritage, in all environments, are considered in the development process, including impacts on unidentified elements of the archaeological and underwater cultural heritage.
- To promote knowledge and appreciation of archaeological and underwater cultural heritage and facilitate access to appropriate guidance regarding its protection and conservation, including at all stages of the development process (including preplanning application consultations).

- To promote early and comprehensive public access to the results of archaeological excavations carried out as a result of development or conservation projects through publications and the provision of onsite interpretive material even where no physical remains are visible.
- To support community initiatives and projects regarding preservation, presentation and access to archaeological heritage and underwater cultural heritage, provided such are compatible with appropriate conservation policies and standards, having regard to the guidance and advice of the Department.

# RE: 12.9.1. AH 4, 17.15.5 Development Management Standards Archaeology. General recommendation regarding development control policies and objectives

- Ensuring that both the relevant statutory procedures and the other procedures and practices noted below are adhered to will be greatly facilitated by the planning authority having access to its own professional archaeological expertise.
- With regard to developers seeking archaeological advice from the Department (through the central
  contact point for heritage referrals from planning authorities in advance of submitting a planning
  application) the Department (subject to available resources) will seek to engage with the pre-planning
  process. However, for the exercise to be beneficial, it is essential that developers carry out an initial
  archaeological assessment prior to engagement with the Department. Planning authorities should
  emphasise this to developers before advising them to seek pre-planning consultation with the
  Department.

#### **Recommended Development Control Objectives and Policies:**

• That proposed developments which may, due to their location, size, or nature, have implications for elements of the archaeological heritage (including underwater cultural heritage) be subject to an archaeological assessment, which should in general be carried out before any grant of permission. Such developments include those that are located at or close to archaeological sites or monuments or

historic wrecks, those which are extensive in terms of area (ground disturbance of 1/2 hectare or more) or length (1km or more) even if no known elements of the archaeological heritage are present, those which would affect significant areas of environments such as wetlands, reclaimed areas of rivers, lakes and coastlines and underwater areas even if no known elements of the archaeological heritage are present, and any developments that require the carrying out of Environmental Impact Assessment.

- Proposed developments in areas of the marine environment or inland waterways for which there are
  no located wrecks may be considered to be areas of high archaeological potential due to the number
  of historic ship losses recorded for these areas over time. Therefore, developments in riverine,
  lacustrine, intertidal and sub-tidal environments of archaeological potential should be subject to an
  archaeological assessment, which should in general be carried out before any grant of permission.
- To ensure that archaeological assessment is carried out in accordance with relevant policies and standards, in particular those set out in the Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland 1999) and the Policy and Guidelines on Archaeological Excavation (Government of Ireland 1999) and the advice in particular cases of the Department, with all relevant techniques (including documentary research, aerial photographic research, geophysical survey and archaeological test excavation) being required as appropriate. This will also include, in some cases, the carrying out of building surveys and assessments of upstanding structures to determine the extent to which they are, or contain within them, structures of medieval or early modern date.
- To ensure that all planning applications for developments of categories set out above are referred to the Department, through its Development Applications Unit, that such referrals take place in a timely manner and that full account is taken of the recommendations made by the Department.
- That permission for proposed development will be refused where the development cannot be carried
  out in a manner compatible with the protection of the archaeological heritage as provided for in the
  policies and objectives contained in the development plan and in relevant national policies, in

particular the Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland 1999).

- That where permission is granted for proposed development such grants of permission will contain appropriate conditions to secure the protection of the archaeological heritage, either by preservation in-situ or, where impact cannot be avoided, by way of preservation by record. In imposing such conditions, the planning authority will act in accordance with relevant policies and standards, in particular the Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland 1999) and the Policy and Guidelines on Archaeological Excavation (Government of Ireland 1999), and be guided in particular cases by the advice of the Department. Such conditions may require, as appropriate, archaeological assessment, preservation in-situ, preservation by record and/or archaeological monitoring as well as post-excavation conservation, analysis and reporting.
- That where preservation in-situ is required as a condition, further conditions may require appropriate immediate and long term conservation and management of the archaeological features in question and long term monitoring of the effectiveness of conservation measures, with appropriate steps required to be taken in the event conservation measures are proving ineffective.
- That where preservation by record is required as a condition, such conditions will further require
  preparation of appropriate follow-up reports, analyses and publications and the conservation as
  necessary of archaeological material and objects recovered during the archaeological excavations as
  carried out.
- That where permission is granted conditions may require presentation to the public of archaeological features preserved in-situ on the site, where practicable, and/or provision of interpretive material at the site (including on a permanent basis) whether or not any features have been preserved in-situ.
- That where archaeological excavation is required as a condition of permission, further conditions may be imposed requiring the provision of public access to such excavations, subject to appropriate safeguards.

		<ul> <li>That where conditions are imposed for the protection or preservation of the archaeological heritage, these will make clear that the costs of implementing these are to be borne by the developer.</li> <li>To develop the planning authority's own professional archaeological expertise and involve that expertise in dealing with planning casework, including the drafting of future revisions of the development plan.</li> <li>RE: 12.9.1. AH6 and 11.16 Burial Grounds</li> <li>Due to the particular concerns (as outlined above) presented by applications for extensions to medieval graveyards, the following new County Policy Objectives should be included in the County Development plan.</li> <li>To protect historic graveyards, including through the avoidance of extensions to them that would have an inappropriate level of impact on sub-surface archaeological remains or on their setting or amenity and, in that regard, as an alternative to extensions to historic graveyards to endeavour to find alternative locations where additional land for burial is considered necessary.</li> <li>To ensure that historic graveyards in the ownership or care of the local authority are managed and maintained in accordance with appropriate conservation standards and that local communities involved in care and maintenance of historic graveyards receive appropriate advice regarding such standards.</li> </ul>
3.	National Transport Authority	The NTA is obliged to evaluate and assess plans, as per Section 31AM of the P & D Act.  Guiding Principles
		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 emphasise 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.

#### **Integrated Implementation Plan 2019-2024**

- 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.

#### **Bus Investment:**

- 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; ② The development of Core Bus Corridors (CBCs); Of particular relevance to Kildare are the following:

Radial CBC's:

Lucan – City Centre;

Tallaght – Terenure;

Oribtal CBC's

Maynooth – Tallaght;

- Improved Interchange Facilities (in particular Liffey Valley and Tallaght); and
- Improved Bus Stops and Shelters.

# **Light Rail Investment**

- Network Development Luas to Lucan; and
- Fleet and Network Enhancement.

# **Heavy Rail Investment**

- 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.

#### **Integration Measures and Sustainable Transport Investment**

- 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.

#### Movement at Inter-Settlement level

- 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.

# Movement at Settlement Level – Local Transport Plans (LTP)

• 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.

#### **Provision of Public Transport Services in Rural Areas**

- 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 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.
- 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.

#### **Strategic Road Network**

• 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.

#### **Parking Standards**

# **Car Parking**

• 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.

#### **Cycle Parking**

• 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 LaoghaireRathdown County Council in 2018, which includes comprehensive guidance on the design of cycle parking.

#### Accessibility

• 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.

#### **National Transport Authority Guidance Documents**

- The NTA recommends that the preparation of the Development Plan is informed by the following NTA guidance,
- The National Cycle Manual;
- 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).

# **Development Plan Indicators – Mode Share**

• 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.
4.	Transport Infrastructure Ireland (TII)	The Authority submits the following observations for the Councils consideration which may inform the preparation of the Draft County Development Plan.
	in Claria (Til)	MANAGING EXCHEQUER INVESTMENT AND STATUTORY GUIDANCE
		• 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.
		<ul> <li>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.</li> </ul>
		<ul> <li>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.</li> </ul>
		<ul> <li>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).</li> </ul>

• 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.

#### **DEVELOPMENT AND CORE STRATEGY**

- 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 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.

- 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.

#### **Development at National Road Junctions**

- 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.
- TII welcomes and commends the recently prepared Draft Athy Local Area Plan which demonstrated the above approach.

#### **Access to National Roads**

- 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.

# 'Exceptional Circumstances'

• 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.

#### TRANSPORT PLANNING AND NATIONAL ROAD SCHEMES

- 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.

#### OTHER SPECIFIC POLICIES AND OBJECTIVES

# **Road Safety**

- 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).

# Traffic and Transport Assessment (TTA)

- 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.

#### **Service Areas**

• The Authority would welcome the provisions of the TII Service Area Policy (2014) and the DoECLG Guidelines reflected in the Draft County Development Plan.

#### Signage

• 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.

#### Noise

• The Council is requested to refer to the requirements of S.I. No. 140 of 2006 Environmental Noise Regulations in the Draft Plan.

#### Safeguarding national road drainage regimes

- 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.'

#### **Renewable Energy**

- 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, 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.

#### CONCLUSION

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.

# 5. Eastern and Midland Regional Assembly (E.M.R.A.)

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.

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 .

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.

- Part (I) primarily addresses the Growth Strategy and alignment with other plans.
- Part (II) addresses the 7 themes outlined in the Issues Paper.

# Part (I)

This section includes commentary around chapters 2, 3, 4 and 5 of RSES which include *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* are discussed. Various sections and objectives are highlighted under each heading to ensure the draft plan aligns with these sections.

#### The Vision

• 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.

#### **Growth Strategy of the RSES**

- 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.

#### **Sustainable Compact Growth**

- 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 NSO 1 of the NPF and RSO 2 of the RSES.
- The council's attention is also brought to RPO 3.7 which outlines the need to ensure sustainable growth. The CDP shall ensure consistency with RPO's 3.2 and 3.3 aimed at securing compact growth in line with the NPF.

#### **Settlement Strategy of the RSES**

- In preparing the Core Strategy the council's attention is drawn to Chapter 4 of the RSES and RPO's 4.1
  and 4.2 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. RPO's 4.26 and 4.27 address the role of Key Towns within Core Strategies and this is augmented by RPO's 4.33 to 4.36 which relate to Maynooth and RPO's 4.48 to 4.54 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.

# Metropolitan Area Strategic Plan

- 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 the 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 RPO's 5.4 and 5.5 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.

## **National and Regional Population Targets**

- 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.
- 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 (Maynooth) 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 (Maynooth) 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).

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.

- 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.

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.

The *upcoming draft Departmental Guidelines for Development Plans* 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 *'Housing Supply Target Methodology for Development Planning'* issued as Guidelines for Planning Authorities under Section 28 of the Act in December 2020.

# Part (II)

Theme 1 - Healthy Placemaking; People and Places

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:

- Chapter 9– "Quality of Life" and the relevant sections and objectives outlined within.
- Section 9.3 and table 3.1 gives further guidance which place an emphasis on the asset-based approach for the strategic location of residential development.
- RPO's 9.10 to 9.13 and the guiding principles set out in section 9.4 are also relevant.
- Section 9.7 and related RPO's 9.24 to 9.30 are relevant which highlight the role of built heritage in creating a sense of place.

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.

- 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.

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:

- 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.

The issues paper recognises that lessons can be learned from COVID-19 in terms of the effective use of buildings and land.

- 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.

#### Theme 2 - Economic Opportunity: Innovation, Enterprise, and Employment

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 "Economy and Employment" 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.

• 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.

## **Spatial Distribution of Strategic Employment**

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 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:

- 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).

## Sectoral Opportunities – Retail, Tourism, Agriculture, Low Carbon, and the Future Economy

## Agriculture, Low Carbon and the Future Economy

- 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.

#### **Tourism**

- 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 Greenways, Blueways, and Peatways are 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).

#### Retail

- 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 Naas/Newbridge and Maynooth and level 3 town / district centres of Celbridge, Kilcock, Kilcullen, Athy, Kildare, Monasterevin, Clane and Leixlip.
- 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.

## **Local Economic and Community Plan (LECP)**

- 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.

## Theme 3 – Climate Action: Environment, Climate Change and Adaptation

- The focus on Climate Action is welcome particularly the statement that it will be one of the crosscutting 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.

## Theme 4 – Sustainable Mobility: Movement and Transport

- 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 RPOs 5.2, 5.3, 8.7, 8.8 and 8.9 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.

# Theme 5 – Creative Places: Social, Community and Cultural Development

- 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 Economic and Community Plan (LECPs) in planning for social infrastructure to meet current and future population needs.

#### Theme 6 – Enhanced Amenity and Heritage: Landscape and Green Infrastructure

- 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.

#### Theme 7 – Making it happen: Infrastructure, Energy and Communications

- 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.
- 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.

# Other Issues / Miscellaneous

- 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.

		<ul> <li>Officials of the Assembly are available to discuss matter raised in this submission and will be throughout the duration of the Plan process.</li> </ul>
6.	Department of Transport	The submission highlights that since the 2017-2023 Plan, there have been important policy developments that are relevant to accessible and integrated public transport which should be reflected in the 2023-2029 Plan. These include the plans/strategies outlined below:
		• The whole of Government "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. This puts obligations on State parties to ensure access for persons with disabilities to the physical environment and transportation in both urban and rural areas.
		To make public transport fully accessible to people with disabilities requires a whole journey approach which refers to all elements that constitute a journey for starting point to destination. The council is a key stakeholder in ensuring a universal design approach to the built environment, including footpaths, roads, pedestrian crossing points and bus stops/shelters.
		The department notes the Award for Best Disability Access and Inclusion Initiative – A County Kildare Access Strategy – A Universal Approach 2020-2022 and is working to make county Kildare accessible to all.
		• The "Local Link Rural Transport Programme Strategic Plan 2018-2022". The mission statement is "to provide a quality nationwide community based public transport system in rural Ireland which responds to local needs". Its key priorities include the reduction of social exclusion and the integration of rural transport services with other public transport services. One of its key objectives is greater interaction and co-ordination with Local Authorities regarding the assessment of strategic transport needs and in the development of proposed transport plans for local areas.
		Sustainable Mobility Policy Review

A new Sustainable Mobility Policy framework is currently being developed by the department. Sustainable mobility includes both active travel (walking and cycling) and public transport. It is the first review in 10 years and the aim is to put in place a new policy that supports:

- A shift away from the private car to greater use of active travel and public transport.
- Travel by cleaner and greener transport.
- Comfortable and affordable journeys to and from work, home, school, college, shops, and leisure.

The policy will deliver on the ambitions of the new programme for government in the area of active travel and public transport. This will replace the existing sectoral policy documents "Smarter Travel, A Sustainable Transport Future 2009-2020" and the "National Cycle Policy Framework".

The new sustainable mobility policy will be closely aligned with the national strategic outcomes of the National Planning Framework (NPF) particularly in relation to compact growth, enhanced regional accessibility, strengthened rural economies and communities, sustainable mobility, and transition to a low carbon and climate resilient society.

The NPF recognises that planning and transport policies are highly interdependent, and several its key objectives support better integration of land use planning and transport planning.

The aim is to develop a new policy framework that better supports sustainable mobility- linking more people, to more places, for more of their journeys and promoting increased use of active travel and public transport. The new policy will also need to consider the impacts of COVID-19 and if we need to do anything differently around the provision of sustainable mobility infrastructure and services.

# 7. Office of Public Works (Flood Relief & Risk Mgt. Division)

The submission primarily relates to flood risk assessment and management under the headings General Guidance and Issues for Consideration which include Plans, Maps, Climate Change Impacts and Arterial Drainage Schemes / Districts.

## Flood Risk Management - General Guidance

- Reference should be made to the guidelines on the Planning System and Flood Risk Management (DHPLG/OPW, Nov 2009) issued under Section 28 of the Planning Acts and associated circulars and appendices to ensure that the key principles of flood risk management and sustainable planning are adopted.
- The 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 carried out before decisions are made.
- The Guidelines set out a three-stage assessment process to identify if risk may exist and the degree to which it is an issue. The three-stages are as follows.
- Flood Risk Identification To identify whether there may be any flooding or surface water management issues related to a plan area or proposed development site that may warrant further investigation.
- Initial Flood Risk Assessment To confirm sources of flooding that may affect a plan area or proposed site, to appraise the adequacy of existing information and to scope the extent of the risk of flooding which may involve preparing indicative flood zone maps.
- Detailed Flood Risk Assessment Assess flood risk issues in detail to prepare flood zone maps based on a quantitative appraisal of potential flood risks to a proposed or existing development or land to be zoned. Identify potential impacts on flood risk elsewhere and of the effectiveness of any proposed mitigation measures.

- In preparation of the Plan, the OPW recommends that particular attention is paid to The Planning Principles and The Sequential Approach, and Definitions of Appropriate Development in Chapter 3 of the Guidelines.
- Attention should also be paid to The Plan Making, Justification Test in Chapters 3 and 4, where it is intended to zone of otherwise designate land where there is a moderate or high probability of flooding, noting that the application of the test should be supported by analysis to an appropriate level of detail.
- The OPW advises that clear commitments and strategic objective regarding flood risk and the principles of the Guidelines are included in the Plan, and that persons with the relevant expertise review any flood risk assessments submitted to the Council.

## **Specific Flood Risk Management - Issues for Consideration**

## Flood Risk Management Plans and Flood Maps

- The OPW undertook the National Catchment based Flood Risk Assessment and Management Programme (CFRAM), through which Flood Risk Management Plans (FRMPs) and flood maps were prepared. These were adopted and are transposed to form part of Ireland 2040 National Development Plan. The implementation of these Plans is an objective of the Regional Spatial and Economic Strategies.
- 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.
- 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.

- The OPW has a statutory duty 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.
- 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.
- 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.

## **Consideration of Climate Change Impacts**

- Potential impacts of climate change include increased rainfall intensities, increased fluvial flood flows and rising sea levels.
- While flood zones are defined based on flood risk, the council need to consider such impacts in the
  preparation of plans 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.
- Flood maps prepared under CFRAM programme include maps for two potential future scenarios taking account of different degrees of climate impact.

# **Arterial Drainage Schemes and Drainage Districts**

- 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.
- 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.
- The location of Arterial Drainage Schemes and Drainage Districts may be viewed on www.floodinfo.ie.

## **Land Protected by Agricultural Embankments**

- 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.
- 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.

## **Impacts on Other Areas**

- 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.
- In line with the Guidelines, proposed new development needs to avoid increasing flood risk elsewhere.

### **Natural Water Retention Measures**

• 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.

		This can include area around existing developments, as well as within existing and proposed
		development in the form of Sustainable Urban Drainage Systems (SuDS).
8.	Irish Water	General Policies and Plans
		<ul> <li>National and Regional Policy - Irish Water acknowledges the NPF and specifically Section 10.2 of the RSES. Irish Water and the Council endeavours to identify the water services required to support planned developments for inclusion in the Irish Water Capital Investment Plans.</li> </ul>
		<ul> <li>Water Services Policy Statement - The Water Services Policy Statement (2018 – 2025) (WSPS) identifies high level objectives and priorities for the delivery of water and wastewater services up to 2025. The policy objectives set across the three thematic areas of:- Quality, Conservation and Future Proofing.</li> </ul>
		<ul> <li>The Water Services Strategic Plan - The Water Services Strategic Plan (WSSP) sets out six strategic objectives for the delivery of water services over a 25-year period and sets a context for investment and implementation plans.</li> </ul>
		<ul> <li>Irish Water Investment Plan (Revenue Control Period 3) 2020 to 2024- The Investment Plan sets out Irish Water's budgetary plan 2020-2024 in line the strategic objectives as detailed in the WSSP.</li> </ul>
		<ul> <li>Irish Water Strategic Funding Plan - The Irish Water Strategic Funding Plan (2019 – 2024) outlines the costs, both operational and capital, associated with the arrangements that Irish Water proposes to make and measures that it intends to take to implement the objectives of the WSSP.</li> </ul>
		<ul> <li>Climate Change - Irish Water are focused on addressing the impacts of climate change in relation to water and wastewater and are preparing a strategy which will respond to global and national climate change legislative and policy frameworks.</li> </ul>
		Water Supply

- The National Water Resources Plan The National Water Resources Plan will be published in two distinct stages. Phase 1 is the Framework Plan and Phase 2 is made up of 4 Regional Water Resources Plans, both phases are subject to an SEA and an AA. The NWRP draft Framework Plan, published in Dec 2020, outlined the Supply Demand Balance (SDB) for the Greater Dublin Area. The SDB shows a deficit in supply in the short, medium and longer term. The growth projections were obtained from the NPF and RSES. Phase 2 of the NWRP will look to determine solutions to reduce the deficit.
- Drinking Water Source Protection Irish Water has adopted the World Health Organisation (WHO)
   Drinking Water Safety Plan approach. These plans seek to protect human health by identifying, scoring
   and managing risks to water quality and quantity; taking a holistic approach from source to tap. Irish
   Water is committed to working with public bodies and other stakeholders towards a common goal of
   the protection of drinking water sources.
- The Water Supply Project Following the publication of the draft Regional Plan for The Eastern and Midlands Region (Group Area 4) of the NWRP, the WSP will be reviewed, after which it is anticipated that WSP will be subject to further public consultation. Abstraction Legislation is expected to be enacted later this year, after which planning permission will be sought from An Bord Pleanála for the Strategic Infrastructure Project. A separate licence application will be made to the EPA.
- The Barrow Water Supply Scheme Area Extension Once completed, this Barrow Water Supply Scheme Area Extension project benefits will:
  - Support future growth and development in Naas and the surrounding area.
  - Decrease the dependence in Kildare on the River Liffey water supply.
  - Increase the resilience of the drinking water supply to businesses and residents in the GDA.
  - Result in an increase in supply of up to 18 million litres per day (Mld) of drinking water for homes and businesses. Enough water for almost 140,000 people.

 Water Networks - Irish Water and the Council will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required.

#### **Wastewater Collection and Treatment**

#### Context

In terms of context, the amount of wastewater generated in the GDA is projected to increase by over 50% in the period to 2050.

• Ringsend Wastewater Treatment Plant

The upgrade project of Ringsend Wastewater Treatment Plant is currently underway and will allow for growth in both population and industry. When works are complete in 2025, Ringsend will have the capacity to treat the wastewater for a population equivalent of 2.4 million.

• Greater Dublin Drainage (GDD)

The GDD project has been identified in the NPF as a National Strategic Outcome of the National Development Plan. The project involves the development of a new regional wastewater treatment facility and associated infrastructure to provide wastewater treatment for half a million people. An Bord Pleanála granted a Strategic Infrastructure Development permission in 2019, but that decision was quashed (in November 2020) following legal challenge. The project's strategic importance remains unchanged.

• Treatment Plants within Kildare County

Irish Water can work with developers to form the best solution for a particular site. The capacity of the WWTW's can be summarised as follows:

 Headroom available at Osberstown WWTW. However to be shared with Newbridge, Naas, Clane & Sallins (Upper Liffey Valley)

- Headroom available at Leixlip WWTW. However, to be shared among Celbridge, Leixlip, Maynooth
   & Kilcock (Lower Liffey Valley Sewerage Scheme LLVSS)
- Athy Very limited headroom.
- Kildare, Monasterevin, Castledermot Good Headroom available.
- Kilcullen, Kill, Propserous, Arthgarvan Part of the Upper Liffey Valley Sewerage (Osberstown WWTW)
- Rathangan There are currently some issues here. Dependent on any additional load not resulting in a significant breach of the combined approach as set out in Regulation 43 of the Waste Water Discharge (Authorisation) Regulations 2007.
- Derrinturn There is no headroom here at present, however, this may be resolved under the Small Towns & Villages Growth Programme
- Smaller Villages & Rural There is modest headroom in most of the smaller villages & a few will benefit from the Small Towns and Villages Growth Programme
- Wastewater Networks, Sustainable Urban Drainage and Blue/Green Infrastructure

There are constraints in the sewer networks. If zoning changes are proposed, infrastructure will have to be assessed on a case by case basis. Projects of note that are planned / underway include:

- Lower Liffey Valley Sewerage Scheme Drainage Area Plan (Celbridge, Leixlip, Straffan, Kilcock and Maynooth).
- Lower Liffey Valley Strategic Pipelines Maynooth and Leixlip Transfer Pipelines

- Upper Liffey Valley Sewerage Scheme Sallins, Clane, Prosperous, Naas, Johnstown, Kill, Newbridge, Kilcullen, Athgarvan, Carragh and the Curragh.
- LIHAF/MUHDS Programme (Maynooth, Celbridge, Kilcock)
- National Programmes Network Extensions
- National Programmes Capital Maintenance (Watermains, Sewers and Rising Mains)
- Irish Water 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 including the
  public realm.
- River Basin Management Plan

Irish Water supports the RBMP Implementation Strategy through participation within the RBMP implementation structures and participation in Water Framework Directive characterisation activities.

# 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.

	1	
		To prohibit the discharge of additional surface water to combined (foul and surface water) sewers.
		<ul> <li>To support Irish Water in the promotion of effective management of trade discharges to sewers to maximise the capacity of existing sewer networks and minimise detrimental impacts on sewage treatment works.</li> </ul>
		<ul> <li>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.</li> </ul>
		<ul> <li>To refuse residential development, other than single house systems, that requires the provision of private waste water treatment facilities.</li> </ul>
		<ul> <li>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.</li> </ul>
		To ensure that private waste water treatment facilities are operated in compliance with their waste water discharge license.
		Note: As per Section 5.3 of the Draft Water Services Guidelines for Planning Authorities, 'Alternative solutions such as private wells or waste water treatment plants should not generally be considered by planning authorities. Irish Water will not take over responsibility of these treatment facilities or associated networks, unless agreed in advance.'
9.	Department of	Legal Framework for Protection of Archaeological Remains
	Culture, Heritage and the	The National Monuments Acts 1930 to 2014
	Gaeltacht	The national legislative code for protection of monuments, historic wrecks, and archaeological objects.
9.	Culture, Heritage and the	Legal Framework for Protection of Archaeological Remains  The National Monuments Acts 1930 to 2014

- The RMP and the Register of Historic Monuments requires notice to be given to the Minister of proposed work at or in relation to monuments and places included in it. The Notification Form can be found at www.archaeology.ie.
- Interference or ground disturbance around or in proximity to National monuments requires the consent of the Minister.
- The Minister and local authorities must maintain national monuments and seek to provide public access to such national monuments.
- All wrecks over 100 years old and all archaeological objects situated underwater, are protected under the Act. Wrecks of any date and archaeological objects may also be protected under the Act by the making of an underwater heritage order.
- Licences are required for the use of detection devices and diving on protected wreck sites or for archaeological purposes.

The Planning and Development Act 2000 and the Planning and Development Regulations 2001

- CDP are legally required to contain objectives for the conservation and protection of the archaeological heritage.
- Imposition of archaeological conditions on grants of planning permission does not create grounds for claims for compensation.
- Ensure planning applications which would affect sites protected under the National Monuments Acts 1930 to 2014 or archaeological sites, are referred to the National Monuments Service.

The Environmental Impact Assessment Directive

• The EU Directive on EIA requires that EIA include consideration of impact on archaeological heritage.

#### **International Conventions**

- Ireland is a party to the 1992 Council of Europe European Convention on the Protection of the Archaeological Heritage (the "Vallentta Convention"). Ensure compliance by using domestic legislation, such as the Planning and Development Act, to give effect to the requirements of the Convention.
- Although not yet a party of the 2001 UNESCO Convention on the Protection of the Underwater Cultural Heritage, full account should be taken thereof.

The Framework and Principles for the Protection of the Archaeological Heritage, Government of Ireland 1999

• Sets out national policy on the protection of archaeological heritage during development.

Section 12.9.1: The following list of objectives and policies for the protection of the archaeological heritage to revise the existing CDP.

# **Recommended objectives**

It will be an objective of the planning authority to protect all elements of the archaeological heritage and other features of the following categories:

- Sites and monuments included in the Sites and Monuments Record (SMR) as maintained by the National Monuments Service (NMS).
- Monuments and places included in the Record of Monuments and Places (RMP) as established under section 12 of the National Monuments (Amendment) Act 1994.
- Historic monuments and archaeological areas included in the Register of Historic Monuments as established under section 5 of the National Monuments (Amendment) Act 1987.

- National monuments subject to Preservation Orders under the National Monuments Acts 1930 to 2014 and national monuments which are in the ownership or guardianship of the Minister for Housing, Local Government and Heritage or a local authority.
- Archaeological objects within the meaning of the National Monuments Acts.
- Wrecks protected under the National Monuments Acts 1930 to 2014 or otherwise included in the Wreck Viewer maintained by the National Monuments Service.
- Archaeological features not yet identified but which may be impacted on by development.

In securing such protection, both generally and in the context of any planning decision, the planning authority shall take full account of, and be guided by, national policy on the protection of the archaeological heritage as set out in the Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland 1999). Any specific recommendations made by the Government Minister responsible for the protection of the archaeological heritage, as a statutory consultee in the planning process, shall be given full consideration by the planning authority.

The planning authority shall take full account of the Framework and Principles for the Protection of the Archaeological Heritage. Any recommendations made by the Government Minister shall be given full consideration by the planning authority. The planning authority shall protect the archaeological heritage with preservation in-situ as the first and preferred option or preservation by record if preservation in-situ cannot be achieved. Preservation by record requires full archaeological excavation, recording of monument/site, the preparation of appropriate reports, post-excavation analyses and publications. The costs of assessing and mitigating archaeological impacts will be borne by the developer.

## **Recommended policies**

• To protect and enhance archaeological monuments and historic wrecks and their settings and amenities, having particular regard to the importance of historic town defences, historic graveyards,

national monuments in the ownership of the Minister for Housing, Local Government and Heritage or a local authority and, in general, monuments and historic wrecks which, through their presence in the landscape or seascape, provide tangible evidence of the past.

- To protect historic graveyards, including through the avoidance of extensions to them that would have an inappropriate level of impact on sub-surface archaeological remains or on their setting or amenity and, in that regard, as an alternative to extensions to historic graveyards to endeavour to find alternative locations where additional land for burial is considered necessary.
- To ensure that historic graveyards in the ownership or care of the local authority are managed and maintained in accordance with appropriate conservation standards and that local communities involved in care and maintenance of historic graveyards receive appropriate advice regarding such standards.
- To promote and facilitate appropriate forms of access (including disabled access) to archaeological
  monuments and historic wrecks, including maintaining or developing means of access (by working with
  landowners to secure appropriate access over private lands), providing appropriate, accurate signage
  and interpretive material and providing appropriate forms of virtual access where physical access is not
  possible.
- To ensure that all aspects of archaeological heritage and underwater cultural heritage, in all environments, are considered in the development process, including impacts on unidentified elements of the archaeological and underwater cultural heritage.
- To promote knowledge and appreciation of archaeological and underwater cultural heritage and facilitate access to appropriate guidance regarding its protection and conservation, including at all stages of the development process (including pre-planning application consultations).
- To promote early and comprehensive public access to the results of archaeological excavations carried
  out as a result of development or conservation projects through publications and the provision of onsite interpretive material even where no physical remains are visible.

 To support community initiatives and projects regarding preservation, presentation and access to archaeological heritage and underwater cultural heritage, provided such are compatible with appropriate conservation policies and standards, having regard to the guidance and advice of the Department.

#### RE: 12.9.1. AH 4, 17.15.5 Development Management Standards Archaeology

## General recommendation regarding development control policies and objectives

- It is essential that all relevant and appropriate archaeological procedures and practices are followed, which will be greatly facilitated by the planning authority having access to its own professional archaeological expertise.
- It is essential that developers carry out an initial archaeological assessment prior to engagement with the Department. Planning authorities should emphasise this to developers before advising them to seek pre-planning consultation with the Department.

# **Recommended Development Control Objectives and Policies**

• Proposed developments which may, due to their location, size, or nature, have implications for elements of the archaeological heritage (including underwater cultural heritage) be subject to an archaeological assessment, which should in general be carried out before any grant of permission. Such developments include those that are located at or close to archaeological sites or monuments or historic wrecks, those which are extensive in terms of area (ground disturbance of 1/2 hectare or more) or length (1km or more) even if no known elements of the archaeological heritage are present, those which would affect significant areas of environments such as wetlands, reclaimed areas of rivers, lakes and coastlines and underwater areas even if no known elements of the archaeological heritage are present, and any developments that require the carrying out of Environmental Impact Assessment.

- Proposed developments in areas of the marine environment or inland waterways for which there are
  no located wrecks may be considered to be areas of high archaeological potential due to the number of
  historic ship losses recorded for these areas over time. Therefore, developments in riverine, lacustrine,
  intertidal and sub-tidal environments of archaeological potential should be subject to an archaeological
  assessment, which should in general be carried out before any grant of permission.
- To ensure that archaeological assessment is carried out in accordance with relevant policies and standards, in particular those set out in the Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland 1999) and the Policy and Guidelines on Archaeological Excavation (Government of Ireland 1999) and the advice in particular cases of the Department, with all relevant techniques (including documentary research, aerial photographic research, geophysical survey and archaeological test excavation) being required as appropriate. This will also include, in some cases, the carrying out of building surveys and assessments of upstanding structures to determine the extent to which they are, or contain within them, structures of medieval or early modern date.
- To ensure that all planning applications for developments of categories set out above are referred to the Department, through its Development Applications Unit, that such referrals take place in a timely manner and that full account is taken of the recommendations made by the Department.
- That permission for proposed development will be refused where the development cannot be carried out in a manner compatible with the protection of the archaeological heritage as provided for in the policies and objectives contained in the development plan and in relevant national policies, in particular the Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland 1999).
- That where permission is granted for proposed development such grants of permission will contain appropriate conditions to secure the protection of the archaeological heritage, either by preservation in-situ or, where impact cannot be avoided, by way of preservation by record. In imposing such conditions, the planning authority will act in accordance with relevant policies and standards, in particular the Framework and Principles for the Protection of the Archaeological Heritage (Government

of Ireland 1999) and the Policy and Guidelines on Archaeological Excavation (Government of Ireland 1999), and be guided in particular cases by the advice of the Department. Such conditions may require, as appropriate, archaeological assessment, preservation in-situ, preservation by record and/or archaeological monitoring as well as post-excavation conservation, analysis and reporting.

- That where preservation in-situ is required as a condition, further conditions may require appropriate immediate and long term conservation and management of the archaeological features in question and long term monitoring of the effectiveness of conservation measures, with appropriate steps required to be taken in the event conservation measures are proving in-effective.
- That where preservation by record is required as a condition, such conditions will further require
  preparation of appropriate follow-up reports, analyses and publications and the conservation as
  necessary of archaeological material and objects recovered during the archaeological excavations as
  carried out.
- That where permission is granted conditions may require presentation to the public of archaeological features preserved in-situ on the site, where practicable, and/or provision of interpretive material at the site (including on a permanent basis) whether or not any features have been preserved in-situ.
- That where archaeological excavation is required as a condition of permission, further conditions may be imposed requiring the provision of public access to such excavations, subject to appropriate safeguards.
- To develop the planning authority's own professional archaeological expertise and involve that expertise in dealing with planning casework, including the drafting of future revisions of the development plan.

#### RE: 12.9.1 AH 6 and 11.16 Burial Grounds of the current CDP

The question of extensions to medieval burial grounds is concerning for the following reasons:

		<ul> <li>Many Early-Christian and Medieval graveyards were enclosed in the nineteenth century, with parts of the original graveyard left outside the later wall.</li> <li>Historic graveyards are understandably important to local communities, however modern extensions to them can erode the very character that makes such places special to people.</li> <li>The following new Policy Objectives should be included in the CDP:         <ul> <li>To protect historic graveyards, including through the avoidance of extensions to them that would have an inappropriate level of impact on sub-surface archaeological remains or on their setting or amenity and, in that regard, as an alternative to extensions to historic graveyards to endeavour to find alternative locations where additional land for burial is considered necessary.</li> </ul> </li> <li>To ensure that historic graveyards in the ownership or care of the local authority are managed and maintained in accordance with appropriate conservation standards and that local communities involved in care and maintenance of historic graveyards receive appropriate advice regarding such standards.</li> </ul>
10.	Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media	<ul> <li>Architectural Heritage</li> <li>The Department recommends the appointment of a Conservation Officer with expert skills and practical experience.</li> <li>Overview of policy context</li> <li>The renewal of a number of key national policy documents pertaining to archaeology and built heritage, including (Draft) Heritage Ireland 2030 and the Climate Change Sectoral Adaptation Plan for the Built and Archaeological Heritage, the (Draft) Built Vernacular Strategy and the National Policy on Architecture (pending), provide the context for this response.</li> </ul>

- The Department welcomes where possible that the policies and objectives of these core documents be inserted into future development plans. The Department notes that research into the symbiotic relationship between cultural heritage and the biodiversity provides opportunities to build capacity as per the National Biodiversity plan 2017- 2021 actions.
- The Department recognises the strategic importance of the role of the Local Authorities and welcomes their leadership in implementing the actions of the National Policy on Architecture.
- Historic urban centres cities, towns and villages, have become the focus of government due to the negative economic impact of COVID -19 pandemic on urban centres and their communities.
- Societal shifts and work pattern changes caused by Covid 19 are an opportunity for vacant town centre buildings and for Local Authorities to support the reuse of underutilised buildings by putting in place skilled teams to enable appropriate and sustainable development.
- The Department supports the Irish Walled Town Network and welcomes the presentation of walled towns and their medieval fortifications that may be regarded as an intrinsic characteristic of the County. The COVID-19 lockdown has demonstrated the importance of cultural and natural heritage sites and their often shared amenity, which supports well-being in communities particularly in urban centres during the pandemic lockdown.
- Kildare County retains many important C18th estates with planned landscapes, such as at Castletown, Carton and Donaghcomper.
- The safeguarding of the planned C18th landscapes from incremental residential development is regarded as important to their long-term conservation and survival of their overall integrity.
- The Department welcomes the opportunity for making cultural heritage more accessible and better integrated with wider tourism and recreational opportunities within the County.

- The Department 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.
- There are several new areas of interest that the Department considers require greater attention and focus in future development plan and policies of Local Authorities including:
  - National Policy on Architecture Places for people/5 themes to be embedded in the future development plan policies to ensure the delivery of and implementation of government's policy.
  - Heritage Ireland 2030 (Draft)- 3 strands to be embedded and the importance of communication, digital opportunities and community engagement as part of the delivery of built heritage policies.
  - National Inventory of Architectural Heritage Use building survey and garden survey to inform policy and planning.
  - Vernacular Architecture address the incremental damage and cultural loss of settlements and their settings due to the lack of awareness, vacancy and demolition.
  - Climate Change heritage resilience and sustainability, consideration of appropriate measures to
    ensure the long term survival of historic structures, their uses and their contribution to the sense of
    place.
  - Town revitalisation Enhanced policies for heritage-led urban regeneration based on an understanding of their cultural layering/transmission of cultural significance/high quality adaptation, reuse and renewal of historic fabric and remaking of historic places.
  - The identification, reuse and repair of early urban buildings raising awareness of the cultural significance of early building fabric as an integral part of historic urban centres and supporting the development of multi-disciplinary practice between archaeologist and conservation experts.

- 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.
- Tall buildings in historic urban centres mitigation of negative impact on historic character areas and urban landscape in relation to large ground scrappers as well as tall buildings through the consideration of design criteria and guidance to safeguard the historic built heritage context.
- The renewal of Local Authority 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 in future County Development Plans as a central theme.

## The following themes are recommended for inclusion along with objectives and policies

- As part of the National Adaptation Framework, the Department has published a Climate Change Sectoral Adaptation Plan for the Built and Archaeological Heritage (2018). The Department anticipates ongoing engagement with the Climate Action Regional Offices (CAROs) throughout the implementation of our sectoral plan.
- Architectural heritage at risk due to climate change.
- In the preparation of the Local Authority adaptation strategies, there are a number of issues regarding protection of architectural heritage that it is recommended should be taken into account to identify the architectural heritage at risk in its area.
- Identify the architectural heritage in the Local Authority area, that may be under threat, directly or indirectly, due to climate change.
- Include objectives to carry out climate change risk assessments for the historic structures and sites in the Local Authority's functional area particularly those in the Authority's own remit.

- Include objectives to develop disaster risk reduction policies addressing direct and indirect risks to the architectural heritage in its area.
- Include objectives to develop resilience and adaptation strategies for the architectural heritage in its area.
- Develop the skills capacity within the Local Authority to address adaptation/mitigation/emergency management issues affecting historic structures and sites in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works
- It is recommended that, where such officers are employed, the Architectural Conservation Officer and/or Heritage Officer should be included on the Local Adaptation Steering Group.

#### The revitalisation of Historic Urban Centre cities, towns and villages

- The Department is developing a National Policy on Architecture (NPA), under several themes, all of which are applicable to the future sustainable development of town centres i.e. research strategies required to inform planning and development, heritage-led regeneration and climate change adaptation and the design of high quality places for people.
- During the consultation phase of the NPA, the Department, has received many significant contributions and presentations the Collaborative Town Health Check Programme (CTHCP) demonstrated its strategic importance to informing future town management policy by providing the point of engagement with a business community, the compilation of baseline data for assessing and visualising the well-being, quality and economic vitality of a town centre and allowing comparison to be made with European counterparts on the significance of the current vacancy rates presenting in Irish towns, pre COVID -19 lockdown.

- The Departments built heritage grant schemes have been revised to tackle climate change resilience and to gather information to inform future funding strategies and practices for towns. The Architectural Conservation Officer has a key role in the implementation of such schemes.
- The adoption of governance tools within Local Authorities such as the Health Check Programme,
  Conservation Plans for special sites, Living Town Initiatives and their respective setting up of one-stop
  shops to promote and co-ordinate the planning and building regulatory aspects of urban regeneration
  is regarded as a positive and proactive means to enabling built heritage to be reused and adapted
  successfully.

## **Policy**

- To 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.
- To consider a Town first approach to the revitalisation of historic urban centres, the appointment of a Local Authority multi-disciplinary team which communicates the historical, architectural context and focuses on the repair and upgrade of existing historic buildings and their adaptation to new uses with regard to their architectural character and significance.
- To consider a Town first approach to the revitalisation of historic urban centres, the appointment of a Local Authority multi-disciplinary team which communicates the historical, architectural context and focuses on the repair and upgrade of existing historic buildings and their adaptation to new uses with regard to their architectural character and significance.
- To promote the development of heritage-led regeneration, to plan for the reuse and conservation of core built heritage and archaeological sites within urban centres as an integral part of the evolution of the historic place and its significance.

- To promote best conservation practice and to lead by example through the management and safeguarding of historic properties in the ownership of the Local Authority
- To support the development of sustainable infill to the town back lands that is 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. To ensure the strategic housing development support rather than detract from the vitality and overall character of historic town centres in terms of their scale, connection and mobility strategies.
- To draw on the historic environment viewer, to 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.
- To co-ordinate significant infrastructural projects such as public realm works, flood relief works or new
  transport routes and alternative modes of transport to the benefit of surviving historic sites in order to
  improve their enjoyment, presentation and enhanced accessibility. The Department notes in this
  regard examples from European counterparts of the removal of traffic from urban centres and the
  resulting improvement in air quality which has been exemplified by the recent COVID-19 lockdown and
  the perceived enjoyment of urban living in Ireland. These transitions support a return to sustainable
  and attractive urban living.

## The National Inventory of Architectural Heritage (NIAH)

• Local authorities must have regard to such recommendations, where they relate to structures recorded by the National Inventory of Architectural Heritage (NIAH) and are rated as being of International, National or Regional significance.

• The purpose of the NIAH is to identify, record and evaluate the post-1700 architectural heritage of Ireland, uniformly and consistently, as an aid in the protection and conservation of the built heritage.

#### **Policy**

- To consider the inclusion of all structures identified by the National Inventory of Architectural Heritage (NIAH) and recommended by the Minister for the Department, in the Record of Protected Structures.
- To consider that all such structures be regarded as Candidate Protected Structures pending verification by the Council and inclusion in the Record of Protected Structures.
- To direct users of relevant Local Authority services to the information resources of the NIAH website www.buildingsofireland.ie.

#### **NIAH Garden Survey**

- The NIAH has compiled a record of significant historic designed landscapes, demesnes and gardens throughout the country.
- The Department recognizes the contribution that these planned landscapes make to the appearance of the countryside, and their significance as a source of information about history. These places also hold significant resources for biodiversity because of their wide range of habitats, whether open grassland, water courses and open water, woods and copses, and old buildings and walls.
- Cork County Council has produced a document, Guidance Notes for the Appraisal of Historic Gardens, Demesnes, Estates and their Settings, which is an attractive guide for understanding designed landscapes and, in the case of development proposals, facilitating the preparation of appraisals of historic gardens and designed landscapes and possible impacts on their heritage value.

#### **Policies**

- To identify significant historic designed landscapes, demesnes and gardens for protection under the Development Plan.
- To designate Architectural Conservation Areas, where considered appropriate, in order to preserve the character of historic designed landscapes, demesnes and gardens.
- To identify and protect significant views to or from such places.
- To encourage the compilation of Conservation.
- To encourage the cataloguing of plant collections, trees and Plans for the long term conservation and management of cultural landscapes and their components in the ownership of the Local Authority/State.
- To co-operate with the National Inventory of Architectural Heritage in assessing and celebrating historic designed landscapes, demesnes and gardens.
- To encourage and facilitate the retention and careful maintenance of these places and the various components set out in the introduction above habitats within these places to appropriate national standards.
- To encourage the cataloguing of fauna within these places to appropriate national standards.
- To protect and promote heritage and traditional varieties of plants and trees within our historic designed landscapes, demesnes and gardens.
- To 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, in this regard.

- To preserve and protect the biodiversity of these places and, where appropriate, to encourage the enhancement of the range of plant and animal species, in order to add to local, regional and national biodiversity.
- To promote conservation, renewal and improvement that enhances the character and setting of historic designed landscapes, demesnes and gardens and of former examples of such places, and to resist proposals or developments that would lead to the loss of, or cause harm to the character, principal components, or setting of these places.
- To require a detailed appraisal of the potential impacts of any development proposed for within or adjacent to these places, or that might affect its setting. A methodology for preparing such an appraisal can be found in the Guidance Notes for the Appraisals of Historic Gardens, Demesnes, Estates and their Settings (Cork County Council, 2005). Applicants for proposed large-scale developments within historic designed landscapes, demesnes and gardens may be required to produce 3D Digital Survey Modelling to demonstrate that the proposed development does not adversely affect the site or its setting.
- To have regard to Guidance Notes for the Appraisal of Historic Gardens, Demesnes, Estates and their Settings (2006) published by Cork County Council (https://www.corkcoco.ie/sites/default/files/2017-4/Guidance%20Notes%20for%20Appraisal.pdf) and to the Architecture Heritage Protection Guidelines (2011) published by the Department (https://www.buildingsofireland.ie/app/uploads/2019/10/ArchitecturalHeritage-Protection-Guidelinesfor-Planning-Authorities-2011.pdf) in the appraisal and description of historic designed landscapes, demesnes and gardens.

#### **Built Vernacular Architecture**

The Government Policy on Architecture 2009-2015 encourages the sustainable reuse of the existing building stock, whether or not such buildings have protected status, and this is particularly pertinent to vernacular architecture.

## **Policies and objectives**

- Recognize that vernacular buildings are characteristic of our local communities and environments and contribute to their authenticity, and to their cultural, traditional, architectural, archaeological, historical and social interest and diversity.
- Promote the appropriate rehabilitation, revitalization and reuse of vernacular buildings, wherever feasible, employing best conservation practice and using traditional, especially vernacular, building methods and materials.

## Rural housing/settlement policy

- Proposals for sensitive rehabilitation of disused vernacular houses will not be subject to the Rural Settlement Strategy for housing in the countryside that applies to new dwellings, assuming that their vernacular character is not compromised, that their fabric is repaired using appropriate techniques and materials, and that the structure was previously a dwelling. Where a building is derelict, measures should be taken to support and protect the building from collapse prior to and during works.
- There will be a presumption against the demolition of vernacular buildings where restoration or adaptation is a feasible option.
- To consider the uniqueness of vernacular buildings and ensembles in terms of their focused and specific relationship with their immediate environment as a model and guide for the development of modern design approaches in rural and other appropriate settings.

## Climate change and sustainability/energy efficiency

• To recognize the inherent sustainability of vernacular buildings by virtue of their use of natural and renewal materials of local origin.

- To ensure the continued sensitive and appropriate rehabilitation and reuse of vernacular buildings in the interest if sustainability.
- To ensure the conservation and reuse of traditional materials in the interest of sustainability, good conservation practice and maintaining the long-term viability of such buildings and their associated features.
- The retention and careful rehabilitation of historic buildings in our landscapes, including vernacular houses and other structures, whether urban or rural, allows the materials and embedded energy of these structures to be harnessed for present and future generations. Removal and replacement of such buildings represents a waste of their embedded energy and such proposals should be subject to rigorous scrutiny.
- Where permission is sought to demolish a vernacular building on the grounds of structural defects or
  failure, or that it is not reasonably capable of being made structurally sound, such a contention must be
  convincingly demonstrated through a detailed report on the existing condition produced by a
  professional with appropriate conservation expertise and, preferably, an understanding of vernacular
  buildings. As part of such justification, details will be required of remedial works normally used in
  similar circumstances and setting out why these would not be appropriate.
- Where a building has been destroyed by fire or accident, the Council may consider demolition to be appropriate, but a report by a professional with appropriate conservation expertise, specifying the cause and extent of damage, will be required. As a minimum, a vernacular building proposed for demolition should be fully recorded to an agreed professional standard. If a disused vernacular house is demolished or replaced with a replica, the Rural Settlement Strategy will apply.
- Ensure that measures to upgrade the energy efficiency of vernacular buildings acknowledge their inherent vernacular characteristics, techniques and materials and do not have a detrimental physical or visual impact.

• Promote and support appropriate and well-informed energy efficiency upgrades to vernacular buildings through the dissemination of factual and relevant information to the general public.

## Rural development/farm diversification/tourism

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. Guidance and information can be found in Traditional
Buildings for Irish Farms (2005) published by the Heritage Council and Teagasc, and Reusing Farm
Buildings: A Kildare Perspective (2006) published by Kildare County Council.

## **Architectural heritage/conservation**

- To protect, maintain and enhance the established character and setting of vernacular buildings, farmyards and settlements.
- 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 and, preferably, an understanding of vernacular buildings. Early consultation with the Planning Authority is strongly advised.
- Facilitate appropriate, high-quality design solutions for adaptations of vernacular buildings that carefully consider their vernacular qualities in terms of design, scale, setting and finishes. While new design can be expressed in contemporary architectural language, consideration should be given to exploring the use of appropriate vernacular features, building techniques and materials.
- 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 generally recommended; connecting the existing building and extension should minimize the number

of new openings and ideally use existing openings; sometimes, an outbuilding contiguous to a dwelling can be successfully incorporated.

- Promote the protection and maintenance of the character and setting of vernacular buildings, farmyards and settlements, including historic gateways, boundaries and other features.
- Ensure that developments proposed within or adjacent to vernacular settlements respect and enhance their spatial character, building forms, features, details and materials.
- Promote the protection and maintenance of thatched buildings (domestic or nondomestic), particularly those with historic layers and roof structures.
- 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.

#### Rural settlement/architectural conservation

 Consider the protection of 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.

# **New National Policy on Architecture**

- The proposed new National Policy on Architecture, currently being drafted, will support high quality architecture which respects our collective cultural identity and past traditions of building settlement.
- 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 and it is recommended that the five themes are included in the objectives and policies of the Development Plan to ensure the delivery and implementation of the policy.

		Heritage Ireland 2030
		<ul> <li>Heritage Ireland 2030 is a new National Heritage Plan which will set out key principles policies for conserving and managing Ireland's heritage over the next decade and more. The Plan is currently being finalised with a view to publication early next year.</li> <li>Heritage Ireland 2030 is formed around three themes: 1. Communities and Heritage 2. Leadership and</li> </ul>
		Heritage 3. Heritage Partnerships and should be embedded in the Local Authority's Development Plan.
11.	Department of Education;	<ul> <li>The Department states that it will work with Kildare County Council to identify projected population growth to a circa ten-year horizon in order to make sufficient provision for the planning and construction of school accommodation where necessary.</li> </ul>
		<ul> <li>The Department seeks to ensure that sustainable communities can be supported with appropriate education provision throughout the lifetime of the National Planning Framework.</li> </ul>
		• The Department notes that Kildare has the highest proportion of young people among all counties in the State. The Issues Paper states that 36.6% of Kildare's population are young people aged 0-24 years. This is significant for the Department of Education as this age group embraces the primary and post-primary school going cohorts (as well as the further and higher education sector1).
		The zoning of appropriate school sites will likely be necessary, particularly in the growth settlements.
		<ul> <li>The Department notes the Settlement hierarchy provided for Co. Kildare in the RSES 2021-2031 for the Eastern and Midland Regional Area. The Department also notes the overall projected population increase for County Kildare to 2031 ranges from 36,500 to 44,000 people across all settlements. In</li> </ul>

<sup>1</sup> Since 2 August 2020, responsibility for Further and Higher Education is with the Department of Further and Higher Education, Research, Innovation and Science (DFHERIS).

order for this Department to assess the adequacy of school place provision in Co. Kildare, specific population growth figures will be necessary for all areas within the county.

- The Department notes that to enhance co-ordination of development in Maynooth, including its environs in Co. Meath that there will be a joint Local Area Plan to be carried out by Kildare and Meath County Councils.
- When more specific and detailed population and housing growth figures for all areas within the Council boundary become available, this Department will analyse them in the context of existing and planned school provision in order to identify potential additional school accommodation requirements for each area.
- The Department has made the following observations:
  - The Department requests that the Kildare County Development Plan 2023-2029 would be explicit in its support for the provision of school accommodation, including the development of new schools and the expansion or alteration of existing ones.
  - That the Kildare County Development Plan 2023-2029 would include policy objectives on both the provision of new schools and the protection of existing schools and the development of wider infrastructure and amenities objectives within the Plan to support both categories of school serving your communities.
  - It is noted that the Kildare County Development Plan 2017–2023 contains Land-Use Zoning Objective E "Community & Educational" that provides for educational development. The Department requests that an equivalent zoning use be included in the new Plan.
  - The Department notes that the proposed new plan will implement sustainable settlement patterns at appropriate locations, facilitating compact growth and urban regeneration. It is possible that the development of underutilised, infill and brownfield sites will form a part of the regeneration process. While this objective is fully supported by the Department of Education, such population

growth within the existing "built-up" footprint of towns and other settlements has the potential to upset the balance of use relative to education provision in the area. The absence of specific school site provision in such locations can significantly challenge the delivery of required school places associated with intensified residential development. It is, therefore, critical that explicit provision for school development to meet that projected population growth be made in existing "built-up" areas, throughout the County.

- The inclusion of buffer zones and land use designations that support education development adjacent to existing and established schools (where required to facilitate potential future expansion) will be critical in meeting school accommodation requirements arising in existing "built-up" areas. In some instances, such provision may present the only viable solution for the provision of school places to meet the needs of the local community.
- Support for urban-design schools, as per the DES guidelines, in established areas would be welcomed. In particular, measures to facilitate reduced requirements for onsite parking and setdown and to support access to off-site public amenities and facilities is essential to achieving the delivery of schools in the urban carbon-neutral model promoted in the NPF.
- In some instances the Department is experiencing challenges in acquiring school sites to meet current requirements where neither zoning provision nor a relevant objective for school provision exists. In that context, it is critical that any school sites required to meet current needs or planned population growth, as may be identified by this Department, 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.
- The proposed development of sites which have already been identified by this Department for school provision to meet immediate school place requirements should also be explicitly supported by means of an appropriate zoning and/or by a Specific Local Objective on the subject sites in the relevant Plan.

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	<ul> <li>The Department requests that Kildare County Council would actively facilitate the principle of permitting schools, both permanent and temporary in as many zoning categories as possible.</li> <li>The DES' current Technical Guidance Documents on school site identification and suitability assessment (TGD 25 and TGD 27) can be used to inform the selection of proposed school sites and are available on www.education.ie . Revised guidelines for schools designed for urban sites will be published by the Department in 2021 and Kildare County Council should monitor the Department's website as guidelines for school developments may be updated from time to time.</li> </ul>
	<ul> <li>Kildare County Council should consider potential synergies with adjacent public (and commercial) facilities in the proposed siting of schools or vice versa, particularly opportunities to locate schools adjacent to open space or recreation amenities, childcare provision and/or other community facilities.</li> </ul>
	<ul> <li>That the capacity of existing schools and any planned schools, as published by the Department, be considered as "supporting infrastructure and facilities" and given high priority in Kildare County Council's assessment of the suitability of specific lands for residential development.</li> </ul>
	Where a designated school site forms part of a wider development area or plan that is being implemented incrementally, or divided into phases by the developer(s), then the Department requests that the granting of permission for any part or phase of that wider development be contingent upon the full consideration and provision of infrastructure and services to the school site as part of that development and such infrastructure and services must be specified to the standards and capacity required for the future school provision at that location.
An Coillte	
	<ul> <li>Coillte is the largest forest company in Ireland and, amongst other things, Coillte, and Irish forestry play a critical role in contributing to the reduction of greenhouse gas emissions, enhancing Ireland's energy security and contributing to a post-carbon and climate resilient economy.</li> </ul>
	An Coillte

• Coillte has approximately 900 employees across Ireland and the UK, and comprises four discrete businesses; Forestry, Land Solutions, Renewable Energy and Medite Smartply (Panels).

#### Submission to Kildare County Council on the Development Plan Issues Paper

## 2.1 Forestry, Tourism / Recreation and Community

• Coillte has a strong tradition of working with communities and stakeholders, including local authorities, and commits to working closely with Kildare County Council to deliver on local and wider needs in a manner which aligns with the overall vision for the county.

#### Forestry

- The regulation of the forestry sector is overseen by the Department of Agriculture, Food and the Marine who ensure that all the environmental, economic and social aspects of forestry and forest operations are considered fully before licenses to carry out operations are issued.
- Given the current issues emerging around climate change and the ability of sustainably grown wood products to address this challenge our forests and forest management practices have never been more relevant. In this context, Coillte supports the inclusion of reference to this regulatory framework in the Kildare County Development Plan.
- Coillte manages 2,050 hectares of commercial forestry in Kildare and has an open forest policy which
  allows members of the public to access the forests for amenity use, according to the principles of Leave
  No Trace. Coillte is committed to managing its forest estate in County Kildare in a fully sustainable
  manner and to continue to work in partnership with the Council and other stakeholder groups within
  the county.
- Coillte is committed to protecting and enhancing the recreation infrastructure in County Kildare, including the walking trails at Moore Abbey and Mullaghreelan Wood, and the extensive range of recreation facilities established at Donadea Forest Park.

• Coillte also welcomes the opportunity to explore the provision of further recreation infrastructure at appropriate locations in the Coillte estate, in partnership with Kildare County Council and relevant stakeholders in the county.

#### **Tourism/Recreation and Community**

- Located at a range of scenic locations in the county, the Coillte estate can play a key role in supporting
  the provision of new recreation facilities/uses at appropriate locations, without compromising the
  heritage and landscape assets of the county. Coillte considers that investment in outdoor recreation
  and forest-based activities drives economic activity, supports job creation and sustains local
  communities.
- Coillte supports the inclusion of policies in the forthcoming Kildare County Development Plan under which tourism/recreation facilities, can be facilitated at suitable rural locations. Coillte also supports the inclusion of policies under which forest based tourism accommodation can be facilitated at appropriate locations within the Coillte estate and looks forward to working in partnership with Kildare County Council, and stakeholders in this regard.

# 2.2 Infrastructure and Development

 Coillte asks that the Council consider the provision of planning policies/land use zoning as appropriate, to support the provision of development on Coillte lands where suitable; to provide, for example, tourism/recreation, commercial, community and/or other uses which would support and enable national, regional and local policy objectives.

## 2.3 Renewable Energy

• Coillte is one of the biggest developers of renewable energy in the State and has enabled in excess of 30% of all installed wind farms through wayleaves/rights of way and as a land supplier and developer.

• The Renewable Energy business unit of Coillte will be transferred to a newly formed joint venture later in the coming months, co-owned on a 50:50 basis by Coillte and ESB.

#### **Climate Action Plan 2019 and Renewable Energy Targets**

- The 2019 CAP provides a roadmap of what must be achieved and how 70% of all our 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 (today) to 8.2GW by 2030. We request that this onshore target and any update thereof is specifically referenced in the new County Development Plan.
- A functioning on shore wind sector is essential to achieve the above targets.
- It is essential that this reliable and established source of renewable energy continues to be recognised; promoted and facilitated in the new Plan.
- The 2020 programme for government further commits to an average 7% per annum reduction in overall greenhouse gas emissions from 2021 to 2030 (a 51% reduction over the decade) and to move to net zero emissions by 2050.
- Coillte believes that planners working in all tiers of government (national, regional, local) and the planning profession in general needs to step forward and frame this national CO2 reduction ambition and the associated requirement for renewable energy, in the form of plan-led 'Renewable Energy Strategies' (RESs) as an utmost priority.
- Only when planning permission is secured can a project apply for a grid connection to export energy to
  the national electricity grid (which may require a separate planning consent) and then seek to identify a
  route to market to sell the energy that will be generated. This can be an overall lengthy and sequential
  process that needs to be underpinned by a robust plan-led framework to ensure time and resources
  are correctly focussed if we are to achieve national targets by 2030.

# East and Midlands Regional Spatial and Economic Strategy & a Regional Approach to Renewable Energy Strategies

- The EMRA Regional Spatial and Economic Strategy (RSES) also clearly recognises the urgent need to decarbonise the energy sector.
- Coillte requests that each local authority in the Region incorporate a RES into the making/updating of its individual County Development Plan.
- In preparing a new RES each local authority should engage closely with neighbouring local authorities and with other local authorities in the East and Midlands region to strive to attain the same important benefits and synergies of a Regional RES. A regional steering group comprising planners from each local authority and/or EMRA, would be optimum.
- A representative from the DHPLG should also be requested to join the steering group. Coillte is also aware of Kildare's role as the lead local authority for the 17 East and Midland Counties that together make up the Climate Action Regional Office (CARO) and suggests Kildare could be instrumental to setting up and facilitating such a steering group.
- It is imperative that a set of guiding principles is agreed and used by all local authorities in developing local authority RESs. To this end the methodology and principles set out in "SEAI's Local Authority Renewable Energy Strategy" [2013] remain valid and should be considered, as was proposed by Kildare in its current CDP, Section 8.5. It should also be noted that the SEAI approach enhances the step-by-step approach to identifying wind energy zones in the 2006 WEGs, which have been transposed into the 2019 Draft WEGs document.

Having regard to Coillte's extensive experience of developing and facilitating wind farms in Ireland it is suggested that the following recommendations complement the principles in the SEAI document:

- Each local authority ensures a proportionate contribution by the county to the achievement of new national on-shore wind targets (i.e. an additional 4.2GW). This could be done in a holistic manner via the Steering Group (referred to earlier). Regardless the individual County Development Plan's Strategic Environmental Assessment should use an evidence-based approach to confirm that the proposed contribution is sufficient to comply with each local authority's obligations in this regard. The level of contribution (ambition) will then dictate the criteria used in identifying lands for renewable energy.
- Each local authority carries out a full assessment of all lands within their county and classifies areas for renewables using terminology which is agreed in advance with the Steering group. Such terminology could include: 'No-Go', 'Open to Consideration', and 'Preferred' areas. It should be noted that that the associated quantum of land identified as potentially suitable for renewable energy development must go beyond the actual amount required to be built to allow for a natural attrition rate across development sites, including for example landowners not choosing to develop, site level constraints arising at the detailed survey and design stage. If no such constraints exist, a project's planning application could still be refused permission, or if granted, overturned on judicial review. If granted permission, a project may not be able to secure an economically viable grid connection or be able to find a route to market for its electricity that make the construction of the project a commercially viable proposition. These are just a few examples of the hurdles a project must clear to convert theoretical potential to actual, delivered capacity and hence the need for significant headroom in the designation of suitable lands to meet the national targets.
- Each local authority consider/reconsider its Landscape Character Assessment (LCA). As above, an approach and terminology should be agreed in advance with the Steering group. Such terminology could include 'Low', 'Medium', and 'High' sensitivity to various types of renewable energy development. It is likely it will be necessary to extend current areas suitable for renewables into slightly more sensitive landscape areas to deliver the requirements of the CAP. However, this can still be done while protecting national, regional and locally important landscapes, particularly if a regional / steering group approach is adopted. It is critical that landscape policies and designations directly relate to renewable energy designations to provide a clear framework for development. Conflicts between general landscape policy and renewal energy designations are unhelpful.

#### **Turbine Technologies**

An Coillte note that turbine technologies have advanced significantly in the past decade and this trend
is set to continue. For this reason, it suggests the SEAI Wind Atlas, or any similar general wind resource
data, is not used as a constraint when identifying suitable areas for onshore wind as was proposed in
Section 8.5 of the 2017 CDP. It should also be noted the SEAI Wind Atlas of Ireland is derived from a
computer model and would not be as accurate as on-site wind measurements which are used by wind
energy developers to verify a site's wind regime as being viable.

#### **Grid Availability**

- In addition, it is recommended that existing grid constraints are not considered hard constraints when
  preparing RESs. This is because, amongst other things, the development of the Grid will react to
  (planning) consented developments where necessary. In essence this means that a planning consent,
  or indeed a critical mass of planning consented projects triggers grid development/reinforcement
  where necessary.
- This issue of existing grid availability was recognised in the SEAI [2013] document which suggested that "local authorities may consider policies and objectives which could underpin and support infrastructure and network deployment to achieve national energy targets while realising local RE potential". Coillte wholly supports the delivery and upgrading of grid infrastructure to facilitate Renewable Energy potential. The Eastern and Midlands RSES has excellent policies in relation to grid development [RPO10.19-10.24] and Coillte requests that these are mirrored in the new Kildare Development Plan.

# **Wind Energy Guidelines**

• The Draft Wind Energy Development Guidelines 2019 were also published last December by the Department of Housing, Planning and Local Government. These are likely to be finalised later this year. Specific Planning Policy Requirement (SPPR) 1 requires compliance with Section 3.4 which in turn says the Development Plan should set out the following: "the identification on development plan maps of

the key areas within the planning authority's functions area where there is significant wind energy potential and where.... Wind energy developments will be acceptable in principle... open to consideration... generally discouraged." As SPPR1 is proposed to be a binding requirement of the Wind Energy Development Guidelines, it essentially requires the preparation of a Wind Energy Strategy. As suggested above there is need to prepare a Renewable Energy Strategy to meet new national targets and an obvious opportunity to incorporate this as part of the new County Development Plan review process.

 An Coillte also requests that the Kildare County Development Plan recognises the DHPLG Wind Energy Development Guidelines 2006 and any updates thereof, as the appropriate national standard rather than seeking to alter or replace the requirements therein. In this regard, WE1 of the 2017 CDP should be included in the new CDP.

# The approach to a Renewable Energy Strategy in the new CDP should address a number of the questions raised in the Issues Paper namely:

- How can the Plan increase the levels of renewable energy production and energy efficiency in the county while protecting the environment, the landscape and public amenity?
- How can the Plan best address the challenges of climate change?
- How can the Plan support our transition to a low carbon climate resilient and environmentally sustainable economy?

#### **Renewable Energy and Economic Growth**

• The Energy Sector is a key sector for job growth, throughout the lifetime of the Plan. Wind Energy development can generate significant construction and operation jobs throughout its lifetime and contribute to communities through community benefit funds and to the local authority through rates.

- Coillte is committed to ensuring that local communities benefit from having a wind farm in their locality in terms of a Community Benefit Fund which supports the development of local recreation amenities and provides additional community project funding. Community benefit schemes relating to RESS projects will have significant community benefit (circa €30k per annum per turbine for a 5 MW turbine; therefore exceeding €200k per annum in projects which are now typically exceeding 35MW in nameplate size), providing an opportunity to transform rural communities where projects are located. We are also working hard around Community Investment and examining how communities could be given the opportunity to invest in a wind farm project.
- Coillte is an active member of the Wind Energy Ireland (WEI, formerly called IWEA) and our staff actively participate in several the Association's committees. WEI statistics confirm that in terms of initial capital investment, every megawatt (MW) of wind energy capacity installed gives rise to an investment of approximately €1.25 million. Ongoing investment and economic development benefits during the 30+ year operational lifespan of wind farms, take the form of rents payable to landowners, financial support for local communities in the form community benefit schemes and commercial rates payable to local authorities. Combined, these amount to approximately €25,000 per MW per annum.

Wind energy is of strategic importance to the county both in addressing Climate Change and in growing the Kildare economy and providing employment opportunities. Ensuring renewables are facilitated in the Plan in a strategic and balanced manner provides one answer to the following question in the Issues paper: 'Are there economic opportunities associated with climate change mitigation that the Plan can harness?"

## **Infinite Lifespan of Wind Farm Planning Permissions**

#### **Conditions**

• Coillte also wishes to bring the Council's attention to WEI's paper on 'Infinite Lifespan of Wind Farm Planning Permissions', (available at https://iwea.com/images/files/final-paper-on-infinite-planning-duration.pdf) and the fact that the majority of developments that obtain planning permission in Ireland are afforded a planning permission of infinite duration. However, despite their being no policy basis for

this, it has been commonplace in Ireland for the life of a wind farm to be restricted by a condition of the planning permission.

- Removing conditions would enable wind farms to continue producing clean energy at a very low cost to the consumer, for as long as possible and continue to contribute via rates to local authorities. Wind energy is set to play a crucial role in helping Ireland to achieve its climate change targets and should not be treated as a temporary solution. Making this relatively minor amendment would save at least €1 billion for consumers under RESS alone while delivering the 70% renewable electricity target for 2030.
- Currently, in order to continue operating beyond these limits, the wind farm operator would need to
  apply for planning permission for life extension (retaining existing turbines for a limited extended
  period) or for repowering (replacing older turbines with newer ones). This can be a costly and timeconsuming process and it can be challenging to create a business case when seeking simply to extend
  the life of existing turbines for a limited number of years.
- Coillte and WEI recognise the importance of having decommissioning provisions in place for a wind farm when it does reach the end of its life. At a certain point it will no longer be viable to operate the wind farm, and in such cases, when the wind farm is no longer generating and exporting electricity to the grid, it should be decommissioned, and the turbines removed. To ensure that this is carried out in the correct manner, and that funds are allocated to cover these works; it is common for a wind farm planning permission to contain conditions that ensure that prior to construction the developer must submit a comprehensive decommissioning plan (which must be approved by the local authority) and a decommissioning bond to cover the cost of the proposed decommissioning works, which could be triggered once the project has stopped exporting electricity to the grid. This provides the local authority with comfort that once the wind farm ceases operations, it will be properly decommissioned.

**Working in Partnership on Wind Projects** 

• The scale of the overall CAP ambition is considerable and requires considerable collaboration between all parties involved or associated with renewable energy including the communities that will ultimately host the infrastructure.

#### 2.4 Sustainable Timber Products

• Timber is without doubt one of the most environmentally friendly and versatile building materials available and being a natural carbon sink can be considered truly renewable. Coillte requests that Kildare County Council promote the use of sustainable timber products in the forthcoming Kildare County Development Plan 2023-2029.

#### 3.0 Conclusions

#### In preparing the draft County Development Plan, Coillte request that the Council:

- Continue to support sustainable rural based enterprises such as forestry and tourism in the county and make adequate provisions and objectives to facilitate their delivery.
- 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.
- Ensure the zoning of sufficient lands with associated objectives for recreational, commercial, tourism and community uses.
- Support the provision of accessible recreational, community and sporting facilities in the county.
- Support the provision of tourism infrastructure and visitor services, including the provision of tourism accommodation at appropriate locations in the Coillte estate.
- Promote the use of sustainable timber products in the Development Plan policies and objectives.

		Climate Action
		<ul> <li>Include policies and objectives in the Plan that recognise, promote and facilitate onshore wind and commit to ensuring the renewable energy potential of the county is maximised to achieve the most recent national targets.</li> </ul>
		<ul> <li>Recognise and respond to the scale and urgency of climate change as part of the County Development Plan review process by preparing a Renewable Energy Strategy based as part of the Plan based on the new national targets and the principles of the SEAI LARES.</li> </ul>
		<ul> <li>Lead the East and Midlands region in developing a consistent approach to key RES issues including a consistent approach to identifying suitable lands and categorising landscape sensitivity. Ensure that wind speed, site specific engineering issues, and existing grid capacity issues are not considered constraints in identifying suitable lands and ensure a sufficient quantum (headroom) is identified to account for site level attrition.</li> </ul>
		Reconsider the attachment of conditions of finite duration to wind farm permissions.
		<ul> <li>Recognise the DHPLG Wind Energy Development Guidelines 2006 and any updates thereof, as the appropriate national standard rather than seeking to alter or replace the requirements therein.</li> </ul>
		<ul> <li>Work in partnership with other government agencies and third parties, including the public, to achieve these goals.</li> </ul>
13.	OPW	The OPW has responsibility for Flood Risk and Estate Management, including heritage. This submission outlines observations from the Historic Properties Units of the OPW.
		<ul> <li>In relation to Castletown Demesne, Celbridge, the OPW welcomes the current planning designations of the lands formerly comprising the historic demesne of Castletown and would wish to see them continued and strengthened.</li> </ul>

		<ul> <li>The protection afforded to the historic vistas of Castletown towards the Wonderful Barn and Connolly Folly should be maintained.</li> <li>The number of dog wardens employed by KCC should be increased.</li> <li>KCC should facilitate the installation of directional signage for Castletown on the County's main roads.</li> <li>And development in Celbridge, a designated Self Sustaining Town, should be sensitive to the wider environment of the demesne of Castletown, its visual amenities, and preserve the rural character of the original setting of the great house. Consideration could be given to developing lands at Dunaghcumper as an amenity/green space for local people. This could also provide historical and ecological connections with Castletown.</li> <li>KCC should consider a strategic plan to open up their lands at Castletown for enhanced amenity.</li> </ul>
14. A	An Taisce	<ul> <li>The new development plan should represent a catalyst for positive change and facilitate the development of the county in a plan-led sustainable manner in line with UN Sustainable Development goals.</li> <li>Strategic Planning and Zoning         <ul> <li>The CDP must comply with methodical and evidence-based approaches to land use zoning and settlement planning in accordance with the P&amp;D Act. A rational assessment of zoned land requirements is required.</li> <li>Residential zoned land must be near public transport corridors, services and employment.</li> <li>Where there is a surplus of zoned land, an appropriate quantum must be de-zoned, down zoned or phased as per P&amp;D Act.</li> </ul> </li> </ul>

- Only considerations of proper planning and sustainable development in zoning, phasing, de-zoning or downzoning land shall be considered. All other considerations (such as private interests) should be disregarded.
- Small scale local industrial/commercial zones, proximate to existing or proposed residential areas must be provided to deliver local employment opportunities

#### **Sustainable Land Use and Transport**

- The plan must address car dependency. It has a negative impact on human wellbeing; it contributes to greenhouse gas emissions and air pollution. The Plan must ensure that settlements are walkable, cycleable and transit-oriented.
- Consolidated urban forms should be provided for. The prevalence of one-off houses must be
  addressed, as this is an unsustainable housing pattern promoting car dependency. An objective for
  serviced sites should be provided. The 'seven test requirement' of the NSS should be included and
  expanded upon in the CDP when considering housing in urban areas.
- The sequential approach to town development is imperative and should be guided by existing social and physical infrastructure, with realistic prospects for addressing capacity constraints.
- A modal shift is required, requiring investment in public transport, walking and cycling. Implementation is lacking. All sustainable mobility targets in the CDP must therefore be targeted, timetabled and resourced. The five key goals of the Smarter Travel framework should form the basis of CDP policy.
- Walking and Cycling must be promoted and it's important that the built environment is reshaped to
  encourage this. Short local trips in particular should not be car based. Guidance is provided in the
  National Cycle Policy Framework and DMURS. The CDP should address how new developments
  integrate/connect with surrounding environments in this regard. Engagement with the community is
  recommended.

- The Sunday car-free zone along the Grand Canal in Naas should be made permanent and similar zones provided throughout the county.
- The CDP policies should also coincide with 'A Framework for Improved Health and Wellbeing 2013-2025' and 'Get Ireland Active'.
- The CDP should include a local transport plan and permeability studies.
- Mobility management plans must be mandatory during the development management process.

## **Addressing the Climate Emergency**

- A primary objective of the CDP must be to break Kildare's dependence on fossil fuels, reduce greenhouse gas emissions and prepare Kildare with resilience to thrive.
- The plan must include targeted and timetabled policies in this regard.
- All Chapters should be assessed against climate considerations.
- A strategy should be prepared which would see the electrical generation needs of the county primarily
  met by renewable sources in accordance with national obligations for 2030, including use of local
  renewable energy sources, district heating and combined heat and power, and energy demand
  reduction measures.
- The most up to date climate projections should be considered in all zoning decisions.
- Prioritise the reuse and improvement of existing buildings over demolition and redevelopment.

# **Economic, Employment and Retail Development**

• Implement a Town Centre First policy in line with the 2020 Programme for Government.

- The CDP must include policies to promote sustainable agriculture, particularly the production of vegetables, grains, pulses, fruits, etc
- The CDP should include a policy for the promotion of local farmers' markets and identify locations where farmers' markets can take place.
- Out-of-town commercial and/or retail development must be strictly prohibited.
- Where it has been permitted historically, car parking charges must be made mandatory to level the playing field and the unfair competitive advantage accruing to 'big box' out-of-town retailer from free car parking and publicly subsidised road infrastructure.
- The PA should take an active role in site assembly for new retail development on brownfield and infill sites, including using CPO powers where necessary to provide for the sensitive revitalisation of town centres.
- The CDP should include a specific policy that explicitly provides that the change of use of retail warehouse units to non-bulky goods comparison and/or convenience uses will not be permitted.
- The CDP should include a policy which restricts large floor-plate multiples, which are dependent on complex fossil fuel-dependent supply chains, in favour of smaller floorplate local shops.

#### Water

- 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.
- The CDP must be fully consistent with the PA's legal obligations under the Waste Water Discharge (Authorisation) Regulations (SI No. 684 of 2007).

- 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.
- The CDP must include policies to provide alternatives to unsustainable urban generated dispersed oneoff, including, for example, a serviced site policy.
- The PA must ensure that all private wastewater treatment proposals comply with the EPA Code of Practice and other related regulations.
- 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.
- The use of Sustainable Urban Drainage Systems (SUDS) and rainwater harvesting must be mandatory for all new development proposals.

# **Biodiversity, Cultural Heritage and Landscape**

- The CDP and development management decisions of the PA must rigidly adhere to its substantial legal obligations under EU law, particularly with regard to the Habitats and Birds Directives.
- Seek to promote biodiversity through pollinator-friendly planting and maintenance where possible for land and areas in its control, including in graveyards.

		<ul> <li>Achieving adherence to the PA's legal obligations under the Habitats Directive and other environmental legislation cannot be achieved without the preparation in tandem with the CDP of a full Strategic Environmental Assessment and Habitats Directive Assessment.</li> <li>The 14 points of the EU Biodiversity Strategy 2030 should be fully incorporated into the CDP. The Farm to Fork policy recommendations should also be incorporated.</li> <li>Urban Greening Plans should be put in place for Naas, Newbridge and Celbridge in line with Point 11 of the EU Biodiversity Strategy. Urban greening measures should also be provided for in smaller towns.</li> <li>The most significant demesnes and designed landscape in the county should be identified and planning policies applied to maintain and enhance their special character and significance in considering agricultural, recreational, or other development.</li> <li>The CDP should seek to designate more ACAs and Special Planning Control Schemes.</li> <li>S. 48 development levies for Protected Structures should be waived to encourage sensitive reuse and adaptation.</li> <li>Important views and prospects must be protected.</li> <li>The Architectural Heritage Protection Guidelines for Planning Authorities must be</li> </ul>
		The Architectural Heritage Protection Guidelines for Planning Authorities must be implemented in full.  SEA
		The submission refers to statutory obligations of the SEA Directive, namely Articles 5 (Environmental Report), 8 (Decision Making), 9 (Information om Decision) and 10 (Monitoring) refer.
15. Fá	áilte Ireland	Tourism is an important economic driver. Land-use plans can manage all land uses and economic drivers in a holistic, strategic and spatial manner. Failte Ireland welcomes collaborating with the Council in this regard.

### Objective of the submission

- To enhance partnership and shared expertise; To enhance policy for all aspects of tourism-strategic planning, visitor experience and destination management.
- An objective should be included the Plan supporting cooperation between the Council, Failte Ireland and other tourism stakeholders in the county.
- Post Covid-19, Kildare must react competitively to appeal to locals and international visitors alike, creating a more sustainable industry. This will also support agriculture, food and drinks, accommodation providers, transport and retail.

#### **Current CDP**

• Section 5.13 of the CDP which refers to Tourism is welcomed, should be carried through in the new CDP and should be updated to reflect key tourism and recreation locations. The significant role that tourism plays in the overall development of the County should be recognised.

## **Issues Paper**

• Reference to tourism as an economic driver and greenways/blueways is welcomed. Reference to Failte Ireland and its brand initiative (Ireland's Ancient East) is not included in the Issues Paper.

## **Key Tourism Assets and Initiatives**

- A list of tourism assets is presented that should be included in the plan.
- Overarching 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.

### **Further Suggestions for CDP**

- Tourism can benefit the vitality and vibrancy of towns and villages. Failte has published 'Development Guidelines for Tourism Destination Towns' in this regard. Improved public realm, signage, promotion of facilities, tidy towns initiatives and painting schemes have positive influences. The Council should encourage redevelopment of derelict/vacant buildings for uses such as accommodation and tourism development.
- Greenways and Blueways: A greater focus on pedestrian and cyclist facilities should be included in the plan. Existing routes could benefit from additional support. The Council should promote access for on and off water-based activities and support blueways.
- Accommodation: The Plan should support the development of quality accommodation in key locations
  in key towns. There is an absence of choice in terms of holiday homes, motorhome parking, camping
  and glamping sites. A wide range of accommodation should be supported through plan policies.
- Tourism Amenities and Asset Maps: A map should be included showing Key Nodes, Transport links, Strategic tourism centres, Sensitive environments, Areas of unrealised tourism potential and Branding (i.e. Ireland's Ancient East).
- Sustainable Tourism: i.e, Tourism that takes full account of its current and future economic social and environmental impacts, addressing the needs of visitors, the industry, the environment and host communities. Resources should be devoted to ensuring negative impacts are avoided in sensitive areas (e.g. River Liffey, Barrow, The Curragh, Bog of Allen).

Wind Energy and Landscape Character Assessment: The Plan should include a Wind Energy Strategy to 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.
16.	Meath County Council	In accordance with Section 11 of the Planning and Development Act 2000-2021 Meath County Council was notified of the Draft Kildare County Development Plan 2023-2029.  Meath recognises that in the area of climate action, Kildare County Council is the lead authority for the 17 East and Midland counties as part of the Eastern and Midland Climate Regional Office (CARO).  Meath County Development Plan  The review of the current Meath County Development Plan 2013-2019 is ongoing. The anticipated adoption date of the Meath CDP is September 2021.
		<ul> <li>Maynooth</li> <li>Maynooth environs in Co. Meath is located on the northern periphery of the town. Lands are largely undeveloped and compromise approximately 139 hectares of land, approx. 1.5km to the north-east of the town centre. The development of these lands will ensure the delivery of a large part of the Maynooth Outer Orbital Route (MOOR)</li> <li>The following Regional Policy objectives set out in the RSES relate to Maynooth:         <ul> <li>RPO4.33; Support the continued development of Maynooth, coordinated with the delivery of strategic infrastructure including pedestrian and cycle linkages within the town and to the Royal Canal Greenway, DART expansion and road linkages forming part of the Maynooth Outer Orbital Route in a manner which supports future development and population growth and builds on synergies with Maynooth University promoting a knowledge based economy.</li> </ul> </li> </ul>

 RPO4.35. A cross boundary joint Local Area Plan (LAP) shall be prepared by Kildare County Council and Meath County Council to provide a coordinated planning framework for the Maynooth area. The Joint LAP shall identify a boundary for the plan area, strategic housing and employment development areas and infrastructure investment requirements and promote greater co-ordination and sequential delivery of serviced land for development.

Volume 2 of the Draft Meath CDP contains a development strategy for Maynooth, which will be replaced over the life of the Development Plan by the joint Urban Plan between MCC and KCC.

#### The following objectives are set out in the Draft Meath CDP

- **CS OBJ 11**; 'To prepare, as a priority, a Joint Vision and Local Area Plan for Maynooth in partnership with Kildare County Council within the lifetime of this Plan in accordance with the requirements of Regional Policy Objective 4.35 of the RSES for the Eastern and Midland Region.'
- MAY POL 1; 'To prepare, as a priority, in conjunction with Kildare County Council a joint Local Area Plan for Maynooth, over the period of the Plan.

It is anticipated that the Draft Kildare CDP will contain corresponding objectives to address the future planned development of Maynooth.

It would be helpful if the Core Strategy of the Draft KCDP also refers to the need for discussion and agreement with MCC regarding the distribution of the Maynooth population.

The objectives pertaining to the delivery of the MOOR is as follows in Volume 1 of the Draft MCDP. The written statement for Maynooth Environs refers to the MOOR.

• MOV OBJ 48; 'To work in conjunction with Kildare County Council to deliver the section of the Maynooth Outer Relief Road located within the administrative area of Meath county Council.'

- MAY OBJ 4; 'To support and facilitate in conjunction with Kildare County Council and private developers and landowners, the construction of the Maynooth Outer Orbital Route.
- MAY OBJ 5; 'To require that the Maynooth Outer Orbital Route connects with the MOOR being delivered in the administrative area of Kildare County Council. Said route shall incorporate the construction of a sewer and ring main linking the sewer and trunk main in the Dublin Road to the residential development in the Mariavilla area'
- MAY OBJ 6; 'To ensure the provision of improved cycle and walking connections to Maynooth Town Centre.'

It is requested that the Draft KCDP contains similar objectives to address the preparation of the joint urban plan of Maynooth.

#### Kilcock

Volume 2 of the Draft MCDP contains a written statement and zoning map for Kilcock.

A review of the Kilcock Local Area Plan will be required post the adoption of the KCDP2023-2029. The new Kilcock LAP must reflect the policies, objectives and land use zoning strategy for Kilcock as set out in the MCDP2021-2027.

The following objectives are considered relevant:

• <u>KIL SP 1;</u> To co-operate with Kildare County Council in the sustainable development of the Kilcock Environs in a comprehensive and supporting manner which will integrate with the existing built up area of Kilcock town in Co. Kildare.

- <u>KIL OBJ 4;</u> 'To reserve the corridor for the permitted Local Distributor Road within Kilcock Environs Area extending from the R148 (Maynooth Road) to the roundabout along the R158 (Summerhill Road). Details of suitable links and tie-ins to the adjoining road network in County Kildare shall be designed in conjunction with Kildare County Council.'
- <u>KIL OBJ 6;</u> 'To facilitate in conjunction with Kildare County Council the provision, in tandem with development, of the section of the Local Distributor Road extending from the R148 (Maynooth Road) to the existing R125 (Dunshaughlin Road).
- KIL OBJ 7; 'To carry out general road improvements in the Kilcock Environs, including junction tie-in works and upgrades to facilitate the provision of new spine road.'
- <u>KIL OBJ 8;</u> 'To examine the feasibility of a one-way traffic management system at Meath Bridge and traffic management plans for the Kilcock area in conjunction with Kildare County Council. All traffic management proposals in this area shall include suitable provisions for pedestrians and cyclists.'
- <u>KIL OBJ 9</u>; 'To facilitate the provision of new and enhanced cycling and walking connections to Kilcock Town Centre.'
- <u>KIL OBJ 10</u>; '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.

It is requested that the Draft KCDP contain corresponding objectives.

# **World Heritage Tentative List**

The Tara Complex as part of the Royal Sites of Ireland has been included in the Tentative List as part of this larger assemblies of sites. MCC would like the support of KCC in supporting this nomination.

		Other Relevant Issues
		It is 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.
		Heritage centres of mutual interest to both KCC and MCC include the development of the Tulus Columbanus walking route.
		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).
		It is requested that the following be noted:
		Designated sites of mutual interest including the River Boyne / Blackwater SAC and SPA.
		The Landscape Character Assessment of the Draft MCDP2021-2027 be consulted.
		The MCDP contains a list of Protected Views and Prospects. These should be consulted.
		List of MCDP and DMCDP contain a record of protected structures, which should be consulted.
		Johnstownbridge is serviced by the adjacent Enfield wastewater treatment plant.
17.	Department of Public Health	Key Government framework on which the submission is built on is the Healthy Ireland; A Framework for Improved Health and Wellbeing 2013-2025; Four major goals to this framework:
		Increase the proportion of people who are healthy at all stages of life
		Reduce health inequalities.

- Protect the public from threats to health and wellbeing.
- Create an environment where every individual and sector can play their part in achieving a healthy Ireland.

#### **Communities**

- Communities must meet the needs of individuals in terms of housing, transport and physical activity.
- Communities promote health by encouraging people to be active and choose sustainable transport methods.
- Communities are pleasant places to live, free of factors detrimental to health (see 'Social Determinants of Health' below).
- Communities provide for citizens of different physical, social and cultural needs, and that financial means should not be a barrier to interaction across communities.
- Support for local industries and businesses to support local economies and draw tourists to communities within Kildare. This can include promoting independent business, sustainable access across the county, fostering local culture, emphasising local heritage and de-prioritising towns and villages as a place for private transport / cars.
- Provision of the key infrastructure, such as availability of high speed broadband, to support
  development of business in County Kildare and facilitate workers to work from home or at local hubs,
  where appropriate. This can enable progress on local economic development and well as facilitate
  reduced need for commuting to workplaces by car.
- Access to green and blue spaces should be available for all residents. Of particular note is that access and infrastructure to support the ability of children to access green and blue spaces is noted as a policy

action in the Better Outcomes Brighter Futures framework, which is promoted by the HSE's own National Healthy Childhood Programme.

Childhood health should be supported through healthy environment initiatives to promote and increase physical activity and active transport, restrict exposure to high calorie foods and advertising (eg. through no fry zones around areas where children spend time and public advertising near schools, buses and transit routes) and reduce exposure to pollutants and chemicals, including air and noise.
 Reducing rates of childhood obesity should be a special goal built into any development plans.
 Provision of suitable local and accessible play and recreation areas for children and young people is important for their present and future health and wellbeing.

## Housing

- Planning should consider the access to services and communities that new housing will need, especially public transport.
- That new housing takes into account air quality and noise pollution.
- Support 'mixed tenure', which is supported by national policies such as the Social Housing Strategy 2020.

# **Transport and Travel**

- Public transport usability and accessibility should be at the centre of all transport plans.
- Public transport should be an attractive and easy option.
- Public transport options should be frequent and comfortable.
- Transport should be sustainable (low-emission where possible).

- Reliance on private car travel should be reduced.
- Active transport (e.g. walking and cycling) should be encouraged and supported through promotion, safety provision and dedicated infrastructure.
- Expand pedestrian and cycling infrastructure within towns, as well as regionally, which could help to promote tourism and access to green and blue spaces (see below).
- Children should have safe transport routes for cycling and walking between places they spent time, such as homes, schools, and green and blue spaces.
- Protected (divided) cycling lanes be implemented, as they have been shown to increase cyclist safety.
- Consideration of inter-village and town cycle routes (as is currently in place along the Royal Canal).

## **Environment and Climate Change**

- Sustainability and emission reduction be considered in all development, policies and procedures.
- Expansion of electric vehicle charging infrastructure should be planned.
- Increasing areas should be set aside for environmental preservation.
- Areas should be set aside for re-wilding. This could include the specific planting of diverse flora to avoid monoculture, and the purposeful introduction of fauna.
- Biodiversity and minimal intervention areas should be strengthened, with a view to, at least, in part, promoting bee populations.
- Rapid reforestation to improve green space availability, but also to aid carbon sequestration.

		<ul> <li>Green and Blue Areas should be accessible in a nature-friendly and low-emission way so that individuals are able to enjoy the benefits of spending time in nature.</li> <li>Supporting and promoting local produce for local communities.</li> <li>Decrease the need for transport waste and recycling waste to other jurisdictions.</li> <li>Investment in sustainable technologies to enhance recycling efficiency and utility locally.</li> <li>Energy</li> <li>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, and larger wind farms.</li> <li>Robust plans for sustainable energy generation in regards to digital infrastructure.</li> <li>Social Determinants of Health and Health Promotion</li> <li>A stringent health risk assessment and consideration in policy and development decisions, with a view to promoting health should be incorporated into the Plan. This should assess the impact of the built environment on individual health.</li> </ul>
18.	Environmental Health (Health Service Executive)	Introduction  Environmental Health Service (EHS) is making this submission under the remit of healthy Ireland and relevant health supporting strategies. KCC should consider the ways that strategic planning can protect population health.  Climate

## The Climate Action and Low Carbon Development (Amendment) Bill 2020

- The EHS recommends that climate change is a key consideration in the development of the strategic objectives of the County Development Plan.
- The key aims of Kildare County Council's Climate Change Adaptation Strategy should be integrated with the Development Plan.
- More compact mixed use development, greater use of sustainable transport options, restricting development in areas that are at risk of flooding and protecting natural landscape and biodiversity.
- It is recommended that key indicators for monitoring of progress on climate action must be outlined to ensure progress is achieved.

# **Sustainable Development**

- It is recommended that all developments should document their carbon action and energy efficiency proposals at planning stage.
- It is also recommended that KCC carries out a carbon audit for its existing building stock and retrofit with more insulated building fabric and sustainable technology.

## Energy

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.

It is recommended that a Renewable Energy Strategy is prepared to investigate the potential for further renewable energy production in Kildare.

## **Transport**

Key aim of the KCDP should be to implement sustainable transport patterns within the county.

- Small scale projects that encourage greater emphasis on pedestrian and cycle linkages. Opportunities for 'greening' of these routes should be considered, which would increase biodiversity in urban centres.
- 'Quality audit' be carried out of existing pedestrian and cycle facilities in towns and villages within the county.
- Targets for trips by pedestrians and cyclists should be set by KCC and progress on achieving these targets is monitored through the lifetime of the Plan.
- Audit of the bus infrastructure should be carried out and the council develops a priority list of necessary improvement works.

# **Smarter Travel Policy**

The Strategic Development Plan should:

- Identify a minimum percentage of new residential and mixed use, which should take place on brownfield / existing sites. The National Planning Framework requirement of 30% of new housing to be delivered on infill / brownfield is noted.
- Maximum permitted level of car-parking for commercial sites, which have suitable transport facilities and are within walking / cycling distance to amenities.
- Set a general restriction of the future development of out-of-town retail centres except in exceptional circumstances and consideration of a similar requirement that parking charges be introduced for most existing centres.
- Require developments above a certain scale to implement viable travel plans which promote public transport and modes of active travel and which reduce reliance on the car. All development should be required to show a route map showing safe cycling and walking routes to schools, shops and public transport.
- Establish e-working centres to provide opportunities to people in rural area and satellite towns to work from a location closer to home. This is of vital importance based on the current settlement patterns of the county.
- Set a target that every school in Kildare has a school travel plan to encourage students to take
  alternatives to the car. This should be supported with a strategic aim to develop safe walking and
  cycling routes to and from schools and other educational institutions as well as providing disability
  access.
- Provide facilities such as secure bike parking and changing / showering facilities at places of employment in public authorities to encourage staff to cycle.

To support smarter travel there should be a strategic aim to:

- Reprioritise traffic signals to favour pedestrians instead of vehicles, reducing waiting times and crossing distances at junctions.
- Create level grade crossings for pedestrians across junctions. Create larger traffic-free areas in urban centres. Ensure that 30km/h zones are designate in central urban areas which accommodate motorised traffic.
- Widen footpaths where there are high pedestrian flows, particularly close to public transport nodes. Improve the surface quality footpaths. Provide appropriately designed safe, well-lit, direct, continuous facilities for pedestrians.
- Ensure state-owned lands such as canal towpaths, former rail lines, Coillte estates, etc, are made available for the development of walking and cycling trails.
- Support private and public sector initiatives to establish car club schemes in the county. Provide onroad parking spaces to be designed for car clubs through appropriate signage.
- Establish park and ride facilities along major public transport nodes, at the periphery of major urban areas and at key public transport locations and nodes.

# **National Cycle Policy Framework**

## The Strategic Development Plan should:

- Reduce the volumes of through traffic in town centres.
- Construct traffic calming measures
- Support dedicated signed rural cycling networks building on Failte Irelands strategy to Develop Irish Cycling Tourism.

- Segregate cycle and pedestrian paths.
- Provide cycle parking at all destinations of importance to the cyclist and integrate cycling and public transport.
- Ensure urban road infrastructure (with the exception of motorways) is cyclist friendly. Link up all existing cycle lanes.

# **Get Ireland Active – National Physical Activity Plan for Ireland**

- A Strategic aim for Co. Kildare should be to increase the active school programme to at least another 20 schools in the county.
- Develop consultation processes with children and young people regarding the implementation of programmes in which they are involved (i.e. playgrounds, public spaces, etc. etc.)
- All plans and developments for nursing homes / residential care facilities should include proposals for gardens and recreational activities.

#### The KCDP should include:

- Opportunities for physical activity in the development of the built environment.
- A network of cycle routes and footpaths should be planned and developed which aim to promote connectivity of housing / employment to town centres, park and recreational amenities.
- Develop local and regional parks and recreational spaces that encourage physical activity.
- A framework for workplace health and wellbeing should be developed.

- The smarter travel workplaces initiative should be promoted. Sustainable or active modes of travel should be facilitated.
- Support and develop 20 new walking groups in the County through funding of signage, upgrade of paths and lighting and resolving safety issues.
- Developing a standardised framework for publicly funded programmes designed to increase physical activity levels.

## **Employment**

- Sustainable and active modes of travel should be required as part of any proposals for large scale employment sites / industrial estates.
- Recreational amenities that promote the health and wellbeing of employees in large employment sites should be incorporated into development proposals. Walking trails, water features, wildlife gardens and outdoor dining facilities are just some of the proposals that should be required.
- Support and facilitate the establishment of co-working remote working hubs and creative hubs. MERITS digital hub in Naas is a good example.

# **Housing and Urban Design**

Please refer to the Urban Design Manual – A Best Practice Guide

- Provide attractive, interesting, and well used public realm and open spaces.
- KCC should implement the concept of the '20 minute neighbourhoods' in larger urban conurbations. The criteria outlined in the Urban Design Manual should be incorporated into the Plan.

- Variety of house types, tenures and typologies should be included in any proposal for a large scale development. All large scale developments should include a Design Statement.
- Implementation and sequency strategy, which outlines the key infrastructural requirements for an area and which ensures that development throughout Kildare takes place in a planned, proportionate and sustainable manner.

## Rejuvenating Irelands Small Town Centres

- Innovative ideas to rejuvenate Kildare's small towns and villages must be developed.
- Broadband, improved public transport and facilities, cycle lanes that links small towns and villages.

## **Green Infrastructure and Biodiversity**

# **Health Benefits from Biodiversity and Green Infrastructure**

- The provision of and preservation of urban green space is paramount.
- It is recommended that the following is considered when planning for parks and recreational areas.
- Green biodiverse spaces should be designed so that there is at least one within walkable distance from people's homes.
- Green spaces should be co-designed with communities and reflect local needs.
- It is recommended that specific areas of Kildare are identified for their biodiversity and ecological value. These areas should be listed in the development plan to offer them some form of legal protection from development by Kildare County Council.

- Kildare County Council should consider leaving land untouched for rewilding initiatives. This land should be viewed as valuable in its own right and afforded legal and planning protection from development.
- All towns and villages should commit to a pollinator plan.

## **Biodiversity and Green Areas**

- Biodiversity should be incorporated into the planning discussion process. Biodiversity Action Plan should be developed, which aims to conserve and restore biodiversity and ecosystem services in the wider countryside.
- Nature based solutions should be explored as much as possible.
- Existing green areas should be provided.
- Pedestrian and cycle routes through green spaces should be a key aspect in any design.
- Towns and villages should be explored to see where biodiversity can be integrated into the urban fabric.
- Any new urban design proposal should employ the knowledge and expertise of a biodiversity expert.
- Maintenance should be factored in at the design stage.

## **Older People**

# **Re National Positive Ageing Strategy:**

• Suitable housing is a key aim in the National Positive Ageing Strategy.

- KCC should aim to carry out an assessment of housing need and provision and consider all housing
  options in development. Housing for the elderly should not focus solely on the provision of Nursing
  Homes.
- All residential development should incorporate the 'Universal Design' Principles to ensure housing can meet the needs of the occupants regardless of their age, size, and disability.

People as they age should be provided accessible, affordable, and flexible transport systems in both rural and urban areas.

- Provision of age-friendly public transport.
- Promotion of the integration of the Rural Transport Programme with other local transport services.
- Provision of public transport linkages to major health facilities and personal social services.
- Supporting the design and development of age friendly public spaces, transport and buildings.
- Designing age friendly urban environments (street lighting, footpaths, roads, public seating).
- Promote access (in terms of affordability, transport availability, accessibility of venue) to a wide range of opportunities for continued learning and education for older people.
- Promote the concept of active citizenship and the value of volunteering and encourage people of all ages in a range of arts, cultural, spiritual, leisure, learning and physical activities in their local communities.

#### **Social Inclusion**

Time to move on from congregated settings – A strategy for community inclusion

- Improve community inclusion for people with disabilities.
- Greater connectivity to services for disabled people.
- Meet housing needs of people with disabilities. A local re-housing plan should be prepared and jointly co-ordinated with the HSE, in collaboration with service providers.
- All residents in congregated settings should be assessed by the local authority to establish eligibility and need for social housing.
- Certain number of units should be reserved for people with disabilities.
- Housing grants should support people with disabilities who want to live in their own homes.
- Support people with disabilities to access employment and educational opportunities.
- Support people with disabilities to access mainstream community services.

# Steering group report on a national substance misuse strategy

- The Development Plan should develop the provision alcohol-free venues for young people. Young people bring centrally involved in the development and management of the programmes / venues.
- Increase access to school facilities in and out of school hours. All community facilities provided should have shared services.

## Tobacco

- Implement the tobacco free playgrounds initiative.
- Promote tobacco free movement.

• All developments that include a designated smoking area should be forwarded to the Environmental Health Service prior to the planning decision.

#### Food

## Healthy Ireland – A Healthy Weight for Ireland

- Kildare County Council can influence the built environment to improve health and reduce the extent to which it promotes obesity.
- An assessment of food outlets in towns and villages should be carried out to ensure healthy food
  options are available and prevent a proliferation of fast food outlets.

KCC should create environments that make the healthy choice the easy choice:

- Support community-based initiatives that develop programmes that support healthy lifestyles and prevention of obesity to children and adults.
- Promote through planning and the built environment the benefits of healthy eating, physical activity and non-sedentary behaviour.
- Improve availability of and access to healthier food choices. Support developments that that aim to improve the health of the population.
- Support opportunities for increasing physical activity levels generally in the community through Local Sports Partnerships and supporting initiatives e,g. Parkrun.
- Facilitate community gardens / allotments through identifying and releasing suitable publicly owned land.

It should be a strategic aim of the KCDP to facilitate the production of more locally produced healthy, high quality food.

#### Waste

# A Resource Opportunity – Waste Management Policy in Ireland

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.

- Disposal of municipal waste to landfill should be a last resort.
- Implement waste prevention measures with local business and community groups. Develop reduction strategies for plastic, food waste and resource use.
- Include community waste prevention demonstration programmes, which provides skills to develop waste prevention within local communities.
- 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.
- 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.

#### Water

• Secure the provision of safe secure drinking water and promote the reduction in waste and overuse of water. Ensure all wastewater treatment plants can operate effectively.

		Environment Noise
		<ul> <li>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.</li> </ul>
		Air Quality
		The Development Plan should 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,
		<ul> <li>Develop Local Air Quality Management Plans that identify pollution 'hot spots' and aim to reduce pollution through local action on emissions.</li> </ul>
		Implementation and Evaluation
		Efficient implementation of the KCDP2023-2029 into clear and effective action is of the upmost importance. The progress of the KCDP should be constantly measured throughout the lifetime of the Plan. Specific measures and performance indicators should establish how progress is quantified and measured.
19.	Eirgrid	Eirgrid is a Prescribed Authority for the purposes of Section 11(2) of the Planning and Development Act 2000 (as amended).
		Eirgrid is responsible for the safe, secure and reliable transmission of electricity – now and in the future.
		Policy Led Plan

- Eirgrid notes and welcomes reference and emphasis placed on climate action and energy in the Strategic Issues Paper.
- The policies and objectives in the adopted Regional Spatial and Economic Strategy (section 10.3 Energy) should be reviewed and considered as an example for inclusion in the forthcoming Draft Kildare County Development Plan. Regional Policy Objective 10.19-10.24 of the RSES should be included where applicable, in the forthcoming plan.
- Eirgrid requests that the Draft Development Plan is explicit as to how the various Government (and State Agency) policy documents have been considered in the preparation of the Draft and how they have informed policy and objectives. A section should be included in the Draft Plan, which sets out how these policy documents have been considered in a holistic and integrated way to inform subsequent plan policy.
- In this regard, the Department of Communications, Energy and Natural Resources (2015) White Paper on Energy Irelands Transition to a Low Carbon Energy Future 2015-2030 reaffirms the Government's position on energy matters and should be relied upon as a source for policy formulation for energy in the draft plan. The White Paper has considerable regard to wider emerging EU Policy which promotes smart low-carbon economies centred on energy efficiency.
- The Climate Action Plan 2019 sets out a 'roadmap' to achieve a net zero carbon energy system by 2050. As of 2019, the Irish government confirmed that Ireland will aim for at least 70% of Ireland's electricity supply to be generated from renewable by 2030.
- The Climate Action Plan states that increased levels of renewable generation will require very substantial new infrastructure, including grid infrastructure.
- The RSES recognises that with the projected increase in population and economic growth to 2040 the demand for energy is set to increase in the coming years.

• It is important that the draft plan reflects EirGrid's need for robust policies to develop the electricity grid in a safe and secure way. The draft plan should 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.

## **Regional Context**

- Co. Kildare is grouped with the South-East, Mid-East and Dublin Area in EirGrid's Transmission Development Plan 2019-2028.
- EirGrid has a number of ongoing and planned projects in Kildare for the purpose of reinforcing the transmission and distribution of networks. The projects that are specific to the area are as follows:
  - Reinforcement of the Transmission Network between Munster and Leinster
    - ➤ Series Compensation on the existing 400 kV overhead lines that cross the country from Moneypoint in County Clare to Dunstown in County Kildare and Woodland in County Meath. The series compensation devices are planned for:
      - Moneypoint 400 kV Station Series Compensation (CP0967) 44
      - Oldstreet 400 kV Station Series Compensation (CP0969)44
      - Dunstown 400 kV Stations Series Compensation (CP0968)
    - It is expected that planning applications will be submitted for all of these projects in the next 18 to 24 months.

# Reinforcement of the Transmission Network in the Midlands and South-East Regions including Kildare

- Laois Kilkenny Reinforcement Project (CP0585), includes:
  - A new 400/110 kV station at Coolnabacky near Portlaoise (looped into the existing Dunstown - Moneypoint 400 kV and Athy - Portlaoise 110 kV lines);
  - A new 110 kV circuit from this station to a new 110 kV station at Ballyragget, Co.
     Kilkenny;
  - o A 80 Mvar 400 kV shunt reactor relocated from Dunstown; and
  - A 110 kV uprate to the existing Ballyragget Kilkenny line which is currently operated at 38 kV46.
- This project is required to address quality of supply issues and provide security of supply in Kilkenny, Carlow, Kildare and Laois.

## CP0966 Kildare-Meath

- The Kildare-Meath Grid Upgrade will add or upgrade a high-capacity electricity connection between Dunstown substation in Kildare and Woodland substation in Meath.
- Power is currently transported across the country on two high-voltage power lines from Moneypoint in Clare to the Dunstown substation in Kildare and Woodland substation in Meath. Transporting more electricity on these lines could cause electricity supply problems throughout Ireland, particularly if one of the lines is lost (where power is out) unexpectedly.

		<ul> <li>➤ The shortlist of technology options that EirGrid have been working on to address these needs is as follows:         <ul> <li>Connect two existing 220 kV overhead lines and up-voltage to 400 kV;</li> <li>Build a 400 kV overhead line;</li> <li>Build a 220 kV underground cable;</li> <li>Build a new single conductor 400 kV underground cable in one route;</li> <li>Build a new 400 kV underground cable using two new conductors in two separate routes.</li> <li>➤ A decision will be taken on these technology options in the next few months</li> </ul> </li> <li>Conclusion</li> <li>To ensure Ireland's sustainable development and growth, EirGrid requires appropriate and robust policies and objectives for planning the national grid infrastructure and prioritising it appropriately in order to deliver national, regional and local benefit. In this regard, EirGrid requests that the importance of the grid is acknowledged as a strategic issue.</li> <li>EirGrid is available to collaborate with the planning authority and to provide expert and focused input into the preparation of the Draft Development Plan, particularly from a strategic energy policy perspective.</li> </ul>
20.	Geological Survey Ireland (a division of the Department of Environment,	<ul> <li>Geoheritage</li> <li>The Kildare Geological Heritage Audit was completed in 2005.</li> </ul>

# Climate and Communications)

- Geological Survey Ireland supports the continued inclusion of the current Section 13.9 policies and objective NH 16, NHO 9, NHO 10 and NH 8 in the new CDP.
- The policy objectives relating to the protection of County Geological Sites (CGSs) from inappropriate development are encouraged.
- CGS 'Rathcore Spring' is omitted in Table 13.4 Sites of Geological importance and should be included in the new CDP.
- Suggested context to address the need to protect geological heritage:
  - List CGS's in the CDP for protection against potentially damaging developments.
  - The democratic process of the CDP means that stakeholders of the CGSs and the local community can buy into the process.
  - CGSs are the optimal way to address the responsibility to protect these sites under the Planning and Development Act 2000 and its amendments.
    - o A policy objective needs to be included to protect geological NHAs.

# **Culture and Tourism**

- Ireland currently has three UNESCO Global Geoparks, and a number of other geotourism projects.

  These Geoparks, along with other tourism initiatives such as the Wild Atlantic Way bolstered tourism.
- We encourage KCC to continue this trend, and to use the geological audit information and make it easily available to the general public.
- We encourage geology to be part of any tourism initiative introduced in the new CDP.

		Groundwater
		• Include the current policies RH 9 (vi) in Section 4.13 and WS 11 in Section 7.5 in the new CDP.
		The continued inclusion of the Groundwater Protection Scheme under the Policy / Legislative Context is also encouraged.
		Geothermal Energy
		Geological Survey Ireland notes the inclusion of the current policies GT 1 and GT 2 in Section 8.11.
		<ul> <li>The Assessment of Geothermal Resources for District heating in Ireland and the Roadmap for a Policy and Regulatory framework for Geothermal Energy in Ireland documents are developed to support the commitments under the Climate Action Plan 2019 and the Programme for Government.</li> </ul>
		<ul> <li>The Geothermal Suitability maps and documents could be considered as part of the renewable energy potential for the new CDP.</li> </ul>
		Natural Resources (Minerals/Aggregates)
		Include the current Extractive Industry policies and objective EI 6, EI 15 and EI 16 in the new CDP.
21.	Demesne	One-off Housing in Towns & Villages
	Architects	<ul> <li>Adopt a policy for serviced sites in appropriate locations in towns and villages for one-off houses, regardless of the zoning of the land.</li> </ul>
		To compensate for the lack of one-off houses being granted permission in rural Kildare.
22.	Ed Nyhof	Celbridge Traffic Congestion

		<ul> <li>Improve public transport services to solve the Celbridge Traffic Congestion issue opposed to the proposed new bridge which would encourage private car use.</li> <li>Provide free and reliable shuttle bus services to Leixlip Louisa Bridge and Hazelhatch railway stations through Celbridge.</li> </ul>
23.	Mary Gillan	Promote social inclusion of people with dementia.
		Upgrading signage and future planning for dementia friendly signage.
		Examples of Dementia Friendly signage can be found on the Alzheimer's Society website.
24.	EOL (Submission from the viewpoint of a tourist and a boater)	Overview  Current issues in Ireland:  lack of housing of a suitable cost and size,  commuter patterns and trends, and  climate change.  Housing Shortage  The number of people living on boats is increasing.  There are no Residential Berths in Kildare and the few long-term moorings, have waiting lists.  Solution:
		Create Marinas to provide Residential Berths.

- Surround the Marinas with native trees and shrubs to create their own ecosystem.
- Provide good wi-fi facilities close by and access to the nearest Greenway.
- Marinas on the canals would attract boaters who need winter moorings, touring boats, boat tour businesses, boat hiring company's, canoeing and kayaking organisation, etc.

#### **Recreation and Tourism**

Naas and its environs require access to additional outdoor recreation areas.

## Solution:

- Regenerate the path that stretches from Naas Harbour to Corbally Harbour into a walking and cycling amenity.
- Ensure the path is safe, accessible by all ages and abilities, and there is suitable signage, including the code of conduct.
- Install a slipway and jetty where kayakers and canoeists can launch their vessels.
- Open up all of the Corbally Branch for tourism and recreation, by refurbishing the bridges and replacing the culvert with a bridge.

## Heritage

• Corbally Harbour and the Corbally Branch is a neglected piece of industrial heritage.

#### Solution:

• Create a place of Living History in Corbally Harbour, by refurbishing the surrounds.

		<ul> <li>Obtain assistance from the Kildare History Group with the history of Corbally and Athgarvan for booklets and signage.</li> <li>Ascertain the potential of Corbally as a tourist attraction on the intoKildare website.</li> <li>Expand on the County Kildare's Towpath Trails publication.</li> <li>Greenway Facilities on Grand &amp; Royal</li> <li>The Greenways in Kildare are being built without the necessary facilities.</li> <li>Solution:         <ul> <li>Provide service blocks at regular intervals along the Greenways.</li> <li>Create trailheads at points of entry with access to public transport, parking, signage, rubbish bins, etc. DTTAS guide to ancillary facilities for Greenways</li> <li>Create rest areas along the greenway with signage, bicycle stands, benches, etc.</li> <li>Install posts to prevent private cars accessing the actual path.</li> </ul> </li> </ul>
25.	Kings Court Residents Association	<ul> <li>Naas Inner Relief Road</li> <li>The Naas Inner Relief Road Part 8 process was democratically rejected by the Naas MD it, along with any iterations of the same concept, should not be considered by the new CDP.</li> <li>Include a clear and stated objective to develop an outer orbital route for Naas outside of existing residential areas.</li> </ul>

26.	Teach Tearmainn	Domestic Violence Step-Down Supported Accommodation
		Teach Tearmainn provide refuge accommodation to the women and children of four families experiencing domestic violence and abuse.
		Step Down Supported Accommodation are required to ensure that families requiring longer term support have a safe space to live.
27.	Caroline Morrissey	Traffic Congestion
		<ul> <li>To reduce traffic congestion, a new bridge needs to be built to facilitate a proper ring road in Newbridge.</li> </ul>
		<ul> <li>A need for a proper cycling system in Newbridge, connecting towns such as Kildare town, Naas, Athgarvan, Milltown and the Curragh.</li> </ul>
		The Curragh Plains
		<ul> <li>A need for two designated car parks to avoid cars parking everywhere and damaging the Curragh Plains.</li> </ul>
		<ul> <li>To enhance and protect the inner parts of the Curragh a walking/running and cycling route on the outer ring are proposed.</li> </ul>
		Facilities for Teenagers in Newbridge
		<ul> <li>A facility that accommodate a few different types of sports, indoor entertainment, etc. are proposed for the young people of Newbridge.</li> </ul>
28.	Keeping Ireland	Limited access to the countryside and directly related issues
	Open (KIO)	Review of Plans in adjoining counties or within the Eastern and Midland Region

- Monitor the reviews of plans in all counties within the region.
- Liaise with planners to ensure that the plans are compatible, where appropriate.

## Broad trust of the new CDP

• Use the existing CDP as a basis for the new CDP, with appropriate expansion and updating.

# **Critique of the current CDP:**

- KIO point out that the current CDP fails to consider:
  - Planning and Development Acts
  - Plans of adjoining counties (including drafts)
  - Development Plan Guidelines
  - Heritage Act 1995
  - National Heritage Plan
- Include subsections under main sections.
- Provide an Index as recommended in the Development Plan Guidelines (5.15)
- Development Management Standards should be dealt with at the end of each section or cross reference sections with the Development Management Standards section.
- Sub-number or sub-letter lists of points and paragraphs.

- Include the section title and its number on each page.
- 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.
- 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.
- The Planning and Development Act 2000 Sec 9(4) requires that the Plan must have regard to the plans of adjoining counties.
- This plan should co-ordinate the objectives in this plan with those in the adjoining counties.
- The plan must conform to the RSES for the Eastern and Midland Region.
- Strive to secure the financial resources to implement the policies and objectives of the Plan.
- Ensure that the CDP is consistent with the strategy of the NTA.
- KIO supports Section 5.13, Section 5.16 Policy ECD 29, Section 5.18, Section 5.19 Objectives EO 48, 49, 51 to 53, Section 5.24 Policies ECD 46, 49 & 53, Section 6.5 Policies WC 2 & 10 and Objectives WCO 4, 5 & 8, Section 8.4, Section 8.5 Policies WE 1 & 3 and Objective WEO 1, Section 8.6 Policy HD 4, Section 8.7 Policies SE 1 to 4, Section 8.12 Policies TN 2, 4, 7, 10, 11 & 13, Section 8.13 Policies TL 7 to 10, Section 10.4.5 Last Paragraph, Section 10.4.6 Policies BL 1 & 3 and Section 10.5.5 Policies FT 2, 5, 9 to 11
- KOI submits that the following additions/amendments be included in the new CDP: (Based on various other CDP's)
  - Add planning permission sub-section to section 10.7 of the current CDP:

Only grant planning permission for new buildings or the expansion of existing industrial business enterprises in the countryside where the location is suitable and that the proposal would not be viable at an alternative location and where the development would not cause a detrimental impact or erode rural character and is compatible with neighbouring land use. Any new building will be required to respect the appearance of and character of the landscape. It will not be acceptable where it is unduly prominent in the landscape, where it results in build-up of development when viewed with existing and/or approved building or where the impact of the ancillary works, including the creation of visibility splays would damage rural character or impact negatively on the environment or the environment or which fails to protect Natura Sites, conservation areas, natural heritage or the environment or fails to protect and improve or is injurious to amenities (including visual amenities). Building should be kept simple and finished with material appropriate to rural settings and should reflect the size, scale and pattern of development in the area. Building of excessive height will not be permitted and should be site to make use of existing hedgerows and topography to provide natural screening.

- KIO supports Section 10.7.8 Policies EI 1, 3 to 6, 8, 12 & 16, Section 10.8 Objective EO 3, Section 11.16 Policy BG 1, Section 12.9 Policies AH 1 to 9, Section 13.3.3 County Kildare Heritage Plan, Section 13.4 Policy NH 1 and Section 13.9 Policy NH 16 and Objectives NHO 9 & 10
- KOI submits that the following additions/amendments be included in the new CDP: (Based on various other CDP's)
  - Add sub-sections to section 13.10 of the current CDP:
  - 1) Mass Rocks/Holy Wells

Policy: Preserve, protect and, were necessary, enhance mass rocks and holy wells.

## 2) Wetlands

Policy: Protect, conserve, preserve, manage, and enhance wetlands (including fens) from infilling, fragmentation, degradation and protect and conserve their quality, character, and features. Resist development (including land reclamation) which would destroy, fragment, and degrade wetlands, coastal wetlands, estuarine marshland, and control adjacent development by the use of buffer zones.

Objective: In partnership with the NPWS, WI and other stakeholders facilitate public access to wetlands and support and protect the recreational and amenity potential of wetlands.

- KIO supports Section 13.10.1 Policy GI 1 and Objective GIO 1, Section 13.10.2.1 Policy GI 8 and
   Objectives GIO 4 & 5, Section 13.10.3.1 Policies GI 18, 20 & 23 and Section 14.4 Map 14.1 and 14.2
- KOI submits that the following additions/amendments be included in the new CDP: (Based on various other CDP's)
  - Add Fencing of Hitherto Open Land sub-section to section 14.8 of the current CDP:
  - 1) It is a requirement of the Planning Regulations 2001 Art 9 (I)(a)(x) that the fencing or enclosure of land open to or used by the public during the ten years preceding such fencing or enclosure for recreational purposes or as a means of access to any seashore mountain or other place of natural beauty or recreational utility, requires planning permission.
  - 2) Wire fencing constitutes visual pollution and destroys the "away from it all" feeling which makes upland areas such an attraction.
  - 3) There has been a large increase in the amount of new fencing in upland areas. Barbed wire has been used in most of this new fencing, which, in the absence of stiles or gates, makes access for recreational users of our countryside almost impossible. Since the introduction of AEOS, sheepfarmers must, in certain circumstances, stock-proof their land. The challenge is to ensure that such fencing is done in a manner that meet the requirements of AEOS without impinging on access for walkers and other recreational users.
  - 4) Policy: As new fencing of land open to or used by the public during the ten years preceding is not exempt development in accordance with Art 9 (I)(a)(x) of the Planning and Development Regulations the following criteria will be used when considering planning applications for new fencing of hitherto open land: Fencing, particularly in upland, highly scenic or amenity areas, will

not normally be permitted unless such fencing is essential to the viability of the farm. The nature of the material to be used, the height of the fence, and in the case of a wire fence the type of wire to be used will be taken into account. Stiles of gates at appropriate places will be required. Barbed wire will not be used for the top line of wire.

- KIO supports Section 14.8.1 Policies LA 1 to 7, Section 14.8.3 Policies LU 1, 2, 4 & 5, Section 14.8.5 Policies WC 2, 6, 7 & 8, Section 14.8.6 Policies CU 1, 2 & 4, Section 14.8.7 Policies PF 2 & 3, Section 14.9.2 Policies WV 1 to 3, Section 14.10 Objectives LO 1 to 7, 10 & 11 and Section 14.11.3 Table 14.11 Recreational Woodlands
- KIO submits that Section 14.11.3 (iv) Public Rights of Way be reposition in Section 14.12.2.
- KIO supports Section 14.12.1 Policies CR 1, 3 to 12 & 14 and Section 14.12.2 Policies RW 3 & 4
- KOI submits that the following additions/amendments be included in the new CDP: (Based on various other CDP's)
  - Add text to section 14.12.2 of the current CDP:
  - 1) Public Rights of Way have existed over the centuries and constitute an important recreational amenity. They enable the enjoyment of high-quality landscape, natural and archaeological heritage and provide links to valuable amenities such as rivers, lakes, bogs, forests and places of natural beauty.
  - 2) A PROW or highway is a physically defined route over which the public have a right of passage even if the route is not in public ownership. It is described as "a user as of right" and confers an unrestricted right of the general public to pass and repass at all times of the day or night and at all seasons without notice to, or permission from the landowner. The most common characteristic of a PROW is that it follows a defined route which may be sub-divided amongst different branches.

- 3) The listing and mapping of public rights of way will preserve Public Rights of Way for recreational purposes.
- 4) The Planning and Development (Amendment Act 2000) makes it mandatory that the preservation of a public right of way which give access to seashore, mountain, lakeshore, riverbank and other places of natural beauty or recreational utility which public right 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 locations on a list appended to the development plan.
- 5) Section 14 of the Planning and Development Act 2000 sets out the formal process for designating rights of way in development plans. The scope of these statutory provisions is grounded on identification of existing routes over which PROWS are deemed to exist. The inclusion of PROW objectives for their preservation provides greater protection for such routes under development management provisions of planning legislation whilst also restricting the scope of certain exempt development.
- 6) The listing of public rights of way is an urgent matter as the lack of certainty on access has not only affected the rights of local people but has been the major cause of the failure of walking tourism to reach its full potential in this country.
- 7) The CDP will include a list of public rights of way in accordance with the 2010 Planning and Development (Amendment) Act Sec 7 (b)(ii)(o).
- 8) It is suggested that a list of public rights of way should be compiled by this modus operandi: Place an advert in local papers seeking permissions from the public to identify public rights of way which give access to seashores, mountains, lakeshores, riverbanks or other places of natural beauty or recreational utility. Identify existing rights of way, paths, and access points to seashores, mountains, lakeshores, riverbanks or other places of natural beauty or recreational utility. Identify access points to seashores, mountains, lakeshores, riverbanks or other places of natural beauty or recreational utility which the Council have maintained or repaired with a view to identifying public

rights of way. Carry out a desktop analysis of public records, maps. Aerial photographs and newspaper accounts to identify reputations of public rights of way. Once the list is compiled, advertise and put it on display. The public will be invited to make rights of way and begin the formal process for designating rights of way under Section 14 of the Planning and Development Act 2000 (as amended). Vary the Plan to include the list and map showing public rights of way.

- 9) If an Interim list is included in the Plan the following should be appended to the list or provided in the written statement. This is not an exhaustive list and the omission of a right of way from this list shall not be taken as an indication that such a right of way does not exist.
- Section 14.12.2, Policy RW 1 Replace text of 1st phrase with:

Council recognises the importance of promoting the preservation, protection, enhancement, maintenance and improvement, for the common good, of all public rights of way particularly those giving/providing access to uplands, lakes, water corridors, river banks, archaeological sites and National Monuments, geomorphological features of heritage value, and other places of natural beauty or recreational utility/ activity by ensuring that development doesn't impinge thereon.

# Section 14.12.2, Policy RW 1 - Replace text of 2nd phrase with:

In accordance with the provisions of either Sections 206 or 207 of the Planning and Development Act 2000 encourage and facilitate the creation of additional rights of way and extend existing ones for pedestrian or amenity reasons, by investigating named areas to facilitate the development of waymarked ways and looped walks, by undertaking a review/survey of green links and cycling routes and by bringing forward proposals within two years of the adoption of the Plan, either by agreement or by the use of compulsory powers, for the creation of public rights of way, particularly in areas of high amenity and recreational importance and to the Royal Canal, lakeshores, river banks, forests, heritage and scientific sites, areas of historic, archaeological and recreational importance and National Monuments, to create meaningful network. Promote their greater use. Provide linkages from built up areas to the countryside and link with public rights of way in adjoining counties.

# Section 14.12.2, Policy RW 2 - Replace text with:

Prohibit development that might have a negative effect on established walking routes/public rights of way and keep them free from obstruction, particularly those at lakeshores, along inland waterways riverbanks or other places of natural beauty or recreational activity and take legal action if necessary, to prevent any attempt to close them off.

#### Section 14.12.2 – Include additional Policies:

- 1) Development will not be permitted where a public right of way might be prejudiced, unless specific arrangements are made for suitable alternative linkages and that the developer can demonstrate that the level of amenity is maintained by:
  - the footpath/bridleway being diverted by the minimal practical distance and the route continues to be segregated from vehicular traffic.
  - o appropriate legal procedures have been undertaken to extinguish the existing right of way and to establish the new right of way to replace it.
  - o the diverted route is of at least equal character and convenience.
- 2) Where, in the interest of proper planning and development, the extinguishment of an existing right of way becomes expedient, the Council may require the provision of a suitable alternative.
- 3) The Council will utilise its relevant statutory powers to preserve as practicable the character of listed public rights of way for amenity purposes.
- 4) Protect and promote Greenways and consider designating them as public rights of way.
- 5) Preserve and maintain existing public rights of way in order to link amenities.

#### Section 14.12.2 – Add Objectives:

- 1) Identify and map, on an ongoing basis, public rights of way and incorporate them in the Plan by way of a Variation. Where appropriate links to established public rights of way in adjoining counties will be identified.
- 2) Ensure the provision of and improvement to signposting and waymarking on all public rights of way. Note The importance of marking public right of way on the ground:
  - Walkers need to know of their existence to encourage usage.
  - Signage would alert local residents to planning applications affecting the integrity of rights of way.
  - Directional signage along the route would prevent involuntary trespass on private property and prevent walkers getting lost which might impinge on walker safety.
- 3) Designate Pilgrim Paths as public rights of way.
- 4) Identify mass paths and routes to holy wells, mass rocks and penal mass stations and consider designating them as public rights of way.
- 5) Encourage the provision, for the common good, of a network of Pubic Rights of Way to traditional outdoor amenities, including heritage sites and features of archaeological interest, national monuments, hills, rivers, forests, lakes, geological and geomorphic systems, water corridors, places of natural beauty and other natural amenities.
- KIO supports Section 14.12.6 Policies GI, Section 14.12.7 Policies LV 1 & 2, Section 14.13 Objectives RAO 2, 9 to 11, 13 & 14 and Section 17.11.1.

# Dr Louie and **Executive Summary** 29 **Babette Harris** • Both the NPF and the RSES identify the need to provide serviced sites with appropriate infrastructure to attract people to build their own homes and live in small towns and villages. **Ardclough – a Rural Settlement** • Ardclough should be defined as a Rural Settlement in the Settlement Hierarchy of the new CDP with a role as a local centre for the rural catchment and potential for tourism-based development incl. provision of self-catering accommodation. Having regard to its proximity to the Grand Canal walkway and its upgraded infrastructure capacity incl. a recently constructed primary school. **Policy Context: National and Regional** • At national and regional level, it is stated planning policy to divert demand for one off rural housing into settlements. • Given Ardclough's proximity to urban centres, it is under pressure for housing development and there is significant pressure likely to arise during the CDP period for one off rural housing within the rural hinterland of the settlement. **Provision for Self-Build Housing** Ardclough has a stated population of 1538 and contains the following services: Church, shop, GAA grounds and club building, community centre and a National School. The new CDP should define the 'local demand' for self-build houses within the rural hinterland that

could be diverted to rural settlements.

**Issues Paper Themes** 

		By facilitating self-build housing demand within Ardclough, with self-catering tourism accommodation and perhaps housing for the elderly incl. nursing home accommodation, the following will be achieved:
		More compact growth.
		Protection of the open countryside.
		Multigenerational housing opportunities.
		Facilitate rural enterprise in service provision (e.g. childcare) and tourism.
		<ul> <li>Reduce demand to travel using car based modes and provision of e-working facilities and childcare facilities at walking distance from homes.</li> </ul>
		Reduce rural isolation and make rural living more sustainable.
		Maximise the value of existing community facilities.
30.	Amber Nugent McCarthy	Wind farms should not be built on bogs as they are an important habitat for endangered birds.
31.	David Mulcahy	<ul> <li>A policy to be adopted which allows for serviced sites at appropriate locations within town and village boundaries to be granted permission for one off housing regardless of zoning. This would allow for sites currently zoned agriculture to be developed which will compensate for the lack of one-off houses being granted in rural Kildare.</li> </ul>
32.	Stephen Fitzpatrick	While recognising the need for housing in Kildare, not enough amenities have been provided over the past 15 years to support the number of houses built in the county. The council should not allow this to happen again.

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		<ul> <li>There is a lack of amenities in Celbridge at present (no permanent school building at Hazelhatch) while yet more areas are being zoned for housing. Further housing developments should not be granted if the council cannot provide amenities to support the population.</li> <li>Public amenities such as urban parks, playgrounds, open spaces, basketball courts and playgrounds need to be provided within walking / cycling distance of developments.</li> </ul>
33.	Cairn Plc (prepared by John Spain & Associates)	An extensive report was submitted addressing four themes from the issues paper which are as follows:  • Healthy Placemaking; People and Places  • Climate Action; Environment, Climate Change and Adaptation  • Sustainable Mobility; Movement and Transport  • Enhance Amenity and Heritage, Landscape and Green Infrastructure  The submission focuses primarily on Healthy Placemaking and Sustainable Mobility for the sustainable development of the "Key Towns" of Naas and Maynooth and towns with good transportation links such as Leixlip. A significant part of the submission contains measures which aim to address the current housing crisis.  A short profile of Cairn Plc is given in the introduction which outlines their commitment to and record of delivering housing throughout the country while highlighting the number of units delivered and under construction in county Kildare (Naas and Maynooth in particular).  Healthy Placemaking; People and Places  Within this theme the tools for achieving compact growth are identified along with various measures which are recommended to be undertaken in the Plan to address the current housing crisis.

# **Compact Growth**

It is stated that the new Plan will play a critical role in the delivery of housing in the right places 'to deliver compact growth'. One of the primary purposes of the new Core Strategy should be to reallocate growth to the designated growth centres based on the RSES designations and to direct growth into the key towns of Maynooth and Naas and towns in the Metropolitan Area with rail infrastructure such as Leixlip.

Seeking to provide disproportionate levels of new housing development in relatively small settlements within inadequate capacity to provide necessary supporting services and infrastructure for a new community, and/or with limited public transport accessibility, would not be consistent with national and regional planning objectives.

Maynooth and Naas are Key towns in the RSES while Leixlip is a Self-Sustaining Growth Town. Therefore, the county plan 'in planning to accommodate additional household demand' should direct growth into these settlements. These towns are also capable of delivering public and active modal choice through improvements accruing because of the Dart + upgrade and greater connectivity to train stations. All 3 towns are of a sufficient scale and size to 'provide the necessary supporting services and infrastructure for a new community'. Population growth should be directed into these towns and should be prioritised over providing disproportionate levels of new housing development in relatively small settlements with inadequate capacity to provide necessary supporting services and infrastructure for a new community.

Table 3.3. of the current Plan does not reflect RSES and the strategic intent to direct growth into key towns. It is noted that Newbridge (a self-sustaining growth town) is allocated 42 more units than Maynooth which is a key town over the period 2020-2023. With the imminent electrification of the Maynooth Railway line, this low level of growth will not deliver an optimal return on the significant investment in public infrastructure. Such imbalances must be addressed in the new Core Strategy.

The variation of the county plan restricted the delivery of dwellings in Maynooth, through the identification of an "absorption period". Maynooth has the capacity to develop at a rapid pace using the existing infrastructure and is well placed to avail of the additional 20% growth (as per NPO 68 of the NPF). It is recommended that the housing allocations in the new Core Strategy/Plan are appropriately adjusted to cater for the designation of Maynooth and Naas as "key towns" in the RSES.

It is requested that the new Plan directs growth into the key towns of Maynooth and Naas as well as self-sustaining towns such as Leixlip with good rail/transport links. The aim of the new Core Strategy should be to promote sustainable settlement patterns by locating growth in these towns rather than relying on dispersed locations which are lacking in necessary social and enabling infrastructure.

The new Plan should prioritise growth into towns which have good public transport, employment, retail, and social/sporting opportunities along with the necessary infrastructure and schools. Directing growth into unsustainable locations, (lower growth towns and villages) will have long-term implications for the spatial development of the county and will impact on the ability of the plan to achieve wider strategic development objectives and the requirements of the Act in respect of providing a Core Strategy which is consistent with national and regional planning policy objectives/requirements.

The NPF identifies Naas as possessing a jobs to workers ratio of 1.122 reflecting the need for additional housing in the settlement to contribute to its sustainable function. A ratio of 1.0 means that there is one job for every resident worker in a settlement and indicates a balance (not a match as some resident workers will be employed elsewhere and vice versa). Ratios of more than 1.0 indicate a net in-flow of workers and of less than 1.0, a net out flow.

The Naas ratio of 1.122 confirms its strong service and employment role thus requiring a balance between employment and housing. A sustainable supply of development land to support the population figures in the Core Strategy should be ensured and it is recommended that the land supply should be extended to 9 years to allow a range of sites to come to development.

The following is noted in RSES regarding the delivery of housing and taking account of existing plans, Planning Authorities should:

 Pay closer attention to the actual delivery of housing and take steps that may be necessary to implement strategic planning aims and "above all avoiding the hoarding of land and/or planning permissions".

- Tackle any tendencies towards land or planning permission hoarding or excessively slow delivery using
  vacant site levy "and release of alternative lands where permitted development, without any wider
  delivery constraints, is not being brought forward".
- To avoid creating "an unreasonable dependency" on certain sites which would impede the bringing forward of other suitable lands with better prospects of delivery in the short term, if the strategic sites are not being brought forward by their owners.

The new Core Strategy and housing / population allocations should not constrain the delivery of housing for the county because of an undue reliance on the delivery of housing in unsustainable locations.

Cairn are seeking an increase in the allocation of growth to the 2 no. key towns Maynooth and Naas, as well as Leixlip particularly on sites that are capable, due to being serviced, of delivering housing in the short term. More specifically, where sites are serviced, and in proximity to relevant amenities (social and retail), then there should not be a constraint on the capability of such sites delivering housing for key towns.

NPO 9 allows for some settlements to be identified for significant growth (greater than 30% growth above 2016 levels) provided there is an agreement at regional assembly level and / or local authority as appropriate. This may entail balancing of growth elsewhere, so that the totality of growth is in line with the overall growth target; all to ensure alignment with investment in infrastructure and the provision of employment (together with supporting amenities).

Naas given its proximity to employment hubs such as Tallaght and Citywest, accessibility to Dublin City Centre and Maynooth as a university town with substantial high technology employment lands located on a public transport corridor are well placed to provide more housing. Both would be a candidate for availing of NPO 9 and identified by the council for significant growth.

Measures to Address the Current Housing Crisis

It is considered that the NPF and its assumptions on population growth do not consider the key determinants of population growth namely.

- the natural growth of population,
- net migration, no. of persons in each household,
- obsolescence of existing housing stock,
- household formation (through separations/divorce).

It is respectfully submitted that the formulation of the Core Strategy for the new Plan considers the above in its compilation. The measures proposed to address the housing crisis are outlined under the following 9 headings.

## 1. Population Growth (underestimation and inconsistencies)

In this section Cairn make the case for higher growth because they believe NPF has underestimated population growth in the county and if not addressed would exacerbate the existing housing crisis in the county and in the region.

The NPF population projections were based on the 2011-2016 census data which coincided with a period of low growth and emigration and resulted in the population growth for the period to 2040 being significantly under-estimated.

It was understood the roadmap which projects Kildare to grow by between 26,500 and 31,500 people by 2026 and 36,500 and 44,000 people by 2031 would be subject to review during the course NPF. However, no review has been undertaken by the Department, which is unhelpful to the development plan review process underway in many local authority areas. This undermines population projections, and potentially future allocations in the new Plan, to the detriment of the delivery of new housing.

The submission refers to recent population data published by the CSO (since NPF) showing a significantly higher level of inward migration and higher level of population growth than anticipated in the NPF. A series of figures from the CSO data are referred which support a significantly higher level of growth and that a high proportion of this growth will take place in the Greater Dublin Area (and likely to effect growth in county Kildare).

It is suggested the new Core Strategy accounts for CSO population forecast growth and the projected future housing needs are based on these current population growth levels, rather than the lower levels predicted in the NPF and RSES. The NPF and RSES have placed councils in a difficult position regarding fulfilling their objectives and providing sufficient and suitable land to meet their requirements. However, under Section 95(1) of the Act the Planning Authority are obliged to "ensure sufficient and suitable land is zoned to meet the requirements of the housing strategy and to ensure that a scarcity of such land does not occur at any time during the period of the Development Plan".

Reference is also made to Section 10 (1a) of the Act which in effect states that the Core Strategy objectives should be consistent with objectives in the NPF and RSES <u>as far as practicable</u>. It is suggested the wording of the Act (which includes <u>as far as practicable</u>) does not mean an absolutist approach to the consistency between the core strategy in the Plan and objectives in the NPF and RSES. It is intimated this wording allows the planning authority some discretion and flexibility regarding population growth figures.

The disconnect between CSO and NPF growth figures may result in the Plan failing "to ensure continuity of supply of zoned residential land" as set out in Section 28, Development Plan Guidelines (2007). It is submitted that Planning Authority uses its judgement to fulfil its obligations in the Act while at the same time being consistent (as far as practicable) with NPF and RSES. By directing growth into the key towns and allowing for increased allocations of growth the new Plan would be consistent with both.

# 2. Shortfall of Housing (evidence)

In addition to the underestimation of population growth there is also an existing shortfall of housing and it is important this is recognised and addressed.

Census 2016 revealed an increase in national housing stock of just 8,800 units in the five-year intercensal period and increase of 0.4%. This is stark given the increase in population seen concurrently (173,613 or 3.8%). Almost 40% of these are one off housing units that do not come to the market. The provision of new houses in towns is therefore significantly behind requirements arising from population growth.

Census 2016 also revealed a rise in the average household size from 2.73 to 2.75 for the first time since 1966. It is contended a reason for this is due to a lack of housing availability and an increased housing need. In urban areas average household size has risen much higher than rural areas. In Kildare, the figure was 3, which is higher than the national average of 2.73. The CSO states that "growth in household size is confined to urban areas" which has resulted in "crowding" with more persons in homes than there are bedrooms (this increased by 28% from 2011 to 2016).

There is an undesirable trend of increased household size forced upon people arising from the significant shortfall in the provision of new housing. There is a need for a significant amount of "catchup" housing to meet the needs of existing population and this must be provided for in the new Core Strategy prior to providing for future population growth in the county. The approach taken to date lining housing need over the plan period solely to the forecasted population growth is no longer valid or sustainable.

The Central Bank of Ireland published a study entitled "Population Change and Housing Demand in Ireland which notes that:

- growth in population has significantly exceeded the increase in the housing stock since 2011 and the average household size has risen, reversing a previous long running trend.
- To keep pace with population growth and changes in household formation an average of 27,000 dwellings were required per annum from 2011 to 2019.
- Assuming unchanged household formation patterns and net inward migration close to current levels, around 34,000 new dwelling would be required each year until 2030.

There is now a need for a two-fold approach firstly to address the deficit of housing for the existing population and then the additional housing needs for the projected population. This results in a significantly increased level of housing need. It is essential that in assessing housing need the existing shortfall in housing provision for Kildare is recognised and addressed upfront.

#### 3. MASP and Additional Growth

According to RSES the aim of the MASP is to unlock development capacity by identifying the sequencing of enabling infrastructure and directing investment to deliver development. In addition to transport investment priorities, the area is experiencing issues in relation to both water and wastewater infrastructure.

In addition to the population projections in NPF and RSES there is a further allowance (NPO 68) of up to 20% of the targeted growth in the city being transferred to other settlements in the MASP if they can demonstrate compact growth on high capacity planned or existing public transport corridors. As a key town in the MASP Maynooth is well placed to avail of this additional 20% growth and to date this has not been factored into the growth figures for Maynooth. Having regard to the investment in public transport of the Maynooth Railway line and the identified 37,000 population increase capacity confirmed in RSES, it is crucial that this significant investment is recognised and that this allocation of 20% is included in the population figures for Maynooth.

#### 4. Headroom

In identifying land requirements for housing the well-established approach in the guidelines is to allow c.50% headroom to reflect lands which are zoned which may not come forward for development during the plan period. While the Implementation Roadmap for the NPF and other documents suggests it is not necessary to apply the same level it is contended that this level of headroom should continue to apply given that the NPF / RSES have underestimated population growth and to address the existing deficit in the delivery of housing.

In addition to the low population projections, it is important to note that the length of time it takes from zoning to delivery of housing is on average 12 years or more. Therefore, it is unrealistic to expect delivery in 6 years from the making of the plan. Headroom levels of 50% or greater are required to provide a sustainable usable landbank over a 9-year horizon to ensure delivery of houses in the short to medium term.

#### 5. Household Size

Single person households without children increased by 18.7% in the EU between 2010-2019 and the average no. of persons per household fell from 2.4 to 2.3 for the 27 EU countries. This is likely to be reflected in Ireland in the future resulting in a higher demand for dwellings to 2040 and beyond. The 2.8 figure in the core strategy of the current plan is exceptionally. Future housing will be required to serve smaller households and the 2.39 figure used in the Kildare Housing Strategy is more appropriate and this should be the figure used in the new Core Strategy.

#### 6. NPF Tiered Approach to Land Zoning

Appendix 3 of the NPF provides a methodology for the tiered approach to land zoning which includes Tier 1: Serviced Zoned Land and Tier 2; Serviceable Zoned Land. It is contended that Cairns landbanks in Maynooth and Naas would fall under Tier 1 as they are able to connect to existing services with available capacity providing a sustainable new residential community with easy access to the town centre.

It is recommended that lands in other towns such as Leixlip are given full attention in the review of what constitutes Tier 1 lands in the context of proximity to the town centre and rail/bus routes. The new Plan should include specific objectives to promote and identify suitable Tier 1 lands in subsequent Local Area Plans to ensure lands which cannot be serviced are not included in the housing allocations.

# 7. Housing Need Demand Assessment

NPO 37 requires that a 'Housing Need Demand Assessment' (HNDA) be to be undertaken for each local authority to correlate and accurately align future housing requirements. The purpose is to ensure the plan making is supported by a robust methodology to inform policies and funding initiatives around housing and associated land requirements.

A December 2020 publication indicates a high net migration scenario resulting in an additional population of c. 318,000 (c. 33,000 per annum) resulting in an overall population of c. 6 million compared to 5.665 million with counties surrounding Dublin in the mid-east 'likely to experience the fastest population growth'. The report further notes that the baseline scenario results suggest, relative to population shares higher levels of housing demand in Kildare (other areas also mentioned).

For Kildare, the structural housing demand per annum is 1,600 dwellings to 2040 (high migration scenario. The low migration scenario (1% over the period to 2040) shows that population could reach 283,400 by 2040.

Preparation of a HNDA is a fundamental element to the review of the Core Strategy in the new Plan, and it is submitted that a HNDA would identify and prioritise Maynooth, Naas and Leixlip for additional growth.

### 8. Delivery of Multigenerational Housing Schemes

Cairn supports the delivery of developments which provide a range of tenures and typologies. The focus on delivery of housing should be in towns with a range of existing social infrastructure to serve the existing population as they age. Well designed high quality medium density schemes which include a mix of houses, apartments and duplex apartment can accommodate multi-generational housing schemes, providing a balance of age cohorts in schemes which places less pressure on local schools and creches etc.

# 9. Higher Density Development

The new plan will need to address how the trend towards smaller households can be accommodated within higher density housing developments. There should be no policies or objectives in the new Plan which restrict apartment development including duplex units. This would be contrary to Apartment Guidelines (2020) and Building Height Guidelines (2018).

It is recommended that the quantum of open space for schemes which are predominantly apartments should be reduced to 10% compared to 15% for developments with more housing.

The new Plan should align with Apartment Guidelines in relation to car parking provision to ensure schemes are viable. Some locations are more suited to lower car parking ratios i.e., Maynooth. Support for car sharing should be provided in the new Plan particularly for higher density schemes.

The key towns (Naas and Maynooth) are well placed to provide a greater mix of apartments and houses in line with Government Section 28 guidance. As the new Plan is an opportunity to revitalise underutilised parts of rural towns and villages and bring life back into the town centres offering an alternative to one-off housing which can over time undermine the vitality and viability of those towns and villages. It is submitted that there is no need to allocate growth within smaller towns and villages which will take sustainable growth from towns with good public transport links and other infrastructure.

#### **Climate Action: Environment, Climate Change and Adaptation**

Cairn Plc welcome the focus and prominence given to climate action within the Plan. It is agreed tackling climate change is an urgent priority and must met with appropriate action while developing sustainably and taking advantage of any new opportunities that climate change may present.

Cairn would support planning policies and objectives in the emerging Plan in principle which promotes tackling climate change but would caution against any overly prescriptive development standards linked to climate action. New standards, technologies and best practice in this area is constantly evolving and will continue to do so over the plan period. A flexible approach should be taken when setting any development standards around climate action. Consideration should be given to facilitating new technologies, constructions methods and materials as they become available and / or viable for use in schemes.

# **Sustainable Mobility: Movement and Transport**

Cairn are supportive of the principles of co-ordinating and integrating land use and planning. The optimal manner to achieve this is to ensure the key towns (Maynooth and Naas) as well as self-sustaining towns (Leixlip) with excellent public transport links are prioritised in the provision of land capable of accommodating future growth.

Cairn have been pro-active about incorporating more sustainable forms of movement in recent projects and support the provision of car sharing schemes, bike sharing and facilities for electric bikes and scooters.

The DART+ Programme will deliver frequent, modern, electrified services from Dublin City Centre to Maynooth and Leixlip (among other areas). This will significantly increase rail capacity on the Maynooth line from 7 trains per hour per direction (4,500 passenger capacity) up to 15 trains per hour per direction (13,750 passenger capacity) subject to demand. The key town of Maynooth and Leixlip will benefit substantially therefore development of appropriate densities and expanded residential areas will underpin and deliver a return to the exchequer on this significant public investment in public infrastructure.

#### **Enhance Amenity and Heritage: Landscape and Green Infrastructure**

Cairn have provided innovative green infrastructure initiatives in their design schemes, which often provide a wider benefit to existing adjacent communities (i.e., Elsmore Phase 2 and Oak Park in Naas).

It is recommended that the new Plan allows for some reduction in the 15% of open space provision in schemes 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 could be accommodated in such instances.

Cairn Plc are supportive of "off-road" green infrastructure links between housing areas within towns, schools, and education campuses. Schools are often located in areas which are not permeable and where it is difficult to provide links to improve permeability leading to unsustainable car-based trips. The new Plan should support the provision of new green infrastructure links, where they could connect through residential areas. These links are most effective where they are overlooked by dwellings, providing passive surveillance, and encouraging their use.

Cairns landbanks in Maynooth are well placed to provide such connections and would welcome the opportunity to discuss how permeability can be improved and link into other landbanks (under 3<sup>rd</sup> party ownership) with the council.

		An objective should be included to deliver "off-road" improved green infrastructure linkages to schools and education campuses in the county with active residential frontages (for passive surveillance).
34.	Noel Geary	<ul> <li>There should be no reference to "The Gallops Avenue" (new name for the Naas Inner Relief Road) in the Development Plan. This was included in the Naas-Sallins Transport Strategy (a document with no legal standing). The part 8 proposal for this project was defeated by elected members of Naas MD and it would be unacceptable to disregard this decision by attempting to include it in a county development plan or a local area plan. Any further iterations of the same concept should not be considered for inclusion and therefore strongly object to the inclusion of an inner relief road.</li> <li>It is imperative that the development of a proper outer relief road to deal with the traffic issues in Naas is given priority in the County Development Plan. A clear and stated objective to develop an outer orbital route should be included.</li> <li>The outer orbital road should link the Ball roundabout to the Blessington Rd taking the route between the Cemex site and Donnellys around the rear of Naas Industrial Estate and Naas Racecourse.</li> <li>A one-way system is proposed for Naas town centre (an image is attached showing traffic flow on Main Street going from south to north). The aim is to provide a solution to the severe congestion and to provide a larger open space in Poplar Square while returning some parking spaces for those who are less mobile than others to access key services more easily.</li> <li>Rectify derelict buildings at Cemex, Donnellys, Jigginstown Castle (refurbish or demolish), Market House, Potatoe Market, Reg Castle. Rectification of these sites should enhance the town and perhaps allow it to win a major tidy towns award while also attracting some tourists as Naas currently does NOT have a tourist attraction.</li> </ul>
35.	Avison Young on behalf of An Post	Introduction

- An Post operates a number of post office and delivery services across the county and due to the age of some facilities and the requirement to modernise facilities due to recent market trends the company will seek to enhance facilities at existing and new locations over the coming years.
- It us requested that the local authority carefully consider this submission and accommodate future engagement with An Post.
- As a semi state body An Post is committed to the objectives of Project Ireland 2040 and the NPF.

# **Background**

- An Post operates two distinctive business in an increasingly digital environment. One being Mails and Parcels and the other being in Retail providing a range of financial services.
- 950 Post offices nationwide offer a broad range of postal, communication and financial services to upwards of 1.5 million customers every week.
- The efficient operation of these facilities is central to the successful provision of the postal service for business and personal customers.
- The company employs more than 9,000 full time and part-time staff utilising a road fleet of over 3,000 vehicles.
- Market has changed in the last decade with a move away from letters to e-commerce parcels. The covid-19 crisis expedited this change with more people shopping online.
- Prior to covid-19, An Post was delivering 1 million more parcels every week than it did in 2017. Post covid-19 it is expected that growth levels for parcel delivery will continue to rise.
- In addition, Irelands population has risen significantly across the country with new urban settlements emerging alongside enhanced infrastructural development. This has resulted in a requirement for An

Post to assess its estate and to ensure its portfolio of facilities meets the operational needs of an expanding population and a growing market.

- An Post will be seeking new sites capable of accommodating modern delivery operations to serve new and expanding catchment areas.
- As the population of Kildare is projected to increase by between 36,500 and 44,000 by 2031, it is noted
  that the core strategy will focus on the key towns of Naas and Maynooth as economic drivers with
  support from the self-sustaining growth towns and self-sustaining towns. In this regard it is requested
  that the council provide a supportive policy framework for the future provision of postal infrastructure.
  An Post would be happy to engage with the council as part of its future assessment of facilities in the
  council.
- Enhancement of facilities and provision of new facilities could generate employment in the county, increasing economic development, re-invigorating redundant and underutilised lands while supporting climate change mitigation with the transition of An Post's fleet to e-vehicles.
- Operational Requirements and Supportive Requirements

# Policy

- There are 10 no. An Post Retail, Mail and Parcel distribution facilities within County Kildare.
- An Post will be considering the potential to redevelop sites / assets which are no longer fit for purpose and may consider the expansion of existing sites to ensure the company can continue to meet the needs of an expanding population and a growing market.
- It is important that during preparation and finalisation of the Plan, that the council carefully consider existing and future requirements of An Post and include appropriate policies to support the companies ambition to enhance postal facilities in the county.

- The following policies would assist greatly in the delivery of An Post projects:
  - To support An Post in the provision of new postal facilities and the enhancement of existing facilities, including operational requirements, in the county
  - To facilitate the provision of postal infrastructure at suitable locations in the county
  - To promote the integration of appropriate post office facilities within new and existing communities that are appropriate to the size and scale of each settlement.

# **Car Parking**

- An Post requires use of c. 3,000 vehicles on a daily basis to transport mail and parcels between settlements throughout the country. Due to the increasing number of larger parcels being process it is likely that this requirement will increase over time and therefore An Post facilities will require greater levels of parking spaces including electrical vehicle charging points. Spaces are not only required for delivery vehicles but also staff and customers collecting mail items.
- As shifts typically start early when public transport is not in operation staff generally travel by private car, as such facilities require staff car spaces as well as parking storage areas for delivery vehicles.
- It is requested the council provide flexibility with car parking standards for postal facilities to accommodate staff parking and delivery vehicles. It is important to note that postal facilities may require a greater quantum of car parking spaces in the future as trends evolve and to future proof the long-term viability of operations.

#### **Deliveries & Access**

Postal facilities in town centre areas have specific requirement with regards access and deliveries.
 Access is required on a 24-hour basis. Any restrictions on times of deliveries/collections to/from An

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		Post facilities could have a serious impact on the ability of An Post to meet the postal needs of the
		public and agreed service legal agreements with the state. It is requested that the council recognise
		this as part of the plan and in future assessment and preparation of planning policy.
		<ul> <li>The council are requested to engage with An Post should any future area plan propose to amend</li> </ul>
		delivery hours in town centre locations. The company is committed to minimising disturbances to
		residents and adjacent properties while providing emission free deliveries in town centres.
		<ul> <li>It is important that a sufficient level of access is maintained to facilities along with loading bay space to</li> </ul>
		accommodate collection and delivery of mail. The council are requested to consult with An Post during
		the preparation of any future public realm and movement strategies to maintain a sufficient level of
		access whilst improving the appearance and function of town centres.
36.	Maureen Boylan	Issues Raised
	,	
		There are four issues addressed in the submission which primarily relate to Naas and they include the Naas
		Inner Relief Road, School capacities, Recreational facilities, and Retailing / Revitalising town centres.
		1. Naas Inner Relief Road (The Gallops Avenue)
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		The proposed Naas Inner Relief Road was defeated by elected members in 2019, to include any such
		proposal such as 'The Gallops Avenue' which was introduced in the recent non-statutory Naas / Sallins
		Transport Strategy as part of the plan flies in the face of democracy as this route follows an almost
		identical line to the route defeated by members of Naas MD.
		<ul> <li>The intention of the proposal is stated to relieve congestion on Main Street and the Dublin Road;</li> </ul>
		however, it will merely move current traffic junctions to new junctions near residential estates thus
		moving thousands of vehicles including large volumes of HGV's to quiet, mature residential areas and
i	1	will not solve any traffic congestion.

- The proposed route also traverses Naas Racecourse. This area must be preserved for recreational purposes as the 'Green Lung' of the town for now and for future generations.
- The Gallops Avenue / Inner Relief Road was first concepted circa 30 years ago and is now out of date it is therefore requested that the council include the following specific objective "to provide an outer ring road for the eastern/north eastern side of Naas, to cater for by-passing traffic, linking the Blessington Road with the Dublin Road close to the junction of the latter with the N7. This outer ring road will be so routed, so as not to traverse or cut through existing residential areas and will provide a long-term development boundary to the east/north east of the town of Naas".
- This objective is to replace the "inner relief road" objective in table 6.1 of the current development plan and would be consistent with existing objective MT 15 in the plan which seeks to channel HGV traffic onto regional and national road networks.

# 2. Education (School capacity in Naas)

• There are significant difficulties in obtaining primary and secondary school places for children in Naas due to the considerable increase in population arising from various new developments. The plan should include a requirement to include additional education campuses within the towns environs to encourage students to either walk or cycle to school.

# 3. Active Leisure (Naas)

 Development of Naas / Sallins greenway is welcomed, however residents may see value in increasing linkages between parks at Kerdiffstown, Sallins and the Greenway. It is also suggested that utilisation of the canal as a Blueway between Naas and Digby Bridge could be improved. Also excellent for cycling, walking, or running.

# 4. Retail / Revitalising Town Centres (Naas)

		<ul> <li>The plan should include a provision whereby development of retail over 1,000m2 (gross) should be prohibited outside Nass town centre.</li> </ul>
		<ul> <li>The town centre should be designated as a development zone with incentives for the creation of "living over the shop" to encourage the revitalisation of the town centre.</li> </ul>
		<ul> <li>To support, encourage and protect traditional on street retailing and to compete with online shopping the council should put a policy in the plan "that all comparison retailing, and all but local convenience retailing (i.e., up to no more than 1,000m2 gross) is not permitted outside town centres".</li> </ul>
		<ul> <li>No sites should be zoned as district centres as the definition is too loose in the Retail Planning Guidelines and this is not suitable for towns of the scale in Kildare.</li> </ul>
		Town centres should be identified on maps in all local area plans. These areas can include within their boundaries brownfield lands where there is potential for regeneration.
		<ul> <li>The plan should make it clear that all comparison retailing and all but local convenience retailing (i.e., up to no more than 1,000m2 gross) is not permitted, whether by new build or by conversion, in any retail warehousing development.</li> </ul>
		<ul> <li>The Monread Shopping Centre in Naas has shown that permitting large scale retail in peripheral locations, outside town centres, has done huge damage to traditional on street retailing in the town. The council must ensure such mistakes are not repeated.</li> </ul>
37.	Eileen Devine	<ul> <li>The submission highlights several infrastructural deficits in Celbridge with an emphasis on the requirement for new roads / bridges to be built to cater for the growing population. It is stated that whilst the population of North Kildare has increased rapidly over the past 30 years the infrastructure has not been delivered with the growth despite numerous reports, studies and promises. Other issues addressed include school capacity, and tourism.</li> </ul>

### **Roads Infrastructure and Car Parking**

- New wider bridges over the Liffey on Main St, and a new ring road and outer bridge on the Clane Road, running to the train station and to the Old Lucan Road running through or close to new housing developments as proposed in the LAP is required.
- A new ring road section from St. Wolstan's School over to Salesians College on the Maynooth Road would be a great help to the Main Street and to all residents of Celbridge.
- Of the 5 routes proposed for the ring road (Hazelhatch to Clane Road) the Killadoon option is the best, away for St. Wolstan's School and not running too close to the primary school and running track. This option runs all the way to the train station and would be a great start to a genuine ring road for the growing town.
- A new parallel bridge to the existing old narrow bridge on Main Street (as per RPS plan in 2016) giving
  residents two lanes into and out of the town would work well along with new footpaths, cycles lanes
  and new positioning for pedestrian crossings. Plus, close off Newcastle Road to reduce number of
  junctions at this dangerous point.
- The plan for a footbridge from Bank of Ireland to Abbey Lodge Pub is most welcome.
- Buses and trucks have struggled on Liffey Bridge for years and a new engineering solution needs to be found urgently.
- Public car parks along the Main Street in Celbridge would be nice.
- If one or two new pedestrian bridges were built it would enhance public realm and bring more life to the Main Street.

- Traffic movements need to improve along the Maynooth Road in Celbridge which are likely to increase when proposed developments on either side of Maynooth Road close to Crodaun Forest Park are built.
- To facilitate these developments significant work is required to upgrade infrastructure i.e., water, wastewater, footpaths, and public parks.
- More buses and more trains are needed to improve life of residents in North Kildare. Small local buses to and from train stations would be a great help.
- Ardclough area needs wider and safer bridges and car parks for those using the canal walks.

# **School Capacity**

• There are 3,000 new residential units proposed on Maynooth Road, Old Lucan Road and Ardclough Road therefore 3 new schools are needed imminently on the Lucan Road. This has been talked about for 10 years and it is not appropriate in 2021 to be using prefab schools.

# Recreation and Tourism (including parking)

- A new theatre is badly needed for music, drama and art exhibitions with car and bus parking facilities (possibly locate on ring road).
- Castletown House front entrance has no car park and shows poor regard for real tourism efforts in north Kildare. Rear entrance is too far away, is unkept with no tarmac and no proper lighting.
- Maynooth College, Connolly's Folly, Carton House, and Castletown should be grouped and promoted as grand houses of North Kildare.
- The council have done a fine job improving Canal Walks and they are very successful but now car parks, shopping amenities such as tea and coffee, and better public lighting are required.

		<ul> <li>The council should look to purchase the Old Rock Bridge in the Abbey and put in a public park on both sides of the Liffey at this point which is in an historic area and close to many developments.</li> <li>Sorting the traffic problems will be key to delivering more tourism in the area.</li> <li>Other</li> <li>Celbridge needs an ambulance and fire brigade in the town (possibly locate on the ring road). A 24-hour Garda Station is also needed for a big town.</li> </ul>
38.	Wild Kildare	The submission addresses three areas which include Peatlands, Other Wetlands and Protection of Habitats on Rezoned lands.  Peatlands  Peatlands (both intact and recovering) are found to be the most biodiverse and important habitats for many rare and declining species in the county. They hold the last remaining breeding populations of Curfew, Lapwing, Redshank (all Red listed) as well as many habitat restricted Moth/Butterfly, Orchid species etc.
		<ul> <li>Peatlands also act as important climate, flooding and water quality buffers via carbon storage, heavy rainfall retention/soakage and water purifying abilities.</li> <li>There is growing concern that these same areas are being targeted for large industrial wind farm developments. Experts have identified that such developments are not compatible with the biodiversity and climate buffering functions outlined above.</li> <li>It has been proven elsewhere that wind farms on bogs can lead to issues like landslips, pollution, flooding, and court actions against the state by the EU and others (i.e., Derrybrien and Keeperhill cases).</li> </ul>

• It is imperative the Plan enshrines the highest protections possible for these areas.

#### **Other Wetlands**

- Wild Kildare have been notified of highly inappropriate zonings of wetlands in a few locations in the county.
- An example being the site opposite the entrance to Craddockstown Golf Club on the outskirts of Naas. It is an obvious floodplain where several streams meet before becoming the Castle stream that flows through the centre of Naas. The site holds open areas of water for much of the year as well as much permanent vegetation.
- The site is currently zoned for residential/retail development and the council are asked to urgently review this zoning to avoid another potentially damaging and expensive planning mistake, like the costly remediation works required due to flooding in nearby Johnstown 10 years ago.

#### **Protection of Habitats on Rezoned lands**

- Efforts by some developers to retain natural features like riparian habitats, hedgerows, and mature trees as much as possible within proposals and to replace lost habitat as far as possible are welcomed.
- A standardised approach/ policy for retaining such features should be incorporated within the plan to determine zonings and planning applications.
- The approach should include a setback of 5 meters from any streams and other wetlands to protect habitat, water quality and provide natural flood buffers.
- The plan should also propose incorporating natural overflow areas for the purpose of flood buffering at new development lands / zoned lands in the same way the NRA provides such areas adjacent to new road developments.

39.	Office of Public Works (National	The submission primarily relates to the Castletown Demesne in Celbridge.
	Historic Properties Unit)	<ul> <li>The National Historic Properties Section of the Heritage Service welcomed the opportunity to make observations which will help inform the policies and the management of Castletown in the decade to come.</li> </ul>
		<ul> <li>The current planning designations of the lands formerly comprising the historic demesne of Castletown should be continued and strengthened.</li> </ul>
		The protection afforded to the historic vistas of Castletown towards the Wonderful Barn and the Connolly Folly should be maintained.
		The vista to the Wonderful Barn crosses the former Hewlett Packard campus now earmarked for development and it is requested that this vista is afforded protection in any plans for the site.
		<ul> <li>In line with the proposed updating of "the Standards for Public Open Space" provision that the number of dog wardens employed by the council be increased to assist with the management of pets off lead in the demesne. At present staff on the demesne do not have authority and can only request owners to keep their dogs under control.</li> </ul>
		In line with the proposed "Considerations for Movement and Transport, the council are requested to facilitate the installation of directional signage for Castletown on the county's main road network.
		<ul> <li>Considering Celbridge's designation as a self-sustaining town it is requested that any development either commercial or residential be sensitive to the wider environment of the demesne of Castletown and its visual amenities and preserves the rural character of the original setting for the great house.</li> </ul>
		The current protection of the Donaghcumper lands is ensured into the future to prevent development there. Consideration should be given to the development of those lands as an amenity for local people which would not only relieve the pressure on Castletown as one of the few green spaces in the area but

		<ul> <li>also provide opportunity for linking Castletown to a site which it already has a historical and ecological connection.</li> <li>The local authority should consider a strategic plan for the opening of the lands owned by them at Castletown under the heading "Enhanced Amenity, Heritage Landscape and Green Infrastructure".</li> </ul>
40.	Westin Homes Ltd	<ul> <li>Highlights need for significant regeneration of Kildare's towns and villages to achieve compact growth and compliance with national and regional policies:</li> <li>Reiterates Maynooth's strategic role in the Metropolitan Area Strategic Plan(MASP), and in the Regional, Spatial and Economic Strategy(RSES) as a Key Metropolitan Town and for that to be transposed into the emerging Core Strategy thereby recognising the need for sequential, compact growth in Maynooth and acknowledging that it is specifically capable of absorbing above average population growth.</li> </ul>
		It is submitted that the Development Plan should focus new development on sequentially preferential lands which are accessible to the existing town centre and public transportation links.
41.	Belmont Data Centres	<ul> <li>Requests the provision of appropriate data centre policies where none presently exist in the current CDP to reflect consistency with national and regional policies:</li> <li>Supportive policies have been included in the Meath Plan:</li> <li>ED POL 13 -To support and facilitate the development of data centres on suitable sites with supporting infrastructure subject to obtaining the relevant consents.</li> </ul>
		■ ED OBJ 67 — To continue to identify suitable sites for the development of data centres and ICT related development within the County.

- ED OBJ 68 To promote and support the development of lands within the Metropolitan Area for the provision of data centre and ICT related development.
- Proposed Data Centre Policy should allow for suitable, unzoned 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:
- Refers to evidence Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy and Grant Thornton's A Study of the Economic Benefits of Data Centre Investment in Ireland stating that 5700 full time roles created in Ireland in the sector since 2010:
- States that 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.
- Early engagement with stakeholders such as Eirgrid is recommended and any new large scale data centres should be close to existing 220kV stations.
- Evidence demonstrates that a large number of ancillary services and roles not directly related to data centre operation have been attracted following initial data centre investments. These include finance, operations, sales, customer support and software engineers.
- Survey responses strongly confirmed that many Irish based data centre operators see the physical location of their data centre operations as closely strategically linked to their overall activity and

42. Valu	Datail ''	
	ue Retail	region in order to achieve balanced social and economic development, whilst protecting the amenities of urban and rural areas.  Support the national objective to promote Ireland as a sustainable international destination for ICT structures such as data centres and associated economic activities at appropriate locations."  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);  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.
		<ul> <li>operations in Ireland i.e. the presence of data centres opens up the opportunity, and in some instances necessity, to locate other ancillary services in Ireland.</li> <li>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.</li> <li>Regional Spatial and Economic Strategy for the Eastern and Midland Region (2019 "RPO 8.25 - Local authorities shall:</li> <li>Promote and facilitate the sustainable development of a high-quality ICT network throughout the</li> </ul>

# (Kildare Tourist Outlet Village/Kildare Village)

- Requests that KTOV's role in the County's economy in relation to retail and tourism, economic
  development and employment should continue to be supported through specific policies within the
  new Development Plan.
- Acknowledges that the current CDP contains policies to ensure that the county sustains and enhances its attraction and competitiveness as a retail destination, it must be proactive and responsive in respect of innovation in retailing and new retail market trends.
- Retailing is a key part of Kildare's tourism offer and, as such, is important to the county's economy as a
  whole. Encouraging and facilitating innovation, be that in trading format, location or product, will assist
  the county to build on the success that has been established to date and, consequently its retail profile
  and attraction.
- States that The Plan must ensure the continued expansion and evolution of the tourist retail offer in the County, and to enable existing retailers to innovatively adapt to constantly changing market trends, particularly with the growth of e-commerce.
- Seeks to ensure the future evolution and expansion of the KTOV is safeguarded and that car parking
  provision (including electric vehicle charging points) should be assessed and where appropriate
  increased on a case by case basis having regard to the unique nature of KTOV and accounting for its
  drawing from a regional and national catchment rather than a local one where car based trips are
  necessary and recognising that many such trips are shared by visitors.
- The expansion and enhancement of the KTOV should be supported accounting for the opening of Phase 3 in Q2/Q3 of 2021;, post Covid-19 and post Brexit consumer behaviour changes; and changing market retail trends including the increase in e-commerce sales, and reduced use of public transport following Covid 19.

- The KTOV can be recognised as an economic driver, not only within Kildare County but also nationwide. It is a destination that offers more than just shopping and encourages those visiting the Village to experience the rest of Kildare Town and its wider hinterland.
  - Over 24,000 sq.m of commercial floorspace
  - Approx. 1,350 people employed
  - Over 4 million visitors annually

### The following specific policies are suggested:

- To support and facilitate the further expansion and evolution of the Kildare Tourist Outlet Village,
- Promote and encourage major enhancement and expansion of the retail offer and town centre functions of Kildare Town, including the Kildare Tourist Outlet Village, to sustain and enhance its importance within the County,
- Encourage and facilitate the delivery and evolution of tourism related retail developments, initiatives and services in the interests of the attraction and competitiveness of the County,
- To 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, through trading format, location, product and services to support and ensure the County enhances its competitiveness as a retail and tourism destination,
- Review and monitor retail trends that could have an influence on the performance of the retail and tourism sector within Kildare and pursue/harness new concepts and formats in the County's retail structure.

43.	Kildare Local Transport Link	Welcome and support the continued inclusion of these below-listed specific policies in the new Kildare County Development Plan 2023 -2029:
		<ul> <li>MT1 Promote the sustainable development of the County through the creation of an appropriately phased integrated transport network that services the needs of communities and businesses,</li> </ul>
		<ul> <li>MT2 Support sustainable modes of transport by spatially arranging activities around existing and planned high quality public transport systems,</li> </ul>
		<ul> <li>MT3 Influence people's travel behaviour and choices towards more sustainable options by working closely with relevant organisations in improving and accessing public transport facilities,</li> </ul>
		<ul> <li>MT4 Develop sustainable transport solutions within and around the major towns in the county that encourage a transition towards more sustainable modes of transport, whilst also ensuring sufficient road capacity for trips which continue to be taken by private vehicles,</li> </ul>
		<ul> <li>MT8 Seek to address urban congestion with particular emphasis on facilitating improved bus transport movement and reliability and improved links to bus and railway stations.</li> </ul>
		Additionally, KLTL wish to see the below-listed policy objectives included as they pertain to Sustainable Mobility goals for the County.
		Connectivity – Towns, Villages and Rural Settlements
		<ul> <li>Prioritise the development of minimum Levels of Service for towns, villages and rural settlements by supporting the development of a sustainable mobility plan ensuring connectivity based on settlement hierarchy, regularity and journey times.</li> </ul>

- Promote and support development of town bus services for the Key Towns within the County ensuring connectivity to and from residential areas, key employers, and public transport hubs such as train stations, along with retail and amenity sites.
- Objectives should at least align with the Connecting Ireland Plan (NTMA) and where possible exceed the minimum targets within. Additionally, this objective should be cognisant and inclusive of the development of the necessary ancillary supports such as bus stops, bus shelters, and Real Time Passenger Information (RTPI) systems.
- Key to the progression of the above will the development of public transit priority within our towns such as segregated bus ways where possible, and bus priority at key junctions.

# **Connectivity – Progression of Active Travel Modes**

- Focus on the development of protected cycleway networks in such a manner that promotes and encourages the use of cycling as a sustainable mechanism for all journeys up to 15km.
- Ensure that cycling becomes a real and safe alternative for all trips within 0-15km range.
- Seek potential partnerships for the creation of bike share schemes within our key towns and identify key strategic bicycle share docks locations.
- Develop high quality walking infrastructure, providing links to Public Transport options.

# **Connectivity – Development of Car Share Schemes for Towns, Villages & Rural Settlements**

• Encourage and support the roll out of car share schemes throughout the County. Develop mechanisms that encourage the lessening of dependency on private car ownership and identify key strategic locations for such schemes.

		In line with the organisations overall objective Local Link Kildare-South Dublin would wish to advocate
		for the importance of 'accessible' transport being integrated in to the Kildare Development Plan so as to ensure it incorporates inclusiveness for all citizens regardless of age, ability or location.
		Crucial Contextual Points
		<ul> <li>Transport must be planned, delivered and administered in an integrated manner. The development of the sustainable hierarchy of walking, cycling and public transit use must be planned in a manner that provides an overarching framework of support and networking options.</li> </ul>
		<ul> <li>Kildare as a county has a requirement to negate the current dis-connect that exists from a public transport perspective between the north eastern key towns of Maynooth, Celbridge and Leixlip to the central settlements of Naas and Newbridge.</li> </ul>
		<ul> <li>The predominantly rural pattern of settlements of south Kildare will require the development of a comprehensive local transport network to ensure minimum levels of inter settlement connectivity along with creating outward connections throughout the county, the region and nationally.</li> </ul>
44.	Peter Hamilton –	Dublin County Boundary and Quality Rail Corridor
	Various	<ul> <li>Large development area in West County Dublin with Adamstown, Grange Castle and new commercial/industrial zoning adjacent to Kildare boundary near Lucan-Celbridge Road. This presents and opportunity and a challenge for planning in Kildare.</li> </ul>
		<ul> <li>There are positive planning opportunities for DART+ service and station serving a new residential centre similar to Adamstown on the quality rail corridor – providing the potential for good sustainable community development adjacent to the employment provided by the developments in Co. Dublin.</li> </ul>

- A location east of Celbridge near Ballyoulster and another near Kill represent potential locations for additional DART+ stops and planning for residential, commercial and village development with positive rail connectivity.
- A ten-year strategy for this rail corridor for residential, commercial, village, green-space and amenity space is very important to support planned sustainable growth.

#### Infrastructure, Energy & Communications/Rapid Growth in Kildare

- The MASP plans present a risk and opportunity for the towns of North Kildare requiring a special focus and careful balanced growth plan with adequate and sustainable infrastructure, services and transport options available to match any growth planned.
- Important not to repeat developer led, infrastructure last outcomes of the past.
- Pressures only intensify in the context of the national housing stock crisis.
- 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.
- Expansion of the DART+ plan beyond Maynooth and Celbridge/Hazelhatch with capacity increases, station improvements and appropriate park and ride facilities.
- Space allocation for rail and bus infrastructure including space planning for adequate bus terminals and bus-stop spaces in our towns and villages and terminal services and bus shelters appropriate to the 21st Century.
- Education capacity planning working closely with the Department of Education to connect spatial planning with demographic planning and school planning.

- Education capacity planning working closely with the Department of Education to connect spatial
  planning with demographic planning and school planning.
- Related green space and amenity planning to provide space and protection of nature and biodiversity and give our residents high quality amenity opportunities with parks trails and leisure options.

#### **Climate Action Decarbonised Zone and Low Carbon Town plans**

- Requests that KCC include an ambitious decarbonising game-plan and strategy in the CDP with a lead decarbonisation zone identified clearly following the criteria and guidelines in the DHLG documents, and additional follow-on decarbonising areas and low carbon town local area plans.
- Requires that wording be added to CDP re climate action targets to reduce emissions 50% by 2030 and to be carbon neutral by 2050 and that every local area plan should be a low carbon town LAP.
- Requests that wording is added to the CDP requiring every Kildare town to be low carbon via the LAP process.

#### **Enhanced Amenity & Heritage**

- Propose that Kildare County Council makes plans in the county development plan to support an extensive wildlife reserve area in rewetted and reclaimed boglands in West Kildare.
- The results of limited rewetting (of boglands) heretofore have been encouraging.
- Areas for further rewetting have been identified and it is requested that an integrated strategy is
  proposed so that peatland areas are planned to support nature and biodiversity and renewable energy
  wind and solar facilities in suitable places with suitable separation, together with extensive trails,
  tourism features and amenity areas connecting with the greenways and create positive attraction in
  the Irish midlands.

		Healthy Placemaking
		<ul> <li>Sustainable and highly positive rural communities are created when a planned approach is taken to develop clusters and villages in locations that either strengthen existing communities or create positive new communities in well-connected locations with transport linkages including rail and bus connections. Existing village streets are supported and institutions including the GAA, schools, local healthcare and public transport are all better supported by the cluster model than by the once-off housing model.</li> </ul>
		<ul> <li>Requests an increased and continued emphasis on clusters and well-planned villages and the consequent ability of villages to support amenities and transport links including inter alia pubs, schools, churches, playing fields, cycleways, local bus services.</li> </ul>
		<ul> <li>A focus on active transport including a focus on segregated cycle ways will make these centres more sustainable and contribute towards addressing the climate crisis.</li> </ul>
		<ul> <li>Villages including Carragh, Straffan, Sallins and the growing Rathcoffey are positive examples of this type of cluster and village creating higher quality of life together with a more sustainable way of living with planned public transport and active transport links.</li> </ul>
		<ul> <li>The quality transport corridor provided by the DART+ expansion creates opportunities to look at locations suitable for new development and new train stations. Examples include the area between Clane and Kill on the Kildare line, or south-west of Hazelhatch Celbridge adjacent to the Dublin commercial areas planned.</li> </ul>
45.	Pat Breen	<ul> <li>The Naas Inner Relief Road was a Roads priority in the Kildare County Development Plan 2017- 2023.         This proposal was comprehensively defeated by a democratic vote of the Naas Municipal District in June 2019. On this basis, this democratic decision must be upheld.     </li> </ul>

- The Gallops Avenue proposal, as introduced in the recent non-statutory Naas / Sallins Transport
   Strategy, will merely move thousands of vehicles, including large volumes of Heavy Goods Vehicles in
   very close proximity to quiet, mature residential estates. It will not relieve congestion on Main Street
   and Dublin Road instead it will simply displace it from current traffic junctions to new proposed
   junctions at The Gallops, Tipper Road and Sunday's Well.
- The Gallops Avenue proposal will follow a similar line to that of the rejected Inner Relief Road and thereby traverse Naas Racecourse. The Racecourse is a 'green lung' for surrounding residents and this must be maintained.
- It makes no sense that KCC continues to receive consultants' reports that recommended rejecting the old Naas Inner Relief Road proposal.
- Specific Objective "To provide an outer ring road for the eastern/north-eastern side of Naas, to cater for by-passing traffic, linking the Blessington Road with the Dublin road close to the junction of the latter with the N7. This outer ring road will be so routed, so as not to traverse or cut through existing residential areas, and will provide a long-term development boundary to the east/north-east of the town of Naas" to replace the rejected "inner relief road, Naas objective in the current CDP.
- Local knowledge is that there are now significant difficulties for parents in obtaining both Primary and Secondary school places for their children in Naas. The plan should include a requirement to include additional education campuses within the town's environs, to encourage students to either walk or cycle to school.
- Subsequent to the Naas/Sallins Greenway success it is worth exploring options aimed at increasing the linkage between the Park at Kerdiffstown Park, the planned park at Sallins, the Greenway, and perhaps improved utilisation of the canal as a Blueway between Naas and Digby Bridge, ultimately heading for the river Liffey.

		<ul> <li>In line with the National Retail Guidelines the plan should include a provision whereby development of retail over 1,000 sq. metres gross floorspace should be prohibited outside the Centre of Naas to encourage revitalisation of the town centre.</li> <li>Kildare County Council should put a policy into the CDP, that all comparison retailing, and all but local</li> </ul>
		convenience is not permitted outside town centres. No sites should be zoned as district centres, as the definition of a district centre in the Retail Planning Guidelines is far too loose and is unsuitable for towns of the scale that are encountered in County Kildare.
		<ul> <li>Town centres should be specifically identified on maps in the various local area plans for the key towns of Naas and Maynooth, and also for the self-sustaining growth towns of Newbridge, Kildare, Athy and Leixlip, and the self-sustaining towns of Celbridge, Monasterevin and Kilcock. They can include, within the boundaries, brownfield lands where there is potential for regeneration, provided that they are genuinely located within the town centre areas (an example would be the lands between South Main Street in Naas and the Canal Harbour).</li> </ul>
		<ul> <li>The County Development Plan should make it clear that all comparison retailing, and all but local convenience retailing ((i.e. up to no more than 1,000 sq. metres gross floorspace) is not permitted, whether by new build or by conversion, in any retail warehousing development.</li> </ul>
46	Michael Skelton	<ul> <li>The Naas Inner Relief Road was a Roads priority in the Kildare County Development Plan 2017- 2023.         This proposal was comprehensively defeated by a democratic vote of the Naas Municipal District in June 2019. On this basis, this democratic decision must be upheld.     </li> </ul>
		<ul> <li>Specific Objective - "To provide an outer ring road for the eastern/north-eastern side of Naas, to cater for by-passing traffic, linking the Blessington Road with the Dublin road close to the junction of the latter with the N7. This outer ring road will be so routed, so as not to traverse or cut through existing residential areas, and will provide a long-term development boundary to the east/north-east of the town of Naas" to replace the rejected "inner relief road, Naas objective in the current CDP.</li> </ul>

47.	Birdwatch	
47.	Ireland Kildare Branch	<ul> <li>Requests that the proposed CDP for 2023-2029 continues to include the current provisions of Chapter 13.10.3 GI 27 which requires all new Developments to identify, protect and enhance ecological features by making provision for local biodiversity.</li> </ul>
		<ul> <li>This should include the provision of Swift Boxes or Towers with an accompanying Calling Lure and providing links to the wider Green Infrastructure Network as an essential part of the Design Process.</li> </ul>
		<ul> <li>In addition to GI 27 we would also like to see provision for House Sparrows Nests in all new Housing Developments on the same lines as the protection given to Swifts as populations are declining rapidly in-line with modern construction methods which preclude nesting where birds traditionally nested e.g. behind barge boards, under eaves etc.</li> </ul>
		<ul> <li>In an around future solar farms consideration given to the protection of nest sites for all birds throughout the County. Proposal would include mandatory erection of 1 Barn Owl, 1 Kestrel and 10 generic passerine Nest Boxes per 5 Acres of the proposed developments but the final mix of Nest Boxes could be agreed based on a survey of Birds in the area concerned.</li> </ul>
		<ul> <li>Greater protection should be afforded to hedgerows and planning permission should be required to remove them. It is considered that the current system where applicants notify the planning authority is not strong enough.</li> </ul>
48.	Castletown	Healthy Placemaking
	Foundation	The new CDP needs to be underlain by climate change and biodiversity principles and actions.
		<ul> <li>Lessons from Covid 19 have to include the recognition of the primary importance of green spaces and amenity.</li> </ul>
		<ul> <li>Could be realised by the continued protection of Donaghcumper and it becoming a public amenity for all to enjoy.</li> </ul>

 Castletown and Donaghcumper combined would serve to provide the people of Celbridge with sustainable green areas to for walking, enhanced biodiversity and protection of amenity and heritage.

#### **Environment, Climate Change and Adaptation**

- Critical that watercourses are properly protected, and that building does not occur where there is a flood risk.
- Regarding the Liffey at Castletown and Celbridge a number of aims can be achieved at the same time by protecting the riverbanks and wider area in respect of watercourse protection, biodiversity, amenity and protection of the built heritage.

#### **Landscape and Green Infrastructure**

- Castletown is of regional, national and international significance and is the jewel in the crown for County Kildare.
- It is vitally important that the current protections for the house and its demesne are enhanced in the new CDP.
- Aside from the house, the grounds, its curtilage and parklands There are a number of structures in the attendant grounds which should all be protected in their own right, including the Temple, Ice-house, Bathing House and farmyard structures.
- The demesne should be added to the Register of Protected Structures as was the case in previous plans.
- The importance of preserving the views within the demesne and leading from the demesne into the borrowed landscape of Donaghcumper and St. Wolstans cannot be overstated. Preserving these views

		<ul> <li>together with the vistas to the Conolly Folly and the Wonderful Barn will not only enhance amenity and heritage but will also contribute significantly to biodiversity and protection of the riverine environment.</li> <li>The pandemic has brought into sharp focus the need for and enormous benefit of green spaces for walking and recreation and the importance of the observation of nature in the course of such walks.</li> </ul>
49.	Butterfly Conservation	Butterfly Conservation Ireland Limited is a conservation NGO and registered charity formed in 2008.
	Ireland	Kildare Peatlands National Park Management and Protected/Endangered Species Objectives
		<ul> <li>Butterfly Conservation Ireland (BCI) operates a nature reserve at Lullybeg, County Kildare in partnership with Bord na Móna. Active conservation techniques are applied on the 30-hectare site to enhance the habitats for several scarce and endangered species.</li> </ul>
		<ul> <li>Butterfly Conservation Ireland sees the cessation of peat cutting on Bord na Móna land, which is state- owned, as a great opportunity for the provision of a new national park in the context of the EMR having no national park in comparison to the western seaboard which has five parks.</li> </ul>
		<ul> <li>The Ballydermot Bog group, comprising Bord na Móna land in the townlands of Lodge, Barnaran, Blackriver, Ballydermot North and South, Codd 1 and Codd2/Sheridans, Lullymore and Lullybeg, Killina, Glashabaun North and South, Derrybrennan and Ticknevin comprises around 40,000 hectares and is a superb wilderness consisting mainly of former raised bog habitat that has been cut for peat.</li> </ul>
		<ul> <li>The main habitats that exist in the area are bogs, acid and calcareous grassland, scrub, mixed and deciduous woodland, marsh, and open water habitats such as flooded cutover bog and rivers.</li> </ul>
		<ul> <li>In some areas, a number of these habitats exist in close proximity, creating habitat mosaics with high biodiversity value, especially for invertebrates.</li> </ul>
		<ul> <li>Nash et al. (2003) describes the Lullymore/Lullybeg/Glashabaun/Blackriver area as one of the three prime areas for butterflies in the Republic of Ireland.</li> </ul>

- Nowhere else in Ireland outside the Burren region contains a similarly large number of butterfly species
  concentrated in a small area. Accordingly, the area is popular with visitors, who study, take
  photographs, and enjoy the butterflies and wildflowers that are abundant in several areas.
- In the areas where the Marsh Fritillary populations exist, BCI is calling for Kildare County Council to avoid any infrastructure or development of these areas and maintenance of the current vegetation structure by occasional mechanical disturbance and extensive cattle grazing.
- Two of the butterfly species found in the area, the Marsh Fritillary Euphydryas aurinia and Large Heath Coenonympha tullia are threatened in Ireland and Europe.
- One is located at Lullymore, for example at N 69296 25844 and the other known population is located at Lullybeg.
- The following grasslands have been identified at Lullybeg: dry calcareous and neutral grassland, dry meadows and grassy verges, dryhumid acid grassland and wet grassland.
- Outside these locations, areas of grassland rich in the Marsh Fritillary breeding plant, Devil's bit Scabious Succisa pratensis, (typically a foodplant density of at least 25% extending over 0.5 hectare or greater) may also have Marsh Fritillary populations.
- In the areas where the Marsh Fritillary populations exist, Butterfly Conservation Ireland is calling for KCC to avoid any infrastructure or development of these areas and maintenance of the current vegetation structure by occasional mechanical disturbance and extensive cattle grazing.
- The present situation with Butterfly Conservation Ireland which manages the Butterfly Reserve at Lullybeg can be developed further across areas of this landscape.

- Butterfly Conservation Ireland advises that all peat cutting cease, that drain blocking and re-wetting be
  put in place to protect one of the populations or probably the last population in the area of this species
  from extinction.
- Ireland's most rapidly declining butterfly The Wall BrownLasiommata megera mainly occurs along the tracks laid down on the site and ranks as 'Endangered' on the red list.
- BCI advocates for the maintenance of the current routeway infrastructure and the creation of additional potential habitat using any additional infrastructure to facilitate visitor access. The use of loose calcareous aggregate, sloped to face the south and west along these routes may offer additional potential habitat for vulnerable species.
- The Dark Green Fritillary Speyeria aglaja is rated Vulnerable on the red list. The population at Lullybeg and Glasabaun may be the only remaining viable populations of this species in County Kildare.
- Species-rich scrub exists in various areas in the area as well as some flooded areas. Some contain unusual species associations that BCI would like to see remain undisturbed, with some necessary management to create woodland clearings and open scrub and to maintain the biodiversity of the flooded areas. Such management maintains a diverse vegetation structure, essential for a number of invertebrates and birds.
- Butterfly Conservation Ireland is calling for its grassland habitats to be protected from development and managed by scrub control and extensive summer grazing by cattle.

# Management and designation of Special Areas of Conservation

- Notes that Kildare has just eight SACs all wetlands.
- Requires liaising with the National Parks and Wildlife Service (NPWS) to prepare and implement management plans for these sites.

- Requests that Kildare County Council liaise with the National Parks and Wildlife Service concerning the status of this commonage.
- Requests that KCC liaise with NPWS to designate the Lullymore / Lullybeg / Glashabaun / Blackriver cutaway bog areas as Special Areas of Conservation.

#### **Management of National Heritage Areas**

• Statest that Carbury Bog and Hodgestown Bog, Kildare's only NHAs, must be protected via continued coordination with the NPWS.

#### **Designation of National Heritage Areas**

- Encourages KCC and NPWS to formally designate the proposed NHAs within the County including but not limited to the Curragh and the Royal Canal.
- Requests that Kingsbog Common, an orchid rich grassland of high ecological value is designated an NHA.
- Requests that stakeholders including Butterfly Conservation Ireland and Kildare County Council liaise
  with Bord na Móna, the National Parks and Wildlife Service and Umeras Community Development CLG
  to transform the Bord na Móna Umeras Bog into a peatlands nature park under the enhanced
  rehabilitation scheme being developed by Bord na Móna.

### **One off Rural Housing**

• Submit that Kildare County Council makes any planning grant conditional on the retention of existing hedgerow consisting of biodiverse, native plant species.

		<ul> <li>The council should also make it a condition of a grant of planning that watercourses be maintained and not filled in.</li> <li>New Housing Developments</li> <li>Planning conditions for new housing developments should stipulate that only native tree, grass and shrub species should be used in landscaping.</li> <li>The All-Ireland Pollinator Plan should be applied throughout the County.</li> <li>Management of hedgerows along public roads</li> <li>Cutting should be carried out during the appropriate period, between August 31st and March 1st and preferably during February.</li> <li>A clear strategy is required for managing the herbaceous fringe between the hedge and road for its importance to biodiversity.</li> </ul>
		<ul> <li>Recruitment of staff for a Kildare Biodiversity Office</li> <li>Butterfly Conservation Ireland advocates the employment of ecologists to staff a Biodiversity Office in Kildare.</li> </ul>
50.	Gavin McDermott	<ul> <li>The Naas Inner Relief Road in accordance with the Part 8 scheme was soundly rejected by the vast majority of Local Representatives in 2019.</li> <li>Future planning for Naas town and environs must enable the construction of an outer relief road.</li> </ul>

# 51. Crylock Developments Ltd

- The new Development Plan should recognise the increased demand for datacentres and associated ICT infrastructure brought about by changing work practices as a result of the Covid 19 public health crisis.
- The Development Plan should promote the delivery of datacentre development at appropriate locations in the county, which are highly accessible via the national road network, and which benefit from the required infrastructure and services (in particular access to high voltage electricity, and appropriate water services). This would accord fully with the relevant national and regional planning policy context, and with the Government's policies in relation to data centre development as an important tool for the strengthening of the national economy.
- There are only a limited number of locations in County Kildare which have the benefit of this infrastructure necessary to support datacentre development. These locations should be identified in the County Development Plan and appropriate policies set out to reflect their potential and to facilitate the development of datacentres at these locations.
- The NPF acknowledges the role of ICT infrastructure, such as data centres. NPO 10b encourages 'Regional and Local Authorities to identify and quantify locations for strategic employment development, where suitable, in urban and rural areas generally'. The new CDP should include policies to support data centre development in appropriate locations to align with the NPF.
- In the context of the Spatial Planning and National Roads Guidelines, 2012, it is argued that data centre developments are suitable for location in proximity to the national road network, including proximate to junctions, due to their comparatively low employment intensity and car parking requirements.
- In the Regional Spatial and Economic Strategy, Naas is identified as a Key Town. Smart specialisation and clustering / agglomeration are acknowledged in encouraging investment and economic development. RSES seeks to 'Align to national strategy and approach for data centres right location for use and energy demand.' Regional Policy Objective 8.25 states that Local Authorities should 'support the national objective to promote Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities at appropriate locations'.

• The Government Statement on The Role of Data Centres in Ireland's Enterprise Strategy- June 2018 outlines the important role data centres play in Ireland's ambition to be a digital economy hot-spot in Europe. It acknowledges that data centres directly contribute to job creation and provides a range of services to other firms. It states that a plan-led approach will develop a range of measures to promote regional options for data centre investment, which will minimise the need for additional grid infrastructure, acknowledging energy demands as a key challenge.

#### **Economic Development**

- County Kildare currently does not accommodate any ICT infrastructure / datacentre development of significant scale. The development of a strong datacentre sector in Kildare has the potential to bring about significant investment, employment creation, and broader economic benefits arising from the location of major multi-national foreign direct investment in the county.
- The new Development Plan should promote the introduction of data centre development in Kildare, as
  one of the most appropriate locations for this type of development in the State, having regard to the
  county's locational characteristics and the presence of the necessary infrastructure and highly skilled
  workforce to capitalise on the significant investment encompassed in this large scale high technology
  development.
- A plan-led approach to the delivery of a significant quantum of datacentre development would promote significant investment in the county, stimulate economic growth, and support the digital and ICT sector in the county.

#### Infrastructure, Energy, and Communications

• 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).

		<ul> <li>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.</li> </ul>
		<ul> <li>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.</li> </ul>
		Some relevant precedents are noted in Meath, Galway and Wicklow.
		Appendix 2 – Engineering Statement prepared by OCSC – looks at the type of traffic generated by a data centre which is typically low given the low-density employment nature of the use.
52.	Michael Higgins	Enhanced Amenity & Heritage
		The adoption of English names for estates in preference to local names of Gaelic origin results in a loss of heritage.
		The naming process is not open to the public to voice an opinion.
		<ul> <li>The following policy of the Fingal CDP should become policy in the Kildare CDP: "Names should be in both the Irish and English languages, or in the Irish language exclusively. The exclusive use of Irish language names is encouraged. Guidance on Irish language names is available from www.logainm.ie.</li> <li>Duplication of existing names in Fingal and north side Dublin City Council areas should be avoided. This is in the interests of owners, occupiers, visitors, service and utility providers and for rapid emergency service provision."</li> </ul>

53.	Vincent Kearns	Sustainable Mobility
		The Naas Inner relief road proposal was democratically defeated in June 2019.
		The route of the Gallops Avenue follows an almost identical line to that of the Naas
		<ul> <li>inner relief road and a portion of this route traverses by Naas racecourse which must be preserved as the "Green Lung" portion of the town.</li> </ul>
		It is requested that the new Kildare CDP includes the following specific objective:
		To provide an outer ring road for the eastern/north-eastern side of Naas, to cater for by-passing traffic, linking the Blessington Road with the Dublin road close to the Junction of the latter with the N7. This outer ring road will be routed, so as to not traverse or cut through existing residential areas and will provide a long term development boundary to the east/north-east of the town of Naas.
		<ul> <li>This objective is to replace the "inner relief road, Naas" objective in Table 6.1 of the current Kildare CDP 2017-2023.</li> </ul>
		<ul> <li>Such an objective would be consistent with the existing objective MT 15 of the CDP, which seeks to channel HGV traffic associated with landfill and extractive sites onto the general regional and national road network insofar as possible, which the defunct Naas Inner relief objective does not.</li> </ul>
54.	Niall Purcell	Sustainable Mobility
		Objects to the Gallops Avenue road proposal for the following reasons:
		The Naas Inner relief road proposal was democratically defeated in June 2019.
		<ul> <li>The proposed road will not ease traffic congestion because it doesn't divert traffic before entering Naas and there are too many junctions that will cause extra tail backs.</li> </ul>

55.	Richard Cotter	<ul> <li>The entrance to Celbridge along the Dublin Road has piecemeal development and requires more definition.</li> </ul>
56.	Kilcloon Environmental Action Association (KEAA)	<ul> <li>Healthy Placemaking: People and Places</li> <li>To support the compact growth of Maynooth, there should be clear "edges" delineating the extent of the town.</li> <li>KEAA submit that clear "edges" already exist to the south formed by the M4 motorway and to the north formed by the Rye River corridor and Special Area of Conservation (SAC).</li> <li>As proposed in the draft Meath CDP 2021 to 2027, Meath County Council (MCC) plans to facilitate the development of low-density development just across the county boundary.</li> <li>The RSES requires that MCC and KCC jointly prepare a Local Area Plan for Maynooth.</li> <li>KEAA requests that, as part of that process, KCC oppose any growth of Maynooth beyond the Kildare / Meath boundary.</li> <li>While recognising the need for an outer orbital route to relieve traffic congestion within Maynooth Town centre, KEAA proposes the adoption of a "C-Ring" approach (as per Dublin's M50). A key part of the eastern section of this C-Ring already has LIHAF funding and the western section will facilitate NUIM.</li> <li>The proposal within MCC's "Maynooth Environs" to construct a section of the Maynooth Outer Orbital Route remote from the town, is proposed as developer led and funded infrastructure solely to open up rural Meath to low density, non-sequential urban development of unserviced lands, undermining the policy of compact development, sustainable transport use and the protection of landscapes and the environment.</li> </ul>

#### **Economic Opportunity: Innovation, Enterprise and Employment**

- KCC's plans to increase employment by the incorporation of incubation / creative hubs, and "synergies with Maynooth University" (NUIM) will be undermined by the incorporation of MCC's Maynooth Environs plan of a "Science and Technology Park" which is stated to be in association with NUIM.
- KCC should recognise that the benefits of NUIM should be focused within Maynooth.
- The completion of the western section of a 'C-Ring' relief road will provide a direct link from the M4 to the college, opening up lands west of NUIM, creating optimum access for Science and Technology innovation hubs adjacent to NUIM and close to the town centre and rail connections.
- Economic and tourism potential arises from the Rye and Lyreen Rivers, the focus should be on preserving their integrity and biodiversity and preserving the landscape and rural setting rather than putting these at risk by increased urbanisation.

#### **Climate Action: Environment, Climate Change and Adaptation**

- Maynooth's development footprint should be focused between the M4 and Rye River.
- To protect the natural environment and ensure that new developments are within walking and cycling distance of existing public transport services.

#### **Sustainable Mobility: Movement and Transport**

- Maynooth is well served by public transport services, including two Dublin Bus routes and the Commuter rail service. The latter to be upgraded as part of the NTA's "DART +" project.
- KEAA submits that all new developments be concentrated within the existing Maynooth town core, thus creating compact, sequential, and sustainable growth.

• KCC must resist all attempts to undermine the promotion of sustainable transport, supported by compact sequential growth, by the MCC proposal to extend growth in an uncontrollable and potentially sprawling manner into rural areas of County Meath.

#### **Creative Places: Social, Community and Cultural Development**

- The compact and sequential growth of Maynooth will maximise the value and use of existing recreational and community resources, including the enhanced Royal Canal Greenway.
- The above will also encourage further investment in enhanced recreational and community infrastructure.

#### **Enhanced Amenity and Heritage: Landscape and Green Infrastructure**

- The Rye River, the Rye River SAC and the Royal Canal are key assets of the Maynooth and Kilcock areas.
- Such continuous wildlife corridors form an essential part of our green infrastructure.
- The Rye River corridor has been placed at risk by development and planned development in County Meath.
- While some development has already taken place in Kilcock, the new Kildare CDP should put policies in place to protect the undeveloped areas along the Rye River corridor.

#### Making it happen: Infrastructure, Energy and Communications

• It is essential that previous and planned investments in water and wastewater services be used as efficiently as possible.

		<ul> <li>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.</li> <li>KCC should not cooperate with MCC's Maynooth Environs proposal to zone around 350 acres of unserviced rural land.</li> <li>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.</li> <li>The paving of large areas of rural County Meath to facilitate new and low density development, with runoff being discharged into the Rye River, is the antithesis of nature based surface water management.</li> </ul>
57.	Clane SuperValu	<ul> <li>Clane has the characteristic traits of a higher order settlement, its status should therefore be upgraded</li> </ul>
		within the Kildare County Settlement Hierarchy from "Small Town" to Self-Sustaining Town.
		<ul> <li>The RSES EMRA identifies the Town of Clane under the heading of Self-Sustaining Town (Section 4.7, page 93), the CDP 2023-2029 should take this direction into account.</li> </ul>
		<ul> <li>Clane's population is over 7,000 people and is strategic located between Naas and Celbridge/Maynooth and between the M4 and M7 transport corridors.</li> </ul>
		<ul> <li>Clane has strong public transport links by bus and is well served by Sallins Train Station. The new TFI route 139 travels daily between Naas, Clane, Maynooth and Blanchardstown. The upcoming provision</li> </ul>
		of DART rail services will further improve rail connectivity.
		<ul> <li>Clane is served by three primary and one secondary level schools – two have recently undergone expansion and two have obtained planning permission for expansion.</li> </ul>

- A wide range of leisure activities are available in Clane, such as sports clubs, drama society, choir and scout groups, local library, men's shed, the evergreens and various other groups and associations. Further investment is required.
- Clane and the wider environs are served by 6 large grocery/retail stores and various other stores in and around the main street, and at the Abbeylands Centre.
- The RSES labels Clane as a Level 3 Key Service Centre within its Retail Hierarchy along with Celbridge, Kilcock, Kildare, Leixlip and Monasterevin, which are all recognised in Local Policy as higher order Settlements.
- Large employers/employment centres in Clane include: the Abbeylands Centre, UMPC (Clane General Hospital), Clane Fertility Clinic, Clane Industrial Park, Clane Primary Care Centre, Hazel Hall Nursing Home, Westgrove Hotel, and the large grocery/retail stores.
- Strong employment links tie Clane with Naas (e.g. Millennium Park), Celbridge (e.g. Hewlett Packard), Maynooth (Maynooth Business Campus, NUI Maynooth) and Leixlip (e.g. Intel).
- Clane has potential to strengthen its employment base and develop as a more sustainable centre. However, Clane needs 'targeted catch up investment' as recognised in the RSES and this need must be accounted for in the CDP 2023-2029.
- The RSES direct that 'local authorities shall apply an evidence driven asset-based approach to the consideration of all settlements, some of which may have the potential and ambition to become drivers for growth in the county or to play a key role in providing services and employment to their local catchments' (Section 4.3, page 46).
- Recent guidance by the Department of Housing, Local Government and Heritage states: "One of the key responsibilities of a local authority is planning for the infrastructure, employment and services needed to sustainably support citizens and local communities in the future. In order to effectively plan

		for such future development, it is critical that a comprehensive and coordinated approach is taken to estimating what the scale and nature of what those future needs will be (Section 1.2, page 2, Housing Supply Target Methodology for Development Planning).
58.	Maynooth Tidy Towns	<ul> <li>Introduction</li> <li>The All Ireland Pollinator Plan has been a huge success, because its implementable by the small household gardener, the large-scale farmer, the Local Authorities and large businesses.</li> <li>Lesson to be learned by KCC to develop a CDP that:</li> <li>Sets clear measurable and realistic targets.</li> <li>Outline timeframes for completion of works and plans.</li> </ul>
		<ul> <li>Indicates the Departments in KCC responsible for implementing each aspect of the Plan.</li> <li>Clearly outline areas outside the control of KCC or governed by National or EU legislation.</li> <li>Provided regular public updates and progress reports on the Plan.</li> <li>Where shortfalls in implementing the plan arise that public are fully appraised as to reasons why targets are not being met.</li> <li>Sets realistic and enforceable penalties for non-compliance.</li> </ul>
		<ul> <li>Healthy Placemaking: People and Places</li> <li>Provide every town and village with a centrally located supported independent elderly housing facility near a day care centre.</li> <li>By planning the design of our towns and villages and not allowing ad-hoc planning.</li> </ul>

- By transferring some of the costs of such facilities to developers as a planning permission requirement.
- Provide greater permeability through estates and other areas to promote an "10 minute town".
- Adopt the "Streets are for People" policy by promoting more car free days in towns and villages and providing more outdoor dining areas.
- Make it more expensive to hoard land or buildings particularly on Main Streets. Such sites should be converted into flexible remote working hubs, or pop up zero waste shops. This would help boost local economies.
- To promote a healthier and more active lifestyle, KCC should implement a policy that requires developers to include multiple areas for community gardens and orchards within new estates.

#### What lessons can we learn from the Covid-19 pandemic on how we use our buildings or land?

- The Covid-19 crisis made us recognize the benefits of the natural world and the great outdoors.
- However, we realised how limited our access is to green open spaces particularly those maintained by KCC.
- We lack outdoor facilities that suit all ages and abilities and are dependent on private landowners for access to their parks and playing fields.
- A policy needs to be adopted for the provision of serviced open green spaces of meaningful size in every town and village.
- Urban green and blue spaces have proven to promote mental health and well-being and should be acknowledged and acted on by KCC.

#### **Economic Opportunity: Innovation, Enterprise and Employment**

- Promote environmentally sustainable jobs which provide our young people with decent livelihoods.
- Provide financial support for start-ups by removing/reducing commercial rates for the first two years of trading.
- Provide support for 'Start your own business' courses.
- Actively promote and translate the benefits of shopping small and locally to the public.
- Actively promote and translate the benefits of locally produced, affordable, sustainable food models.
- Promote the "10 Minute Town" concept for ease of accessibility.

#### **Climate Action: Environment, Climate Change and Adaptation**

- Addressing climate breakdown and biodiversity loss needs to underpin every single part of the plan. Develop a set of criteria or questions to measure every element of the proposed CDP against.
- We suggest changing the wording from "Climate Change" to "Climate Breakdown" or "Climate Emergency" to accurately reflect the situation.

# Biodiversity:

- A report from the National Biodiversity Forum warned that the National Biodiversity Plan failed to stem the loss of nature in Ireland and that "little or no action" has been taken to address some of the NBP key objectives.
- Oonagh Duggan, Head of Advocacy at BirdWatch Ireland commented:

- "Despite Ireland being a signatory to several biodiversity laws and conventions, 85% of Ireland is in bad ecological status and two-thirds of wild bird species are in trouble. Around one-third of our 98 wild bee species are threatened with extension and over 60% of the 202 species of commonly occurring birds in Ireland are on the red and amber conservation lists."
- "This is the decade of action out to 2030. It's now or never to stop the loss of biodiversity and restore it"
- In June 2019, KCC declared a climate and biodiversity emergency No immediate actions are taken.
- Given the above, and that KCC stated that Climate Action will permeate all actions of the CDP, it is imperative that Biodiversity Loss receives the same attention and that proper measurable targets are set and assessed on an ongoing basis.
- The new CDP should take account of the observations of the National Biodiversity Forum.
- The current CDP cited the measures outlined in the National Biodiversity Plan and the European Union's Biodiversity Strategy (2011) which are not working and biodiversity is continuing to be lost.

The current CDP does not inspire confidence in the measures currently in place to protect and preserve biodiversity.

- Greater protection for trees is needed. Tree felling licenses for the removal of mature, healthy trees should be required with valid reasons. This should be enforced and have large penalties for infringement.
- A higher level of protection for existing hedgerows and trees should be given on all development sites.
   Development design plans should incorporate these hedgerows and trees where possible. Protection of these features should be central, and non-compliance should result in heavy enforcement penalties.

- Old established hedgerows (whether deemed of high, moderate, or low conservation value) are key, not only to biodiversity, but also ecosystem benefits such as carbon sequestration and flood mitigation.
- It is of little conservation/biodiversity/heritage value to require developers to plant trees in replacement of existing hedgerows.
- It should be a requirement of planning permission for developers to suitably restore existing hedgerows deemed as low conservation by employing local experts in hedge laying.
- Planting should consist of local native plant types, indigenous to the area and of local provenance and be incorporated into the site to enhance biodiversity.
- A sufficient bond or cash lodgement should be required as part of planning permissions to encourage developers to protect trees, hedgerows, and other natural features on site. Enforce if developer fails to meet requirements.
- Enforce the correct management and maintenance of hedgerows.
- Provide every town with space for allotments or community supported agriculture.
- Enable increased cycling and walking to reduce environmental degradation from private cars.
- Review and update the Biodiversity and Heritage Action Plan to give due consideration to the protection and enhancement of biodiversity (as stated in the National Biodiversity Action Plan 2017-2021).

What measures or strategies can be included in the Plan to support the protection and enhancement of our environment in our daily lives?

 A daily reminder of the declared Climate and Biodiversity Emergency should be posted in all KCC offices.

#### **Sustainable Mobility: Movement and Transport**

Enabling rather that promoting active travel, for example:

- Provide safe secure bike parking facilities at public transport sites and in the towns.
- Increase permeability though housing estates to create safe, direct, and faster access to town centres and other amenities.
- Lack of alternative safe transport options between the towns of KCC.
- Provide high-quality active transport infrastructure, with the appearance of E-bikes, the distances cycled increases.
- KCC must develop a Strategic Cycling Plan with local targets and annual monitoring and reporting.
- KCC needs to emphasise its policy to reduce car dependency on the grounds of health, environment, and sustainability.
- KCC must reduce speed limits in urban areas and provide street furniture/ traffic islands.
- Create space and footpaths accessible and safe for use by all ages and abilities.
- Provide Park and Stride facilities within reasonable distances of schools.
  - Near church or supermarket carparks which would simultaneously encourage parents/guardians to shop locally.
  - Near public transport to encourage train and bus use.

**Creative Places: Social, Community and Cultural Development** 

- Ensure that every town and village are serviced with meaningful sized community hubs.
  - Fully accessible to all regardless of age and ability.
  - Ensure that language and terminology is inclusive and respectful to all.
  - Ensure proper youth facilities.
- Provide outdoor spaces for teenagers such as skate parks, playing fields.

### **Enhanced Amenity and Heritage: Landscape and Green Infrastructure**

- No reference is made to biodiversity loss in the Issue Paper, a critical oversight by KCC.
- KCC should give practical credibility to its declared Climate and Biodiversity Emergency (June 2019) by employing suitably qualified biodiversity staff to:
  - Expertly review planning applications and enforce planning requirements.
  - Practically achieve environmental education by developing a one-stop-shop on the Council's
    website of easily accessible environmental information (compiled from previous publications). To
    easily access correct scientific information on the ecological value of habitats such as: (not an
    exhaustive list)
    - Roadside verges
    - Hedgerows
    - Canals, lakes and rivers
    - o Riparian vegetation
    - o Fens
    - Bogs
    - Marches

- Marginal land
- Meadows with local diversity.
- Ways to recycle hazardous waste
- Ways to upcycle
- This information can be used to create more localised awareness campaigns.
- KCC should implement biodiversity friendly measures, including the actions of the All Ireland Pollinator Plan.
- Ensure that developers retain existing hedgerows, and that sustainability objectives are central to developments.
- The power to stop the wanton destruction of hedgerows should be strengthened.
- Local planning policy should require developers to include: Green spaces, edible hedges, community orchards, retain mature trees, incorporation of bee and swift bricks in all new residential estates. Penalties should be imposed for non-compliance.
- Native trees to be incorporated into hedgerows.
- All boundaries and perimeters, including industrial fencing to have native hedgerow planting.
- Developers should be required to restore hedgerows with suitable expert advice.
- Hedgerows should be maintained at, at least 1.82m in height to sustain biodiversity.
- A Tree Strategy for Kildare should be developed like that developed by Dublin City.
- Pesticide and herbicide use should be banned across the county.
- Small woodland areas and copses should be planted across the county, KCC should make land available.

		KCC should promote the actions outlined in the All Ireland Pollinator Plan and provide resources to
		enable all communities to take positive actions for biodiversity.
		Conclusion
		<ul> <li>The structures put in place in the CDP to address the Climate and Biodiversity Crises will determine whether KCC is a laggard or a leader on these most important issues.</li> </ul>
		<ul> <li>Access to appropriate levels of expertise and skills are required to guide elements of the CDP relating to climate science, renewable energy, restoring biodiversity loss, sustainable land use etc.</li> </ul>
		<ul> <li>Maynooth Tidy Towns vision for Kildare is a county where people can live in dignity and harmony with the natural world and our fellow human beings; where communities can thrive through sustainable development and living sustainably; so that we can pass to the next generation healthy and vibrant wholly sustainable communities.</li> </ul>
59.	Liam & Angela O'Beirne	<ul> <li>The route of the Gallops Avenue follows an almost identical line to that of the Naas inner relief road and a portion of this route traverses by Naas racecourse which must be preserved as the "Green Lung" portion of the town.</li> </ul>
		• It is requested that the new Kildare CDP include the following specific objective: "To provide an outer ring road for the eastern/north-eastern side of Naas, to cater for by-passing traffic, linking the Blessington Road with the Dublin road close to the junction of the latter with the N7. This outer ring road will be so routed, so as not to traverse or cut through existing residential areas and will provide a long-term development boundary to the east/north-east of the town of Naas".
		Education
		Due to the population increase of Naas, Primary and Secondary school places are limited.

		The CDP should include additional education campuses within the town's environs, to encourage students to walk or cycle to school.
60.	Debbie Hurley	Healthy Place Making - Celbridge
		<ul> <li>Celbridge is an ever-growing town and needs more parks with amenities like playgrounds for small children, outdoor gyms, skate parks, etc. to accommodate the growth.</li> </ul>
		The town needs more bins (general, recycling, dog waste bins).
		Infrastructure, Energy & Communications - Celbridge
		Invest in a road linking Clane road to Salesians roundabout.
		<ul> <li>More 67 buses on both Maynooth and Clane road routes and more shuttle buses to link up to close towns and train stations are needed.</li> </ul>
		More electric car charging points are needed.
61.	Cliona Kelliher	The Climate Crisis is the key issue of our time.
		<ul> <li>The Kildare CDP is an opportunity to meet the targets of the Kildare Climate Adaptation Strategy, whilst creating a better way of living for all residents.</li> </ul>
		<ul> <li>Incorporating the principles of Just Transition will allow us to have a more balanced distribution of economic wealth, whilst bringing cleaner air, greater biodiversity, and stronger communities.</li> </ul>
		Urban

- Employment and sustainable transport should be considered in tandem. Non-urban large facilities should provide cycle parking and/or a bus service, plus incentivise employees to use alternatives to the car.
- For the efficient use of resources and transport networks, restore derelict sites and provide for 'above shop' accommodation.
- Sustainable Urban Drainage Systems should be implemented within towns and be a requirement of all new housing estates, to reduce run off and help biodiversity https://www.ors.ie/news/sustainable-drainage-systems-suds-why-in-todays-built-environment-are-they-becoming-increasingly-important/
- Traffic free zones should be implemented where possible in towns. At the same time, air quality monitoring systems should be installed at various locations within urban centres, data clearly visible on street, to highlight the impact of traffic.
- A car no-idling awareness campaign and bye-laws should be introduced, in particular around school zones.

#### Procurement

- Green procurement should be standard for all public contracts and preference given to companies who can demonstrate genuine green credentials (note that 'greenwashing' is not an acceptable alternative).
- All external contractors should be made aware of Council Climate/Environmental Policies.

# **Resource Management**

- Segregated bins should be provided in all towns, i.e. bins with both recycling and waste facilities.
- Community composting should be encouraged.

- Rainwater harvesting systems should be made available to community gardening groups and housing estates where required.
- Water refill stations should be available in every town.

#### **Biodiversity**

- Correct tree management records should be kept and be publicly available. Building contractors should not be allowed to remove mature trees as the replacement with younger trees is not the equivalent in terms of carbon capture.
- Council is commended for reducing glyphosate spraying and this policy should be maintained and extended wherever possible.
- Community Grants for Tidy Towns initiatives should give extra weight to environmentally friendly initiatives.

### **Natural Heritage**

- Natural heritage areas should be preserved and protected. The Hill of Allen is an example of where this has gone wrong. Any kind of activity damaging the natural environment should be ruled out unless necessary.
- The Curragh Plains management plans need to be escalated and implemented. This amenity has been neglected to date.

#### **Just Transition**

• Economic activity should be primarily focused on 'green' jobs and initiatives, as well as upskilling and training programs for a new sustainable economy.

		<ul> <li>Companies providing 'green' solutions should be encouraged to invest in the county and begin to phase out environmentally damaging industries such as quarrying.</li> <li>Any future quarrying applications must be reviewed considering the damaging impact on the immediate locale, and the impact of the dependence on extractive industry.</li> </ul>
		Accessibility
		<ul> <li>Accessibility must be embedded into all plans and projects. Our physical infrastructure and leisure areas should be accessible to everyone, including to those who are mobility impaired.</li> </ul>
		<ul> <li>Neurodiversity should be considered in terms of physical infrastructure, events, consultations, and access to Council information.</li> </ul>
62.	Louise Hyland	The Naas IRR was a priority in the KCDP 2017-2019 and was defeated by a democratic vote of the Naas MD in June 2019.
		The democratic decision must be upheld.
		The Gallops Avenue will like its predecessor the Naas IRR move thousands of vehicles close to quite mature residential estates.
		The proposed route also traverses Naas Racecourse. This area must be preserved for recreational purposes as the 'Green Lung' of the town.
		The new Kildare CDP should include the following objective:
		<ul> <li>"To provide an outer ring road for the eastern/north-eastern side of Naas, to cater for by-passing traffic, linking the Blessington Road with the Dublin road close to the Junction of the latter with the N7.</li> </ul>

		<ul> <li>This outer ring road will be routed, so as to not traverse or cut through existing residential areas and will provide a long-term development boundary to the east/north-east of the town of Naas."</li> <li>This objective is to replace the "inner relief road, Naas" objective in Table 6.1 of the current Kildare CDP 2017-2023.</li> <li>Such an objective would be consistent with the existing objective MT 15 of the CDP, which seeks to channel HGV traffic associated with landfill and extractive sites onto the general regional and national road network insofar as possible, which the defunct Naas Inner relief objective does not.</li> </ul>
63.	Kingsfurze Avenue Residents Association	<ul> <li>Sustainable Mobility</li> <li>The Naas IRR was a priority in the KCDP 2017-2019 and was defeated by a democratic vote of the Naas MD in June 2019.</li> <li>The democratic decision must be upheld.</li> <li>Including it in the CDP flies in the face of the democratic vote.</li> <li>The Gallops Avenue like its predecessor the Naas IRR will move thousands of vehicles close to quite mature residential estates.</li> <li>Congestion will move from current traffic junctions to the new proposed junctions at The Gallops and will not solve traffic congestion.</li> <li>The proposed route also traverses Naas Racecourse. This area must be preserved for recreational purposes as the 'Green Lung' of the town.</li> <li>The new Kildare CDP should include the following objective: "To provide an outer ring road for the eastern/north-eastern side of Naas, to cater for by-passing traffic, linking the Blessington Road with the Dublin road close to the Junction of the latter with the N7. This outer ring road will be routed, so as to</li> </ul>

not traverse or cut through existing residential areas and will provide a long-term development boundary to the east/north-east of the town of Naas."

- This objective is to replace the "inner relief road, Naas" objective of the current Kildare CDP 2017-2023.
- Such an objective would be consistent with the existing objective MT 15 of the CDP, which seeks to channel HGV traffic associated with landfill and extractive sites onto the general regional and national road network insofar as possible.

## Other issues facing Kildare

#### Education

- Due to the population increase of Naas, Primary and Secondary school places are limited.
- The CDP should include additional education campuses within the town's environs, to encourage students to walk or cycle to school.

#### **Active Leisure**

• Residents may value increased linkages between Kerdiffstown Park, the planned park at Sallins, the Naas/Sallins Greenway, and perhaps improved utilisation of the canal as a Blueway between Naas and Digby Bridge, ultimately heading for the river Liffey. Excellent for cycling, walking, or running.

## **Development of downtown Naas**

- In line with the National Retail Guidelines, the CDP should prohibit development of retail over 1,000 sq. metres gross floorspace outside the Centre of Naas.
- Naas town centre should be designated as a development zone with incentives for the creation of "Living over the Shop".

		How can we support and protect traditional on – street retailing with the increase of online shopping and encourage new business looking to locate within our town centres?
		• The CDP should include a policy, that all comparison retailing, and all other retail but local convenience (i.e. up to no more than 1,000 sq. metres gross floorspace) is not permitted outside town centres.
		<ul> <li>No sites should be zoned as district centres, as the definition in the Retail Planning Guidelines is far too loose and it's unsuitable for the scale of the towns in County Kildare.</li> </ul>
		<ul> <li>The town centres of the key towns, the self-sustaining growth towns, and the self-sustaining towns should be marked on maps in the local area plans. Brownfield land with potential for regeneration should be included within the boundaries, if located within the town centre areas.</li> </ul>
		The CDP should not permit comparison retailing, and all other retail but local convenience in any retail warehousing development, whether by new build or by conversion.
		• The Monread shopping centre has clearly shown that permitting large scale retail in peripheral locations, has done huge damage to traditional on-street retailing in the town. The site was zoned as a "district" centre in the late 1990's, KCC must prevent such mistakes in future.
64.	Canal Side Residents &	Car parking has become a major issue in Sallins.
	Business	<ul> <li>The residents and business owners need to be updated relating the Health Check and all other proposed projects in the pipeline impacting the Village.</li> </ul>
		The removal of car parking spaces from the Main Street had a detrimental effect on the community.
		The recent changes are forcing cars down the side streets, double parking, parking on double lines, parking in loading bays, all in an area where there are pedestrians & children in abundance.

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		<ul> <li>The community needs to be involved in the processes of all plans for Sallins.</li> <li>A copy of a previous petition relating to car spaces /parking are provided and a new list is currently being complied.</li> </ul>
65.	Anthony O'Regan	<ul> <li>Extracts from Eastern River Basin District – Programme of Measures Pilot Studies. The Plans and POMs were finalised in October 2009, but never followed up.</li> <li>"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."</li> <li>"The aluminium concentration downstream of the discharge stays under the limit of 0.2 mg Al/L required by the Drinking Water Directive (98/83/EC), and table 3.1 of the EPAs Interim Guideline Values for Characterisation list of parameters as sourced in Irish Drinking Water Regulations 2000 SI 439 of 2000, EQS for the Aquatic Environment, EPA Discussion Document, however, lower concentrations can be toxic for fish populations (JJ Bowman, JJ Bracken, 1993). A study of the health of the fish population on the Lower Liffey River should be carried out."</li> <li>The study of the health of the fish population was never carried out.</li> <li>"Finally, the sludge created by the water treatment is not a threat for the water quality of this area because it is disposed in a landfill at Kilcullen (Kildare)." (It now goes to County Cavan)</li> <li>The above is not true. As stated above approx. 3.7 tonnes of sludge per month are washed down the slipway discharge to the Liffey at Ballymore Eustace.</li> <li>Also the aluminium concentration no longer stays under 0.2mg Al/L.</li> </ul>

# 66. Ballyshannon Action Group (BAG)

## Healthy Placemaking

• BAG emphasises the importance of the existing protections within the CDP for rural residential settlements, particularly within the context of unsuitable and/or inappropriate industrial development with the potential to impact negatively on residents' health, livelihoods, wellbeing and the overall amenity of an area.

#### **Climate Action**

- Quarrying has a detrimental effect on people's lives and temporary quarry licenses have often been extended over decades throughout Kildare.
- BAG believe that quarrying activity should be restricted in line with Ireland's Climate Action goals and eventually phased out completely.
- 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.
- 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.
- BAG proposes a required minimum distance of at least 1km from the nearest residential dwelling for any new or extended quarry facilities.

## **Enhanced Amenity & Heritage**

- BAG proposes that heritage sites like Dun Ailinne are given further protected status.
- To protect the immediate area around the site, given the high probability of further areas of undiscovered archaeological importance around the primary site.

		Agriculture and the equine industry are integral to Kildare's economy.
		Kildare is internationally renowned for its horse racing and breeding facilities.
		<ul> <li>Protection should be given to such facilities to sustain the industry and avoid unsuitable development within their vicinity.</li> </ul>
67.	Lorraine Benson	High Level Objectives for Healthy Placemaking and Climate action
		<ul> <li>To identify and designate large scale biodiversity space in Kildare for nature, to connect our remaining peatlands, create new green corridors and to create a new national park with wild spaces allowing nature to recover, safeguard carbon storage and promote climate resilience.</li> </ul>
		<ul> <li>To manage and restore our rivers, waterways and areas designated as Natural Heritage Areas (NHA and proposed NHAs) and Special Areas of Conservation to good status.</li> </ul>
		<ul> <li>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 county.</li> </ul>
		Creative Places
		The pandemic brought into sharp focus the importance of outdoor spaces.
		Welcome projects have commenced like Poplar Square in Naas and Market Square in Kildare town.
		Sustainable Mobility
		Traffic through our towns is unacceptable high.
		<ul> <li>A shift in approach is needed to prioritise pedestrians over vehicles with lower speed limits and multiple pedestrian crossings.</li> </ul>

		The new CDP should clearly indicate new and upgraded cycle routes and set targets for completion.
		Prioritising cycling and pedestrians will deliver on climate action and assist with healthy placemaking.
68.	Phil Hayden	All elements of the CDP should take account of our goals to combat climate breakdown and facilitate biodiversity recovery.
		<ul> <li>Bogs are of utmost importance for carbon sinks (and biodiversity). The first aim for all bogs should be to rehabilitate them. Alternative uses for bogs should only be considered once established by experts that better results for our climate and biodiversity goals will be achieved.</li> </ul>
		KCC should identify land in every town for allotments or community supported agriculture or both.
		<ul> <li>Ensure that the CDP and LAP's clearly specifies actions, identifying who is responsible for each action, when it will be achieved, how it will be achieved, what the achievement will look like, how it will be measured and how it will be enforced.</li> </ul>
69.	Naas Access &	Naas Access & Disability Group Vision:
03.	Disability Group	"We want Co. Kildare to be inclusive, accessible, distinctive, community driven, sustainable, ambitious, fun and creative for all. But most of all, in light of the impacts of the coronavirus pandemic, we want our County to be safe".
		Overarching consideration.
		The policies and objectives of the CDP should be underpinned by the following:
		<ul> <li>Quality of Life</li> </ul>
		<ul><li>Prosperity</li></ul>

- Health and Wellbeing
- Social Inclusion and Accessibility for all
- Climate Change Adaptation

## **Housing Objectives**

- Provide accommodation for older and disabled people in new and established residential housing projects.
- Include a mix of accommodation types for older and disabled people (independent and semiindependent living) at locations that are proximate to services and amenities.
- A comprehensive study of housing options for older and disabled people needs to be done within the lifespan of the CDP.
- To provide for the subdivision of large houses or amalgamation of smaller houses within established areas to provide independent, semi-independent, or nursing home accommodation.
- 3 storey 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. This method would reduce land use and create a better community spirit.

## **Childcare Objectives**

 Seek to facilitate the provision of good quality and accessible childcare infrastructure at appropriate locations by combining area-based requirements in new communities with market-led provision in more established areas.

### Accessibility in the Public Realm & Our Community - Objectives

- 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.
- Need more outdoor seating on our streetscapes, recreation, and outdoor areas.
- Use and include the KCC Access Strategy vision.
- Promote the provision of Changing Places in public and community buildings. \*
- Ensure wheelchair accessible toilets have a universal key-lock system.
- Ensure that services and facilities are physically integrated with residential and employment areas, clustered to optimise accessibility and usage, and universally accessible.
- Conduct an accessibility audit throughout the County. This would include dishing and ramps to roads, footpaths, pedestrian, and pelican/zebra crossings. Access to graveyards, heritage sites, public parks, and buildings.

## **Climate change and the Environment - Objectives**

- Increase the quantity, quality, and safety of cycle lanes in our towns.
- All future shared spaces for pedestrians and cyclists should have a tactile line in the centre of the path for vision impaired.
- KCC should issue CPO's for safe cycle lane access between housing estates. Designated cycle lanes, through housing estates can be a safer way for children to reach their schools.
- Encourage an empty beverage and glass containers refund scheme like Western Australia.

- The benefits include: Less landfill collection and deposits, opportunities for social enterprise and benefits for community organisations.
- More recycling facilities is needed where we as citizens can dispose of plastic bottles, cardboard boxes and packaging.
- Unused KCC owned land can be donated to community tree planting projects.
- Create more open spaces facilities.
- Work with Irish Waterways on the removal of Kissing Gates which are inaccessible for wheelchair users.
- Parking barriers/ poles in car parks and other amenities prevents wheelchair users and their vehicles to gain access.
- Everybody should have the right to access our natural heritage.
- Develop a directory of accessible recreational areas and sport facilities.
- Greater focus on the use of sustainable building methods, to ensure that future construction methods are more environmentally friendly.

## **Transport and Infrastructure objectives**

- Develop a relief road in Naas, all large HGV vehicles should be routed away from town.
- The engagement and progression of the Rail Transport 2020 Route project. KCC need to work with the NTA on extending the electrified line from Hazelhatch to Kildare town. This will allow for the twin tracking of the Kildare Town rail network, thus increasing the frequency of trains.
- Create a light rail line from Sallins to Naas.

- Provide a park and ride facility, where traffic exits the M7 motorway network ring road in Naas, to avail of the rail network.
- Create a bus/transport interchange at the depo at KCC yard beside Hedderman's car park for local and county buses and Irish Rail feeder bus connectivity.
- Ensure direct accessible public transport links, such as linking Naas and other towns in Kildare directly to their local rail stations.
- Make Naas a one-way street system, by not letting bus routes travel in both directions.
- A safe cycle lane and street path widening project can be created on the main streets of Naas.

## **Tourism, Retail & Enterprise - Objectives**

- Enhance and develop the urban fabric in accordance with the principles of good urban and universal design and sustainable development.
- Achieve an efficient use of land and development densities that can support vibrant, compact, walkable places that prioritise pedestrian movement.
- Businesses and a variety of other land uses to be directed into urban centres.
- Continue the promotion of Shop Front and Accessibility Improvement Grants.
- Identify and map Kildare's access friendly business and tourist sites. Include equestrian centres, skate board and dog friendly parks, forest and wood trails, and canal and water attractions.
- Provide changing places in key tourist centres, racecourses, and shopping centres. \*

		<ul> <li>Protect and support new and evolving businesses by operating an indoor pop-up/ market style setting, with no rates, heating bills etc. In a central location with a small coffee shop. Promoted by KCC and guided by the LEO.</li> <li>Develop the Naas harbour area in an environmentally and architecturally sound manner including the canal link to Corbally Harbour. This will provide an 8KM stretch of canal travel waters and additional walking and cycling routes.</li> <li>The promotion of a community garden working with local community groups and service providers. Projects similar to Delta Gardens in Carlow which became a tourist attraction.</li> <li>*Description of Universal Design and Changing Places provided in the submission.</li> </ul>
70.	County Kildare Access Network (CKAN)	<ul> <li>Context</li> <li>County Kildare Access Network CKAN is a network of individuals who have lived experiences of disabilities, local disability organisations and community stakeholders. We focus on continually improving universal access of the local built environment for all people irrespective of size, age and ability, on an equal basis with others'.</li> <li>12.5% of the population of Kildare or 27,768 people have at least one disability. There is no reference to disabled people on page 5 of the AIRO info-graphic of The Issue Papers of this Development Plan.</li> <li>Together we aim to promote the United Nations Convention on the Rights of People with Disabilities (UNCRPD) and work towards developing County Kildare as a Disability Friendly County.</li> <li>It is a prerequisite that the County Development Plan that it is aligned with the needs and experiences of disabled people.</li> </ul>

- The National Disability Inclusion Strategy (NDIS) 2017 -2021 calls for Local Authorities to develop actions at a community level to increase the participation of disabled people in their communities and calls for all public bodies to implement universal design principles.
- Under the Disability Act (DA) 2005 CKAN calls on Kildare County Council to reflect the responsibilities it holds under Public Sector Duty (PSD).
- Requires that the following manuals and strategies are implemented:
  - The National Disability Authority Building for Everyone: A Universal Design Approach External Environment.
  - The Irish Wheelchair Association's Best Practice Assess Guidelines: Designing Accessible Environments.
  - The National Disability Inclusion Strategy 2017-2021 calls for Local Authorities to develop actions at a community level to increase the participation of disabled people in their communities and call for all public bodies to implement universal design principles.
  - Implement the actions and objectives of the County Kildare Access Strategy "A Universal Access Approach 2020-2022".
- Specific Actions to improve disability access and wellbeing:
  - Wheelchair accessible toilets must have a universal key-lock system for ease of access.
  - Increase the quantity, quality, and safety of cycle lanes in our towns.
  - It is imperative that all future shared spaces for pedestrians and cyclists have a tactile line in the centre of the path for vision impaired.

- Promote community gardens using a universal design, sustainable and accessible to all, approach.
- Ensure public playgrounds are accessible to disabled children through the provision of physical and age appropriate play facilities.
- Develop a directory for accessible outdoor spaces recreational areas and sports facilities.
- Changing Places in buildings where there is access to the public in County Kildare need to be provided on a planned basis.
- Support/encourage a variety of options for engaging with education, cultural and community services.
- Ensure inclusion of older people, disabled people and people for whom English is not a first language.
- Work with Irish Waterways on the removal of Kissing Gates with alternatives that are access friendly, these are inaccessible for wheelchair users. Parking barriers /poles in car parks and other amenity areas can prevent access by wheelchair users and their vehicle.
- Information for the public should be available in formats that communicate and respect all people including easy to read, audio and visual presentations.
- Access to public and private transport is essential to people with disabilities to access community life and move from place to place.
- Bus users need to have bus stops with shelters and display when the next bus is due.
- Carryout an audit of bus stops, shelters and paths, public and private intercity bus and train stations.

- Develop an action plan with Co. Kildare Chamber to positively engage with inclusion for both disability and diversity.
- Engage with the private sector in accommodating the employment of disable people and facilitating their consumer spending power in the retail sector through adaptations.
- Support business to reflect in their workforce their broad customer base so by definition if businesses are selling products and services to disabled people, over time they will also be looking to recruit talented employees with disabilities.
- Boost the promotion of the Shop Front Grant and Accessibility Improvement Grant.
- Identify and map Kildare's access-friendly business and tourist sites. This includes equestrian centres, skate-board and dog friendly parks, forests and wood trails, canal and water attractions.
- Promote the provision of Changing Places in key tourist centres, racecourses and shopping centres.
- Promote Co. Kildare as a Disability Friendly County through Kildare Tourism Strategy.
- Targeted access measures to outdoor spaces that enhance emotional and mental health of disabled people.
- Provision of additional spaces to be allocated in existing and new neighbourhoods for Community gardens neighbourhoods.
- Parks and playgrounds need to be accessible and include equipment that can be used by disabled children and parents/family members of a variety of ages.

#### **Climate Action**

One way to achieve increased health and wellbeing and more sustainable travel is through reduced car travel

• Actions: Designated cycle lanes to encourage children to cycle.

## Housing

- CKAN calls on the prioritisation of disabled people in relations to the allocation of accessible social housing.
- The lack of suitable and affordable housing within the current housing crisis disproportionately impacts on disabled people. As such KCC needs to ensure that:
  - The process is accessible to all who require it. Particular needs including more than one wheelchair user within the family unit.
  - Disabled people are recognised as having different needs in relation to their own disabilities. KCC therefore needs to provide for the subdivision of large houses or amalgamation of smaller houses within established areas for the purpose of providing independent, semi-independent or nursing home accommodation.

## **Community and Culture**

- The council must also recognise the important role of private actors in the provision of cultural, community and education services.
- Universal accessibility must be promoted to the highest levels in all new and existing community facilities.
- Community art grants should be assessed against measures to include disabled people as creators and users of community and art activities.
- Retain a variety of options for engaging with education, cultural and community services to ensure inclusion of older people, disabled people and people for whom English is not a first language.

		Public awareness raising about respecting disabled people in the community is also required.
		MONITORING AND EVALUATION
		Targets need to be set within the Plan and a monitoring and evaluation team should be put in place.
71.	Sean O'Broin	Climate Change / Biodiversity
		<ul> <li>Lack of alignment between the UN policy on Sustainable Development (2015) and draft Development Plan (2023- 2029) – This was a factor in the current CDP. Failure to align emerging Plan with the UN Agreement on Climate Change will lead to sub-optimal application and cohesion as the process cannot be tackled in isolation by Ireland.</li> </ul>
		<ul> <li>Application of the Bonding Process to Biodiversity – e.g. to encourage the preservation of trees and hedgerows is essential.</li> </ul>
		The system of Bonds is a normal feature attached to the planning process with a view to ensuring satisfactory completion of developments and their ultimate taking-in-charge should be extended to the Biodiversity to become an integral part of framework for planning and development going forward.
		The CDP should contain a commitment to examine the bonding process to improve the efficiency and effectiveness of the process in respect of compliance with residential construction under the planning & development acts and also provide for the automatic inclusion of Biodiversity within its ambit going forward.
		Trees lost to development should be replaced by an equivalent no. of trees.
		<ul> <li>The loss of trees from granted permissions has resulted in the loss of tons of sequestration as they have not been replaced.</li> </ul>

- Using the North Carolina State methodology KCC could have calculated the loss of carbon sequestering trees and replaced them so as to ensure a net neutral carbon impact.
- FORMULA Assuming a girth of between 30 inches 39.99 inches for these the 60 trees felled by the Local Authority for road widening for the Mariaville development, the yearly carbon dioxide sequestered is calculated at 2,687 lbs X 3.14 amounting annually to 8,439 lbs of carbon dioxide which is equivalent to 8.2 imperial tons of carbon dioxide.
- Formulation of a Tree Preservation & Replanting Policy: The destruction of the trees on the Moyglare Road to facilitate the Mariaville development reiterates the urgency for formulation of a tree preservation and replanting policy along the lines of the model developed by Fingal County Council and such desirability and necessity should be reflected in the Development Plan (2023 2029)which should also include the pursuit or a mandatory and obligatory process for calculation of the annual sequestration level of carbon dioxide lost in the planning process, together with imposition of conditions attached to planning permission granted for replacement by an equivalent amount of carbon dioxide by the replanting of trees, preferably within the confines of the development for which planning permission has been granted.
- Formulation of a Biodiversity Net-Gain Policy: There is necessity for formulation of Biodiversity Net Gain Policy of 10%, and inclusion of a reference is essential in the Development Plan (2023 2029) to the desirability of such proposal.
- Prohibition on Planting of Laurels as Replacement for Trees and-Hedgerows
- Provision of 'Planning Quadrants' as a Prerequisite for Planning Permission for Residential
  Developments: The inclusion of a reference to the desirability and necessity for the provision of
  planning quadrants in the planning process is essential going forward, such as the small shopping
  complex in Beaufield, Maynooth, since this process would contribute to the alleviation of traffic
  congestion in towns such as Maynooth due to the availability of services locally for residents.

- The principle of the Deich Nóimead Policy would transform the re-generation of towns and villages throughout the county, since residents could conduct business in the post Covid era with the likelihood that greater working from home will become the norm by walking or cycling 10 minutes from their private residences.
- Lack of Coordination & Consistency with Development Legislation: It is recommended and advocated
  that a task force should be established under the aegis of the Minister for the Environment, Climate
  Change & Communications to reduce, avoid and eliminate excessive sub-optimisation, fragmentation,
  unnecessary duplication and diffusion of responsibility resulting in major conflicts of interest between
  the Wildlife Acts / Forestry Acts / Planning Acts.
- The Plan contain a commitment that prevailing legislation which inhibits the Local Authority in execution of its statutory duties and responsibilities in an efficient and effective manner will be drawn to the attention of the relevant Government Department for appropriate attention.
- Commitment & Implementation of Pollinator Plan: The Development Plan should contain a reference to the measures been taken by Kildare County Council to tackle lack of Commitment and Implementation of the Pollinator Plan.
- Sustainability & Transport: Needs to contain a commitment for the availability of computerised models of proposals for cycle and walking routes on the website of the Local Authority to create greater awareness and information for citizens to greatly facilitate submissions and comments.

## **Strategic Policy on Problem of Dog Waste**

• Should contain a commitment for formulation of a strategic policy to tackle the problem of dog waste, including provision and erection of specifically designed bins for collection of dog waste at locations throughout the county where there are persistent problems and risks to public health.

## **Customer Service Needs to be Improved**

		<ul> <li>The residents association is obliged to submit correspondence in writing rather than meeting directly (or though Zoom) with Kildare County Council (on issues relating to problems with the planning process is grossly unsatisfactory. This effectively results in denial of countervailing power and exercise by citizens of their democratic rights in tackling the problems posed by unscrupulous and recalcitrant developers.</li> <li>The Bonding Process should contain Specific Timelines and if these cannot be met then the KCC should be a contained to the container of the container of the container.</li> </ul>
		have automatic recourse to the security so as to arrange completion of works by a third party contractor.
73.	Maynooth Tidy Towns	Asking Kildare County Council to become a leader in Climate and Biodiversity Action, and to show the commitment and leadership needed to tackle Climate Change and Biodiversity Loss, Observes that the All Ireland Pollinator Plan has been a great success because there are clear, measurable targets and guidelines that can be implemented by all stakeholders regardless of scale.
		The lesson for KCC is that we must create a new CDP that is fit for purpose and that:
		Sets clear measurable and realistic targets.
		Ensure timeframes for completion of works and plans are outlined.
		Provides information on the Departments in KCC responsible for implementing each aspect of the Plan.
		<ul> <li>It is clearly documented in the Plan the areas that are outside the control of KCC or governed by other National or EU legislation.</li> </ul>
		Public are provided with regular updates and progress reports on the Plan.
		Where shortfalls in implementing the plan arise that public are fully appraised as to reasons why targets are not being met.

• Sets realistic and enforceable penalties for non-compliance with requirements set out in the plan particularly in relation to construction development.

#### **Healthy Placemaking: People and Places**

- Every town and village in Kildare should have centrally located supported independent housing facilities for our elderly community in close proximity to a day care centre, e.g. the elderly housing in Maynooth by transferring some of the costs of providing these services to the developers as requirements for planning permission.
- Ad-hoc building should not occur.
- Greater permeability through estates and other areas is needed to encourage more walking and cycling and promoting the "10-minute town" for walking and cycling.
- KCC need to adopt "Streets are for People" policy by promoting more car free days in towns and villages and providing for more outdoor dining areas in Maynooth.
- KCC need to make it more expensive to hoard land or buildings particularly on Main Streets. Such sites should be converted into flexible remote working hubs or pop up zero waste shops.
- Need to promote a healthier and more active lifestyle; KCC should implement a policy that requires developers to include multiple areas for community gardens and orchards within new estates.
- Covid shows that KCC must adopt a policy for the provision of serviced open green spaces of every town and village in the county. The benefits of the green and blue to our mental health and general wellbeing are well documented and cognizance of this must be acknowledged and acted on by KCC.

## **Economic Opportunity: Innovation, Enterprise and Employment**

- Promote environmentally sustainable jobs which provide our young people with decent livelihoods.
- Provide financial support for start-ups in terms of removing/reducing commercial rates for the first two years of trading for certain businesses e.g. vegetable shops, local produce, organic foods, shoes, clothing, and crafts.
- Actively promote and translate the benefits of shopping small and shopping locally to the public.
- Actively promote and translate the benefits of locally produced, affordable and sustainable food models.
- Again, promote the "10 Minute Town" for ease of accessibility.

## **Climate Action: Environment, Climate Change and Adaptation**

- Addressing climate breakdown and biodiversity loss needs to underpin every single part of the plan.
- We suggest developing a set of criteria or questions to measure every element of the proposed plan against, for example:
  - Is this element of the plan in line with our goals to combat climate breakdown?
  - How can it be improved or changed to help further with climate breakdown mitigation or adaptation?
- Suggest that the plan changes the wording throughout from "Climate Change" to "Climate Breakdown" or "Climate Emergency".

<u>Biodiversity</u> - In June 2019, Kildare County Council declared a climate and biodiversity emergency. Emergency implies immediate action to address the crisis, but this is not happening.

- Attention and that proper measurable targets are set and assessed on an ongoing basis to show that genuine efforts are being made to reverse the loss of our biodiversity.
- Will KCC make every effort to take account of the observations of the National Biodiversity Forum when drafting new CDP?
- Will KCC recognise that the measures outlined in the National Biodiversity Plan and the European Union's Biodiversity Strategy (2011) and which are cited in the current CDP are simply not working and biodiversity is continuing to be lost?
- There is nothing in the current CDP that would inspire confidence in the measures currently in place by KCC to protect and preserve biodiversity in our county.
- Need greater protection for trees, requiring tree felling licenses for the removal of mature, healthy trees in the community.
- Need greater protection for hedgerows design plans should incorporate these hedgerows and trees where possible. Protection of these features should be central and non-compliance should result in heavy enforcement penalties.
- It is of little conservation/biodiversity/heritage value to require developers to plant trees in replacement of existing hedgerows. Especially when a maintenance plan is neither required nor enforced.
- Planting should consist of local native plant types, indigenous to the area and of local provenance and be incorporated into the site to enhance biodiversity.
- A sufficient bond or cash lodgement should be required as part of the planning permission to
  encourage developers to protect trees, hedgerows and other natural features on site. And enforced if
  developer fails to meet requirements.

- It is vital that correct management and maintenance of hedgerows is enforced. Hedgerows are being cut inappropriately; branches broken because of incorrect use of machinery.
- Identify commons land throughout the county and provide access to it to communities. Kildare Co. to provide every town with space for allotments or community supported agriculture. Local sustainably produced food protects the global environment.
- The Council must plan for infrastructure which will enable increased cycling and walking to reduce environmental degradation from private cars.
- Review and update the Biodiversity and Heritage Action Plan to give due consideration to the protection and enhancement of biodiversity (as stated in the National Biodiversity Action Plan 2017-2021).
- Daily reminder of the Climate Emergency should be posted in the Council Offices.

### **Sustainable Mobility: Movement and Transport**

Emphasis should be on **enabling** rather that **promoting** active travel by:

- Providing adequate for purpose bike parking facilities at transport nodes and towns.
- Increase permeability for pedestrians and bicycles at adjacent estates.
- Unsustainable modes of transit will continue to be used due to size and rural character of county, however challenge is to increase walking and cycling up to 5km with walking and cycling infrastructure.
- Walking and cycling need to be infrastructure led.
- KCC must develop a Strategic Cycling Plan with targets and annual monitoring and reporting.

- Traffic calming measures in urban areas are needed and the speed limit reduced in the interests of safety of vulnerable users.
- Park and Stride facilities for children going to and from school should be located a reasonable distance from schools, and near church car parks or supermarkets and public transport nodes.

## **Creative Places: Social, Community and Cultural Development**

- KCC needs to undertake a full audit of facilities across the county to ensure that every town and village has properly serviced and meaningful sized community hubs.
- Ensure that all facilities are accessible to all.
- Safe youth facilities should be provided for socialising and interaction, including outdoor spaces for teenagers such as skate parks, playing fields.

## **Enhanced Amenity and Heritage: Landscape and Green Infrastructure**

- No reference to biodiversity loss is made in the Issues Paper published by KCC.
- KCC must credibility to its declared Climate and Biodiversity Emergency by employing suitably qualified biodiversity staff to review planning applications, enforcement planning requirements, achieve environmental education by developing a one-stop-shop on the Council's website of easily accessible environmental information on verges, hedgerows, watercourses, riparian vegetation, fens, bogs, marshes, marginal lands, meadows, recycling of hazardous waste, upcycling etc.
- This information could then be easily copied to create more localised awareness campaigns to promote good practice.
- KCC must ensure that all estates and lands under their control are actively.

		<ul> <li>Implementing biodiversity friendly measures, including implementing the actions outlined in the All Ireland Pollinator Plan.</li> </ul>
		Need to ensure that developers retain hedges and that sustainability objectives are central.
		Inappropriate cutting of and/destruction should be severely sanctioned and powers to do so increased.
		<ul> <li>Policy should require that developers provide green spaces, edible hedges, community orchards, retain mature trees, incorporation of bee and swift bricks in all new residential estates.</li> </ul>
		Native trees to be incorporated into hedgerows.
		All boundaries and perimeters, including industrial fencing to have native hedgerow planting.
		Hedgerows should be maintained at, at least 1.82m in height.
		A Tree Strategy for Kildare should be developed similar to that developed by Dublin City.
		Small woodland areas and copses should be planted across the county. KCC should make land available in every locality for such planting.
73.	Rosemary	Issues Raised
	Flanagan	General
		General
		Want a review of the CDP process.
		Need a review of existing Plan listing.
		<ul> <li>What's been achieved.</li> </ul>

- How do we know.
- Failures, what's not worked.
- What works well and what doesn't.
- What changes are needed.
- The Issues Paper key achievements is not considered a review of the Plan.
- It is not clear what, if any involvement the county may have had in shaping and influencing the NPF and the RSES.
- Not clear whether the county can go further and take greater measures than those outlined in the NPF and RSES if it believes these are required to address the issues facing us.
- Ensure the CDP and the LAPs identify not just what the Plan hopes will be developed, but is an actual fit for purpose plan identifying who is responsible for each action, when it will be achieved, how it will be achieved, what will achievement look like, how will it be measured and how will it be enforced.
- Public consultation is not working well. Many finding it very difficult to engage with the process so is not surprising we have seen little or no input from individuals in our communities. They are not experts and cannot engage knowledgably.
- The lack of a review of the existing Plan makes it difficult to engage with the new Plan.
- Request that KCC engage in a paid expert review of the Plan in climate science, biodiversity, renewable energy, sustainable land use etc.

- Some of the questions posed in the issues paper were difficult to address and do not instil confidence
  in the process and should be answered by experts or should already have been researched by the
  Council.
- Time required to read all 66 questions never mind carry out extensive research and prepare answers is an enormous barrier to engagement by the public, and volunteer community groups.
- Not an appropriate way to engage with community.
- To engage with community all submissions points should be answered comprehensively.
- All plans to be very specific and clearly articulate the actions being taken to achieve goals and targets.
- If KCC and the Plan is guided by the current Climate Adaptation Plan, then it will not be far reaching enough to achieve climate goals.
- It is difficult to tell if the goals and proposals in the Plan are under the remit of the Council or not:
  - I would ask that the council clearly identify where an action or proposal in the development plan is under council control or if it relies on others i.e. who is accountable?
  - For all items, both under council control or accountable by others, I would ask for the plan to specify exactly how the items will be monitored and managed.
- CDP should Identify in the plan where the underlying assumptions come from.
- The Plan should begin with the end in mind and plan for the end of the century.
- The County should develop a set of criteria informed by experts against which to test all parts of their plan.

- Suggest removal of all references to 'economic growth' from the plan and replacement with 'sustainable development' or other suitable wording.
- The plan places much greater emphasis on sustainable growth, social inclusion, just transition, quality of life rather than a life of consumption.
- In the context of the pandemic every element of the Plan and our ability to change should be examined.
- Has Covid and the responses we see given us an opportunity to radically change something we thought could never change?
- The CDP should consider how we prepare for future shocks to the system such as another pandemic and how we could encourage and build community resilience to help adapt and survive.

## **Healthy Placemaking: People and Places**

- Rural housing there should be very stringent criteria to be demonstrated to prove a genuine requirement for rural housing. Expansion of rural housing is not compatible with many of the goals around climate and biodiversity. Rural housing should be developed as communities.
- 10 Minute Towns Need to identify how this will be done underpinned by a plan and not a vision with targets, budgets, community involvement and accountability.
- All planning permissions should to have strict enforceable conditions around all areas relating to Climate and Biodiversity.
- Development should not be developer led.
- The Council should impose strict requirements for: best practices for building a community, best practices for multigenerational communities, efficient use of resources.

- BER should be achieved with the initial premise that the residential and business development will be energy self-sufficient and this should be conditioned.
- Currently throughout Kildare we see developments being built which are not climate proofed, are not built to current best practice, have no natural flood management systems installed, and are currently ripping out hedgerows and destroying habitats.
- Development Management Standards around building regulations and development infrastructure and biodiversity preservation are contravened on a regular basis. If bonds from developers were increased would this improved enforcement.
- Need to provide housing that is attractive, practical, and viable and should:
  - Have storage spaces for sports equipment.
  - Feature shared facilities and equipment.
  - Empower and involve people.
  - Provide sufficient open spaces/ green areas. Give residents autonomy over these.
  - Gradually change the model of housing estates and developments so that they are managed by a co-operative of the owners/tenants and all know their rights and responsibilities.
- Vacant site legislations should be pursued as it is currently not being enforced or implemented.
- Greenfield planning permissions should only be allowed when brownfield sites have been discounted.
- Capital allocation of infrastructure needs to be examined.

- Kilcock does not have the infrastructure to cope with current demand never mind the expansion.
- Kilcock needs a cross border LAP to include Meath.

## **Economic Opportunity: Innovation, Enterprise and Employment**

- Need to carry out review of County in terms of resilience and identify risks in terms of sustainability under headings of energy, food, water, employment, cultural, social, employment, infrastructure, human skills and expertise, health of community, engagement of community, capacity of community, preparedness, cohesion and cross community links.
  - This can then be analysed in terms of threats and opportunities.
- Support circular economy, green tourism, repair cafes, zero waste stores, and create a full-time position for a Circular Economy Development Officer.
- Zero rates on businesses that are set up for sustainability.
- Protection of on-street shopping in towns should be encouraged through the development of all the derelict buildings in the town centres.
- Introduce rules to make it easier for sustainable businesses to set up, and to make it harder for non-sustainable ones.
- Tourism Community has many ideas and they just need to be empowered and enabled, e.g. Kilcock community Gardens linked by a walking trail.
  - Relying on community alone is not appropriate therefore paid coordinators should be employed with a brief to create resilience in the community, empower the community and facilitate community activation and agreed projects.

- Need to look at industries in the County and assess them against standards required for sustainability, circular economy, social justice. Example would be meat plants and distribution centres where employees are poorly paid and are often migrant workers who are treated very poorly.
- Help farmers to see that they have a role to play in the Climate Emergency promoting less
  intensification, and incentivising methane capture from slurry, paying for herd reduction, monitor
  fertiliser and pesticide use and employ an operative to oversee this, incentivise farmers to grow own
  feed, beans etc from non-GMO sources and to set aside land to act as a carbon sink.

### Climate Action; Environment, climate change and Adaptation

- Addressing climate breakdown and biodiversity need to underpin every single part of the plan.
- Need to develop a criteria list to measure every element of the Plan against so as to achieve climate-proofing.
- Instead of 'climate change' the Plan should refer to 'climate breakdown' or 'climate emergency' to accurately reflect the urgency of the situation.
- Improved public transport.
- Encourage the set-up of 'not for profit' businesses like Community Supported Agriculture where the
  people involved get a living wage. Encourage these by reducing costs, rates and other barriers to set
  up.
- Provide grants to businesses that set-up sustainable businesses, e.g. shared car schemes.
- Identify where our carbon emissions in the county arise from and target these areas first.

- Tying targets back to commitments made in other plans e.g. Reducing CO2 and other emissions in the county by 40% by 2030 per the Climate Adaptation Strategy.
- High speed broadband and initiatives like rent a desk to allow working from home.
- Support / campaign national government for lower speed limits.
- Re-wetting peat lands.
- Need sustainable Land use.
- Increase broadleaf forestry, manage forests, no more clear-felling.
- Protection of flood plains and no building on flood plains.
- Ensuring sustainable drainage works.
- Encourage more tree and shrub planting in towns and on verges.
- Invest heavily in the conservation of insect life (Ireland is losing insect species at the highest rate in the EU).
- Reduce or carefully manage the dredging of rivers.
- Mitigation measures to be included in developments.
- Employ experts on biodiversity and planning to inform the policies and plan.
- By protecting those parts of our environment that are most useful as carbon sinks and habitats for biodiversity.

- Bogs are of utmost importance the first aim for all bogs in the county should be to rehabilitate them.
   Other use for bogs should only be considered where it has been established conclusively by experts that this alternative use will give better results for our climate and biodiversity goals.
- Make it a condition of Payment to Residents Associations for Grass cutting and upkeep that they have to commit to KCC or submit to KCC their agreement with landscaper which needs to include 1) a commitment to not use any glyphosate or other pesticides, herbicides.
- Plan to reduce mowing / create wildflower meadows.
- Lack of dark spaces due to development is affecting biodiversity. The replacement of street.
- Educate public about lighting many householders leave very bright external lights on all night.
- Support air quality monitoring and reporting throughout the county.
- Education of our horticulture and landscapers.
- Support the biodiversity plans developed by Heritage office / Green Pine Consulting for 10 towns in the county, and more to be developed this year. This could be supported by:
  - Having a full-time biodiversity officer to engage with the local community organisations
  - Communicating with organisations, clubs, businesses, and schools in the community to create awareness of the biodiversity plans.
  - Council grants (if any going from council to local organisations) to organisations to include conditions around implementing biodiversity plans.

- Carbon credits available for organisations and businesses that implement biodiversity measures. This may be one for council to put forward to national government.
- Licence required for felling trees, enforceable and with large penalties for infringement.
- Plant trees properly Staking young trees is generally unnecessary.
- Identify commons land throughout the county and provide access to it to communities.
- Extend rights and recognition to non-humans: bogs, trees.
- KCC to give either council land or organise to lease land in every town for allotments or community supported agriculture or both.
- Collaborate with the regenerative farming movement and identify how Kildare agriculture stakeholders can move more towards supporting biodiversity. Provision of education perhaps through KWETB.
- Investigate use of energy efficient lighting that is less bright.
- Public buildings are now lit up all night. Change these to be motion sensor lighting.
- Investigate if motion sensor lighting could also be done for lighting on motorways.
- All KCC land should become ARKs based on the Mary Reynolds model. See wearetheark.org for information.

## **Sustainable Mobility: Movement and Transport**

• Slow down the traffic on the streets in towns to make them safer.

- Safe secure bike parking at railway stations (there is none in Kilcock Railway station), and in the towns.
- Increase permeability between existing and new estates via planning condition.
- Coordinate with residents to overcome obstacles to increased permeability.
- Hierarchy of goals would be useful, e.g. climate and biodiversity take precedence over say fears about anti-social behaviour.
- Preface all communication about planned changes to streetscape with the overarching objective of Climate Breakdown mitigation.
- More electric vehicle charging points at car parks, GAA grounds etc.

#### **Creative Places: Social, Community and Cultural Development**

- Education for existing inhabitants and new inhabitants. To cover their rights and responsibilities, how they can interact with their community, have a say in local community and county wide, information about habitats in their area, and their responsibilities for them, information about active transport, renewable energy choices.
- Revitalise town centres by providing pedestrian space and market/cultural event space.
- Community empowerment strategies to increase community interaction, engagement and self-efficacy.

## **Enhanced Amenity and Heritage: Landscape and Green Infrastructure**

		<ul> <li>Conditions in all planning approvals that for every square meter of land built on a certain percentage of land needs to be provided in that development for biodiversity following guidelines like the All Ireland Pollinator plan.</li> <li>Need to ensure that quarries/extraction do not damage built and natural heritage as they are not</li> </ul>
		sustainable.
		Making it happen: Infrastructure, Energy and Communications
		Sell smart meters cheaply to homeowners & incentivise a 10% reduction in electricity usage.
74.	Andrew Griffith	Introduction
		Housing design needs to consider specific needs of residents with Dementia.
		Development Management Standards should include universal design guidelines to address such issues as outdoor spaces, signage, transport etc.
		Placemaking: People and Places
		Encouraging the Delivery of multi-generational housing schemes
		<ul> <li>Proposed amendments - Requirement to identify the optimal locations for age friendly housing throughout the County,</li> </ul>
		Housing needs to cater for all age groups and all housing needs and it needs to be fully accessible
		With reference to existing policies we wish to see them amended as follows where the underlined text is additional:

- SN 2 Support the provision of accommodation for older people in established residential and mixed-use areas that offer a choice and mix of accommodation types to older people for independent living, semi-independent living, and assisted living where additional facilities can be established to accommodate the various levels of dementia care, in conjunction with healthcare providers and approved housing bodies.
- SN 3 Provide for and facilitate the provision of accommodation to meet the needs of older people and to encourage the provision of a range of housing options for elderly persons in central, convenient, and easily accessible locations and to integrate such housing with mainstream housing. In addition, locations that may be appropriate for the health and wellbeing of elderly people may be considered and assessed on their merits and consideration given to what ancillary facilities will be delivered as part of the development, in conjunction with healthcare providers.
- Need for better designed nursing homes that incorporate adequate outdoor spaces.
- Age friendly housing and the support services should be included in both the "Allowed in Principle" category, and the "Open to Consideration" category.

### **Creative Places: Social, Community and Cultural Development**

- Regarding the transition from independent living to nursing home care both forms of accommodation provided on a co-location basis in conjunction with healthcare providers, such as the HSE and with appropriate Approved Housing Bodies.
- There is a need for step down, convalescent and transition care as well as specialist long term dementia care.
- 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.

		<ul> <li>Nursing Carer Facilities - All future Nursing Care facilities should be delivered with, associated dining,</li> </ul>
		living, communal areas, ancillary clinical and nursing care rooms within the development. Safe and secure gardens need to be incorporated into the site.
		Day centres should be located close to Gerontology Centres.
		A Training Facility for Healthcare Assistants should be also be established in association with the HSE.
75.	Bru na Riogh Residents	Sustainable Transport
	Association	Naas Inner Relief Road was a roads priority in the KCDP 2017-2023.
		Defeated by a democratic vote.
		<ul> <li>Decision must be upheld, inclusion in the CDP flies in the face of the democratic vote of the Naas MD in June 2019.</li> </ul>
		<ul> <li>The Naas Racecourse should be preserved as the 'Green Lung' portion of the town, for recreational purposes.</li> </ul>
		<ul> <li>The submission requested the CDP includes and objective to provide for an outer ring road for the eastern/north-eastern side of Naas which should not traverse of cut through existing residential areas. It is recommended that this objective replace the IRR road for Naas.</li> </ul>
		This would be consistent with MT 15, which seeks to channel HGV traffic associated with landfill and extractive sites onto the regional and national road networks insofar as possible.
		Sustainable Town Centres

	<ul> <li>In line with the Retail Guidelines the CDP should include a provision whereby development of over 1,000sqm should be prohibited outside the centre of Naas.</li> <li>No sites should be zoned as district centres, as unsuitable for towns of the scale that are encountered in Kildare.</li> <li>Town centres should be specifically identified in Key Towns, Self-sustaining growth and Self-sustaining towns.</li> <li>The County Development Plan should make it clear that all comparison retailing, and all but local convenience retailing ((i.e. up to no more than 1,000 sq. metres gross.</li> <li>floorspace) is not permitted, whether by new build or by conversion, in any retail warehousing development.</li> </ul>
76. Kevin Greene	<ul> <li>Monread has done huge damage to Naas Town Centre.</li> <li>Recreational</li> <li>It is essential that the Kildare Plan include provision for additional recreational facilities to meet the demands of the growing population in the Naas Municipal District.</li> <li>Following the Greenway along the Canal there is a need to incorporate the inclusion of a Blue Way and further facilities linking the Kirdiffstown Park and Sallins Park.</li> <li>Specific provisions for the wider sporting community should be prioritised for KCC across the County &amp; should be set a short-term target within the CDP.</li> </ul> Linkage with RPGs

- RPGs identify opportunities for growth along the M7 corridor, but it is unclear how current zoned lands would meet the maximum recommended growth.
- In the event there is excess zoned lands the CDP should include provision to dezone some of these lands.

#### Osberstown Waste treatment plant and constraints on growth

- Facility is near capacity and is not capable of taking greater demand as it is close to capacity from the additional housing already planned for Kildare and Newbridge.
- The Liffey further downstream provides drinking water for North Kildare and Dublin under the WFD and must meet drinking water standards.
- Due to this constraint there is a finite limit to the amount of residential development and commercial/industrial development that can be accommodated in Naas (and Newbridge, and all the other towns and villages discharging to the Liffey via the Osberstown waste water treatment plant).
   This must be taken into account in the new county development plan in terms of population allocations for those towns.
- The population allocation to Naas is unbalanced w. development to Naas (where the constraint of the Osberstown waste water treatment plant and the consequent impact on drinking water status for the Lower Liffey does not appear to have been realised, or taken into account).
- It is most important that this issue is rectified transparently so that the population allocations for Naas (and Newbridge, as well as the smaller towns which discharge via the Osberstown waste water treatment plant) are limited to the ultimate capacity of that treatment plant.
- May require rezoning of existing zoned lands.

		<ul> <li>All of this has implications not just for the rational planning of Naas and Maynooth.</li> <li>Also has implications for the SEA and AA processes, to which the entire procedure for the preparation and adoption of statutory development plans is subject.</li> </ul>
		Compliance with National Policy regarding National Roads
		<ul> <li>In Naas it is essential that the observations of the Planning Regulator, 31 May 2019, made in respect of the earlier Draft Plan for Naas (withdrawn following receipt of the views of the Regulator who objected, inter alia, to provisions for expansion into the North West Quadrant) are taken into account in identifying areas suitable for development.</li> </ul>
		<ul> <li>The development of lands for residential purposes in the northwest quadrant of Naas, proximate to the N7 and in particular the new N7 interchange would be directly contrary to the Planning Regulator's Opinion. Such zoning would therefore be contrary to national policy in relation to spatial planning and the national roads network.</li> </ul>
77.	Emma Hannon	<ul> <li>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 Councilllors in June 2019. An outer ring road objective for Naas should be given priority in the County Development Plan.</li> </ul>
78.	Eileen Keogh	<ul> <li>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 Councilllors in June 2019. An outer ring road objective for Naas should be given priority in the County Development Plan.</li> </ul>

79.	Pat Keogh	<ul> <li>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 Councilllors in June 2019. An outer ring road objective for Naas should be given priority in the County Development Plan.</li> </ul>
80.	Helena Hearne	<ul> <li>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 Councilllors in June 2019. An outer ring road objective for Naas should be given priority in the County Development Plan.</li> </ul>
81.	Teresa O'Neill	<ul> <li>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 Councilllors in June 2019. An outer ring road objective for Naas should be given priority in the County Development Plan.</li> </ul>
82.	Cllr. Noel Heavey	KCC should provide two serviced sites in the Kildare Newbridge and Clane Maynooth MDs and one site in each of the other MDs. The Housing SPC should bring forward best practise models to provide an opportunity to build a home at a reasonable cost.
		<ul> <li>There is a critical need to provide a facility for the non-sporting creative needs for young people in Newbridge, particularly for mental health purposes.</li> <li>A relief road and second bridge in Newbridge must be brought forward as a matter of urgency.</li> </ul>
		<ul> <li>Strategic investment is required in sustainable transport for Newbridge-Athgarvan corridor to make walking and cycling an option for students getting to school.</li> </ul>
83.	Noel Heavey, Pat O'Mahoney, Tony Harte, John	<ul> <li>KCC should now undertake a feasibility study to establish a Research Institute as part of the public realm development at St. Conleth's Square / Bord na Mona Complex Newbridge. If feasible, this should</li> </ul>

	Grogan, Ger McNally	be planned for 2023. The Institute should be a collaboration between third level education, state agencies and private sector. It should research how farmland/peatland can be transformed in accordance with the Department of Agriculture, Food and the Marine's 'Ag Climatise- A Roadmap towards Climate Neutrality'.
84.	Noel Heavey and Pat O'Mahoney	<ul> <li>The Development Plan needs to comprehensively incorporate planning for ageing in relation to housing, public transport and social &amp; health services. McAuley Place in Naas is a good example. Sites in central locations should be zoned with senior citizen's housing needs in mind. Processes should be put in place to ensure senior citizens can interact with the community.</li> </ul>
85.	Michael Grogan	<ul> <li>Objects to the proposed Naas Inner Relief Road objective in Table 6.1 of the current CDP, which is a 30 year old proposal and is out of date. A new policy should be included to provide an Outer Ring Road for the Eastern/North Eastern side of Naas linking the Blessington Road with the Dublin Road. This new objective would be consistent with Objective MT15 which seeks to channel HGV traffic onto regional and national roads.</li> </ul>
86.	Jacinta Gale	<ul> <li>The Naas Inner Relief Road should not be included in the new CDP as it was defeated by a vote of the Naas MD in June 2019. This objective in Table 6.1 of the current CDP is a 30 year old proposal and is out of date. A new policy should be included to provide an Outer Ring Road for the Eastern/North Eastern side of Naas linking the Blessington Road with the Dublin Road. This new objective would be consistent with Objective MT15 which seeks to channel HGV traffic onto regional and national roads.</li> <li>The Naas Sallins Greenway is welcome. Linkages between Kerdiffstown Park, the planned park at Sallins, the Greenway and the canal to Digby Bridge may bring value for cycling, walking and running.</li> <li>A policy should be included in the Plan whereby all comparison retail developments and all but local convenience retailing (up to 1000sqm) should be prohibited outside of the centre of Naas. No sites</li> </ul>

		<ul> <li>should be zoned district centres, as defined in the Retail Planning Guidelines, given the impact of Monread Shopping Centre which has damaged retailing in the town.</li> <li>Town centres should be mapped in LAPs and include within the boundaries land where there is potential for regeneration in the town centre (e.g. South Main Street and Canal Harbour in Naas).</li> <li>'Living over the Shop' incentives should be offered for Naas town centre to encourage revitalisation.</li> </ul>
87.	Angela Cawley	<ul> <li>The Naas IRR was a priority in the KCDP 2017-2019 and was defeated by a democratic vote of the Naas MD in June 2019. The democratic decision must be upheld. Including it in the CDP flies in the face of the democratic vote.</li> <li>The Gallops Avenue that like its predecessor the Naas IRR will move thousands of vehicles close to quite mature residential estates.</li> <li>Congestion will merely move from current traffic junctions to the new proposed junctions at The Gallops, Tipper Road and Sunday's Well.</li> <li>The Naas Racecourse should be preserved as the 'Green Lung' portion of the town, for recreational purposes.</li> <li>The now defunct Naas IRR / Gallops Avenue is an approx. 30-year-old proposal out of date.</li> <li>CDP should include an objective to provide for an outer ring road for the eastern/north-eastern side of Naas which should not traverse of cut through existing residential areas. It is recommended that this objective replace the IRR road for Naas.</li> <li>This would be consistent with MT 15, which seeks to channel HGV traffic associated with landfill and extractive sites onto the regional and national road networks insofar as possible.</li> </ul>

88.	Philip Cawley	
88.	Fillip Cawley	<ul> <li>The Naas IRR was a priority in the KCDP 2017-2019 and was defeated by a democratic vote of the Naas MD in June 2019. The democratic decision must be upheld. Including it in the CDP flies in the face of the democratic vote.</li> </ul>
		The Gallops Avenue that like its predecessor the Naas IRR will move thousands of vehicles close to quite mature residential estates.
		<ul> <li>Congestion will merely move from current traffic junctions to the new proposed junctions at The Gallops, Tipper Road and Sunday's Well.</li> </ul>
		<ul> <li>The Naas Racecourse should be preserved as the 'Green Lung' portion of the town, for recreational purposes.</li> </ul>
		The now defunct Naas IRR / Gallops Avenue is an approx. 30-year-old proposal out of date.
		<ul> <li>CDP should include an objective to provide for an outer ring road for the eastern/north-eastern side of Naas which should not traverse of cut through existing residential areas. It is recommended that this objective replace the IRR road for Naas.</li> </ul>
		This would be consistent with MT 15, which seeks to channel HGV traffic associated with landfill and extractive sites onto the regional and national road networks insofar as possible.
89.	Fianna Fail Members	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.
		<ul> <li>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 priority and highlight those for delivery within the timeframe of the plan.</li> </ul>

• 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.

### **Healthy Placemaking**

- A matrix of infrastructure should be prepared and managed by the Council that encompasses hard and soft infrastructure, using an inter-agency approach, that should establish a baseline standard that must exist in advance of development.
- Policies that support higher levels of design in creating attractive living environments should be included.
- Minimum space standards for dwellings need to be reconsidered in recognition of working from home.
- The plan should include polices that support the reuse of town centre spaces/underused buildings into use. Council could acquire some buildings, or through the housing capital programme advertise for a turn key development specifying a town centre derelict site.
- We should lead the way to achieving higher residential densities and reimage the use of height to delivery high end living spaces (a 'Z' zoning is suggested). Height restrictions should be removed from key sites and invite bold innovative design to encompass mixed uses. Apartment living should offer comparable advantage to 3 bed semis.
- The number of one bed units in all developments should be minimised as they are very restrictive.
- A dedicated cross party group of members working with officials needs to be established before Q3 to scope out a reasonable, consistent, fair and sustainable set of policies to realise rural housing objectives. Policies RH9 and RH10 should be removed from the CDP.

- The Plan needs to devise policies that will deliver integrated diverse communities where all socio economic, cultural and intergenerational members of the community are catered for in all settlements.
- Housing for Older generations needs to be a key consideration of the CDP. Specific zoning for this should follow into the LAPs, at the heart towns where services and amenities re located. Appropriate co-location should also be considered to promote intergenerational society and complimentary use of grounds.
- CDP should ensure SHDs are not permitted in inappropriate locations and where suitable that they are required to achieve very high levels of design.
- The plan should include policies to delivery serviced sites in rural locations on within settlements, subject to owner occupier permission.
- Regard should be had to the happiness index of residents of County Kildare.

#### **Economic Opportunity**

- The recently adopted economic strategy should be the blueprint for this CDP.
- We need to set a goal to reduce commuting times and improve the working and living ratio for the County.
- Post Covid, we should support work space hubs/housing that accommodates working from home.
- We need to plan beyond 2029. In a competitive global economic, it is valuable to become a recognised centre of excellence in a particular field.
- Where light industry is relocated from Dublin, we should consider opportunities associated with this. Active promotion of sites for this market and policies to support this should be included int eh plan.

- The Enterprise and Employment zoning objective should have a more nuanced matrix of land use based on density and value of employment.
- A key priority objective should be the comprehensive delivery of broadband across the County.
- We must facility the delivery of education infrastructure. The CDP should develop policies that inform LAP decisions for location and quantum of educational infrastructure. We must continue to strengthen our links to 3rd level and KWETB. Explore R&D links in driving progressive educational programmes.
- Continue to grow economic hubs (Merits, Equine, Food).
- Capitalise on Primary Defence Forces Military base.
- Review the potential to develop an inland port at junction of Cork/Limerick/Waterford routes at Cherryville, Kildare.
- We should foster the SME sector as a priority. The LEO should be supported by a dedicated planning officer to assist in engaging investors and operators.
- The Council should identify a pilot where a small medium town will operate as a co-operative of independent retail outlets limiting the number of chain/franchise outlets. This could be a USP for the town and as asset for tourism.
- The CDP should identify optimum levels of retail space and retail zoning for various levels of settlements. Policies should encourage the reuse of retail for other uses. Private owner occupied residential units in our town centres would bring additional vitality.
- Policies for Big Box Retail/Multiples should have regard to the sequential approach and the capacity to shift the retail dynamic of a settlement. The out of town centre is undermining the primacy of our town centres. Town centre brownfield sites should be zoned for this use.

- Tourism policies should aim to improve bed night supply in the County. A pilot for reuse of town centre spaces into micro hotels should be considered. We should capitalise on our county attractions; support high end hostels in appropriate locations; continue to strengthen tourism related activities; support national/international destination events; capitalise on links to equine and 3 racecourses within the County; develop an Arts and Crafts Hub.
- We should be more amenable for licensing large scale national events.

#### **Climate Action**

- The CDP should include policies to fast track our climate adaptation plans. A review of the Development Contribution Scheme should be considered to incentivise developers.
- CDP should support reuse and recycling of waste. Big box retail should be obliged to deliver bring centres. All public bins should facilitate segregation of waste.
- Public open spaces should be designed to mitigate dumping potential.
- We should have ambitious tree planting targets as a proportion of our population, to be delivered on site or in levy format. Also replanting forests.
- Transition from fossil fuel energy use in domestic dwellings requires some considerations in house design.
- Reducing car dependency and smarter settlement design will are valuable means of achieving climate action targets.
- There should be an ambitious roll out of car charging points.
- CDP should promote rainwater harvesting, minimise waste of water and protect use of processed water. Our reliance on the Liffey should be considered within the Core Strategy.

- Examine potential to deliver more municipal swimming pools, using alternative energy resources, potentially through a PPP under social responsibility.
- Harness agri/equine sector potential in mutually beneficial activities for climate adaptation.
- To include an objective 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.

# **Sustainable Mobility**

- Traffic studies should be mandatory for LAPs, and the CDP should include this as a policy.
- An inter-county and an improved rural public transport network are required.
- More one-way systems will provide more space for pedestrians and cyclists. There should be more 'shared spaces' in town centres to reduce car dominance.
- All bus stops should have a shelter. All bus stops should be subject to planning permission. Public and private stops should be shared. Bus spaces for out buses should be provided in towns with tourism attractions.
- EV charging points should be provide as a ratio of population at convenient locations.
- Consider park and ride facilities at larger private spaces (e.g. Racecourses, motorway service stations).
- Examine with Irish Rail more customer friendly train station locations and facilities. Work with tourism outlets to see rail liens used more during off peak times. Establish better links with Irish Rail. Work towards an extra track from Houston to Kildare/Monasterevin. Deliver Dart service throughout the County.
- Review locations of taxi ranks across in the County in conjunction with age friendly programme.

- Prioritise delivery of relief road in Athy.
- All tier 1 and tier 2 towns have outer and inner relief routes protected for delivery.
- An inland port at Cherryville should be delivered.
- Priority safe parking should be provided for public transport at schools, park and stride locations.
- Medical facilities should be located where readily accessed by walking.
- Large surface car parks should be avoided in preference for multi storey. Large free car parks at the edge of town will undermine town centres.
- Brown space should be identified in towns for multi-storey parking, identified in LAPs and zoned to protect for this purpose.
- Identify appropriate locations for sustainable motorway service stations.
- Include objective to deliver second bridge in Newbridge.
- Include policies to deliver cycleways and walking routes throughout the County.

#### **Creative Places**

- Development should only get permission subject to deficits being adequately addressed.
- There should be zoning for childcare and retirement centres in optimal locations. Co-location of retirement and pre school centres is complementary. Creche facilities should be considered on new school sites also.
- Run a pilot project for a public private retirement village.

- Retirement facilities should be convenient to services for residents.
- Community clubs should be encouraged to use shared facilities.
- Include an objective to support delivery of a County GAA centre of excellence for female players.
- Deliver recreational and amenity destinations in key towns.
- Investigate potential to link in with religious order across the County for projects like library in Dominican Church in Athy.
- Expand libraries to accommodate arts and crafts workshops and learning.
- The plan should support lifelong activity and sports for people of all ages and ability.
- A regional cultural centre of excellence dedicated for use by Youth should be established in Newbridge.
- Include an objective to establish a Research Institute in St. Conleth's Square, Newbridge.

# **Enhanced Amenity & Heritage**

- Or natural heritage needs to be protected, with stronger linkages through community organisations and schools.
- Develop a county signage programme for amenity.
- Proactive conservation assistance should be provided with a review of levies to help preserve built heritage.
- Promote 'adopt a building' initiative; engage with national agencies, educate.

- Provide incentives for businesses to reuse derelict buildings.
- Heritage Towns should have a more proactive approach to enhancing heritage, such as attractive signage, public realm, shop front grants.

# **Infrastructure, Energy & Communications**

- CDP should include an objective to establish a forum of infrastructural service providers that ensures good communications network, shared use of ducting.
- Data centres need to be appropriately located and should invest heavily in alternate energy resources and levied/rated accordingly.
- Plan should address legacy deficits of failing wastewater treatment plants in settlements and small rural developments.
- 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.
- Public buildings should be net contributors of alternative energy to the grid (e.g. solar).
- The agri-sector should be encouraged to energy renewables (e.g. Future Pigs, Nurney).
- We need to be clear which area of renewables is most sustainable and productive.
- Irish Water's business model has failed and should be resolved. A more equitable levy scheme is required.

		<ul> <li>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.</li> </ul>
90.	Eilish Kavanagh	This submission relates to sustainable mobility which requests a feasibility study to be undertaken to address four areas in Newbridge that will improve road safety.
		<ul> <li>Create a cycle lane and pedestrian walkway on the R416 (Miltown to Newbridge). This is a very busy and dangerous stretch of road for motorists, cyclists, runners, and walkers. It needs to be made safer to help to save lives, prevent accidents and injuries.</li> </ul>
		<ul> <li>Installation of Road Lighting on the R416 (Newbridge to Milltown). The lack of illumination on this road is alarming and a review of this is requested to improve road safety for users and increase visibility of roadside hazards.</li> </ul>
		<ul> <li>Traffic congestion at Byrnes Crossroad (junction near Sarsfield Football Club) has increased due to the recent and ongoing development of new housing estates in the area. This is particularly bad at peak hours and school times. The council should demonstrate how they propose to manage congestion at this junction once new developments are completed.</li> </ul>
		<ul> <li>There is a high risk for potential accidents around Scoíl Na Naomh Uílig due to congestion and obstructions on the road during drop off and pick up times for children. This has become an alternative route for road users accessing Newbridge as they try to avoid congestion on the R416 and needs to be addressed to avoid accidents and ensure the safety of children.</li> </ul>
91.	Larry & Ann Breen	The submission objects to proposed road called the "The Gallops Avenue" in Naas. Also referred to as the "Defunct Naas Inner Relief Road". It is stated that the proposed road is not a solution to the traffic problems in Naas and it is out of date and not fit for purpose.

		<ul> <li>Rather than solving any traffic issues it will only shift congestion to points along the proposed route at Blessington Road, Tipper Road and Dublin Road. This will be problematic for those living in estates along the route which include air and noise pollution, road safety and accessibility.</li> <li>Naas needs an Outer Relief Road and the "Gallops Avenue" proposal should be removed from the draft plan.</li> </ul>
92.	Michael Piare	<ul> <li>The submission objects to proposed road called the "The Gallops Avenue" in Naas. Also referred to as the "Defunct Naas Inner Relief Road". It is stated that the proposed road is not a solution to the traffic problems in Naas and it is out of date and not fit for purpose.</li> <li>Rather than solving any traffic issues it will only shift congestion to points along the proposed route at Blessington Road, Tipper Road and Dublin Road. This will be problematic for those living in estates along the route which include air and noise pollution, road safety and accessibility.</li> <li>Naas needs an Outer Relief Road and the "Gallops Avenue" proposal should be removed from the draft plan.</li> </ul>
93.	Clir. Anne Breen	<ul> <li>Objects to the proposed road reference 'The Gallops Avenue'.</li> <li>To reintroduce the road proposal under the guise of another name is both disingenuous and disrespectful to the public representatives who worked so hard on behalf of their constituents wishes to reject it in the first instance.</li> <li>Naas needs an Outer Relief Road.</li> <li>The road will only shift traffic problems and cause problems, for anyone living in estates along the route, air pollution, noise pollution, road safety issues and accessibility.</li> </ul>

94.	Kathleen Moran	Defunct Naas Inner Relief Road / The Gallops Avenue
		<ul> <li>The Naas Inner Relief Road was a priority in the 2017-2023 County Development Plan and was project rejected by the elected members of Naas MD following local elections in 2019 which effectively reflected the wishes of the electorate. To include such a proposal in the new Plan flies in the face of democracy.</li> </ul>
		<ul> <li>The Gallops Avenue was introduced by a non-statutory Naas/ Sallins Transport Strategy and follows an almost identical line as the defeated inner relief road project. It will move thousands of vehicles (including HGVs) to quiet residential areas and will not solve any traffic congestion in Naas. The strategy states the road will "relieve congestion on Main Street and the Dublin Road", however it is contended it will simply move congestion to new junctions.</li> </ul>
		<ul> <li>A considerable portion of the route traverses by Naas Racecourse and this area must be preserved for recreational purposes as it forms a "Green Lung" for the town.</li> </ul>
		• It is requested that the new Plan includes a specific objective "to provide and outer ring road for the eastern/north-eastern side of Naas, to cater for by-passing traffic, linking the Blessington Road with the Dublin Road close to the junction of the Dublin Road with the N7. This outer ring road will be so routed so as not to traverse or cut through existing residential areas, and which will provide a long-term development boundary to the east/north-east of Naas".
		Leisure
		The development of the Naas/Sallins Greenway is welcomed.
		Retail / Naas Town Centre

		<ul> <li>Large scale retail in peripheral locations has done considerable damage to on street retail in Naas. To support and protect on street retail in Naas the Plan should ensure that all comparison retailing and all but local convenience retailing (i.e. no more than 1,000m2 gross floor space) is not permitted outside town centres.</li> </ul>
		<ul> <li>Town centres should be clearly identified on maps in LAP's. Brownfield land where there is potential for regeneration can be included as part of the town centre but only when genuinely located in the town centre area.</li> </ul>
95.	Thomas Maguire	Housing for Older Persons (over 55 years) in Kildare
	(prepared by	TI
	Maguire &	The percentage of population over 55 years old will increase exponentially in the next 20 years.
	Associates)	Provision of specific policies to cater for this should be included in the new Plan.
		<ul> <li>Consideration should be given to the inclusion of housing for older persons in all residential land use in the county. 10-15% of residential land in each housing estate should be set aside for this age cohort. Development Management Standards must be amended to allow for this which include reducing car parking requirements, house size, private and public open space.</li> </ul>
		The advantages of doing this will include reducing housing costs, increased densities and improving the mix of residential units while allowing older persons to integrate into the housing estates.
		Zoning of land for Residential Use for Individual Sites in Kildare Towns
		<ul> <li>Having regard to the number of major employers in Kildare such as Intel, Kerry Group, Lidl, Queally Group, Pfizer, P&amp;G, IFS State Street and many others there is a clear need to provide individual sites for their workforce. There is also a need to provide individual sites for indigenous population of Kildare and this would help alleviate pressure for housing in the countryside.</li> </ul>

	T	
		<ul> <li>Many of the above employers are situated in the larger towns and it is suggested that other towns should also be considered for the zoning of lands to residential use for individual sites at the edge of these towns.</li> <li>Providing sites for individuals within towns should also be considered to allow individuals to purchase a reasonably priced site that allows them to build an affordable home that is designed to their own taste.</li> </ul>
96.	Hester McAllister	Gallops Avenue / Naas Inner Relief Road
		<ul> <li>The Naas Inner Relief Road was a priority in the 2017-2023 County Development Plan and was project rejected by the elected members of Naas MD. To include such a proposal in the new Plan flies in the face of democracy.</li> </ul>
		<ul> <li>The Gallops Avenue was introduced by the non-statutory Naas/ Sallins Transport Strategy and follows an almost identical line as the defeated inner relief road proposal. The strategy states the road will "relieve congestion on Main Street and the Dublin Road", however it is contended it will simply move congestion to new junctions.</li> </ul>
		<ul> <li>Part of the of the proposed new route traverses by Naas Racecourse. This area must be preserved for recreational purposes as it is a vital amenity for the locality and nationally. The Gallops Avenue proposal would separate this vital green area from the rest of the town.</li> </ul>
		<ul> <li>Support is given for the new Plan to include a specific objective "to provide and outer ring road for the eastern/north-eastern side of Naas, to cater for by-passing traffic, linking the Blessington Road with the Dublin Road close to the junction of the Dublin Road with the N7. This outer ring road will be so routed so as not to traverse or cut through existing residential areas, and which will provide a long-term development boundary to the east/north-east of Naas"</li> </ul>
		Infrastructure / Climate Action

		Providing Electric charging points in the towns of Kildare would be necessary in the future
		Creative Places / Economic Development
		Incentives within towns are necessary to prevent the decentralisation of retail from town centres.
97.	Cllr. Brian Dooley	Recreation and Amenity
		<ul> <li>As part of the development plan review Cllr. Dooley offers his support to the development of a second playing pitch and running track for Castledermot GAA which will benefit the town and future generations.</li> </ul>
		Serviced Sites
		<ul> <li>As part of the development plan review Cllr. Dooley offers his support to the council developing serviced sites on their lands that allows people to build affordable homes. This will strengthen towns and villages by having a positive feel of social inclusion.</li> </ul>
		<ul> <li>As part of the development plan review Cllr. Dooley offers his support to the development of serviced sites in rural villages across Kildare in areas like Ballyshannon and Calverstown. With rural one-off housing being difficult to obtain this will allow people build their own home while remaining part of their community. It is suggested that Pilot projects should be rolled out around the county with the council having input to ensure affordability.</li> </ul>
		<ul> <li>An area in Ballyshannon has been referred to that may support serviced sites which could support the local school as well as the community of Calverstown.</li> </ul>
		Rural Housing

		<ul> <li>It is requested that the council review policies RH9 and RH10 as they are far too restrictive and have serious consequences to the level of one-off rural housing objections. This has had negative ramifications for rural communities as well as those looking to build a home.</li> </ul>
98.	Matthew	Rural Planning Policy (land sterilisation)
	Madigan	
	(prepared by	The Planning Authority is asked to include a policy in its rural housing chapter, on the manner in which
	Farry Town	previously sterilised land is to be treated. The current plan does not address this issue and the council's
	Planning)	decision making has been inconsistent as a result.
		<ul> <li>Reference is made to a specific planning file for a dwelling on family land which was acceptable on many grounds but refused for the sole reason that the site is burdened by an historical sterilisation clause.</li> </ul>
		<ul> <li>This approach differed dramatically from several other decisions (numerous planning application file references / applicants are noted) all of which involved housing on previously sterilised land in the open countryside. To ensure consistency in decision making there is a need for the Planning Authority to clarify its approach to developments of this nature.</li> </ul>
		<ul> <li>Consistent with Government policy, which seeks to avoid the use of sterilisation agreements as a planning tool, the Planning Authority is asked to include a provision in the new Plan to the effect that permission will not be denied on the basis of a previous covenant of this nature in circumstances where no other planning objections exists to a proposed rural house.</li> </ul>
99.	Clanard Court	Healthy Placemaking: Core Strategy / Settlement Strategy
	Hotel and	
	Michael Fennin	The submission refers to land at Dubin Road, Athy. It is contended that Variation No. 1 of the Kildare
	(prepared by	County Development Plan 2017-2023 greatly understates the quantum of residential development
	Farry Town	needed in Athy and which can be accommodated in the centre. While the NPF promotes increased
	Planning)	

		<ul> <li>housing development in built up areas, the variation effectively reduced the number of dwellings which can be built in Athy.</li> <li>The Planning Authority is asked to apply the methodology in "Housing Supply Target Methodology for Development Planning – Guidelines for Planning Authorities" (December 2020). When doing so, it would be appropriate for the council to consider the following factors.</li> <li>The falling household sizes, when applied to the existing housing stock of the town (which would have the effect of these existing dwellings accommodating fewer residents)</li> <li>The fact that the 50% headroom does not take account of the phasing of residential land, as occurs in locations such as Kildare Town.</li> <li>The difficulty applicants are facing in securing consent for one-off housing in the countryside, which</li> </ul>
		in turn places greater weigh on nearby towns to overperform.
100.	David and Susan	Rural / Economic Development
	Sexton (prepared by Farry Town Planning)	<ul> <li>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.</li> </ul>
		It is suggested the following clauses in Table 10.3 should be omitted.
		<ul> <li>As a general guide, development proposals shall be limited to small-scale business development with a floor area at circa 200m2 and shall be appropriate in scale to its location.</li> </ul>
		<ul> <li>The proposed development shall be located on the site of a redundant farm building / yard or similar agricultural brownfield site.</li> </ul>

		<ul> <li>The Kildare countryside accommodates activities which service the local community and / or tourists / day trippers and provide valuable employment opportunities allowing residents of small towns and other rural areas to work locally without having to commute long distances.</li> </ul>
		<ul> <li>The criteria contained in Table 10.3 discourages new enterprise in the countryside and inhibits the expansion of existing operations.</li> </ul>
		<ul> <li>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.</li> </ul>
101.	Paul Stapleton	Enhanced Amenity & Heritage
		<ul> <li>The Greenways located along the Royal and Grand Canal provide a wonderful opportunity for an increase in boating and watersports.</li> </ul>
		<ul> <li>The infrastructure is not there to support the increasing number of barge owners on the canals, this needs to be addressed.</li> </ul>
		The following works should be carried out:
		<ul> <li>Increase the number of wooden jetties, for example a wooden jettie on the west side of the bridge in Sallins.</li> </ul>
		<ul> <li>Restoration of the existing infilled dry dock in Sallins as a location for boat owners to work on their boats.</li> </ul>
		<ul> <li>Bins, service blocks etc. would be welcome along the Greenway routes for walkers and cyclists.</li> </ul>
		<ul> <li>Look at the re-development of the Corbally and Mountmellick Lines of the Grand Canal for boat navigation and similar greenway development.</li> </ul>

102.	Joseph Neville	Sustainable Mobility
		The Transport SPC requests that the Development Plan should include the below elements of the workplan agreed by Transport SPC of Kildare County Council.
		Electric Vehicles – Plan for Electric Vehicle charging points.
		<ul> <li>Rural Public Lighting: Examine all issues in the context of the of the current requirement on KCC to reduce its energy costs in line with the EU Energy Efficiency Directive (2012/27/EU).</li> </ul>
		Access & Disability – Development of Accessible Public Realm Streetscapes.
		Permeability local – Permeability between housing estates and within towns.
		Cycling – Segregated cycleways both within and to all towns in Kildare.
		Transport links – Effective transport links across all towns in Kildare.
		Rail Network – Appropriate park and ride should be provided.
		<ul> <li>Bus Services – Increase capacity, work with the NTA, Bus Eireann and Dublin Bus in relation to identifying bus routes.</li> </ul>
		<ul> <li>Public Parking – KCC should review the policies around public parking in the context of urban renewal, cycling and pedestrian amenity with associated benefits to health and wellbeing, changing economic models and the transition towards a carbon-neutral societies.</li> </ul>
		Cycle and walking signage. Council should invest and roll out cycle and walking friendly signage.
		Greenway & Blueways – make them into thriving connections and tourist destinations.

		Road network and Congestion – Focus on road developments that allow us to reclaim town centres.
		Planning for Communities not Housing
		<ul> <li>Develop sustainable communities. Currently a lack of community facilities. Need to ensure that the local GAA, rugby and soccer clubs have the required space available. Especially towns and villages such as Celbridge, Leixlip, Maynooth and Straffan.</li> </ul>
		Infrastructure
		<ul> <li>Development Plan must account for infrastructure such as roads, wastewater and bridges etc. etc.</li> <li>Celbridge with one inadequate river crossing is an example of deficient infrastructure.</li> </ul>
		Heritage
		<ul> <li>Need to ensure that key Heritage sites such as the wonderful Barn, Tea Lane, Castletown House, The Oblisk are supported and protected.</li> </ul>
		Tourism
		<ul> <li>Development Plan must ensure that the county has a developed tourism plan to showcase our heritage sites. Greenways must also be promoted.</li> </ul>
103.	June Stuart	Enhanced Amenity and Heritage
		We are at a critical crossroads regarding our relationship with the environment.
		Celbridge
		Celbridge has a wealth of natural and built heritage.

- There is a need to identify and protect out outdoor spaces and enable and encourage healthy activity.
- The River Liffey is a vital part of the green infrastructure of Celbridge and should be specifically protected. The policies of 13.10.4.1 should be strictly implemented.
- Liffey Valley Park, Policy 14.12.7 of the KCDP 2017-2023 should be strengthened and advanced and would meet green infrastructure objectives as in 13.10.
- Castletown demesne has been a lifesaver for the duration of the pandemic.
- A river or natural park for Donaghcumper should be proposed. This could be linked to the north bank and would provide extra amenity for the growing population of Celbridge.
- No further population growth of Celbridge should be permitted without better infrastructure in all its aspects.
- Preserve the historic fabric of the main street of Celbridge by fully implementing the proposed Architectural Conservation Area.
- Celbridge Tourism and Heritage Forum has worked to highlight the assets of the town. A policy to further progress such initiatives is needed.
- KCC should have regard to the unique heritage of Celbridge and the policies of the County Development Plan should reflect this.
- Fully support the establishment of greenways, blueways and peatways but as these wait to be delivered it will be imperative to include further objectives in the KCDP to afford the identified areas protection.
- The valley of the River Liffey be afforded strong protection. Extension of an SAC from Lucan upstream to Straffan should be provided.

104.	Joe Colfer	The Grand Canal could be transformed into a Greenway / Blueway.  Biodiversity has become better understood in the last year.  Other issues facing Kildare
		<ul> <li>A spur should be taken from the M7/M9 south of B &amp; Q / Harvey Normans and connected to the Naas-Kilcullen Road and further link to the Ballymore Road.</li> <li>A levy should be imposed for every cubic metre of material deposited in Walshestown landfill.</li> </ul>
		The Gallops Inner Relief Road should be maintained as a Green Belt with walkways and cycle paths.
		<ul> <li>New junction on the Blessington-Naas Road would be unsafe and would add additional traffic to a residential route. The Plan for relief traffic through Naas does not protect residential routes for local housing.</li> </ul>
105.	Wind Energy Ireland	County Kildare's Renewable Energy Strategy     Clear and supportive policies in favour of wind energy development must be provided within the CDP
		as there are no commercial scale wind energy installations within the County.  WEI and Wind Energy in Ireland
		<ul> <li>Wind Energy Ireland (WEI) is the representative body for the Irish wind industry and they are happy to share any technical advice or discuss any issues which may arise in the development of a Wind Farm Strategy for the County.</li> </ul>
		Wind energy currently provides almost 33 per cent of Ireland's electricity.

- Wind energy decarbonises our electricity supply, cuts our import bill and drives down wholesale electricity prices.
- The new CDP and Renewable Energy Strategy should provide every opportunity to get as many of the projects currently in development through the planning and approvals system in order to hit the 2030 Climate Action Plan target.
- Wind energy is popular, and it is important to consider the views of wider society not just those living in proximity to a proposed / existing wind farm when drafting the County Development Plan and Renewable Energy Strategy for County Kildare.

### **National Policy**

- The Climate Action Plan (CAP) clearly set a 70% target for renewable energy by 2030. Kildare County Council should therefore be cautious when considering the designation 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.
- 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) clearly set out that it is a specific planning policy requirement under Section 28 (1C) of the Act that, in making a development plan with policies or objectives that relate to wind energy development, the relevant planning authority shall carry out the following three actions: 1. Ensure that overall national policy on renewable energy is acknowledged and documented in the development plan; 2. Indicate how the implementation of the development plan will contribute to realising overall national targets on renewable energy and climate change mitigation and in particular wind energy resources (in MW) and, 3. Demonstrate detailed compliance with item no. 2 above with regard to development management objectives and have such development management objectives subject to SEA and AA with regard to likely significant effects on climatic factors in addition to other environmental factors.

#### **Investment Opportunity**

• Wind energy generates economic benefits of two types, the initial capital investment and the ongoing investment during the operation of the wind farm. The County Development Plan should draft policies that support this economic opportunity.

## **Policy Ambition**

• Kildare County Council should 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.

### Methodology

- KCC should engage with its adjoining Local Authorities viz. Wicklow, Carlow, South Dublin, Fingal, Laois, Meath and Offaly County Councils to ensure a consistent approach is taken across county boundaries as each Local Authority moves to prepare or review its Renewable Energy Strategy.
- 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.

# **Landscape Capacity and Landscape Sensitivity**

 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.

## **Regional Approach**

The benefits of a more regionally based approach include the following:

- It fits within and neatly compliments the Regional Spatial and Economic Strategies (RSES) now prepared for the three regions.
- A single, consistent methodology can be used across an entire region and across all three regions in the country, including across county and local authority boundary areas where approaches to-date have been inconsistent in many cases.
- A regional approach would ensure that the optimum locations for wind energy development are identified, and every county's potential is assessed in a regional and national context, in direct comparison with the rest of the region.
- It would ensure that national targets, objectives and requirements for the delivery of wind energy, directly translate into the identification of suitable areas and corridors, and a sufficient quantum of land is identified and deemed appropriate to ensure national targets, objectives and requirements can be delivered.
- Landscape sensitivity, value and capacity can be assessed on a broader, regional scale, rather than just within the sometimes-limited confines of an individual county. This would provide consistent, evidence-based landscape policies across local authority areas, and ensure the appropriate landscape policies are implemented irrespective of the county boundaries. This forms of development and types of land uses, the assessment of landscape sensitivity and capacity specifically for wind energy and electricity infrastructure is a much more defined work stream, that could be progressed in advance. Existing Local Authority landscape policies can be used to align landscape values across a region, to ensure existing local policy is fully considered when moving to a regional approach for the assessment of landscape sensitivity and capacity for wind energy and other electricity infrastructure. would ensure that wind and other electricity infrastructure projects that span or are visible across county boundaries, can be assessed in a consistent landscape policy context.

	<ul> <li>Iandscape sensitivity and capacity for wind energy and other electricity infrastructure.</li> <li>RPO 7.35 of the Eastern Midland Regional Assembly's RSES which promotes co-ordination of the identification of potential renewable energy sites of scale is particularly relevant in the context of the new County Development Plan and Renewable Energy Strategy for County Kildare given the timeframes</li> </ul>
F	for the preparation and adoption of the new Kildare County Development Plan by 2023.  Reference to Wind Energy Development Guidelines
	• The new County Development Plan and Renewable Energy Strategy for County Kildare should 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.
elbridge Cycling S ampaign	<ul> <li>Celbridge Cycling Campaign is a member of Cyclist.ie, the Irish Cycling Advocacy Network (ICAN), the federation of Cycling Advocacy Groups, Greenway Groups, and Bike Festivals on the island of Ireland. Cyclist.ie is the Irish member of the European Cyclists' Federation (www.ecf.com). Its vision is that cycling will be a normal part of transport and everyday life in Ireland.</li> <li>To achieve the goal of creating 'high quality well designed and well-planned neighbourhoods' the County</li> </ul>

- Include a comprehensive network of connected cycle routes suitable for all ages, that link places where people live, work and play.
- Set targets for modal share for cycling and sustainable transport
- Prioritise cycling, walking and public transport as ways for people to move around
- Consider how any new developments can be best utilised by pedestrians and cyclists i.e. cycle-proof all developments
- Include retrofitting of existing residential, commercial and retail areas to increase permeability by foot and bike.

#### **Sustainable Movement**

- The council should produce a mobility plan for the county that prioritises active travel and public transport, which should include a network of safe, segregated cycle routes that are suitable for people of all ages. (8 to 80)
- Safe, secure and sheltered bike parking should be provided that meets the Dublin City Bike Parking Guidance, which means:
  - Adequate bike parking at all villages, major buildings, shopping areas, and schools, including at locations that are not owned by the council.
  - A range of bike parking options, e.g. cycle lockers and covered "Sheffield" stands at transport hubs, secure, sheltered and observable bicycle parking in apartment developments, bike bunkers for terraced houses and duplexes, and cargo bike parking at shopping locations.
- The plan should include:

- A list of key cycle routes that will be completed in the timeframe of the Plan.
- Reallocation of some existing road space to cycling, e.g. by making some roads one-way and dedicating one lane to cycling
- Intermodal connections between cycling and public transport with cycle connections / pedestrian routes to Rail stations and adequate safe bike parking at bus connectors (especially hubs with Bus Connects)
- Introduction of one or more bike sharing schemes within the county
- Interconnectivity on cycle routes to other Local Authority infrastructure (SDCC and Fingal)
- Emphasis on safe cycling routes to Schools, Community buildings / sporting venues, shops and large areas of employment e.g. Backweston and Intel.
- A comprehensive signposting system showing the best routes for walking and cycling to destinations within the County and neighbouring Local Authority areas so that people become aware of the walking and cycling infrastructure for example Arthurs way.
- In any scheme to improve existing roads or build new ones, consideration must be given to how cyclists and pedestrians can negotiate the route safely.
- Increasing permeability throughout the county for pedestrians and cyclists. Where possible new routes and short cuts through large housing developments to local amenities should be made available for pedestrians and cyclists.
- Government has mandated that cycle network plans be drafted by every local authority. These
  network plans must be drafted and activated so that there is an impact on the way people travel for
  everyday journeys in our cities, towns, villages and countryside.

		<ul> <li>Learn from the mistakes of Wales in not achieving the results sought under the Active Travel Wales Act.</li> <li>Celbridge</li> <li>Use the opportunity to connect Celbridge to the greenways on the Royal and Grand Canals. Celbridge needs a more coherent network strategy to help improve cycling for small journeys to schools, shops and to increase tourism opportunities.</li> </ul>
107.	Louise Lardner	<ul> <li>Other issues facing Kildare</li> <li>The covid 19 pandemic has highlighted a number of housing sustainability issues for our elderly.</li> <li>Many elderly have a strong preference to remain living at home. Early intervention is a common recommendation of Public and Charitable organisations.</li> <li>The Kildare County Development Plan should adopt policies to prepare for the predicted surge in over 65s.</li> <li>The following policies of early intervention for the elderly population should be included in the CDP</li> <li>Planning to adapt existing houses before it is needed</li> <li>Where it is not feasible to adapt their property, then new or alternative accommodation should be available in the neighbourhood. A good mix of house types and tenures should be provided in developments.</li> <li>Ensure that all new housing will be fit for purpose to accommodate the doubling of the elderly population by 2040.</li> </ul>

		Promotion of universal design principals.
108.	Colm Kenny	Sustainable Mobility
		<ul> <li>The EU and National policy on transport is shifting to Sustainable Transport i.e. walking, cycling and public transport.</li> </ul>
		<ul> <li>Commuting patterns within Kildare have altered due to covid however levels of car use are still unsustainable. The council should liaise with other stakeholders such as the NTA to develop more sustainable transport patterns.</li> </ul>
		<ul> <li>Within the north-eastern part of the county there is a concentration of major employers. Greater framework of bus terminals should be provided in each town and appropriate bus connections and space at rail stations and other places where nodes of transport interconnect. Increased security for bicycle parking at these transport nodes should be provided.</li> </ul>
		<ul> <li>Rail electrification is required extending to Sallins, Newbridge, Kildare and Monasterevin and Kilcock on the Galway line.</li> </ul>
		<ul> <li>Good quality walking and cycling infrastructure are paramount to achieving a 15 minute Town Model.     Active Travel indicators can be used to monitor and annually report on usage. Shared cycle and     pedestrian paths should only be used in exceptional lower volume traffic areas.</li> </ul>
		<ul> <li>Cycle infrastructure design features such as the Dutch designs of cycle lanes on roundabouts should be encouraged.</li> </ul>
		<ul> <li>Greater traffic calming measures within towns and remove heavy goods vehicles within town centres.</li> <li>Develop infrastructure for electric vehicles i.e E.V charging points and E-scooters.</li> </ul>

		<ul> <li>The council should get its guidance from the following documents; Design Manual for Urban Roads and Bridges (DMURS); The National Cycle Policy Framework (a part of Smarter Travel – A Sustainable Transport Future) (2009); The Greater Dublin Area Cycle Network Plan (2015).</li> <li>All towns and rural areas should be cycle friendly. The council should support sustainable nodes of transport by spatially arranging activities around existing and planned high quality public transport systems.</li> <li>Greater resources should be put into road and transport development, which would support cycling and walking. Greater focus should be placed on accessibility to public buildings, parks and sports facilities.</li> <li>Rural Isolation</li> <li>Greater community services should be provided in rural areas.</li> <li>Development of the Greenways</li> <li>The Barrow blueway and indeed routes through peatlands should not be limited to tourists and pedestrian use only.</li> </ul>
109.	Ursula King	Healthy Placemaking: People and Places  Restrict the rezoning of agricultural lands/green field sites.  Identify how all towns can become 10-minute towns.  There should be stringent demonstrable criteria to prove a genuine requirement for rural housing.
		<ul> <li>Every town and village in Kildare should have centrally located, supported, independent housing facilities for our elderly community in close proximity to a day care centre.</li> </ul>

- Not allowing ad-hoc planning to occur.
- Transfer the costs of providing services to the developers as requirements for planning permission.
- Conditions should be set (and enforced) to ensure the inclusion of high-quality design that promotes more active, healthier lifestyles as part of proposed developments.
- Enforcing the Derelict Sites Act, 1990 (as amended by the Planning and Development Act, 2000). 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.
- Enforcing the Urban Regeneration and Housing Act 2015.
- All housing measures should allow people to live with dignity and a sense of community and not create substandard tenements.
- We are lacking in outdoor facilities and amenities that suit all ages and abilities.
- Pursue a housing model which is self-containing in terms of energy requirements.
- Provide passive solar heating, solar panels and other renewable forms of energy in all new housing developments.
- Rainwater harvesting and grey water reuse should be provided in all new housing developments.
- 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.
- Pursue a housing model, which provides quality living conditions for the residents through the incorporation of: sufficient communal well-planned and safe garden spaces for children to play; change

the model of housing estates so that they are managed by a co-operative of the owners/tenants which would empower residents.

- Develop communal well-planned and safe garden spaces for children to play and for people to sit outside.
- In relation to the Climate Change Crisis and the Biodiversity Crisis; Promote education to inform people about reducing people's environment footprint; consider the sustainability consequences of our purchasing power.
- Pursue a housing model (either directly or through private development) which is self-containing in terms of energy requirements and seeks to reduce the overall carbon/environmental footprint.
- Pursue an industrial planning model which seeks to reduce the overall carbon/environmental footprint, such as: Incorporation of solar panels in all new industrial developments; Rainwater harvesting and grey water reuse in all new industrial developments.
- Ensure that developments incorporate correctly installed sustainable drainage systems.
- Restrict one-off development in the countryside.
- Planning permission for development to be given for greenfield sites only where it can be demonstrated that all efforts to build on brownfield sites have been completely exhausted.
- Enable rather than promote active travel.
- Refuse planning permission for housing and industrial development which would impact existing wetlands (which lock up large amounts of carbon)
- Refuse planning permission for solar/wind farms and other similar developments.

- Retain bogs suitable for rewetting in Kildare by: Rapidly identifying such bogs; Proactively supporting the rewetting of these bogs as a matter of priority; Educating the community of the value of this strategy; Proactively supporting the community in investigating tourism opportunities.
- Reverse the decline of our towns and villages by actively supporting and encouraging: small diverse enterprises; the sale of locally grown and sustainably produced food; small local markets and shops.
- Install safe cycling routes to schools and town centres.
- Where schools are located on the periphery of towns, provide shared bus facilities from town centres to reduce single car usage
- Install park and ride facilities adjacent to public transport.
- Protect remaining hedgerows within developments in our towns and villages and install and enforce a sufficient planning bond to deter developers from damaging or removing hedgerows, trees or other natural features.
- Provide spaces for community gardens and allotments.
- Promote the reduction of mown grass and the return of grassland with diverse local species in any areas within towns and villages that are not required for children to play, for example. identify, promote and support small woodland schemes.
- Remove herbicides and other pesticides in the management of Council spaces.
- Reduce further threats to bats and other nocturnal wildlife in our towns by installing appropriate street lighting.
- Promote the top tiers of the waste hierarchy triangle which are reduce and reuse.

- Pursue the elimination of single use plastics in the environment.
- Pursue a circular economy.
- Actively promote relationship with town/village community organisations.
- The council should impose strict requirements for; planning permissions that ensure; best practices for building a community; best practices for multigenerational communities; efficient use of resources; BER to be achieved, renewable energy, the initial premise should be that the development is to be selfsufficient for energy (through solar on roofs, heat pumps, etc.); self-sufficient for water (rainwater harvesting, and grey water re-usage); flood management using best practice building, for example, permeable paths, swales etc; biodiversity preservation and management.
- Employ suitably qualified energy and biodiversity staff to: expertly review planning applications and enforce planning requirements; practically achieve environmental education by developing a one-stop-shop on the Council's website of easily accessible environmental information. This will allow local Tidy Towns/interested groups and individuals to easily access correct scientific information on the following topics (for example): the ecological value of habitats such as: roadside verges; hedgerows; canals, lakes, rivers; riparian vegetation; fens; bogs; marshes; marginal lands; meadows with local diversity etc.; the importance of invertebrates (not just pollinators) and other species; the current state of our habitats and species; the importance of preserving the genetic integrity of our own native tree species; the importance of preserving the genetic integrity of our own native and local wildflower species and to discourage the planting of non-local, outline ways to make our gardens more nature friendly (not just pollinator friendly) through planting; ways to make our houses/gardens more nature friendly e.g., by reducing biocides/pesticides; ways to divest our purchasing power from unsustainable purchases; ways to reduce wasteful consumption of water (not just in drought periods); ways to reduce wasteful consumption of other resources; ways to recycle hazardous waste;

• Establish a database of natural features of importance in each local area; Establish a database of local environmental groups; Liaise with professionals in Maynooth University to support undergraduate and postgraduate projects relevant to climate change and biodiversity at the local level.

## **Economic Opportunity: Innovation, Enterprise and Employment**

- Define the kind of new jobs that are envisaged and who will benefit.
- Encourage enterprise and innovation in the context of Climate Change and Environmental enhancement.
- Promote environmentally sustainable jobs which provide our young people with decent livelihoods.
- Foster collaborations with educational institutions and engage with the experts.
- Capitalise on our natural assets rather than exploiting them for short-term gain; educate the community on the importance of supporting local farming etc look at other models across the country.
- Liaise with NUI Maynooth and other educational bodies.
- Greater emphasise should be placed on addressing infrastructural shortfalls in relation to sustainable travel, sustainable energy provision and broadband, etc.
- Provide support for 'Start your own business courses.
- Actively promote and translate the benefits of shopping small and shopping locally to the public.
- Actively promote and translate the benefits of locally produced, affordable, sustainable food models.
- Support collaboration between people with different skill sets.

- Develop cycle ways to access the raised bog lands and fens, particularly as an offshoot of the Grand Canal cycle way.
- Maximize the connectivity of the Green and Blue infrastructure, particularly through cycleways. Potential greenway between Edenderry in Co. Offaly and Enfield Co. Meath along the path of the former railway.
- Ensure that solar/wind farms do not detract from tourism plans.
- Reverse and mitigate some of the decline in our towns in recent years by: halting any further cheap and poorly finished apartments/housing schemes, enhancing green spaces, support initiatives to encourage commercial enterprises to enhance their premises, actively enforce anti-litter and dog fouling campaigns.
- Create our towns as attractive places to go to by: use of active transport which reduces traffic; greening of the streets; permeability throughout the town making it easy to get to town centres; identification of gaps in our locally provided needs (for example, Monasterevin does not have a butchers); development of all derelict buildings in town centres.
- Introduce rules to make it easier for sustainable businesses to set up, and harder for non-sustainable ones.

#### **Climate Action: Environment, Climate Change and Adaptation**

- The wording throughout the development plan could be changed from "Climate Change" to "Climate Breakdown" or "Climate Emergency" to accurately reflect the situation as acknowledged by scientists.
- The main sources of greenhouse gases are heating/electricity, agriculture/forestry, manufacturing and transport. Kildare Co. Co. can influence, for example, whether:

- Carbon remains locked up in the bogs; Bogs can be rewetted to enhance carbon lockup; Carbon remains locked up in wetlands; Carbon remains locked up in hedgerows and trees; Buildings are sufficiently insulated. Buildings should be self-sufficient in energy terms from renewable energy; Sustainable modes of transport should be provided.
- Encourage the setup of 'not for profit' businesses like Community Supported Agriculture where the people involved get a living wage.
- Identifying the industrial and housing sectors where our carbon emissions come from within the County. Target the highest emission areas first. Empower communities to become involved.
- Expand focus in relation to energy and reducing emissions to the whole built environment in the county and not just the Council's own housing stock and buildings.
- Tying targets back to commitments made in other plans, for example, the commitment to reduce CO2 and other greenhouse gas emissions in the county by 40% by 2030 as per the Kildare County Council Climate Change Adaptation Strategy (2019 –2024).
- Identify and protect green Infrastructure in the region and promote the sustainable management of strategic natural assets such as our wetlands, peatlands, uplands, woodlands and farmlands in an integrated and coherent manner.
- Employ experts on biodiversity and planning to inform the policies of the Plan.
- Protect those parts of our environment that are most useful as carbon sinks and habitats for biodiversity.
- Lack of dark spaces due to development is affecting biodiversity. The replacement of street lights with LED has made streets brighter than they were with the old lighting.
- Educate public about lighting many householders leave very bright external lights on all night.

- Support air quality monitoring and reporting throughout the county.
- Better education should be sought within our horticulture and landscape sectors.
- Protection of trees and features should be central and noncompliance should result in heavy enforcement fines.
- Planting should consist of local native plant types, indigenous to the area and of local provenance and be incorporated into the site so as to enhance biodiversity
- A sufficient bond or cash lodgement should be required as part of the planning permission to encourage developers to protect trees, hedgerows and other natural features on site.
- Identify commons land throughout the county and provide access to it for communities.
- Review and update the Biodiversity and Heritage Action Plan to give due consideration to the
  protection and enhancement of biodiversity (as stated in the National Biodiversity Action Plan 20172021), with: key measurable targets; annual succinct reviews of the progress of this plan; plans and
  reports that are easily readable, without fancy graphics and redundant pictures.
- In relation to flood risk and renewable energy production, a collaboration of experts for example hydrologists, geologists, engineers, builders and planners should be sought.
- Sign Issue significant environmental issues are; pollution of our waterways; depletion of our water resources; depletion of our soils; plastic pollution; air pollution; noise pollution and light pollution.
- A collaboration of experts in hydrology, ichthyology, ecology, botany, entomology, engineering, building and planning is required to safeguard the water quality of our rives and groundwater.
- Recycling facilities need to be provided within apartment buildings to allow for separation of waste.

- In new developments, developers should be required to retain and protect all existing hedgerows (and all trees if possible) and to incorporate existing hedgerows into planning design.
- Green roof technologies should be explored for mitigation of water run-off.
- Greening of streets requires greater resources for maintenance.
- The Plan can support sustainable energy communities in Kildare by collaborating with existing sustainable energy communities within Kildare and further afield, a good example of this is Cloughjordan Eco Village.

#### **Appendix**

#### **Climate Change and Biodiversity Loss**

- No reference made to biodiversity loss in the Introduction Section of the KCDP Issues Paper.
- A growing body of scientific research points to the fact that further pandemics are inevitable given the global extent of biodiversity loss and climate change.
- Changes to ecosystems and biodiversity are almost always caused by multiple interacting factors that work across different temporal, spatial and organisational scales.
- The UN Sustainable Development Goals (to which we are a signatory) list climate action, life below water, and life on land, as separate independent goals. In this context, I fundamentally object to some of the objectives listed in Project Ireland 2040-National Planning Framework (e.g., National Policy Objective 60 and 62) or the Regional Spatial & Economic Strategy (2019-2031) which guide the County Development Plan.

- It is incumbent upon us to reflect on the recent words of Dr. Mike Ryan (Executive Director, WHO Health Emergencies Program (17 February 2021) who stresses that we need a world which is more sustainable.
- We need to place climate change and biodiversity loss as the central tenets of this County Development Plan with clear measurable objectives and accountable reporting.

# Kildare County Development Plan (2023-2029) in the context of the County Kildare Biodiversity Plan (2009-2014)

- Below are examples of key targets in the Kildare Biodiversity Pan (2009-2014) that have not been achieved (but please note this is not a complete list of where the Council has failed to achieve its targets).
- Objective 1: To facilitate the collection and dissemination of heritage information. The County Kildare Biodiversity Plan (2009-2014) lists a number of surveys to be achieved across the county. For example, identifying areas such as thermal springs, towpath grasslands, waterway corridors, significant tree surveys, hedgerow surveys, areas of local biodiversity interest, etc.
  - Seven years on, why are some of these surveys not centrally available on the Kildare Co. Council website?
- Additionally, the 2 Year Progress Report on the Kildare County Development Plan (2017-2023) states that habitat mapping has been carried out for Athy, Naas, Clane and Leixlip.
  - Why are these reports not available on the Council website?
- The 2 Year Progress Report on the Kildare County Development Plan (2017-2023) also states that a number of tree surveys have been undertaken for Athy, Naas, Kildare, Newbridge.
  - Why are these reports not available on the Council website?

- I would like to suggest that all such information should be freely available to the general public of Kildare in a well-organised, central location.
- Objective 2 of the County Kildare Biodiversity Plan (2009-2014) states (amongst other things) that targeted biodiversity education programmes for various key groups including: Tidy Towns Groups and Residents Associations, developers and architects, hedge cutting contractors, homeowners and landowners will be developed.
  - Why then are hedge cutting contractors continuing to inappropriately conduct hedgerow maintenance in Kildare? See recent report which includes photographs of hedges cut in Kildare during the prohibited season, and extensive damage to Kildare hedgerows owing to the use of inappropriate equipment and techniques.
- Objective 2 of the County Kildare Biodiversity Plan (2009-2014) also states that Kildare Co. Co. will support efforts to identify areas of cutover and cutaway peatlands that could be suitable for creating natural reserves.
  - Have these areas been identified and documented?
  - Where is this information available in the public realm?
- Objective 2 of the County Kildare Biodiversity Plan (2009-2014) also states Kildare Co. Co. will develop and maintain a dedicated heritage website for the county as part of Kildare Co. Co.'s main website and that this website would be linked to other websites and additionally, will develop and promote a Kildare Biodiversity website. This has not been achieved.
- Objective 3 of the County Kildare Biodiversity Plan (2009-2014) deals with promoting best practice in heritage conservation and management. In this section, it is the Council's objective to identify methods for incorporating natural features, native species and biodiversity into new developments.

- Why is it then that currently in Kildare we have housing developments where the original hedgerows have been completely stripped out, or destroyed through inappropriate cutting back?
- Why do the presumed mitigation measures still involve planting of non-native trees and quick impact laurel hedges as boundaries between houses?
- It is immediately evident that these trees and hedges are only used to put a quick gloss on the overall appearance of a housing estate.
- Objective 4 of the County Kildare Biodiversity Plan (2009-2014) states that the Council will publish an annual review of the Biodiversity Plan with a view to developing the subsequent 5-year plan.
  - Have annual reviews been carried out in the seven years since this plan was originally published?
  - If so, can the Council quantify the amount of biodiversity in Kildare that has been destroyed/reinstated/enhanced since publication of that plan?
  - If so, are these reviews available in the public realm.
- Objective 4 of the County Kildare Biodiversity Plan (2009-2014) also states that the Council will provide training for local authority staff with a particular emphasis on seven key areas, including (to mention a few), the retention of natural habitats in new developments and the use of native species of trees and shrubs, consistent with the hedgerow survey of 2006.
  - Again, why is it the case that new developments continue to obliterate hedgerows in the majority of housing developments in our towns and villages and that cheaply available non-native trees and shrubs are used as 'replacement' planting in these schemes?
  - Is there appropriate monitoring and enforcement by the Planning Department?

The Council has failed to address key Biodiversity and Green Infrastructure targets relating to
Allotments as outlined in the Kildare County Development Plan 2017-2023. The Council's attention is
drawn to para 13.3 Biodiversity and Green Infrastructure in the 2 year Progress Report on the Kildare
County Development Plan (2017-2023). There is a clear lack of specific, measurable and time bound
goals.

#### **Accessibility of Biodiversity information**

- As stated above, Objective 2 of the County Kildare Biodiversity Plan (2009-2014) states that Kildare Co.
   Co. will: "Develop and maintain a dedicated heritage website for the county to be part of Kildare County Council's website. This website will be linked to other relevant websites".
- and additionally, states that the County Council will: "Develop and promote a Kildare biodiversity website".
- In accessing the Councils Biodiversity and Natural Heritage main web page (Feb 2021). the overwhelming body of publications cover pollinators. There is also not even a link to the County Kildare Biodiversity Plan or any of the other publications on natural heritage.
- Some key messages of the National Pollinator Plan are overlooked by the Council. Greater emphasis
  and value should be placed on the rare and valuable habitats in the county and not just pollinating
  insects that are under threat.
- The Kildare County Development Plan cannot allow short term business interests to build solar and wind farms on bog lands suitable for rewetting or other important habitats in Kildare as this would be contrary to our drive to become a carbon neutral economy.
- Kildare County Council should give practical credibility to its declared Climate and Biodiversity Emergency (June 2019) by employing suitable staff to:

- expertly review planning applications and enforce planning requirements.
- practically achieve environmental education by developing a one-stop-shop on the Council's website of environmental information (which should include reports from local surveys and nationally published reports of environmental interest). This will allow local Tidy Towns/interested groups and individuals to easily access correct scientific information.

#### **General observations on planning process**

## **Accessibility of Information**

- More thought should be given to the presentation of the Development Plan on the Kildare County Council website.
- Planning page is poorly laid out.
- The town / village maps are not on the same page as the corresponding information for that area.
- The local area maps should be laid out in a more legible computer format.
- Large areas of the document are taken up with glossy generic photographs, which are a distraction and contribute to an unsustainable waste of paper.

#### Conclusion

- The Council is guided to achieve certain targets under Project Ireland 2040 National Planning Framework. Any conflicts with climate change mitigation and the halting of biodiversity loss should be identified and removed at Development Plan stage.
- We have seen a further deterioration of biodiversity and the environment since the adoption of the County Kildare, Biodiversity Plan Action to enhance our living environment 2009-2014, It is time for

demonstratable action on Climate Change and Biodiversity Loss and this should be led by expert staff within Kildare County Council.

#### **Sustainable Mobility: Movement and Transport**

- Safe secure bike parking facilities at public transport sites should be provided (for example, there is none provided at Kilcock Railway station) and in the towns.
- Increase permeability though housing estates for pedestrians and bicycles.
- The challenge is to attract people to active modes of travel for short journeys of less than 5km by the provision of high-quality walking and cycling infrastructure, with the appearance of E-bikes, the distances cycled by people are being increased but infrastructure is a prerequisite to greater use.
- The Council must develop a Strategic Cycling Plan with local targets and annual monitoring and reporting.
- The Council needs to design healthy streets to enable and prioritise more active travel in accordance with the Design Manual for Urban Roads and Streets rather than just ticking the box of active travel.
- Multi-disciplined teams are required to ensure that redesigns include walking and cycling,
- Reduce the default speed limit in urban areas in the interests of the safety of vulnerable road users.
- The standards of paths for new developments should be defined in terms of effective width, and paths should be continuous across minor junctions as is common practice abroad.
- Pedestrians and cyclists should only share paths as a last option and in areas with low volumes of people.
- Shared spaces are inappropriate at the level of traffic currently found in many Kildare towns and villages.

- Kildare County Council must identify dedicated cycle networks or alternative ways of enabling cycling in Kilcullen, Rathangan, Monasterevin and Castledermot, all of which are omitted from the Greater Dublin Area Cycle Network Plan (2013).
- Kildare must future proof new transport developments and ensure that they are compatible with other Council policies in particular with climate change policies. Mitigating climate change implies an overall reduction in travel by private car.
- The new Programme for Government includes a commitment to a high level of investment in cycling. Unless the Council commits to spending what is on offer on high quality infrastructure, the funding will be spent without a sizeable increase in cycling.
- Standards for new development must take into account micro mobility, for example, E-bike parking requirements, E-scooter cargo bikes and the re-allocation of road space for such uses.
- We have to make the shift from privately owned cars to public buses and trains.
- If new schools must be located on the outskirts of towns, such as has happened in Maynooth, then thought needs to be put into planning how to minimise the associated car transport, whether that is through: provision of safe cycling route for students or communal buses from more central town locations.
- Provision should be made for cross county public transport to high density job locations.
- Investment in better transport facilities for towns such as Athy, Naas (Sallins), Celbridge (Hazelhatch), Newbridge and Kildare, together with the extension of the DART from Maynooth to serve Kilcock would yield a significant return on investment in terms of combating the impact of climate change.
- Provide, as a matter of priority, park and ride facilities as an incentive for commuters to travel by public transport.

- Support provision for cycling within the county towns.
- The cost of parking in our town centres should be high to discourage all day parking.
- On the Continent, many historic towns and villages do not allow cars in their historic centres.
- Kildare should eliminate rat running by using filtered permeability to reduce the risk of collisions in residential areas.
- Traffic Management Plans should be designed to force traffic to keep to the "main roads".
- Examine the feasibility, suitability and acceptability of creating a cycle town for Maynooth in association with Maynooth University along the lines of the facilities available in the University Cities of Oxford and Cambridge.
- New one-off housing should not be allowed unless people are directly working in the locality.
- Support elderly people through the provision of transport to weekly get togethers in community centres, through community meals on wheels.
- Kildare County Council must significantly increase the number of crossings (controlled and uncontrolled) for pedestrians and cyclists in towns and villages.
- Restrict motorised traffic as is being done in Dun Laoghaire, Dublin City as well as Paris, Helsinki etc.
- Provide high quality protected cycling facilities that enables Cycling for all.
- Implement ambitious school streets and school zones, which benefit from the government's proposed Safe Route to Schools programme.
- Amend traffic lights so that the council prioritises active travel by switching control to fixed times.

- Carry out a systematic survey of private car transport pressure points in the county to determine where resources and planning can be directed immediately.
- There are very few EV charge points in towns and villages, so more will need to be provided at minimum in all towns.
- Charging units must not be located on footpaths or cycle tracks.
- Park and Stride facilities for children going to and from school would be best located near church car parks or supermarkets.
- Park and ride facilities should also be located near public transport to encourage train and bus use.
- Better enforcement should be provided to ensure that footpaths and cycle tracks are not used as car parks.

#### **Creative Places: Social, Community and Cultural Development**

- Promote environmentally sustainable jobs which provide people with decent livelihoods, where they
  will have the time to contribute to their communities and where wealth is distributed equitably in the
  community.
- Foster community strategies for our immigrants.
- The current standards for public open space provision associated with new developments are not appropriate. Covid-19 has made this particularly apparent.
- Promote greater interconnectivity of recreational resources in towns and villages with housing developments, this would help ensure recreational and community resources meet the demand of Kildare's growing population, while protecting existing resources from inappropriate development.

 Increase community interaction, engagement and self-efficacy in relation to existing community facilities.

#### **Enhanced Amenity and Heritage: Landscape and Green Infrastructure**

- Long term vision and planning is essential to enhance amenity and heritage.
- Employ experts on biodiversity and planning to inform the policies of the Plan.
- Identify and protect green Infrastructure in the region and place a value on it (natural capital).
- Educate and inform the public on how to conserve and enhance the biodiversity of our protected habitats and species including landscape and heritage protection.
- 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.
- Promote the planting of native woodland schemes.
- Promote education in the long-term management of native continuous cover forestry.
- Promote the horticulture industry to start producing native tree stock of local provenance.
- Support sustainable, locally produced food instead of the current model of industrial monoculture.
- Retain bogs suitable for rewetting in Kildare.
- There are a number of existing areas in towns and villages in Kildare that could be enhanced, and would benefit from, small woodland features. One example might be in the stepped back areas in housing estates adjacent to motorways.

- Require the retention, incorporation and protection of remaining hedgerows within developments in our towns and villages for their multitude of benefits.
- Explore how Protected Structures can be used as digital hubs, communal workspaces, provide financial incentives to restore etc.
- The council should employ more staff with an expertise in how natural heritage and biodiversity can be enhanced.
- Outline how the council can gain greater access to the natural, built and archaeological heritage, while
  having regard to the sensitive nature of many sites. The council should explore other site examples, for
  example, Boora Bog in Offaly.
- Expert guidance needed on an increased number of well planned, easily accessible walking and cycling routes that take into account: the sensitivity of the local environment, the interconnectivity of recreational resources in towns and villages with housing developments.
- Promote the development of a coherent county-wide tourism strategy, capitalising and integrating our geological and landscape heritage; habitats of European and National importance (SACs, SPAs, NHAs and pNHAs); built heritage and remaining areas such as raised bogs, fens, rivers and woodlands that traverse our county.

#### Making it happen: Infrastructure, Energy and Communications

- Infrastructure relating to; Sustainable travel; Sustainable energy provision and Broadband etc. needs to be improved.
- 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.

- 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.
- 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.
- Employ suitably qualified staff with the necessary expertise to evaluate and explore options in the use of renewable energy sources.
- Require the incorporation of renewable energy strategies in all new data centres, such as rainwater reclamation, solar energy and heat recycling as per numerous examples worldwide.
- That Kildare is adequately financially reimbursed for the location of all data centres.
- Good landscaping for data centres is essential.
- Support training in replacement technologies and hence employment in climate change mitigation.
- 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.
- Support circular economy, green tourism, repair cafes, zero waste stores.
- No commercial rates on businesses that are set up for sustainability, for example, zero waste stores.
- Protection of on-street shopping.

		<ul> <li>Create our towns as attractive places to go to by the use of active transport which reduces traffic throughout the town making it easy to get to town centres.</li> <li>Introduce rules to make it easier for sustainable businesses to set up, and harder for non-sustainable ones.</li> </ul>
110.	Landen Park	The submission provides some background on Landen Park and the Management Company.
	Owner's Management Co	Creating a Strong, Vibrant and Self-sustaining community
		<ul> <li>The submission outlines a number of measures to be integrated into the next CDP.</li> </ul>
		A community development levy of €100 per unit that is paid by the developer to the local authority but vested in the local authority for the beneficial use of a homeowner's association / resident's association (RAs).
		KCC through the PPN provide template constitutions for new estates looking to set up RAs, and tips and guidance on best practice in running a homeowners association/RA.
		<ul> <li>As RAs are established in new housing estates, the money that has vested through KCC is made available to the newly established RA.</li> </ul>
		Proactive Communication
		<ul> <li>KCC ensure that every new home built in the County receives a homeowner's pack outlining the timelines involved to estate completion and an outline of the applicable policy framework.</li> </ul>
		New homeowners have a right to know about issues in their estate relating to public infrastructure.
		By KCC taking a more proactive approach to these issues would create more meaningful and constructive engagement with newly established communities.

	1	
		The submission would encourage KCC to take a more proactive position on communications surrounding estate taking in charge/completion.
		Development Bonds and Taking in Charge (TIC) Policy
		The submission states the 2008 TIC policy is outdated; however, they are aware it is due to be updated.
		<ul> <li>KCCs current policy states that it's an all-or-nothing scenario, whereby if we want to maintain a degree of autonomy over our public green spaces, we must accept the open-ended liability of public streetlighting, sewage and waste water systems, attenuation tanks and road surfaces, or else opt for full taking in charge, and wind down the OMC.</li> </ul>
		<ul> <li>The 2008 policy is sufficiently vague in relation to partial TIC as an option.</li> </ul>
		<ul> <li>The submission urges KCC to update their TIC policy with immediate effect facilitating partial TIC of residential estates that have been complete by the developer as per the local authority's permissions of planning.</li> </ul>
		<ul> <li>The submission states that KCC has stated that the OMC will have to be wound up if the estate is taken in charge. Currently the OMC manages the upkeep and maintenance of the estate and have a 100% compliance rate with collection of the service change and provide beautifully landscaped open green spaces.</li> </ul>
		The updated TIC policy should apply to every new residential estate from the introduction of the new CDP.
111.	Dublin Gliding Club (DGC)	<ul> <li>Dublin Gliding Club's submission details the heritage of Gliding in Co Kildare, the sport in general, opportunities for further development and its contribution to the local community.</li> </ul>

- DGC acknowledge that aviation and airfields can be seen in a negative light.
- However, there are benefits to a community, such as creating awareness and opening career opportunities in aviation, opening opportunities in sports tourism and rural development while not compromising the quality of life or the environment in rural areas.
- Gliding can be complementary to agriculture and the rural environment in many ways.

## On foot of the above, DGC suggests the following:

- KCC should continue to regard general aviation as a core strength in the County.
- KCC should recognise the history of gliding in Kildare and support the development objectives of DGC.
- The club is keen to implement our growth plans:
  - To provide opportunities for students to experience what gliding and aviation has to offer as recreation or potential gateway to careers in aviation or STEM disciplines.
  - To engage with local businesses, retail parks and public spaces to showcase gliding by placing a real glider on display at suitable open spaces. KCC's support would be required.
- Gliding is a sustainable and environmentally friendly recreational activity and will enhance the diversity of experiences available in KCC.
- Opportunity exists for local tourism businesses to develop a new market for accommodation and hospitality based around a gliding or general aviation tourism package.
- The current Gliding Club airfield is not an ideal gliding site.
  - It does not support the winch launch method and

		<ul> <li>the western side of the field is bounded by tall mature trees which prevents operations in any significant westerly wind.</li> </ul>
		DGC are keen to identify a suitable airfield site and needs the support of KCC to facilitate reasonable conditions for the development of such a site.
		DGC would welcome a discussion with KCC to determine how the club can contribute to the local community.
112.	Naomi Scott	Infrastructure, Energy & Communications
	Hayward	<ul> <li>A wind energy strategy is needed to ensure a balance between creating wind power and biodiversity losses.</li> </ul>
		I'm in favour of the use of rewetted peatlands however, a balanced approach is needed.
		Sustainable Mobility
		I propose a bus stop at North Kildare Sports Club, Kilcock.
		<ul> <li>Increase modes of transport to all sports clubs to encourage walking, cycling and the use of public transport by local members and visiting teams.</li> </ul>
113.	Newbridge Access Group	People with Disabilities need to Access All Areas to fully participate in Family, Community and Work Life.
		KCC need to proof all plans to ensure the creation of a 'Healthy Place for All'.
		<ul> <li>Almost 13% of people living in Newbridge have at least one disability and important disability services are located in Newbridge.</li> </ul>

		<ul> <li>It is imperative that people with disabilities and their families and organisations are consulted about all local authority plans for Newbridge.</li> <li>Newbridge Access Group welcomes the County Kildare Access Strategy 2020-2022 and its objectives.</li> <li>The Covid 19 Pandemic changed the role of open space and amenities, a few suggestions in relation to this.</li> <li>As more people use outdoor spaces, more pathways and seating, more bicycle parking, litter bins, dog waste bins and bigger parking areas needs to be provided.</li> <li>Particular attention needs to be paid to the roads and pathways leading to the Curragh and KCC needs to create walkways and parking adjacent to it.</li> <li>Restaurants with outdoor eating facilities were and are welcome. Guidelines are needed to ensure they don't hinder the movement of people who are vision impaired, wheelchair or other mobility aid users.</li> <li>The lack of toilet facilities makes it impossible for people with bladder or bowel issues to circulate freely.</li> <li>Additional changing places in Newbridge will be welcome.</li> <li>CDP needs to pay attention to outdoor leisure and sports facilities, as more exercise programmes will take place outdoors as happened during lockdown.</li> <li>Many restaurants use electric scooters for deliveries, adequate road space is needed for these to travel safely without harming pedestrians.</li> <li>Dedicated direction arrows on paths needs to be placed and repainted regularly.</li> </ul>
114.	Monasterevin Sustainable	How can we move towards higher density housing developments which are attractive, practical and viable? Are there areas of the County that could accommodate taller buildings?

# Energy Community (MSEC)

- Pursue a housing model (either directly or through private development) which is self-containing in terms of energy requirements and seeks to reduce the overall carbon/environmental footprint.
- Incorporation of passive solar heating, solar panels, and other renewable energy in all new housing developments should be a planning condition.

How can the Plan increase the levels of renewable energy production and energy efficiency in the county while protecting the environment, the landscape and public amenity?

And What methods should be encouraged to maximise renewable energy provision for commercial developments and individual homes?

- Wind and solar farm developments on peatlands should include conditions that ensure the carbon sequestration and biodiversity value of the peatlands are maintained and enhanced.
- A windfarm strategy should be completed in consultation with the public, with efforts to engage with communities likely to be particularly affected.
- Interdisciplinary teams including experts in renewable energy production and energy efficiency along with ecologists, botanists, entomologists, hydrologists, geologists, engineers, builders, and planners should address this issue in a holistic manner.
- Planning development should include conditions to utilise roof space for solar panels.
- Identify opportunities in developments to develop renewable energy provision through solar, wind, or district heating.
- Local, community renewable energy projects should be encouraged and enabled by KCC.

How can the Plan support sustainable energy communities in County Kildare?

**Kildare Energy Agency** 

- We recommend setting up a Kildare Energy Agency, sponsored by KCC, to support energy transition.
- It would provide advice, access to grants & financial support via the SEAI, other Irish and European agencies, contractor development & deployment, project management & help in sourcing low-cost finance and insurance.
- Also engage in all activities that would allow communities to move towards the development and everyday use of renewable energy sources.
- Could also conduct accredited energy audits, feasibility studies, and business cases for retrofits & renewable energy projects that develop.

#### **Community Owned Renewable Electricity Generation**

- The new CDP should compel Grid Networks Ireland to ring-fence grid connection capacity for communities in Co. Kildare.
- Protecting grid capacity in this way will assist local communities to develop their renewable energy (RE)
  projects under the Renewable Energy Support Scheme. Revenue generated to be used to support other
  community projects.
- The new CDP should provide public land for community owned RE projects.
- The new CDP should insist that every private/developer owned RE project have a proportion of the project in community ownership i.e., for every ten turbines a developer is applying for, one or two of the turbines should be community owned.
- This will more significantly benefit the local community than the money mandated by the Community Benefit element of the Renewable Electricity Support Scheme.

		Even if the Community Project has to lease the site, and pay for the Renewable Energy project itself, it would still be a huge benefit if it could piggy-back on the grid and planning applications.  Other areas of accounts.
		Other areas of concern:
		Data Centres
		The CDP should limit the number of data centres to be built in Co. Kildare.
		Each data centre employs relatively few people while being a major consumer of electricity.
		Any new data centres must be district heating supply-enabled.
		Park and Ride Facilities
		<ul> <li>Monasterevin is an ideal location for a Park and Ride facility to encourage people to use public transport.</li> </ul>
		Electric Vehicle Charging Points
		Ambitious targets for the roll-out of public Electric Vehicle charging point should be set in the CDP.
115.	Ivan Codd	<ul> <li>As the Naas Inner Relief Road Part 8 process was democratically rejected by the Naas Municipal District Council it, along with any further iterations of the same concept, must not be considered for any future CDP.</li> </ul>
		<ul> <li>Instead, an outer ring road should be included in the new CDP as a priority or strategic objective, to provide appropriate infrastructure to allow an orderly development of the town and town centre.</li> </ul>

116.	Straffan AFC	<ul> <li>Straffan has been subject to continuous development over the past number of years however, there has been no funding or allocated space for recreational facilities.</li> <li>Straffan afc requests a space for a community facility of 5 acres to incorporate a community playground/recreational facility and our soccer club.</li> <li>Straffan afc needs to be included in the planning phase of the next development plan for Straffan.</li> </ul>
117.	Joint Owners of Rathangan Demesne	<ul> <li>Proposal to provide a route objective with link road, cycle path and walkway at Rathangan Demesne between the R401 Kildare Road and the R414 Monasterevin Road. A map is provided.</li> <li>The proposed objective will have the following community benefits:         <ul> <li>A relief road for Rathangan, diverting HGV traffic from passing Ardscoil Primary School and the bottle neck at Rathangan Bridge.</li> <li>An amenity for Rathangan providing an accessible cycle and walking path through existing Forestry.</li> <li>Consistent with the National Cycle Policy Framework</li> <li>Consistent with the Environmental Health Service Consultation report by the HSE dated February 2021 in relation to the new CDP.</li> </ul> </li> </ul>
118.	Mark Hendrick	Sustainable Mobility  The Normal Report of the Model and t
		<ul> <li>The Naas IRR was a priority in the KCDP 2017-2019 and was defeated by a democratic vote of the Naas MD in June 2019.</li> </ul>
		The democratic decision must be upheld.

- Including it in the CDP flies in the face of the democratic vote.
- The Gallops Avenue like its predecessor the Naas IRR will move thousands of vehicles close to quite mature residential estates.
- Congestion will move from current traffic junctions to the new proposed junctions at The Gallops and will not solve traffic congestion.
- The proposed route also traverses Naas Racecourse. This area must be preserved for recreational purposes as the 'Green Lung' of the town.
- The new Kildare CDP should include the following objective: "To provide an outer ring road for the eastern/north-eastern side of Naas, to cater for by-passing traffic, linking the Blessington Road with the Dublin road close to the Junction of the latter with the N7. This outer ring road will be routed, to not traverse or cut through existing residential areas and will provide a long-term development boundary to the east/north-east of the town of Naas."
- This objective is to replace the "inner relief road, Naas" objective of the current Kildare CDP 2017-2023.
- Such an objective would be consistent with the existing objective MT 15 of the CDP, which seeks to channel HGV traffic associated with landfill and extractive sites onto the general regional and national road network insofar as possible.

### Other issues facing Kildare

#### **Education**

- Due to the population increase of Naas, Primary and Secondary school places are limited.
- The CDP should include additional education campuses within the town's environs, to encourage students to walk or cycle to school.

#### **Active Leisure**

- Residents may value increased linkages between Kerdiffstown Park, the planned park at Sallins, the Naas/Sallins Greenway, and perhaps improved utilisation of the canal as a Blueway between Naas and Digby Bridge, ultimately heading for the river Liffey.
- Excellent for cycling, walking, or running.

#### **Development of downtown Naas**

- In line with the National Retail Guidelines, the CDP should prohibit development of retail over 1,000 sq. metres gross floorspace outside the Centre of Naas.
- Naas town centre should be designated as a development zone with incentives for the creation of "Living over the Shop".

How can we support and protect traditional on – street retailing with the increase of online shopping and encourage new business looking to locate within our town centres?

- The CDP should include a policy, that all comparison retailing, and all other retail but local convenience (i.e. up to no more than 1,000 sq. metres gross floorspace) is not permitted outside town centres.
- No sites should be zoned as district centres, as the definition in the Retail Planning Guidelines is far too loose and it's unsuitable for the scale of the towns in County Kildare.
- The town centres of the key towns, the self-sustaining growth towns, and the self-sustaining towns should be marked on maps in the local area plans. Brownfield land with potential for regeneration should be included within the boundaries, if located within the town centre areas.

	<ul> <li>The CDP should not permit comparison retailing, and all other retail but local convenience in any retail warehousing development, whether by new build or by conversion.</li> <li>The Monread shopping centre has clearly shown that permitting large scale retail in peripheral locations, has done huge damage to traditional on-street retailing in the town. The site was zoned as a "district" centre in the late 1990's, KCC must prevent such mistakes in future.</li> </ul>
	<ul> <li>Road Infrastructure</li> <li>A proper vehicular crossing of the River Liffey in Celbridge is required, which includes cycle lanes and pedestrian footpaths.</li> <li>New ring road required for Celbridge.</li> <li>Confey needs a new bridge at the railway station, large carpark and possible link road towards the Galway road.</li> <li>To many traffic lights in Maynooth, please replace with roundabouts.</li> <li>Ring road around Maynooth should be completed.</li> </ul>
	<ul> <li>Ardclough needs work on the narrow bridges that cross the canal and a car-park for pedestrians who wish to walk along the canal.</li> <li>Need to liaise with adjacent local authorities regarding the improvement of the road infrastructure.</li> <li>Services</li> <li>Ambulance and fire station needed for Celbridge.</li> </ul>

		Swimming pool needed for North Kildare.
		Theatre and modern gym required.
		Decline in the town centre – to many apartments not enough services / infrastructure.
		More public parks required for North Kildare.
		<ul> <li>North Kildare needs an emergency fund of 500 million. Aylmer Park in Naas is a good example, which should be replicated in North Kildare.</li> </ul>
		Schools
		3 new schools required for Celbridge.
		Carparks
		Carparks required close to Celbridge town centre and within the Donaghcumper estate.
		Water / Wastewater Infrastructure
		Sewage flowing along Main Street Celbridge, which must be sorted out.
120.	Monasterevin Sustainable Energy	<ul> <li>Pursue a housing model (either directly or through private development) which is self containing in terms of energy requirements and seeks to reduce the overall carbon/environmental footprint.</li> </ul>
	Community (SEC)	<ul> <li>Incorporation of passive solar heating, solar panels and other renewable forms of energy in all new housing developments should be a condition of planning.</li> </ul>
		housing developments should be a condition of planning.

How can the Plan increase the levels of renewable energy production and energy efficiency in the county while protecting the environment, the landscape and public amenity? And What methods should be encouraged to maximise renewable energy provision for commercial developments and individual homes?

- 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.
- A windfarm strategy for the county should be completed as soon as possible in consultation with the public. Efforts should be made to engage, during the consultation process, with any communities likely to be particularly affected by having a windfarm located nearby.
- Local communities should play a key role in the development of renewable energy throughout the county.
- 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 to address this issue in the holistic manner necessary.
- Developments should be looked at in a holistic manner to identify opportunities to develop renewable energy provision through solar, wind, or district heating.
- Local, community renewable energy projects should be encouraged and enabled by Kildare County Council.
- Recommend the setting up of a Kildare Energy Agency sponsored by KCC with purpose to support and coordinate the energy transition for the County.
- Would act as umbrella group for Kildare's Sustainable Energy Communities.
- Kildare Energy Agency could also conduct accredited energy audits to the required standard, feasibility studies, and business cases for retrofits & renewable energy projects that develop.

		<ul> <li>CDP should provide public land where possible for community owned RE projects as occurred/is occurring in Mayo, Limerick, Westmeath and Leitrim.</li> <li>CDP must require that private/commercial RE projects are owned to some degree by the community e.g. of every 10 turbines 1-2 are community owned should provide public land where possible for community owned RE project.</li> <li>Data Centres</li> </ul>
		<ul> <li>CDP set a cap on the number of data centres as they are a major consumer of electricity.</li> <li>Any new date centre should be district heating supply enabled.</li> </ul>
		<ul> <li>Monasterevin is an ideal location for a park and ride for commuters – needs to be located so as to encourage public transport use after the pandemic.</li> <li>CDP must set out ambitious targets for rollout of EV points.</li> </ul>
121.	Emer Hynan	<ul> <li>Replace the democratically rejected Inner Relief Road Objective in table 6.1 of the current CDP 2017- 23.</li> </ul>
		<ul> <li>New objective: To provide an outer ring road for the eastern/north-eastern side of Naas, to cater for by-passing traffic, linking the Blessington Road with the Dublin road close to the junction of the latter with the N7. This outer ring road will be so routed, so as not to traverse or cut through existing residential areas and will provide a long-term development boundary to the east/north-east of the town of Naas".</li> </ul>

122.	Gerard Burns	Sustainable Mobility - Naas Inner Relief Road/The Gallops Avenue
		To attempt to place a roadway on Route 2 of the original Naas Inner Relief Road will not solve the traffic congestion within the town of Naas.
		<ul> <li>The Naas Inner Relief Road/The Gallops Avenue must no longer be considered as part of any local or County DP.</li> </ul>
		<ul> <li>The area of Naas racecourse that the road would pass through should be preserved as a green lung for future generations.</li> </ul>
		<ul> <li>An outer ring road would be more appropriate to take traffic well outside the town to the east and northeast side of the Naas.</li> </ul>
		<ul> <li>Should be designed to cater for by-passing traffic as well as providing a link between the Blessington Road and Dublin Road close to the junction of the latter with the N7.</li> </ul>
		<ul> <li>It is vitally important that such a route would not traverse or cut through existing residential areas and housing estates.</li> </ul>
123.	Deirdre Kennedy	Heritage and Amenity
		The canalways and the Curragh could be developed for dedicated greenways that would bring tourism into the area, thereby bringing economic development with it.
		Sustainable Mobility
		More bike places needed on trains.
		Commuting into Dublin by train from Newbridge and beyond is way too expensive.

# **Healthy Placemaking**

High density housing needs to have facilities for recyling, drying washing, charging EVs, children
playing, etc. In other European countries it is possible for families to live in apartments because of
cellar/ garage spaces, washing and drying facilities, playgrounds etc. Management fees and admin also
make apartment living here unattractive.

#### **Creative Places**

- Build a large public swimming pool for Newbridge, so that schools, swim clubs, swim lessons, aqua aerobics and other groups are not dependent on the largesse of other bodies to enable swimming as recreational and sporting activity. Work with Swim Ireland to develop this facility. Ensure proper swimming lessons for every child in the county, not just those who can pay for them.
- Make culture and creativity more accessible not just physically, but to all children, young people and adults. The old library space and building in Newbridge is architecturally lovely, but no public access is allowed, this could be a lovely cultural space. More public facing space for library and arts centre. Riverbank development is needed to bring the Arts Centre more into the public space and made more accessible from the street. A cultural quarter focused around Riverbank with cafe spaces, arts exhibitions and the linear park could be realised and would add greatly to the town. Outdoor performance space in the linear park could be developed and linked to Riverbank and other programmes.

#### Climate Action

- A plan for installation in existing apartment blocks and housing estates should be created and then implemented.
- Create a forum for young people on the topic of climate action.

		<ul> <li>A programme of plantations of native species of trees would add to the recreational and beauty amenities of the county and would be supported by all, especially younger people.</li> </ul>
124.	Niamh Young	Sustainable Mobility
		Traffic calming is needed.
		Towns should be built for people not cars.
		<ul> <li>Prior to occupation of new houses in Prosperous new infrastructure is needed to enable villagers to get around without a car.</li> </ul>
		Need more cycle paths, HGV restrictions and traffic calming.
		Biodiversity
		Hedge cutting rules to be enforced with a contact no. if contractors are operating out of season.
125.	Irish Green Building Council's (IGBC)	<ul> <li>This Plan will be critical in ensuring and managing local delivery on Ireland's commitments made under the Paris Agreement on Climate and EU burden sharing, translated at national level by the Climate Action Plan, National Adaptation and Mitigation Strategies, Sectoral Adaptation Strategies and local, county level Climate Action Plans.</li> </ul>
		<ul> <li>The CDP sits within this framework however it must be designed so that all its actions, objectives and policies are aligned with the overall national objective of reducing carbon by 30% by 20301 or by 7% per year incrementally2 and then to a position of net zero carbon, by 2050.</li> </ul>
		<ul> <li>The IGBC's mission is to address decarbonisation within the built environment and the construction sector.</li> </ul>

The IGBC believe that the transition from a "carbon culture" to a "climate culture", in terms of both policy and practice need:

- A singular focus by all State actors esp. at Council level to decarbonise.
- Planning policy and development control plays a key role here and it is crucial that it sets the correct framework that aligns with local Climate Action Plans.

The IGBC is proposing that a set of 'first principles' for cross-cutting action to mainstream the principle of net zero emissions and circularity should be applied across the plan.

- Keep an eye on the climate prize (policy makers should at all times focus on the zero-carbon target by 2050).
- Think ZEB (Zero Energy Buildings) not near Zero energy.
- Roadmap to zero (all policies and objectives should be part of the delivery of a roadmap to zero carbon).
- Whole Life Carbon approach for all new and existing buildings.
- Energy efficiency first.
- Go beyond minimum and lead by example.
- Avoid lock-ins (such as large-scale car-based travel modes.
- Make Metrics Matter begin to understand carbon as a key metric of all development and move away from focusing solely on 'energy' management so that a whole life carbon approach is taken.

- Comply with the 'do no harm' principle i.e., no action should undermine environmental objectives
- Think Adaptation how best to 'design-in' adaptation for climate change.
- Think Mitigation how best to ensure that the plan mitigates against increasing the carbon load of the plan over its lifetime and beyond.
- Construction Waste Hierarchy: Reuse, Renovate, Demolish (first to last).
- Future focussed.
- Flexible, adaptative, responsive and agile development.
- Innovation first.

# Development Standards for Net Zero – examples of suggested policies

- Policy S11: New developments standards for air quality and If a development can demonstrate that it
  has exploited all relevant on-site measures it may be possible to make the development acceptable
  through additional mitigation or offsetting payments.
- Policy S12: A. Major developments should be net Zero (see Glossary for definition). B. Major development proposals - include detailed energy strategy to demonstrate how target will be met within the framework of the energy hierarchy.
- The London Plan is useful as an example of a development plan that is aiming for net zero carbon.
- The Council should also develop a policy on green procurement and introduce whole life carbon assessment for all construction.

		The Council should also develop a policy on green procurement and introduce whole life carbon assessment for all construction:
		Commit to net zero carbon emissions in buildings
		<ul> <li>Consider 'total carbon' benchmarks based on occupancy for all housing units and buildings (private, public and/or rental/leased)</li> </ul>
		Start addressing whole life carbon
		<ul> <li>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</li> </ul>
		Council should examine ways by which LCA (life cycle assessment) can be mainstreamed through action at the appropriate level e.g., at procurement level, at planning consent level etc.
126.	L. Carey	<ul> <li>Public transport linkages to cities as well as villages and towns is poor and needs to be better to reduce commuting.</li> </ul>
		The development of a dedicated youth facility in Kilcullen is needed as there are no youth facilities in the town and five pubs.
127.	David Martin	Heathy Placemaking: People and Places
	Wright	Build a youth and age friendly county.
		Forget further rural one-off housing, it is anti-socialisation and environment ideals.
		Think 50 to 100 years ahead, not just the next plan.

- Build communities with facilities; allowing people to be within walking distance to most facilities, including schools.
- Building higher density housing in conjunction with high recreational facilities.
- Consider how you can encourage independent living for an aging population.

# **Economic Opportunity: Innovation Enterprise and Employment**

- Kildare has an opportunity to move away from the reputation of a high commute county to a Life-Work balance county, with a combination of 'home' working and excellent towns with good infrastructure resources, especially recreational spaces.
- Build on the successes and clusters of the past and encourage their growth, not taking anything for granted.
- Uncover and grow the emerging clusters e.g. distribution (Aldi/Lidl), IT (Intel), equestrian (thoroughbred industry), Bord na Mona (Bog of Allen rewetting).
- Take a lead on the green agenda and build strong industries around environment movement.
- Plan and build new life to our town centres and kick out the 'dead shops'.
- Enhance creativity and innovation in our schools.

# **Climate Action: Environment, Climate Change and Adaptation**

- Have a clear strategy that reduces the needs for private transport (See Chapter 4).
- Make safe walking routes, including to schools.

- Protect what we have and endeavour to expand the biodiversity and habitats.
- Work with agriculture and with County Enterprise and develop value added agriculture that is environmentally friendly.
- Develop the counties peatlands and water courses (See Future Chapters).
- Change the status of the county's housing stock to be energy efficient.

### **Sustainable Mobility: Movement and Transport**

- Recognise hierarchy of rights for road users. Pedestrians, Cyclist, Public Transport, Electric vehicles, Other road users transport (cars), etc.
- Planning needs to be '50-100 year' proof as there are major time lags between concept to capital investment.

#### **Pedestrians**

- Zebra crossings should be the first option before lights. The latter used only where there is heavy pedestrian and traffic congestion.
- Pedestrian lights should have priority for the user, that is, if the lights have a two minute 'delay', they
  should turn immediately green for pedestrians, if vehicle traffic has not been interrupted in the
  previous two minutes.
- In general, there should be more/better footpaths and traffic separation in urban areas, especially near schools. This should be planned into all 'urban'/ semi-rural road planning.

# **Cyclists**

• Much of what is said about pedestrians could apply to cyclists.

#### **Private Car**

- Provide fast electric points across the county, as most EV owners can do the slow deliver of power at home.
- Encourage car sharing e.g. at M-way junctions.

# **Creative Places: Social, Community and Cultural Development**

- Would like to see Kildare at the top of the local authority league as Youth and Aged friendly county.
- Need to work with the voluntary sector to realise this.
- More open/green spaces in towns and villages.
- Collaborate with the volunteer groups in the county and we know from the past that in giving funds to the voluntary sector you get great value for money.
- Ask the question how can we as a county be youth & age friendly?
- Recognise the synergy there is between youth and aged, grandchildren and grandparents.

# **Enhance Amenity and Heritage: Landscape and Green Infrastructure**

- Protect what you have in terms of biodiversity, Curragh, Pollardstown, Bog of Allen & the thoroughbred industry.
- Develop the 'Ancient East theme' with good access to ancient monuments.

		<ul> <li>Have a complete plan for Green and Blue ways, rather than piecemeal developments.</li> <li>Open up the Naas/Corbally canal including the walkway.</li> <li>Talks to Irish Water and encourage an ambitious plan for a Bog of Allen Lake/Reservoir.</li> </ul>
		Making it happen: Infrastructure, Energy and Communications
		Engage with Irish Water and share you vision.
		Engage with Eirgrid about Green Energy storage.
		Raise the bar on recycling as a county.
		<ul> <li>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.</li> </ul>
128.	Creative	Climate Action/Natural Heritage
	Rathangan Meitheal	<ul> <li>Urgent need for Kildare Co Co to audit the state of all peatlands in Co Kildare to establish what activities are ongoing on the site, is it cutover, bcut for turf, used for horticulture, what are the after- use plan, how much land is owned by BNM or in Private ownership This audit would identify the key sites for conservation on the basis of their importance as habitats for wildlife, sphagnums and other plant-life.</li> </ul>
		<ul> <li>Bord na Mona has generated a unique set of buildings both permanent and temporary. An inventory of industrial buildings linked to peat extraction should be conducted to establish some key items for preservation.</li> </ul>

	T	1
		<ul> <li>In the case of rewetted cutovers and raised bog remnants there is a need to ensure that sensitive areas are protected, by ensuing that tourist/recreational needs do not take precedence over the protection of vulnerable sites and that easy access to such sites is not facilitated.</li> </ul>
		Infrastructure/Renewable Energy
		Kildare's County Development Plan should not give positive support to the development of renewable energy at the expense of other considerations.
		<ul> <li>In granting planning permission for such developments Kildare Co. should 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.</li> </ul>
129.	Irish Peatland	Loss of Peatland Habitat in County Kildare
	Conservation Council (IPCC)	County Kildare once had 18,473ha of intact raised bog habitat but this has been reduced to 1,205ha.
		End to state sponsored peat extraction is a chance to re-wild this habitat and for the flora/fauna.
		<ul> <li>Any commercial and community-based rehabilitation must be connected with joined up thinking to maximise the biodiversity and conservation potential.</li> </ul>
		County Kildare Peatlands
		KCC need to make an inventory of peatland sites and their LU status.
		Sites of conservation importance could then be identified through a County wide survey.

 Once this baseline is established local community groups (LCGs) could then manage the sites with necessary provided funding.

### **Carbon Accounting**

- Increasingly evident that peatlands act as a carbon sink and KCC need to create a program to establish how much carbon is stored in the County's peatlands and use this as a baseline for future monitoring and to measure the success of restoration projects.
- Would be in-line with carbon accounting under land-use, land-use change and forestry (LULUCF).
- This data could permeate into other research programmes undertaken. For example, the County could engage in a project to assess the condition of its carbon stores and this would help inform future policy creation for the county.

### **Amenity**

- So far peatland restoration/rehabilitation has been patchy and not connected these sites would benefit from increased interlinkage between sites via protected nature corridors.
- This would provide increased public amenity and would promote economic potential through tourism.
- New amenities such as the Barrow Blueway should be interconnected with habitats in the surrounding communities creating linked cycle and walking routes between them.
- Visitors should not be forced to stick to one route but instead the abovementioned interconnection
  would provide opportunities for people to explore other areas such as Lullymore which is cut off from
  both green/blueways.
- Need to be connected to public transport and accessible walking/cycle routes.

		<ul> <li>Kildare County Council could designate a Recreation Officer to connect community groups who are interested in exploring and potentially developing local amenity.</li> <li>Renewable Energy Strategy</li> <li>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.</li> <li>IPCC require KCC to avoid haphazard siting of windfarms with no integrated plan.</li> <li>IPCC need to see the development of a strategic windfarm plan which takes into account the conservation needs of the County.</li> <li>Nitrogen Deposition</li> <li>Nitrogen deposition has been identified as a serious concern within Special Areas of Conservation.</li> <li>Increased nitrogen loads have been associated with to new housing developments, roads, agriculture and urban wastewater.</li> <li>This needs to be monitored in County Kildare and appropriate measures must be put in place including strengthening planning policy so as to ensure that developments are not going to be detrimental to any designated site through increased nitrogen deposition.</li> </ul>
130.	Newbridge Family Resource Centre	<ul> <li>Vision</li> <li>Following consultation with their community, the NFRC has a vision for Kildare over the next 10 years where unemployment is at a minimum, community is connected to each other, to services, businesses and recreational amenities in their locality and one where our community is a supportive and inclusive place for all.</li> </ul>

• There should be a linked approach to education, training and employment opportunities such as local employment drives for young people. Better communication among all members of a community could be achieved by a localised mobile app. Existing services and facilities to be supported to allow for increase in provision. Community Call to be supported to continue post Covid to support vulnerable community members.

# **Healthy Placemaking**

• A community garden allotment, a playground, a playground suitable for children with disabilities, an area suitable for teenagers (including parking, seating lighting etc.) are recommended for Newbridge.

## **Economic Opportunity**

• It is recommended that better education opportunities are provided for young people; expand the youth reach service in Newbridge; develop links between apprenticeship and education; expansion of the centre etc.

#### **Climate Action**

- It is recommended that more bins and a community recycling centre is required.
- Climate change awareness is required in the business community.

### **Sustainable Mobility**

- It is recommended that a railway link be provided from Newbridge to Maynooth, and from Newbridge to Dublin City Centre.
- More links should be provided from rural towns into Newbridge.

• 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.

#### **Creative Places**

- The centre offers family support services to families in disadvantaged areas and is part of a national network based on a life cycle approach.
- It is recommended that Newbridge needs a big community space and facility for children, young people, families and older people. A public indoor swimming pool is also needed.
- Wheelchair accessible ATMs are required in Newbridge.
- The impact of Covid on our communities is not fully known yet. Investment will be needed for services to support society through the trauma of the pandemic.

# **Enhanced Amenity & Heritage**

• There is opportunity for a walking track/garden at Dara Park. Improvements to lighting and walking surfaces are needed to make walking safer in the area.

# **Infrastructure, Energy & Communications**

- There is a growing number of new houses in Newbridge, but without the amenities required to sustain them (more schools, better transport and local amenities). Better transport is needed for the community.
- Council owned buildings could be used better, like the Town Hall.
- A new secondary school is needed.

# Joe Penny, 131. This submission is on behalf of the residents of Parson Lodge Estate, Maynooth (PLRA). Its focus is on Chairman of real needs for the betterment of the people of Maynooth and Kildare. PLRA **Healthy Placemaking** Regeneration of towns: Town centres should be repopulated. Plans for towns and villages must focus on long term sustainable living. Family living should be facilitated in towns and therefore high density, high rise apartments will not work. For families to live long term in town centres, they must have sufficient space. Amenities should be provided by condition when granting developments permission. Create unique identities of place: The Plan should recognise the unique characteristics of each town to drive forward a nuanced plan. A unique vision should be drawn up for each place. Placemaking: The focus should be on people, place and processes, involving best practice in urban design, architectural practice and good planning guidelines. For a town like Maynooth, active community participation is envisaged. A 'big project' idea can allow local communities to transform their community in conjunction with KCC and others. Town centres first making them capable of being lived and worked in to build resilience. Work patterns/hubs/spokes: There will be a need for innovative moves of urban acupuncture. Flexible offices will be needed, supported by high speed broadband. This can be achieved by re-purposing empty buildings. Third Space: This is the social surroundings separate from home and work. These need to be

cultivated. We need high quality outdoor safe public spaces.

• The Plan should provide space to bring people together and create destinations. 'Place' should have meaningful connections and be walkable.

# **Economic Opportunity**

- A 10 year plan should be developed with Maynooth University.
- Every town or locale should use its Unique Selling Points to support local economic development. We should build an economy of smart specialisation around towns and regions. A 'business' planning focus, rather than a 'land use' scheme.
- The Plan should facilitate the collection and sharing of local date through GIS and LIS.
- The Plan should promote the sustainable circular economy.

### **Creative Places**

• Investment funds should be identified in the Plan to enhance arts, culture, sustainable tourism, improve outdoor recreation and natural heritage.

# **Enhanced Amenity & Heritage**

• Maynooth needs a public swimming pool, a youth centre and a People's Park.

# Making it happen

• Kildare should embrace the 'Fifteen Minute City' concept, whereby most human needs are within a distance of 15 minutes. This reduces the need to travel, reduces fuel consumption. (This issue is considered a Core Strategy Issue, and is considered under Healthy Placemaking).

132.	Eco Parish Prosperous	<ul> <li>Overcutting of hedgerows is alarming. Hedgerows are part of our heritage, are wildlife corridors, carbon sinks and are vital for biodiversity. The Plan should include urgent action to address this.</li> <li>The Plan should include steps to restore Ballinafagh Bog and Lake. Drained bogs are deteriorating as habitat and intervention is necessary.</li> <li>The planting of laurel should be banned. It provides little or no benefit, it allows no other plants to grow underneath it and is often seen as toxic.</li> </ul>
		<ul> <li>Conditions of planning permission should require native planting only. Existing hedgerows or trees on site should not be removed unless absolutely necessary.</li> <li>KCC should have a Biodiversity Inspector.</li> <li>Round up should be banned.</li> <li>Native trees should be planted in all villages and towns in public areas.</li> </ul>
133.	Brendan Colivet	<ul> <li>Multi-generational housing.</li> <li>The Kildare Age Friendly Programme (2010) is a useful starting point on this issue. It aims to support people of all ages to actively participate in community activities, to live safety and securely in their own homes, to stay connected to people, to remain healthy and active in their communities and to be treated with respect regardless of age.</li> <li>There is an ongoing case study into a Multigenerational/Integrated Community Development in Co. Kildare, which may result in Integrated Liveable Community.</li> <li>Liveability is defined as containing 8 domains: Housing, Outdoor Space and Buildings, Transportation, Communication &amp; Information, Civic participation and Employment, Respect and Social Inclusion, Health Services and Community Supports and Social Participation.</li> </ul>

134. U	Ina Halpin F	<ul> <li>The Men's Shed Movement in Kildare was identified in a global study as one of the 16 best globalk examples of the 8 domains of liveability.</li> <li>KCC should examine the potential of new housing models such as multi-generational integrated community development to ensure older people stay socially connected in their community and to provide social care.</li> <li>The Plan should include a policy objective that KCC will consider the changing demographics in the County and plan for the predicted growth of an ageing population.</li> <li>The Plan should include a policy objective that KCC will identify appropriate urban and rural sites to satisfy and sustain the need for community integration and enhancement schemes.</li> <li>Healthy Placemaking</li> <li>Derelict/ unused / brownfield sites should be developed for housing/ retail / industry without encroaching on natural spaces. Compulsory purchasing should be used. Apartments over shops should also be encouraged.</li> <li>New housing developments should be conditional on the planting of native trees, wildflower areas, community gardens and native hedgerows (instead of wooden fences). Laurel and cypress hedging should be banned.</li> <li>Suitable native trees should be planted in towns and villages with sufficient space to grow.</li> <li>Newbridge's Liffey Linear Park and Athy's People's Park are good examples of healthy placemaking.</li> </ul>

		Economic Opportunity
		<ul> <li>The opportunities for jobs in areas that will enhance our environment should be supported, such as rewetting/restoring peatlands; high nature value farming; organic food; local biogas plants, energy retrofitting; traditional skills training; indigenous manufacturing of renewable energy products; keep it local.</li> </ul>
		Climate Action
		<ul> <li>Climate change mitigation is far more important than adaptation. Urgent actions are needed such as the appointment of a KCC Biodiversity Officer; KCC hedgerow cutting should be less aggressive; incentives should be provided to farmers to allow hedgerows grow tall; tourism projects should prioritise the protection of biodiversity (e.g. Abbeyleix Bog project); more recycling facilities are required; natural flood management solutions are required to address increased rainfall, tree planting around towns should be encouraged; a comprehensive action plan is required to deal with invasive species.</li> </ul>
		Sustainable Mobility
		<ul> <li>Increased use of public transport should be encouraged, i.e. car pooling, shuttle buses and safe parking infrastructure, particularly as this relates to people travelling to work.</li> </ul>
		Infrastructure, Energy & Communications
		<ul> <li>Community hubs should be established (from existing public buildings) to offer services such as Repair cafes; Skills/ Equipment sharing; community environmental directories (access to information); energy and retro fitting hub.</li> </ul>
135.	Reada Cronin	Healthy Placemaking

- The Covid pandemic has exposed the fault-lines in how we are living now. This Plan must prioritise the psychological welfare of the community. The Plan could make an official recognition of all in our community who have lost their life to Covid (e.g. a park or natural amenity).
- There is inequality in housing. Many working people face a lifetime of renting. KCC must make it clear to central government that this crisis must be tackled urgently.
- The plan should address future housing crisis facing older people, in terms of mix and accessibility. Accommodation should facilitate pets and growing areas (food/flowers). We must plan for our older people to remain in their homes and in the community for as long as possible.
- Single people's housing need should also be considered as they are often excluded from the rental and mortgage market.
- All housing developments should be heavily planted.
- Every town in Kildare needs a community centre.
- A swimming pool in North Kildare is central to development.
- Primary Care Centres must be adequately staffed. An audit of these centres and their capacity and condition should be undertaken within the plan.
- The plan should promote the use of An Ghaeilge.
- Housing developments must be delivered in tandem with accessible primary and secondary schools, as well as affordable public childcare.
- An affordable transport system is vital for a sustainable future. Sinn Féin is proposing free public transport for all under-18's. Free public transport for all will have to be a consideration in the future to lower emissions. Electrifying out national rail service is inevitable. We should extend the electric rail-

136.	Clane Community Council	Healthy Placemaking
		<ul> <li>The 21st century must be the age of conservation, insofar as we look after ourselves and the planet in a holistic and responsible way. This plan can reach out to the community and remind us that each choice has a profound impact not just locally, but globally.</li> </ul>
		<ul> <li>Just Transition in energy and emissions is critical to the CDP. It will take action together to make the shift, irrespective of who can afford to make the change.</li> </ul>
		Climate Action     Every aspect of the Development Plan should be examined in terms of its environmental impact and
		A social and affordable housing plan is a critical economic opportunity for Kildare.
		Local business will require support, such as rate waivers or other supports.
		<ul> <li>The ingenuity and creativity offered by Maynooth University represents major economic potential locally and across the state.</li> </ul>
		Infrastructure and broadband are central to economic opportunity.
		Economic Opportunity
		All planning must reflect the need to keep out air as clean as possible.
		line to Kilcock to improve opportunity and accessibility. A generous bus service should also be provided from rural parts of the County to Naas General Hospital and Maynooth University.

- To enhance the quality of our environment and to enable healthier lifestyles, the following suggestions are made: Enhancing pedestrian and cycling routes around and between our towns and villages; discouraging through traffic in town centres; prioritising sustainable transport modes; pursuing improved permeability; reducing the proliferation of utility boxes in urban areas.
- Lessons learned from Covid pandemic include: the need for improved public open spaces; policies should be developed to avoid KCC land being leased to sports clubs and being inaccessible to the public.
- To address the climate change crisis and biodiversity crisis, the following are suggested: settlement strategy growth should be apportioned to rail infrastructure; Decarbonising Zones should be identified; Council should be cautious of high energy demand data centres; policies should protect remaining biodiversity; Local Authority should manage environmental reports submitted with planning applications; native species should be used in landscaping plans; native hedgerows should be protected; riparian areas should have appropriate zonings to achieve setback distances that support high ecological status of waterbodies.

### **Economic Opportunity**

- Infrastructural shortfalls include the rail network, childcare, schools and urban centre renewal.
- The Plan should include a policy to support people working from home with a network of local digital hubs.
- HGV through traffic should be discouraged through town and village centres.

#### **Climate Action**

- The main environmental issues are: High rate of commuting to work; SHD's in towns with no mass public transport; Bog rehabilitation could be squandered by inappropriate development; ABP ignoring County and Local Area Plans; Over development of remaining wilderness.
- To protect water quality, the following measures are suggested: Nature based solutions should be chosen over hard engineering; Re-wet historic areas of wetland; provide managed flood plains.

### **Sustainable Mobility**

- To encourage people to walk/cycle/use public transport, there should be reduced HGV traffic through town centres and more provision of footpaths and cycle paths.
- New transport infrastructure is required as follows: Bus capacity needs to be improved between Clane to Dublin, and Clane to Maynooth; More bus shelters; Quality bus corridors on the N4 and N7; Car drop off at school entrances; prepare a county level transport strategy to frame and support local transport strategies; exploit the Local Link service to reduce car dependency.
- To create successful streets, segregated cycle paths and reduced speed limits should be implemented.

#### **Creative Places**

- Community centres should be provided in growing towns and villages.
- Current public open space standards do not seize all opportunities. Native planting should be a default. Copses and thickets should be used.

# **Enhanced Amenity and Heritage**

• To conserve biodiversity and landscape, towns and villages should have strategic parkland amenity in a traffic free environment that all ages can enjoy.

		<ul> <li>Reference is made to their submission to the Open Space Strategy, which refers to general considerations, management and maintenance, County Kildare issues, Biodiversity and Climate Change.</li> <li>Policies should leave room for urban centre amenity areas near natural amenities. Greater weight should be placed town centre locations for natural environment protection and access. Flood zones should not be the deminant form of open space amonity.</li> </ul>
		should not be the dominant form of open space amenity.
		The reuse of all buildings should be a priority and should be considered before demolition.
		Making it happen
		<ul> <li>Emphasis should be placed on micro-generation, energy waste reduction and avoidance of biodiversity loss in the development of renewable sites.</li> </ul>
137.	Sonya Moore	<ul> <li>Biodiversity: Kildare could be a leading county in implementing the measurements outlined in the Landscape Convention (Articles 5 'General Measures' and 6 'Specific Measures' are quoted).</li> </ul>
		<ul> <li>Kildare should be proactive in adopting and implementing positive biodiversity actions, e.g. appoint a Biodiversity Officer; implement a Green Roofs policy; use of 'fauna gateways' (instead of walls in new developments); Prohibit sale of peat for horticulture; Provide composting space in every town/village; maintain a database of surveyed biodiversity (by Heritage officer) and use when considering EIAs/planning applications; the Red Book should be published on KCC websites, Kildare should increase its number of SACs/SPAs/NHAs and pNHAs due to its varied landscape; any EPA protected drinking water rivers/lakes should be made public and included in any planning application; to make public unauthorised landfills; and to address any long standing and recent landfills urgently.</li> </ul>
		<ul> <li>All existing hedgerows in Kildare need to be protected under the Landscape Convention 2000 and inline with the recommendations of the Kildare Hedgerow Survey (2006).</li> </ul>

- The existing situation in relation to tree felling is unsustainable. Greater protection measures are required such as: Trees 15cm diameter should be protected; List all protected trees and rare trees and forests; Insist on bonds where development sites include mature trees; Native wooded areas should be protected; Urban planting of native trees/shrubs should be increased; Monoculture should be avoided; uncultivated woodlands should be protected in law; tree planting should be encouraged in any riparian environment.
- Pollinator Plan: Pollinator friendly planting should be encouraged in all areas; new development should have a mandatory percentage of pollinator planting; Citizen's science should be encouraged and published on KCC websites.
- There should be more allotments in every town/village; with beekeepers; that provide courses.
- No insecticides etc. should be applied in any public spaces.
- Commercial/Industrial sites should have a percentage of their open space dedicated to the national pollinator plan.
- Street/Road lights should be down cast, low lux. Any state/local authority large scale buildings should switch off lights between midnight and 5/6am to decrease light pollution. Street lights should be turned off at night time. Motorway lights could be generated by wind turbines or solar panels.
- There should be talks between KCC and stakeholders to establish what is needed to maintain native flora.
- The Grand Canal overflow at Sallins should be restored for historical, educational and visual reasons.
- Incentives should be given to convert existing roofs to green roofs. Rainwater from roofs can also be harvested.
- Bogs need to be preserved as they are an invaluable carbon sink.

		Irelands ecological footprint is now 7 times its own land area.
		<ul> <li>Town Centres: The number of supermarkets should be reduced. Town centres need to be rejuvenated. Historical streetscapes should be retained. Special events should be held.</li> </ul>
		<ul> <li>Affordable houses: All housing development should have a good percentage of affordable houses, be climate friendly in design with more biodiversity. 'Tiny Homes/Houses' should be provided for in the Plan as an affordable option.</li> </ul>
138.	Maynooth	Economic Opportunity
	Campus	
	Conference & Accommodation	<ul> <li>The Council should explore a Regional Convention Bureau for County Kildare which would source and support business tourism events such as Corporate meetings, incentive programmes, academic conferences and medium to large scale sports, activity, education and culture events. This would build on Kildare's profile in the fields of enterprise, education, sport and culture.</li> </ul>
		<ul> <li>Kildare should establish a Charter to connect and unify Kildare tourism operators (the 'county jersey' approach). It is currently disconnected for reasons relating to the road network, limited public transport options and lack of co-operation between tourism properties.</li> </ul>
		<ul> <li>The Council should examine the feasibility of a tourist office in one or both of the Key Towns (Naas and/or Maynooth) to provide centralised and co-ordinated information for tourists who stop.</li> </ul>
139.	Swindon	
	Investments	<ul> <li>It is suggested that policy EO55 of the current CDP should be re-affirmed as it relates to Carton House and its acknowledgement as a tourism facility of national and international significance. It is the owners intention to complete original plots (as per original 1991 masterplan and updated in 2020) where further residential style development was envisaged and supported by EO55. The conservation and restoration of Carton Demesne's woodland and protected structures are reaffirmed.</li> </ul>

		<ul> <li>The Plan should recognise the key role that Carton plays from a tourism, leisure, sports, residential and employment perspective in Kildare.</li> <li>Appendix 1 includes information about Carton Demesne.</li> </ul>
140.	ESB	Reducing Green House Gas Emissions
		<ul> <li>ESB working towards at least 40% reduction in domestic GHG emissions by 2030 compared to 1990 levels. Note: in 2019, the Minster 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.</li> </ul>
		Supports TNO1 of the current CDP in relation to safeguarding strategic corridors.
		Supports a review of Chapter 8 of the CDP to align with NPF, RSES and national guidelines.
		Hydro Generation
		<ul> <li>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.</li> </ul>
		Onshore Wind Energy
		<ul> <li>Regard to be taken of Draft Revised Wind Energy Development Guidelines (2019) which confirm a 'preferred draft approach' when formulating planning policy.</li> </ul>
		<ul> <li>Request that KCC prepare a Wind Energy Strategy (WEO 1 in CDP) for a clear strategy, targets and identification of suitable areas for wind energy development.</li> </ul>

- Need to consider areas that cross county boundaries that may be suitable for wind energy development (ref to RPO 98 and RPO 99 of RSES).
- Suggests that a 'Renewables-Enabling Map' showing preferred locations for FlexGen gas turbine plant and synchronous condensers could be included in a Kildare Wind Energy Strategy.

### Solar

- Supports the continuation of Policy SE 1 (CDP) which promotes the development of solar energy infrastructure in Kildare.
- 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.
- 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.

### **Energy Storage**

- Reference to Section 8.7 of the CDP in relation to seasonal energy storage technologies.
- 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.
- The inclusion of specific policies to support these new technologies should be considered.

#### **Telecommunications**

		<ul> <li>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).</li> <li>Supports co-location policy.</li> </ul>
		Supports co-location policy.
		Would welcome support for 'smart metering'.
		<ul> <li>Encourages policies consistent with the Department Circular (PL 07/12 of 2012), particularly for broadband capability.</li> </ul>
		<ul> <li>Welcomes support for Electric Vehicles in current CDP (Section 17.7.6) &amp; KCC Climate Change Adaptation Strategy 2019-2024 Objective T56. Reference to increase to 20% for number of parking spaces in line with forthcoming EU Energy Performance of Buildings Directive.</li> </ul>
		<ul> <li>Recommended updated minimum parking standards in relation to electric vehicles provided in Section 2.4.1 of submission.</li> </ul>
141.	IWAI Royal Canal	Tourism
		<ul> <li>Opportunity to develop eco-tourism links between boglands and canals (including mooring posts, jetties and greenway trails).</li> </ul>
		<ul> <li>Potential for development of inland marinas including on flooded bogs adjacent to the canal system (e.g. Norfolk Broads, UK).</li> </ul>
		Need for basic services along the length of the Grand Canal Greenway.
		The only circular boating route in Ireland (linking Royal Canal, Shannon and Grand Canal) which passes through Kildare needs to be promoted as a tourist route.
		Living

		<ul> <li>Opportunity to create clusters of liveaboard communities to include basic services reflecting current and projected demand.</li> </ul>
		Corbally Harbour
		Opportunity to develop Corbally Harbour with appropriate supporting services.
		Silting of the Corbally Line is necessary to increase water supply.
		R409 culvert needs to be replaced by a bridge to reopen the Corbally Line, development continues to encroach the site of the culvert.
		Appendix
		<ul> <li>Included 'Nav-Watch Report 2020; A Condition Survey of the Grand Canal, Royal Canal &amp; River Barrow Navigations' which includes a 'snag' list of issues that could be addressed through targeted maintenance, with increased funding, as part of an overall improvement plan.</li> </ul>
142.	Maynooth	Transportation
	Cycling Campaign	a. Need for increased evaling infrastructure
		Need for increased cycling infrastructure.
		KCC policy should be to reduce car dependency.
		Calls for with reallocation of road space for walking/cycling.
		More sustainable modes of transport should be encouraged.
		Strategic Cycling Plan to be prepared for all towns with local targets/monitoring/reporting.
		Low Traffic Neighbourhoods in larger towns should be promoted.

- Extension of the electrified line from Hazelhatch to Kildare town should be promoted.
- Light rail line from Sallins to Naas should be promoted.
- Car parking should be discouraged in town/village centres.
- Bus/transport interchange requested at the depot at KCC yard (Naas) beside 'Hedderman's' car park.
- Additional electric charging points requested. The required spaced should be relocated from roadspace and/or car parking spaces.
- Request for Park & Ride facilities outside towns, close to motorway exits with bus connections.
- Park & Stride facilities to be encouraged in the vicinity of schools.
- Request for direct accessible public transport links and cycle infrastructure between rail stations and towns.

# Accessibility

- Elimination of 'kissing-gates' requested which hinders accessible movement.
- Universal accessibility should be promoted.
- Continuous footpaths and cycle paths should be provided.
- Wider footpaths requested.
- Universal access in car parks and amenity areas should be available.
- Shared spaces should be encouraged but only where there are reduced traffic volumes.

	<ul> <li>Increase in number of pedestrian and cyclist crossings requested.</li> <li>Request for an accessibility audit to be conducted throughout Kildare.</li> <li>Maximise permeability between adjoining residential areas.</li> <li>Enable active travel.</li> </ul> Amenity <ul> <li>Potential for greenway between Edenderry and Enfield along the path of the former railway.</li> <li>Development of Corbally Harbour, Naas, encouraged.</li> <li>Development standards should provide for improved active travel and green infrastructure.</li> </ul>
143. Joanne Pender	<ul> <li>More outdoor seating areas requested.</li> <li>Sustainable Living         <ul> <li>Community gardens and food waste facilities in public spaces should be encouraged.</li> </ul> </li> <li>Social Infrastructure         <ul> <li>Co-locate childcare with care for the elderly.</li> <li>Provide more community childcare facilities.</li> <li>Need for community facilities for teenagers.</li> </ul> </li> <li>Housing</li> </ul>

- Sheltered housing in town centre locations to be encouraged.
- Lack of affordable housing in Kildare.

#### **Amenity**

- Complements the works undertaken at the Square in Kildare Town which should be rolled out to other areas.
- Provide more adult exercise equipment co-located with playgrounds.
- Importance of outdoor space, request to continue to develop and open Cherry Avenue in Kildare Town.
- Improve walking and cycling routes around The Curragh Plains.

### **Employment**

- Trade and apprenticeship education centres should be encouraged throughout the county.
- Concerns surrounding the use of energy around data centres.
- Proposals for data centres in Kildare should only be permitted when the impacts on the environment, climate change targets and on water services is fully understood. Renewable sources of energy should be considered.

# **Transportation**

- Need for more faster electric vehicle charging points.
- Support for electric public transport.

		<ul> <li>Need for improved rail capacity.</li> <li>Need to improve cycle lanes especially near schools.</li> <li>Need to improve bus shelters.</li> </ul>
144.	Elizabeth Cullen	<ul> <li>Climate Change</li> <li>Need to maximise opportunities for local markets.</li> <li>Refundable centres for hard plastic to be considered e.g. Monaghan.</li> <li>Provide for publicly accessible allotments.</li> <li>Employment</li> <li>Need for more local shops in town centres.</li> <li>Consideration to be given to a green energy/circular economy hub/ climate action training centre on the old Bord na Mona site in Newbridge.</li> <li>Energy</li> <li>Consideration to be given to the development of community owned locally generated power supplies.</li> <li>Consider bio-solar roof tops on developments.</li> <li>Transportation</li> <li>Development of cycle lanes on all roads should be considered.</li> </ul>

		Biodiversity
		Call for the appointment of biodiversity officers for each municipal area.
		<ul> <li>Promotion of biodiversity through planning policy including inter alia; green spaces, retention of trees/hedgerows, community composting facilities, swift boxes in all new housing developments, planting of pollinator friendly native Irish trees and vegetation.</li> </ul>
		<ul> <li>Using existing Bord na Mona rail tracks to link the Royal, Grand and Barrow Canals. Could be used as a network of green roads linking rewetted cutaways into a regional wilderness park.</li> </ul>
		Amenity
		Develop pedestrian and open spaces in towns/villages.
		Water Services
		Consider using grey water for toilet flushing or composting toilets.
		Investigate the possibility of using integrated water management systems in boglands.
		Housing
		Explore co-housing
145.	Liam Knowles	Housing
		<ul> <li>Consider including Clonuff (which has its own wastewater treatment system) within the Broadford Rural Settlement (c. 1.4k to the north) as an alternative to one off rural housing</li> </ul>
		Serviced sites to be encouraged (18b of NPF)

		<ul> <li>Compact growth to be encouraged (RSES; NSO 1)</li> <li>Appendices</li> <li>Proposed layout for a specific site</li> <li>Outline design proposal for a specific site</li> <li>Preliminary Services Specification with reference to a specific site</li> <li>It should be noted however that the Appendices as submitted will not be considered as it is considered that to do so would be contrary to Section 11 (2) (b) (bc) of the Planning and Development Act 2000 (as amended).</li> </ul>
146.	Bracq Ltd	<ul> <li>Seeking the extension of the Rural Settlement boundary at Rathcoffey.</li> <li>Serviced sites could be considered at Rathcoffey.</li> <li>Amend Policy SO9 in the CDP to read 'or, where such development [in the CSO settlement boundary] is not feasible, within centrally located brownfield lands adjoining the existing built-up footprint'.</li> <li>Employment</li> <li>Lands for employment uses could be considered at Rathcoffey.</li> </ul>
147.	Ardlea Construction Ltd	Housing

		<ul> <li>Promotion of Prosperous for additional housing. Range of available supporting social and physical infrastructure. Reference to national policy documents promoting additional housing.</li> <li>Serviced sites to be encouraged.</li> <li>Compact growth to be encouraged.</li> <li>Infrastructure</li> <li>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.</li> </ul>
148.	Felipe Reitz	Housing
		Request that lands within the curtilage of the village of Kilteel be considered for housing.
149.	Cormac Hickey	Housing
		Request that the area designated for 'Settlement Expansion' in Calverstown be extended.
		<ul> <li>Reference to a number of national policy documents that support additional housing in towns/villages in particular.</li> </ul>
		Alternatives to one off rural housing should be encouraged.
		Parts of this submission refer to a specific site for housing purposes. In this regard it should be noted that consideration will not be given to this detail at this time as it would be contrary to Section 11 (2) (b) (bc) of the Planning and Development Act 2000 (as amended)

150.	David Mulcahy (Brenda Woods)	The submission argues for the extension of the settlement boundary of Maganey / Levitstown.
		<ul> <li>The submission also outlines the planning context as to why residential development should be directed into settlements like Maganey / Levitstown.</li> </ul>
151.	David Mulcahy (redacted)	The submission argues for the extension of the settlement boundary of Maganey / Levitstown.
		<ul> <li>The submission also outlines the planning context as to why residential development should be directed into settlements like Maganey / Levitstown.</li> </ul>
152.	Celbridge Guided Tours	<ul> <li>Please add the Swift and Vanessa original Bower located on the Liffey riverbank at Celbridge Abbey to the protected structure list.</li> </ul>
153.	Eddie Lenehan	Sustainable Mobility
		<ul> <li>The proposal to develop the 'Naas Inner Relief Road' was comprehensively defeated by a democratic vote of the Naas Municipal District in June 2019.</li> </ul>
		<ul> <li>Discourage car journeys and facilitate cycling and walking alternatives in the town and residential areas of Naas. Promote the planting of trees along these cycleways/ walkways.</li> </ul>
154.	Paul Murphy	<ul> <li>The Naas Inner Relief Road was a Roads priority in the Kildare County Development Plan 2017-2023 and was defeated by a democratic vote of Naas Municipal District in June 2019.</li> </ul>
		<ul> <li>The Gallops Avenue, which was introduced in the recent non-statutory Naas / Sallins Transport         Strategy, will move thousands of vehicles, including large volumes of Heavy Goods Vehicles in very         close proximity to quiet, mature residential estates.</li> </ul>

		<ul> <li>The route of the Gallops Avenue follows an almost identical line to that of the now defunct Naas Inner Relief Road. A considerable portion of this route traverses by Naas Racecourse, which must be preserved as the "Green Lung" portion of the Town.</li> <li>The now defunct Naas Inner Relief Road / The Gallops Avenue is out of date.</li> <li>The following objective should be included in the new Plan: 'To provide an outer ring road for the eastern/ north-eastern side of Naas to cater for bypassing traffic, linking the Blessington Road with the Dublin Road close to the junction of the latter with the N7. This outer ring road will be so routed so as not to traverse or cut through existing residential areas, and will provide a long-term development boundary to the east/north-east of the town of Naas.'</li> </ul>
155.	Fine Gael-Caragh	Sustainable Mobility
155.	Branch	Sustainable Mobility
		<ul> <li>An objective of the KCDP2023-2029 should be the laying down of a segregated cycle &amp; walking track to link Caragh with Millenium Park, via the most direct route through Halverstown Cross.</li> </ul>
		<ul> <li>A segregated cycle &amp; walking track linking Caragh with Millenium Park would allow those living in Caragh, to access the Grand Canal Greenway via Naas. We believe that permitting such safe access would prove more cost effective than building a more direct link between Caragh and the Grand Canal Greenway.</li> </ul>
156.	Teresa Behan	Sustainable Mobility
		<ul> <li>The Naas Inner Relief Road was a Roads priority in the Kildare County Development Plan 2017-2023 and was defeated by a democratic vote of Naas Municipal District in June 2019.</li> <li>The Gallops Avenue, which was introduced in the recent non-statutory Naas / Sallins Transport Strategy, will move thousands of vehicles, including large volumes of Heavy Goods Vehicles in very</li> </ul>
		close proximity to quiet, mature residential estates.

		<ul> <li>The route of the Gallops Avenue follows an almost identical line to that of the now defunct Naas Inner Relief Road. A considerable portion of this route traverses by Naas Racecourse, which must be preserved as the "Green Lung" portion of the Town.</li> <li>The now defunct Naas Inner Relief Road / The Gallops Avenue is out of date.</li> <li>The following objective should be included in the new Plan: 'To provide an outer ring road for the eastern/ north-eastern side of Naas to cater for bypassing traffic, linking the Blessington Road with the Dublin Road close to the junction of the latter with the N7. This outer ring road will be so routed so as not to traverse or cut through existing residential areas, and will provide a long-term development boundary to the east/north-east of the town of Naas.'</li> </ul>
157.	Shane Blake	Sustainable Mobility
		<ul> <li>Object to 'The Gallops Avenue' proposal, which is a similar proposal to that of the Naas Inner Relief Road that was recently rejected by the local members. To re-introduce this proposal under a different guise would be undemocratic and disrespectful.</li> </ul>
		Reasons for objecting to 'The Gallops Avenue' proposal are as follows:
		■ Naas needs an "Outer Relief Road"
		<ul> <li>This road will not serve its intended purpose and will not solve any Naas traffic problems "short or long term".</li> </ul>
		<ul> <li>This road is bringing traffic into the town to take it back out again.</li> </ul>
		<ul> <li>This road will only shift the traffic problems and congestion to junctions at the Blessington Road, the Tipper Road and the Dublin Road.</li> </ul>

		This road will cause problems for anyone living in estates along the route, air pollution, noise pollution, road safety issues and accessibility.
		<ul> <li>In conclusion, this road proposal is out of date and should be removed from the draft plan.</li> </ul>
158.	Steven Fadian	Sustainable Mobility
		<ul> <li>The Naas Inner Relief Road was comprehensively defeated by a democratic vote of the Naas Municipal District in June 2019.</li> </ul>
		<ul> <li>The Gallops Avenue, which was introduced in the recent non-statutory Naas / Sallins Transport Strategy, will move thousands of vehicles, including large volumes of Heavy Goods Vehicles in very close proximity to quiet, mature residential estates. Congestion will be moved from current traffic junctions to new proposed junctions at The Gallops, Tipper Road and Sunday's Well.</li> </ul>
		The Naas Racecourse area must be preserved as the "Green Lung" portion of the Town.
		The proposed Naas Inner Relief Road / Gallops Avenue is now out of date.
		• The following objective should be included in the new Plan: 'To provide an outer ring road for the eastern/ north-eastern side of Naas to cater for bypassing traffic, linking the Blessington Road with the Dublin Road close to the junction of the latter with the N7. This outer ring road will be so routed so as not to traverse or cut through existing residential areas, and will provide a long-term development boundary to the east/north-east of the town of Naas.'
		<ul> <li>This objective is to replace the 'inner relief road, Naas' objective in Table 6.1 of the current Kildare County Development Plan 2017-2023 (page 137).</li> </ul>
159.	Alan Stewart	Sustainable Mobility

		The Naas Inner Relief Road was comprehensively defeated by a democratic vote of the Naas Municipal District in June 2019.
160.	Barry Redmond	Sustainable Mobility
160	Rarry Pedmond	<ul> <li>close proximity to quiet, mature residential estates. Congestion will be moved from current traffic junctions to new proposed junctions at The Gallops, Tipper Road and Sunday's Well.</li> <li>The Naas Racecourse area must be preserved as the "Green Lung" portion of the Town.</li> <li>The proposed Naas Inner Relief Road / Gallops Avenue is now out of date.</li> <li>The following objective should be included in the new Plan: 'To provide an outer ring road for the eastern/ north-eastern side of Naas to cater for bypassing traffic, linking the Blessington Road with the Dublin Road close to the junction of the latter with the N7. This outer ring road will be so routed so as not to traverse or cut through existing residential areas, and will provide a long-term development boundary to the east/north-east of the town of Naas.'</li> <li>This objective is to replace the 'inner relief road, Naas' objective in Table 6.1 of the current Kildare County Development Plan 2017-2023 (page 137).</li> <li>Such an objective would be consistent with the existing objective MT 15 of the County Development Plan, which seeks to channel HGV traffic associated with landfill and extractive sites onto the regional and national road networks insofar as possible.</li> </ul>
		<ul> <li>The Naas Inner Relief Road was comprehensively defeated by a democratic vote of the Naas Municipal District in June 2019.</li> <li>The Gallops Avenue, which was introduced in the recent non-statutory Naas / Sallins Transport Strategy, will move thousands of vehicles, including large volumes of Heavy Goods Vehicles in very</li> </ul>

	<ul> <li>The Gallops Avenue, which was introduced in the recent non-statutory Naas / Sallins Transport Strategy, will move thousands of vehicles, including large volumes of Heavy Goods Vehicles in very close proximity to quiet, mature residential estates. Congestion will be moved from current traffic junctions to new proposed junctions at The Gallops, Tipper Road and Sunday's Well.</li> </ul>
	<ul> <li>The Naas Racecourse area must be preserved as the "Green Lung" portion of the Town.</li> </ul>
	The proposed Naas Inner Relief Road / Gallops Avenue is now out of date.
	<ul> <li>The following objective should be included in the new Plan: 'To provide an outer ring road for the eastern/ north-eastern side of Naas to cater for bypassing traffic, linking the Blessington Road with the Dublin Road close to the junction of the latter with the N7. This outer ring road will be so routed so as not to traverse or cut through existing residential areas, and will provide a long-term development boundary to the east/north-east of the town of Naas.'</li> </ul>
	<ul> <li>This objective is to replace the 'inner relief road, Naas' objective in Table 6.1 of the current Kildare County Development Plan 2017-2023 (page 137).</li> </ul>
Ann Moran	Economic Opportunity
	<ul> <li>Need to create greater capacity for the development of commercial lands to deliver local employment within Maynooth and the greater North Kildare area.</li> </ul>
	<ul> <li>The Plan needs to create the opportunity for the development of more interconnected transportation links in the area of North Kildare. For example, shuttle services between University –Maynooth Train Station – Maynooth Business Park – Intel – Hazelhatch.</li> </ul>
	The Plan does needs to factor in the future need for industrial and commercial demand in the North Kildare and Maynooth area.
	Ann Moran

# Maynooth 162. Introduction Community • The new CDP 2023-2029 should include key performance indicators (KPIs) with actions, timeframes and Council expected outcomes clearly documented. Provision is made for a public mid-term review of the CDP 2023-2029 to ensure that the plan is on course to being implemented and that Kildare County Council (KCC) are accountable for any inaction that arises. **Healthy Placemaking: People and Places** • KCC should implement a policy which protects the residents from construction traffic at certain times of the day and which enables the introduction of cycle or walking buses for young children during the peak rush hour times, construction traffic could be banned from town centre during those times. KCC should implement a policy that requires developers to include multiple areas for community gardens and orchards within new estates. Policies should also be adopted which promote community involvement within new estates by encouraging new residents to form residents' associations and outlining the role of management companies. Management companies have proven to be a barrier to residents participating in their estate. Maynooth requires a community sports amenity centre. High quality estate developments and more compact developments, such as 'living over shop' should be encouraged within the centre of Maynooth. More outdoor dining space should be allocated for restaurants. A public realm plan is needed for the area between St. Patrick's College to Carton Avenue including Courthouse Square.

- Apartment development should be sympathetic with the historic nature of the town.
- More emphasis on the provision of sheltered housing and a policy in relation to the development of nursing homes at a county level.

### **Economic Opportunity: Innovation, Enterprise and Employment**

- Improve the public realm in the town centre to complement St. Patrick's College, Maynooth Castle, Courthouse Square and Carton Avenue.
- Would like to see the development within Maynooth of remote flexible working hubs with high-quality broadband, meeting rooms, auditoriums, business equipment like printers and copiers etc.
- Great opportunity within Maynooth for the development of a community centre / green/ climate
  action hub with community sharing libraries (toys, tools etc), a zero-waste store, cafe and a recycling
  centre.

# **Climate Action: Environment, Climate Change and Adaption**

- Maynooth is well positioned to become a 10-minute town.
- Please provide assurances in the CDP that any tree losses will always be mitigated by new planting schemes and that the guidelines in the current CDP relating to replacement planting are strictly adhered to by developers and enforced by KCC.
- A specific policy on the provision of allotments, which would ensure a significant increase in availability.

# **Sustainable Mobility: Movement and Transport**

- We welcome the DART+ expansion to Maynooth which will further improve our train service to Dublin however we would like to see suitable Park & Ride and Park & Stride facilities provided on the outskirts of the town.
- For residents of Maynooth we need a strong policy on the provision of safe walking and cycling routes to the train station to reduce the need for locals to use their cars for drop off and collection.
- Additional routes to the train station through existing housing estates should be planned for, to discourage car use by those living further out from town centre.
- NTA funding for cycling routes through the town are very welcome and we would like to see these
  prioritised in the CDP, in addition to the provision of safe bicycle storage/parking facilities at the
  station.
- Bike hire should be provided in Maynooth.
- Bus service needs to consider the interconnectivity between the towns of the metropolitan area, Maynooth, Leixlip, Celbridge and Kilcock as well as further afield such as Blanchardstown and Tallaght.
- There is going to be significant expansion of the area along the planned Maynooth Eastern Relief Road (MERR) and the CDP should include a plan to ensure that such developments have adequate access to cycle and walking routes to the town either by using the canal greenways, enhanced Celbridge Road infrastructure, and permeability through existing estates. For existing estates, we need to ensure we have at least footpaths and where possible cycle lanes into town.
- Maynooth needs proper roads infrastructure consisting of a ring road around the town and a second
  exit off the M4 motorway. The CDP needs to lay down a comprehensive strategy on how this might be
  achieved.
- Improve the infrastructure for cycling and walking and include a 'Car Free Sunday' scheme.

• The CDP should include solutions to move through traffic away from the centre and to improve the streets for people on foot or cycling. Maynooth could have an almost car-free Main St with pedestrian-and cyclist- friendly routes.

# **Creative Places: Social Community and Cultural Development**

- A performing arts and cultural centre, including stage, performance space, kitchen facilities, meeting rooms etc is required. One suggestion is to convert the Fire Station for such a use.
- Primary Care Centre is required.
- A swimming pool is needed for the people of Maynooth and North Kildare.
- The CDP should address the deficiency of creche places in Maynooth.
- Careful co-ordination with the Department of Education regarding educational provision in Maynooth is required as part of the CDP.

# **Enhanced Amenity and Heritage: Landscape and Green Infrastructure**

- No public parks of meaningful size in Maynooth. St Patrick's College and Carton Estate are in private ownership.
- The Harbour Field, The Green, Carton Avenue and the Royal Canal Greenway between Mullen Bridge and Leixlip are projects that should be given priority in the CDP together with the provision of a public park for the citizens of Maynooth.

# Making it happen: Infrastructure, Energy and Communications

		<ul> <li>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.</li> <li>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.</li> </ul>
163.	John O'Dwyer	Enhanced Amenity & Heritage
		The Hill of Allen, which is a site of huge cultural and historical importance is being destroyed.
		<ul> <li>Please prohibit any further destruction and insist that measures are put in place to attempt some form of restoration.</li> </ul>
		<ul> <li>An amenity like the Hill of Allen, if properly managed, could bring in future tourism to Ireland's Ancient East.</li> </ul>
164.	Glenveagh Properties	Issues Paper questions:
	roperties	<ul> <li>How can we protect and enhance the quality of our built and natural environment to enable a more active, healthier lifestyle?</li> </ul>
		<ul> <li>What tools can be used to deliver compact growth to assist in the regeneration of our towns and villages?</li> </ul>
		<ul> <li>How best can we co-ordinate and integrate transport and land use planning in order to reduce the demand for travel and dependence on private car transport?</li> </ul>
		How can the Plan best address the challenges of climate change?
		Current Planning Context

# **National Planning Framework and Regional Spatial & Economic Strategy**

- The Kildare County Development Plan must align with the national and regional planning policy framework.
- The NPF highlights the urgent requirement for a major uplift of the delivery of housing within the
  existing built up areas of cities and other urban areas. According to the NDP, a key tenet to achieving
  these ambitious housing targets is through compact growth. This compact growth model focuses on
  the prioritisation of housing development in locations within and contiguous to existing urban
  footprints where it can be served by public transport, walking and cycling.
- Under the Regional Spatial & Economic Strategy, Maynooth and Naas are identified as Key Towns.
   Maynooth, Leixlip and Celbridge fall within the Dublin Metropolitan Area: The RSES makes a provision
   for increasing the targeted growth within the Metropolitan Area. Due to proposed investment in key
   infrastructure both Leixlip and Maynooth are recognised as having capacity for significant residential
   growth. In terms of the Retail Hierarchy, under the RSES Maynooth is identified as Kildare's only
   Principal Centre Town (Level 2), Celbridge and Naas/Newbridge are identified as being Key Service
   Centre Towns (Level 3).

# **Housing Supply Target Methodology Guidelines**

- The Housing Supply Target Methodology for Development Planning Guidelines provides a methodology for all Local Authorities when undertaking a Housing Need Demand Assessment (HNDA) as part of the development of housing strategies.
- The HSTM Guidelines calculate an average annual housing demand for Kildare County of approximately 1,535 units from 2020 to 2031. These projected targets are lower than the actual housing output recorded in the CSO New Dwelling Completions by Local Authority (NDQ05) for Kildare County which indicate an output of 1,898 units in 2019 and 1,663 units in 2020.

# Kildare Development Plan 2017-2023

- The Kildare County Development Plan 2017-2023 (2017 KCDP) was adopted in February 2017 and varied in June 2020 (Variation 1).
- In updating the Settlement Hierarchy in Variation No.1, the changes made reflected the decrease in the total number of units, but no change was made to the growth allocated to each settlement.

#### Rationale

# **Population**

- The review of the Kildare County Development Plan provides the first opportunity for the Development Plan to have regard to new strategies and objectives developed at a national and regional level, which will mean a notable shift to a more compact urban form, a higher density of development and increases in building heights.
- The CSO has identified a higher level of population growth from April 2018 to April 2019, which if applied up to 2040 would lead to population growth significantly higher than predicted in the NPF. An occupancy rate of 2.8 has been used to determine the number of units outlined in Variation No.1 of the KCDP 2017, which may need to be revised downwards over the course of the Plan.
- Having regard to the above, a shortage of land supply will constrain the delivery of housing units, put upward pressure on house prices and rents, and prolong the current housing crisis in the County.

# **Healthy Placemaking**

 The RSES indicates that Self-Sustaining Growth Towns include commuter towns however, Celbridge and Kilcock which are clearly commuter towns located within the Dublin Metropolitan Area are classed as Self-Sustaining Towns in the KCDP 2017. The only other town within this classification in Monasterevin, which is significantly removed from the Metropolitan Area and does not benefit from the proximity to transport links available to Celbridge and Kilcock.

- Consideration should be given as part of the review process to the classification of the Towns within
  the County with particular regard being given to the transport infrastructure and proposed transport
  infrastructure in those towns. Recognising the role of commuter towns as defined in RSES will ensure
  that the population needed to support the investment being made in the public transportation
  infrastructure is in the best locations.
- 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.
- The review of the County Development Plan should recognise the strategic location of towns with the Dublin Metropolitan Area as locations within the County where additional growth can be delivered in tandem with planned improvements to public infrastructure.

# **Sustainable Transport**

- The RSES identifies signification investment being made to the public transport as part of the DART expansion programme, with the extension of the DART to Celbridge/Hazelhatch, and the LUAS extension to Maynooth.
- The CDP should provide opportunities for residential development to meet the demand for housing that will be generated by the expansion of the DART and LUAS services within Kildare.

# **Climate Action: Environment, Climate Change and Adaptation**

 The current development management standards in relation to houses exceeds the minimum floor area requirements outlined in the 2007 Quality Housing for Sustainable Communities Guidelines. This requirement within the 2017 KCDP results in dwellings that are larger that dwellings typically constructed elsewhere in the country.

		<ul> <li>Reduced floor area requirements would deliver more opportunities for greater compact growth in Kildare's towns and villages while also meeting the minimum density requirements as required by the 2009 Guidelines for Sustainable Residential Development in Urban Areas.</li> </ul>
165.	Lullymore Heritage &	Infrastructure Energy and Communications
	Discovery Park	<ul> <li>Any present or future Wind Farm proposals / projects should not adversely affect tourism for the Peatlands and the communities living around them.</li> </ul>
		The Panoramic views of the Peatlands in West Kildare (please see attached photograph) should be preserved and not adversely impacted by Wind Farm developments.
		Climate Action
		<ul> <li>The Kildare County Development Plan should give consideration to the designation of a network of Peatlands in Kildare, which links with other Peatlands across the Midlands and forms a National Peatlands Park. This will ensure the protection of Peatland biodiversity as a carbon store and also promote tourism growth.</li> </ul>
166.	Social Democrats	Healthy Placemaking: People and Places
		<ul> <li>County Development Plan must be the driving force behind a dramatic shift in our towns and villages, from dormitory towns to attractive liveable spaces.</li> </ul>
		<ul> <li>The council should adopt a concept known as the 15-minute town or village. This provides for the availability and access of all services and most common needs for all residents of an urban area within 15 minutes by any form of transport except by car.</li> </ul>
		Greater emphasis be placed on quality pedestrian and cycling infrastructure.

- Planning conditions that require cycling lanes and footpaths must be installed into all new developments and all new developments must include covered and secure bicycle parking.
- A cycling infrastructure project that would strategically link high population areas Leixlip, Celbridge and Maynooth should be proposed. We also urge the completion of the Naas Neighbourhood Greenway and the Grand Canal Blueway.

### Housing

- The example of the affordable housing initiative by Fingal County Council at Dun Emer, Lusk, should be copied.
- Greater use of the Derelict Sites Act.
- Services and amenities should be installed before houses.
- A maximum height of four story building should be permitted, and they should be confined to within a town centre and within easy walking distance of good transport links/cycling lanes.
- Childcare facilities, public parks and community centres be imposed as planning conditions for developers and they must be developed as part of phase one rather than subsequent phases as a condition of planning, or within the first 50% of houses.

### Public Land for Affordable and Social Housing

• (1) End the social leasing model of housing delivery; (2). That Kildare County Council conducts an audit of residentially zoned public lands in the County and publishes it in this CDP; (3) Purchase land and use residentially zoned public land that is available to public authorities to build homes that are affordable to rent or buy; (4). A far greater commitment to affordable for-purchase housing schemes alongside cost-rental projects in the vein of the Vienna Model.

### **Ending Youth Homelessness**

• CDP commits to the development of a youth homelessness strategy.

## **Vacant Housing Officer**

• Kildare County Council should have at least one full-time Vacant Housing officer and that the remit of the officers extends beyond the current two years.

# Taking in Charge of Housing Estates

• This issue needs to be prioritised with resources. A robust bonds system should be implemented so that there are appropriate incentives for developers to finish out estates.

# **Community Gardens**

- 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.
- Non-food planting shall be pollinator friendly, all trees must be native, and that generous minimum standards be included in planning conditions for green spaces in all new developments – and that a developer can no longer include balcony space as green or open space. It is also proposed that the historical hedgerows and townland boundaries are mapped and recorded so they can be assessed in view of planning applications.

#### **School Streets**

• We propose the adoption of the school streets scheme as used in Galway and Malahide.

### Other community initiatives

• All housing estates are built in line with crime prevention measures.

# **Economic Opportunity: Innovation, Enterprise and Employment**

- Greater emphasis on cycling tourism and the installation of proper cycling infrastructural links between the various greenways and nearby or neighbouring towns and villages.
- Links to other amenities should also be developed, such as tourist spots like Castletown House, the wonderful Barn, as well as Blueway's, peat ways, walking, famine and historic trails.
- Develop supporting infrastructure for outdoor markets and casual traders along the greenways.
- A series of trails can be developed, along the lines of heritage, famine, historical and gourmet, etc.
- Greater promotion of the figure of Brigid.
- A new countywide tourist attraction should be adopted which overlays a scaled solar system map on the county. A new trail be created to give effect to this proposal. This idea has been done in Sweden, New South Wales, Maine and in Illinois.

#### Incubation

• The development of business incubation and innovation hubs, in each town, but especially in rural areas and smaller villages.

# High - street retailers/footfall

• Greater pedestrianisation and cycling infrastructure in our urban centres, which has proven to increase commercial activity and footfall. Efforts be made to bring people back to live in our town centres.

### Hot - desking

• The development of hotdesking facilities in all of the county's bigger towns.

#### Kathleen Lonsdale

• Her former home in Newbridge should be purchased and redeveloped into an outreach centre for Maynooth University in Newbridge.

### Making urban centres more vibrant

• Reduce over-reliance on cars and develop recreational, green and cultural spaces in urban centres.

# **Climate Action: Environment, Climate Change and Adaptation**

- The County Development Plan should consider the carbon footprint of each of Kildare's citizens.
- The 15-minute town, with its emphasis on public transport, cycling and walking infrastructure makes urban places more attractive to live in and also reduces reliance on private cars within the urban space.
- New housing developments must have important community facilities and amenities such as creches etc, installed before houses are built/occupied.
- Greater emphasis on achieving better cycling infrastructure and public transport.

#### Flood Risk

- An audit be undertaken of all sewage and wastewater infrastructure throughout the county.
- Independent heritage, archaeological, ecological, biodiversity and geological surveys of areas be considered as part of the zoning process to prevent houses being built on potential flood plains.
- Legal counsel be made available for county councillors when they are considering proposed zonings.
- All forms of renewable energy production on both a domestic and community level should be encouraged.

## **Recycling facilities**

- Recycling facilities in County Kildare are insufficient and existing ones are at full capacity. More
  recycling centres be established around the county. Recycling and waste collection services be
  managed by Kildare County Council as much as possible rather than commercial third parties. Recycling
  banks be made a condition of planning in larger estates and on commercial sites and in new UDZ's.
- Funding for the development of recycling centres should be reinstated.
- End the practice of all waste collected in public bins going to landfill and seek to roll-out segregated public waste bins. Innovative social enterprises such as the Rediscovery Centre, Food Cloud, and Recreate Ireland in Kildare should be supported.
- CDP commits to increasing public bins particularly at bus-stops and taxi ranks, on approaches to schools, outside neighbourhood shops, ATMs etc.

# **Sustainable Mobility: Movement and Transport**

Segregated cycling lanes are essential to encourage more cycling and less car use.

- Every town and village in Kildare must place at the centre of their transport plans, walkers and cyclists.
- Cars and car parking must be limited in town centres and park and ride or park and walk facilities must be developed.
- To reduce traffic usage in Kildare's towns or villages, vehicular access must be limited in those towns and villages.
- Increase the number of EV charging points.

## **\_Creative Places: Social, Community and Cultural Development**

- Propose the adoption of a score card system of measuring the social, community and cultural value of public spaces and of Kildare's towns and villages. This idea has been pioneered in small urban areas of the US. This is an innovative way to have a living social infrastructure audit and to highlight the gaps in provision of community resources and services.
- Designate a site of cultural development at The Wonderful Barn, as an opportunity to develop a cultural space.
- Designate spaces in every village/town for use by both young and older people, catering for their individual needs with skate parks / BMX tracks / basketball as well as being age-friendly and safe.

#### Other Issues

• 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.

Devise a manual of funding

		Keep a register of applications per department and a register also of how much funding was not applied for and why, so that county councillors and the public can have oversight on this.
167.	Ann Behan	<ul> <li>We need to place water, biodiversity and climate as the central tenets of this CDP with clear measurable objectives and accountable reporting, and with communities at its core.</li> <li>It is essential that the CDP protects our Inland waterways and biodiversity.</li> </ul>
		<ul> <li>Clear trajectory to achieving carbon neutrality by 2050.</li> <li>The CDP must address the security of our water supply so that it provides for Kildare's future needs.</li> <li>It is time now for demonstrable action, with targeted time-bound achievements, and sufficiently punitive measures to deter actions that are not in support of climate change mitigation measures or biodiversity loss measures.</li> </ul>
168.	Claire Meehan	The County Development Plan should look into the feasibility of re-opening the Corbally Branch of the Grand Canal to navigation, along with it being developed as a Greenway.
169.	Gerard Byrne	<ul> <li>The Naas Inner Relief Road is ill-conceived and will result in moving not mitigating congestion within Naas.</li> <li>The proposed Inner Relief Road has been democratically defeated on at least 3 occasions, most recently in June 2019.</li> </ul>
		An Outer Relief Road is the most appropriate solution.

		The locat College Avenue proposel is an etternation (divide and construct) and is unon in every respect.  The locat College Avenue proposel is an etternation (divide and construct).
		<ul> <li>The latest Gallops Avenue proposal is an attempt at 'divide and conquer' and is wrong in every respect.</li> </ul>
170.	Ronan Foley	The Naas IRR was a priority in the KCDP 2017-2019 and was defeated by a democratic vote of the Naas MD in June 2019.
		The democratic decision must be upheld.
		Including it in the CDP flies in the face of the democratic vote.
		The Gallops Avenue like its predecessor the Naas IRR will move thousands of vehicles close to quite mature residential estates.
		<ul> <li>The proposed route also traverses Naas Racecourse. This area must be preserved for recreational purposes as the 'Green Lung' of the town.</li> </ul>
		The new Kildare CDP should include the following objective:
		<ul> <li>"To provide an outer ring road for the eastern/north-eastern side of Naas, to cater for by-passing traffic, linking the Blessington Road with the Dublin road close to the Junction of the latter with the N7.</li> <li>This outer ring road will be routed, to not traverse or cut through existing residential areas and will provide a long-term development boundary to the east/north-east of the town of Naas."</li> </ul>
		This objective is to replace the "inner relief road, Naas" objective of the current Kildare CDP 2017-2023.
		<ul> <li>Such an objective would be consistent with the existing objective MT 15 of the CDP, which seeks to channel HGV traffic associated with landfill and extractive sites onto the general regional and national road network insofar as possible.</li> </ul>

171.	Newbridge Playground Group	The new CDP should reflect the importance of play for children.
		Open spaces and town centres should be safe places for children and young people of all ages.
		Playful urban design and landscaping creates an attractive, creative environment for all ages.
		Child-friendly public spaces are needed that are accessible, inclusive, and conducive to play.
		<ul> <li>A balanced allocation of play facilities is needed, the design should meet the needs and specifications of the location in question.</li> </ul>
		<ul> <li>A mix of formal and natural play spaces should be provided with the highest possible standards of inclusivity and accessibility.</li> </ul>
		Children and families should be given a voice in the location and design of local play facilities.
		<ul> <li>New residential developments should all include safe play spaces proportionate to the size of the development.</li> </ul>
		<ul> <li>A portion of development levies should be allocated to funding for play spaces in town centres and public parks.</li> </ul>
		There is currently only one playground in Newbridge which is outdated and not up to the standards of playgrounds.
		<ul> <li>Given the size of Newbridge and the growth in recent years, a play facility is required to meet the needs of the parents and children.</li> </ul>

172.	North Kildare Trout & Salmon Anglers Association	<ul> <li>Extracts from Eastern River Basin District – Programme of Measures Pilot Studies. The Plans and POMs were finalised in October 2009, but never followed up.</li> <li>"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."</li> <li>"The aluminium concentration downstream of the discharge stays under the limit of 0.2 mg Al/L required by the Drinking Water Directive (98/83/EC), and table 3.1 of the EPAs Interim Guideline Values for Characterisation list of parameters as sourced in Irish Drinking Water Regulations 2000 SI 439 of 2000, EQS for the Aquatic Environment, EPA Discussion Document, however, lower concentrations can be toxic for fish populations (JJ Bowman, JJ Bracken, 1993). A study of the health of the fish population on the Lower Liffey River should be carried out."</li> <li>Comment: The study of the health of the fish population was never carried out.</li> <li>"Finally, the sludge created by the water treatment is not a threat for the water quality of this area because it is disposed in a landfill at Kilcullen (Kildare)." (It now goes to County Cavan)</li> <li>Comment: The above is not true. As stated above approx. 3.7 tonnes of sludge per month are washed down the slipway discharge to the Liffey at Ballymore Eustace.</li> <li>Also, the aluminium concentration no longer stays under 0.2mg Al/L.</li> </ul>
173.	Corcom Development Partners	Issues Raised: Kildare County Development Plan 2023 – 2029
		<ul> <li>CDP propose that the new KCDP consider:</li> <li>the amalgamation of Sallins and Naas into one settlement.</li> </ul>

- and the identification of strategic sites for development in Sallins.
- The twin goals meet and address the objectives of the NPF and the Issues Paper including:
  - Compact growth.
  - Achieve higher densities at appropriate locations including the development of infill strategically located sites.
  - Deliver and enhance the availability of economic opportunity.
- Meet the requirement of climate action policies including sustainable mobility:
  - Minimise flood risk.
  - Within 15-minute connectivity of town centre and provide for sequential development.
  - Provide services to the community e.g. multi-generational living, education, health services.

# **Sallins and Naas Compared**

- The disparity between Sallins and Naas based on a comparison of metrics (Settlement Hierarchy, NPF population growth % allocation, growth allocation to 2026, growth in housing units to 2026 and current housing capacity of zoned land) are impediment to the growth and development of Sallins.
- The amalgamation of Sallins and Naas would result in the combined settlement having a population of c.30,000, exceeding the current population of Athlone (21,349, Source Census 2016) which is categorised as a Regional Growth Centre.

# **Sallins and Naas Connectivity & Relationship**

- The Sallins LAP 2016 2022 states "It is important therefore that future zonings prevent the coalescence of the two towns and creates and reinforces as sense of place"
- The above does not reflect the actual reality in terms of the symbiotic relationship between Sallins and Naas. Examples:
  - Naas MDC includes Sallins.
  - Naas and Sallins are connected by a number of bridges, waterways and transport links.
  - The train station in Sallins is called the Sallins Naas train station.
  - Various residents in developments in "Sallins" use "Naas" in their address.
  - Sallins pupils attend secondary schools in Naas.
  - Naas Golf Club is the golf course of choice for residents of both Sallins and Naas.
  - Residents of Sallins generally consider Naas as their principal shopping location.
  - Residents of Sallins who work locally work in Naas.
  - Residents of Naas use the walking, cycling and water recreational amenities along the canal in Sallins.

## **Sallins Infrastructural Investment and Amenity Improvements**

- The below infrastructural investment and amenity improvements will assist with enhancing the live, work and recreational experience of Sallins and Naas residents:
  - Sallins Flood Alleviation Works, completed in 2011

- Opening of the Sallins By-pass in 2021
- Sallins Town Park
- Other Sallins Infrastructural, Recreational and Community Investment:
  - o Grand Canal Greenway project, work commencing in 2021
  - Up-grading of Sallins Naas Dublin rail link
  - o Sallins Naas Train Station Provision of 200+ additional car parking spaces in 2021
  - Kerdiffstown Park project

### Use / Lack of Use of Existing Zoned Land in Sallins

- 66% of the Phase 1 and Phase 2 lands in Sallins on which residential development can be accommodated are in the ownership of one party and remain undeveloped.
- Lands zoned mixed use and town centre remain undeveloped and in some cases in a state of dereliction / abandonment.

### **Future Development in Sallins**

HP1 of the Sallins LAP 2016 – 2022 states: "In the event that no development occurs on lands
designated for Phase 1 within 3 years of the adoption of this Plan, consideration may be given, subject
to availability of services, to development of Phase 2 lands which are sequentially close to the town
and are adequately serviced by appropriate infrastructure. The scale of development must comply with
the core strategy figures."

CDP urge KCC to consider alternative strategically located lands for zoning.

174.	Irish Heart	Issues Raised:
	Foundation	Planning & Health: Why Development Plans must take a strong focus
		<ul> <li>The following design and planning principles can support improvements in health and reduce the risk of developing certain diseases, and help to improve people's physical and mental wellbeing:</li> </ul>
		■ Enhance neighbourhood walkability
		■ Build complete and compact neighbourhoods
		<ul> <li>Improve indoor environmental quality of housing</li> </ul>
		<ul> <li>Increase provision of affordable and diverse housing for all, including groups with specific needs</li> </ul>
		Provide healthier affordable food for all
		■ Enhance community food infrastructure
		Reduce exposure to environmental hazards
		<ul> <li>Enable access to, and engagement with, the natural environment</li> </ul>
		<ul> <li>Adaptation to climate change</li> </ul>
		<ul> <li>Provide active travel infrastructure</li> </ul>
		<ul> <li>Provide public transport</li> </ul>
		<ul> <li>Prioritise active travel and road safety</li> </ul>
		<ul> <li>Enable mobility for all ages and activities</li> </ul>

# Make a strong commitment to public health in the Development Plan

Recommendation 1: Include 'promote a healthy environment' as a strategic goal in the Development Plan.

- Reference the health of communities in the strategic aims and objectives of the new CDP, to ensure the LAP's focus on promoting good health for local communities.
- Include a health objective to ensure that land use decisions, the planning process, etc be 'health checked'. This 'health checking' should include a commitment to invest money in infrastructure which promotes public health and reject proposals which will negatively impact the health of the community in Kildare. Irelands current obesity crisis results from living in obesogenic environments.

How can we protect and enhance the quality of our built and natural environment to enable a more active, healthier lifestyle?

- Significant scope for greater emphasis on public health in this section. The IHF recommends that reference be made to:
  - Healthy Ireland. A Framework for Improved Health and Wellbeing 2013-2025: Relevant actions:
     Action 1.9 and Action 2.3
  - A Healthy Weight for Ireland: Obesity Policy and Action Plan 2016 2025: Relevant actions: Action point 2.1
  - Local Area Plans Guidelines for Planning Authorities.

Recommendation 2: Include 'tackle health inequality" as a strategic goal in the Development Plan.

• Coronary heart disease is almost 2.5 times more prevalent and stroke 2.2 times more prevalent in the most deprived areas than in the least deprived areas.

• The CDP should include a commitment to addressing health inequalities amongst the population.

Recommendation 3: "The promotion of health" should be specifically mentioned in the Development Plan's vision

- The following points are critical:
  - Ensure the county is a great place to be as a visitor, worker, entrepreneur or resident.
  - That people live in safe, healthy communities with transportation options.
  - Residents are physically and mentally healthy and can lead healthy lifestyles.
- The IHF note that:
  - Resident should have priority in terms of making the region a great place to be. It should be a great place to live, raise a family and grow old. The economic considerations should then follow.
  - The ability to lead healthy lifestyles is very much contingent on the environment that surrounds us and, if the right conditions are not in place (for example active travel facilities, restrictions on new fast food outlets opening near schools), it is not possible for residents to lead healthy lifestyles.

Regulate for a Healthy Environment - Introduce No-Fry Zones in the Development Plan

Recommendation 4: Introduce no-fry zones adjacent to schools, with the exclusion zone set at 1km. Maps showing the exclusion zones around each school be provided in the new CDP

- Limit access to fast food and the promotion of unhealthy foods in the vicinity of schools.
- Ensure an appropriate mix of uses of the retail space to prevent the concentration of fast food outlets or takeaways, particularly in the proximity of schools.

• Section 28 of the Planning Act 2000 (as amended) with regard to fast-food outlets is that "consideration can be given to the appropriateness of their location in the vicinity of schools and parks, for example in newly developing areas, while at the same time taking into account wider land use considerations. In addition, planning policy with regard to the location of fast-food outlets needs to be considered also within the wider policy context of practical steps that planning authorities and other public bodies can take to more widely promote and facilitate active and healthy living patterns, for example, by enhancing the scope for activities such as walking, cycling and sports and active leisure pursuits and their associated facilities."

## **Sustainable Movement and Transport**

## **Recommendation 5: Make Active Travel a Priority**

- What should be done to encourage people to walk, cycle or use public transport more?
  - Make sustainable methods of transport safe, enjoyable, easy to use, and accessible to all;
  - introduce policies that deter private motorised vehicle use; and
  - recognise and promote the economic advantages of active travel.
- IHF recommends that the new CDP considers:
  - Allocate 10% of its transport budget for walking, 10% for cycling and divide the remainder 2:1 in favour of public transport over road maintenance.
  - Provision of properly lit footpaths of quality materials and ensuring regular maintenance to facilitate all age demographics and wheelchair users.
  - Provision of physically segregated footpaths between cycling and walking.

- Upgrade and expand Kildare's cycling infrastructure, ensuring that all future and existing cycling lanes are physical segregated from roads and pedestrian paths, sign posted, maintained to a high standard, and lit well.
- Reallocate more road space to pedestrian and cycling lanes
- Provide more zebra crossings and introduce new regulations to reduce the pedestrian waiting time to 30 seconds maximum signal times to ensure that pedestrians of all ages have adequate time to cross the road.
- Introduce a Green-Schools Programme
- Expand the Schools Street program to all schools in KC.
- Provide and upgrade all school bicycle sheds.
- Introduce clean air zones around all schools and other sites where young people congregate.
- Provide safe cycling routes to all primary and secondary schools and third level colleges. Carry out
  an audit of every school/routes leading to the school from residential areas.
- Carry out a Kildare road audit to identify the most dangerous junctions and roads for cyclists.
   Accordingly, retrofit all dangerous junctions and roads to the standards set out in the National
   Transport Authority's National Cycle Manual and the Department of Transport's 'Design Manual for
   Urban Roads and Streets' at a minimum.
- Provide safe, secure, and well-lit bicycle parking.
- Promote walking and cycling within large towns using "soft interventions" such as public awareness campaigns, bike week, and information targeting certain users.

		<ul> <li>Allow contra-flow cycling in one-way streets on specifically signed roads with low volumes of traffic.</li> </ul>
		<ul> <li>Establish more Park and Ride facilities and Bike and Ride facilities.</li> </ul>
		Recommendation 6: Ensure a sustainable Mobility Policy
		<ul> <li>To respond to the immediate challenges: An unprecedented climate crisis; a growing and physically inactive population; increased congestion; the use of fossil fuels in our transport fleet and an over- reliance on private vehicles.</li> </ul>
		To promote active travel and public transport use.
175.	Cllr. Kevin Duffy	<ul> <li>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.</li> </ul>
		Consider the following key goals:
		<ul> <li>a competitive economy with world-class services and transport;</li> </ul>
		<ul> <li>a county of housing choice with homes that meet our needs and lifestyles;</li> </ul>
		<ul> <li>a great place to live with communities that are strong, healthy, and well connected; and</li> </ul>
		<ul> <li>a sustainable and resilient county that protects the natural environment and has a balanced approach to the use of land and resources.</li> </ul>
		Critical key objectives:
		<ul> <li>Create a County that is supported by infrastructure.</li> </ul>

- 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)

# **Healthy Placemaking**

- Need KCC resourcing to work with owners/interest parties to regenerate derelict buildings, dedicated town teams linked with NFP local development associations.
- Use serviced sites on edge/connected to our towns as an alternative to one-off rural houses. Need a holistic response around Housing Choices to encourages 'right-sizing'.
- Develop a Housing Choice strategy, each LAP needs to develop this into workable plans.

- Consider higher density around our transportation nodes, train stations or integrate developments into bus interchanges in larger towns.
- Enhance our public realm spaces.
- Increase our access to and use of open public spaces and facilities.
- The regional population growth figure is not specifically linked to the existing demand for social and affordable housing in each area. KCC need to show the metrics of how the housing waiting lists will be reduced through the current strategy and by when. (Example: When will a 1 bed housing applicant on the waiting list in Monastrevin be housed?)
- Strengthen the volunteer networks (tidy towns and sustainable energy communities) while making internal KCC resources available to coordinate and enhance these volunteer sectors.

## **Economic Opportunity**

- Consider geographical themed economic zones.
  - Build individual strategies around these zones to increase business collaboration and investment (domestic and international).
- Engage with Maynooth University on their future strategy (end 2022), to consider a whole of Kildare strategy off-campus on aspects like; partnering with industry/co-location off-campus, research hubs, education nodes; Newbridge campus focus on sustainability and climate change.
- Engage with the KWETB further Education strategy.
  - To make education and employability more accessible.
  - Set target to have 1 educational hub in each town.

- Visibility and access are key to increase attainment.
- Attract a second tertiary education institution by 2030, potentially an international institution.
- Grow our Work Hubs target 1 work hub per town by 2030 to cater for 15% of the working population.
- Capitalise on the post-Covid working environment and retain workers in our communities.

#### **Climate Action**

- Ground the new CDP on sustainable and environmental principles.
  - Needs to be addressed in each section, measured and funded separately.
- Continue to protect the biodiversity and promote opportunities to increase our biodiversity and landscapes.
- The 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 hydrogenerated electricity.
- 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.
- All public buildings should be carbon neutral by 2030.
- Illegal dumping is a widespread issue.
  - We need to set ambitious targets and cultural change.

- Millions are spend cleaning up; would it be more cost-effective to make wate management free and include it into the cost/tax upstream?
- Each town to have a reverse recycling facility and a dedicated recycling facility for all waste by 2025 an MD level strategy is required.
- Invest in Sustainable Energy Communities, increase resourcing partnered with local groups and community.

# **Sustainable Mobility**

- Encourage a 'Modal Shift'.
  - make towns/ villages more accessible by footpaths and cycling,
  - remove cars from streetscapes and
  - open up town centres.
- New infrastructure and the transition of existing infrastructure to more sustainable modes of transport are required.
- Electrification of the rail lines across the County to increase capacity and frequency.
- Connect towns by cycleways Green/Blue/Brown ways segregated from the road.
- Build park and ride/stride facilities with bus/train services or within the town to access services and schools.
  - Consider the co-location of these parking facilities, so they're active and self-managed from an antisocial perspective.

- Consider shared vehicle lanes M7 three lanes, dedicate one lane to buses and cars with 3 or more persons in the car.
- Promote car sharing schemes, work with industry to encourage them and provide dedicated car spaces.
- Increase EV charge spaces as a standard as on-street charging.

#### **Creative Places**

- Lack of community facilities in some of our towns, equally lots of facilities are under-utilised.
  - Forge partnerships/relationships to increase use of public and private resources.
  - Intra-county accessibility between towns/villages is critical to, opening up and sharing.
- Review community facilities at a Municipal District and Local Area level and develop community plans and access strategies.
- Enhance the Public Realm team into MD Teams to implement forward planning and district strategies.
- Need locally based Community staff tasked with increasing accessibility and equality at an MD level working with community groups to achieve the goals of the CDP.

# **Enhanced Amenity and Heritage**

- For disused heritage structure and areas of conservation, engage at local level to establish active teams linking with local development and regeneration of our heritage building.
  - Council to take a Leadership role rather than responding to planning applications.
  - Enhance the initial work of the Public Realm team.

- Encourage the enhancement of our green infrastructure in partnership with Government.
  - new opportunities and jobs in this section.
- Enhance and protect our heritage, arts and culture through storytelling, which can promote and enable tourism.
  - Need a County-wide approach and tools to capture local heritage, art and culture and display it both physically and digitally.
  - Into Kildare App a one-stop shop for 'know your Kildare'!

# **Making it Happen**

- Accessibility to broadband and broadband speeds are limiting economic growth and development
- The cost of services is a significant inhibiter of development. Unclear how these charges are calculated.
- Address the disconnect of services in rural nodes and provide adequate services to support future growth.
- KCC's drive for a more renewable community should not come at the expense of important factors such as biodiversity, heritage etc.
  - Develop sustainable renewable strategies.
- Need to understand KCC's energy requirement.
  - Set targets to meet energy demand and for energy production.
  - Will KCC be a producer of energy, net neutral or consumer?

176.	Gas Networks	Introduction
	Ireland	<ul> <li>GNI is involved in two initiatives which can benefit KCC from both an economic and environmental perspective.</li> </ul>
		<ul> <li>Development of renewable gas injection infrastructure.</li> </ul>
		<ul> <li>Development of Compressed Natural Gas (CNG) infrastructure for gas in transport.</li> </ul>
		Climate Action: Environment, Climate Change and Adaptation
		How can the plan support our transition to a low carbon climate resilient and environmentally sustainable economy?
		<ul> <li>Promoting renewable gas and Anaerobic Digestion (AD).</li> </ul>
		<ul> <li>Farm and food wastes mixed with other feedstocks can be converted to biomethane which is a renewable gas.</li> </ul>
		<ul> <li>A by-product from the AD process, known as digestate, can be used as an effective nitrogen fertiliser on land with a low environmental impact.</li> </ul>
		<ul> <li>Contribute to the circular economy.</li> </ul>
		<ul> <li>Renewable gas was first introduced to the Irish gas grid through an injection point in County Kildare, supplied by Green Generation, in August 2019.</li> </ul>

- The Climate Action: Environment, Climate Change and Adaptation section of the new CDP should include the following: "Renewable Gas: There is potential to produce renewable gas from the anaerobic digestion of organic wastes and residues from the agriculture sector and from domestic/commercial food waste. Renewable gas is carbon neutral and identical in function to natural gas so the existing network can be used, and gas customers do not need to change their boilers or gas-powered appliances. There will be a presumption in favour of applications for anaerobic digestion plants provided planning and environmental criteria are satisfied."
- Industry and transport are also key areas that can help Kildare transition to a low carbon economy.
  - CRG provides a carbon neutral alternative to diesel for heavy good vehicles (HGVs).
  - Companies with large energy requirements can lower their carbon emissions by switching from heavy fuel oil and coal to natural gas.
  - Converting to gas also provides the opportunity to use renewable gas in future without any further changes to boilers or gas-powered appliances.
  - Particularly important to companies / industries with high thermal heat requirements which cannot be met by other forms of energy.

How can the Plan increase the levels of renewable energy production and energy efficiency in the county while protecting the environment, the landscape and public amenity?

- Support for renewable gas production and AD, can increase levels of renewable energy production.
  - The AD process captures greenhouse.
  - Renewable gas can help Kildare reduce its carbon emissions.
- Combined Heat and Power (CHP) and Micro CHP improve energy efficiency

- Utilises a primary fuel, such as natural gas, to produce electricity and heat simultaneously.
- Ideally suited to domestic and commercial users, reduce a customer's reliance on the national electricity grid.
- Particularly advantageous to industries where a consistent and reliable source of electricity is key.
- Several benefits such as reduced energy costs, reduced CO2 emissions and lower carbon taxes.
- According to the Cogen Europe Study, "The benefits of Micro CHP", states that "(Micro-CHP) decarbonises heat and electricity production. Micro-CHP is a highly efficient way of using gas for heating and power production. It saves carbon dioxide now, and can save even more in the future, due to the use of renewable fuels and/or biogas injection into gas networks."
- Photovoltaic (PV) Panels increases the production of renewable energy and energy efficiency.

# What methods should be encouraged to maximise renewable energy provision for commercial developments and individual homes?

- The CDP should set policy and objectives to support PV Panel technology.
- The current SEAI grant schemes, provide homeowners with opportunities to self-generate renewable energy.
- GNI recommend all homeowners located on or close to the gas network, with oil fired central heating systems, to upgrade their homes using a "fabric-first" approach.

# How can the Plan support sustainable energy communities in County Kildare?

• In addition to wind and solar farms, the establishment of AD plants to produce renewable gas.

- The production of indigenous renewable gas enhances security of supply and supports the circular economy and sustainable agriculture.
- Bring employment and additional revenue to rural communities.

# **Sustainable Mobility: Movement and Transport**

# Is new or improved transport infrastructure required in the County and, if so, where?

- CNG infrastructure is required (One planned for Monasterevin)
- To support the technology and a modal shift in the HGV sector, in particular.
- HGVs are responsible for a disproportionate amount of transport emissions.
- When the injection of renewable gas is increased on the gas network, and utilised by CNG vehicles as bio-CNG, carbon neutral transport can be achieved.
- Kildare already has a renewable gas injection point increasing the prospect of carbon neutral transport.
- The Transport and Sustainable Mobility section of the new CDP should include the following: "Compressed Natural Gas (CNG): CNG is natural gas that has been compressed to fit into a vehicle's tank and is particularly suitable for use in commercial vehicles. The development of CNG infrastructure will enable fuel switching from diesel to CNG for HGVs and buses. CNG is an established technology that is used in many countries around the world. CNG contains virtually no particulate matter (PM) and also has low emission levels of nitrogen oxides (NOx)11 which is beneficial from an air quality perspective. CNG vehicles can be run on 100% renewable gas which is a carbon neutral fuel, produced using AD technology from existing waste streams and a variety of sustainable biomass sources, including grass, animal waste, crop residues and food waste. Infrastructure development for CNG is already underway in Ireland, with 14 fast fill CNG stations being installed across the Core TEN-T road network via a project called the Causeway Study that is supported by the European Commission

		through the CEF Transport Fund12 and the Commission for Regulation of Utilities (CRU). The Council will support the use of gas in transport by a presumption in favour of applications for CNG refuelling infrastructure, provided planning and environmental criteria are satisfied."  Making it happen: Infrastructure, Energy and Communications  How can the Plan support the relevant external agencies in the provision of electricity, gas, water, wastewater, renewable energy, telecommunication and broadband infrastructure?  • Encouraging projects such as upgrading and expanding the gas network, renewable gas production and CNG infrastructure for the transport sector.
		<ul> <li>Continued support of the gas network can help sustain development in the region and help the county in realising its climate action objectives.</li> </ul>
177.	Leo Gordon	<ul> <li>Explore the possibility of developing the walkway around Balinafagh Lake, Prosperous.</li> <li>It's an underutilised nature walk of approx. 3-4 km in length.</li> </ul>
		<ul> <li>Currently walkers park in the existing council park and walk around the lake where the walkway is soft and undulating.</li> </ul>
		Local walkers are keen to support and volunteer in the walkway development.
		The investment required would be minimal for the potential benefit for walkers, locally and beyond.
178.	Martin Waters	Objection to the construction of the inner relief road (gallops ave) for the following reasons:
		<ul> <li>Congestion and HGVs using this route close to Kingscourt estate.</li> </ul>

		<ul> <li>The construction of a concrete boundary wall creating will be unsightly in a fine area.</li> <li>Constant noise and exhaust pollution close to established houses and pedestrians.</li> <li>Lack of a safe pedestrian walkway close to passing HGVs.</li> <li>Hazardous material will be transported into the Naas road chemical storage area, with young families in proximity.</li> <li>Access and egress into established estates will become both difficult and hazardous for the residents, to mitigate this risk will mean both traffic lights and speed ramps which will cause further congestion.</li> </ul>
179.	IFA	<ul> <li>Development charges</li> <li>The level of agricultural services provided doesn't reflect the development charges.</li> <li>Charges need to be brought into sync with neighbouring counties.</li> <li>Rural housing</li> <li>A large social and economic need exists for rural housing.</li> <li>The absence of youth returning to rural areas will lead to issues of isolation and closures of services.</li> <li>The above highlighted living with Covid-19.</li> <li>Wind farm/solar policies</li> <li>Currently no policies regarding wind and solar farms.</li> </ul>

		Snow disruption
		Farmers assist clearing roads during heavy snowfalls.
		IFA seek clarification on whom is responsible if an accident occurs.
		Bog re-wetting
		IFA seek clarification on whom is responsible for any interference caused by bog re-wetting to adjacent land and/or housing.
		KCC Management
		IFA would like to establish a better protocol for interaction with KCC management.
180.	DS Breathnach	Healthy Placemaking / Economic Opportunity
		Urban Regeneration & Placemaking
		Urban regeneration should be a key focus - to improve the public realm of towns and villages.
		Example: A row of deteriorated shops in Castledermot main street.
		<ul> <li>Policy Suggestion 1A: Include policies to tackle dereliction in towns and villages to find ways to repurpose and bring buildings back into life, for example, converting shops into dwelling houses/apartments and the development of Remote Working Hubs by the use of the ground floors of former retail premises.</li> </ul>
		Open Space & Recreation Facilities to support tourism
		Create open spaces around historical sites with walking routes to access them.

- New open space and recreational facilities for local residents; and
- more attractive for tourists to visit.
- Example of where this can work is Dún Ailinne near Kilcullen.
- Policy Suggestion 1B: Identify key locations with great potential for access to important lands and sites
  which also provide access to open space and are of tourist interest and include strong policies to
  provide public access and off road walking routes to such locations.

# **Sustainable Mobility**

# **Safe Walking and Cycling Facilities**

- Lack of off-road public footpaths.
- Example: Once you leave the footpaths in Castledermot, there are no public footpaths or designated rights of way through the fields and woodlands.
- Policy Suggestion 2A: Policy to support and develop off-road public footpaths and looped walks through fields and woodlands around each town and village, with the assistance of for example, agreements on permissive agreements with local landowners or transfers of lands to the local authority.

#### **Sustainable Travel Opportunities**

Suggested Policy: Develop new green routes that consist of dedicated cycling and walking routes
alongside roads or through adjacent fields (narrow strip of land required in places if not space available
on roadside) accompanied by planting and landscaping. This would create attractive safe walking and
cycling routes which would encourage sustainable travel modes and support biodiversity.

- Policy Suggestion 2B: Develop Footpaths and cycle paths to main roads/motorway junctions for
  potential access to inter-city public transport services which now bypass many towns. Witness all the
  car parking at motorway junctions in Co. Kildare and for example the potential for inter-city buses to
  come off and stop at motorways at junctions with cycle parking facility and shelter to provide improved
  access to these services from nearby towns.
- Eg. Castledermot only 2km from M9 (Junction 4) a safe footpath/cycleway could link the town to the motorway junction.
- Policy Suggestion 2C: Develop Local Transport Plans (LTPs) in conjunction with the NTA to provide for a plan-led approach to sustainable transport provision in our main towns and surrounding areas.

## **Enhanced Amenity and Heritage**

## Policy Development and Local Authority Resources and funding

- Given the significant increase in population in KCC, there has not been a commensurate increase in open space and recreational facilities.
- Policy Suggestion 3A: 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 and to address the legacies of rapid population growth but inadequate public
  infrastructure and community and recreational facilities across the county. In addition to Government
  funding, the implementation of improved public open space and recreational infrastructure will require
  an updated development contributions scheme to provide explicit support for contributions to open
  space and recreation.

# The lack of public parks in Towns

• Lack of high-quality open space in towns, such as Athy and Clane.

- Policy Suggestion 3C: Develop policies and identify locations for new urban parks in towns where there is a deficit of public open space. This could be through the acquisition of open fields at locations on the edge of towns for gradual conversion into parkland.
- Wexford County Council have been proactive in developing new urban parks in recent years and may provide some good practice examples.

# **Development of Blue and Green Infrastructure**

- Opportunities for linier walks along rivers, field boundaries, and hedgerows, subject to obtaining necessary agreements/purchase of strips of land.
- Opportunities to link green spaces in urban areas should be explored with a view to creating Linier Parks along rivers or between housing estates, for example.

## Support for Gaeilge/the Irish Language in Co. Kildare

- Consider the use of Irish/Gaeilge in signage/ public notices and for historical and recreational places and facilities.
- Significant proportion of the population in Co. Kildare have knowledge or use the language daily, as evident in the phenomena of 'pop-up Gaeltacht' open sessions.
- This should also be supported, for example through development and encouragement of the bilingual town approach adopted in Carlow Town.
- Policy Suggestion 3D: Include a policy to draw up a blueprint to promote the use of the Irish language in Co. Kildare and explore the opportunity provided by the Gaeltacht Act 2012 to provides for a new statutory designation of Irish Language Networks to which such locations can aspire, providing an innovative new option to build critical mass for the language.

		Issues Relating to Castledermot  Lack of public footpaths  • Develop public footpaths through the fields such as looped walks. –envisaged in the Castledermot LAP
		2009 and should now be developed.  Develop new recreation open space to support tourism/economic opportunity.
		<ul> <li>Policy Suggestion 4B: : 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</li> </ul>
		Conclusion
		<ul> <li>KCC should be pro-active in pursuit of Government Funding, with a dedicated team to apply and pursue such funding.</li> </ul>
181.	Jane Tripp and Rita Shah	There is an absence of planning policy in respect of the County's ageing population and it is suggested the following should be included in the CDP
		<ul> <li>'Encourage and facilitate in accordance with the NPF (NPO30) the provision of planned ageing communities within urban and rural locations that have social and infrastructure capacity to response to the urgent housing and health requirements of the County's ageing population'.</li> </ul>

		<ul> <li>National Planning Policy (NPF NPO30) and the Regional Spatial and Economic Strategy (RPO9.4 and 9.5) acknowledge the ageing population and the urgent need for a planning policy to avoid a crisis. Rebuilding Ireland also acknowledges this situation.</li> <li>Housing Options for our Ageing Population Policy Statement (2019) calls for innovative solutions to meet housing and health needs. A Wellness and Retirement Village model is suggested in this regard.</li> <li>A 'County Kildare Ageing Population Analysis' document has been submitted also, which highlights Kildare's population trends, Government policy, Benefits of retirement Villages, etc. It also includes an</li> </ul>
182.	larnrod Eireann	analysis of the rural area of Moyvalley and Cadamstown.  The part of this submission that refers to a particular use at a particular site has not been summarised.
		<ul> <li>National Transport Authority's Transport Strategy for the Greater Dublin Area (2016-2035), is currently undergoing statutory review - imperative that the new CDP ties in with the revised Transport Strategy.</li> <li>Facilitate a mindset shift towards a mass transit sustainable mobility system integrated into a compact spatial planning framework for housing and commercial development.</li> </ul>
		Iarnród Éireann - Core Objective and Benefits of Rail
		An overview of larnród Éireann's core objective and objectives over the new CDP period are provided.
		<ul> <li>Heavy rail can play an essential role in supporting the sustainable growth and prosperity of the Kildare County and Greater Dublin Area, and by extension the growth of the wider regions and national connectivity. Iarnród Éireann outlined the numerous benefits.</li> </ul>
		Current Rail Development in Kildare County

- Iarnród Éireann has made significant progress on the rail objectives contained in the NTA Transport
  Strategy for the GDA. The Integrated Implementation Plan 2019-2024 supports the delivery of the
  wider Strategy. It sets out the central infrastructure investment programme and overall funding
  provision over six years. Progress made on the following rail objectives are detailed in the submission:
  - DART+ Programme
  - Station Improvement/Other Enhancement Programmes incl. Accessibility
  - Non-DART Fleet Enhancement
  - Network Development

#### Iarnród Éireann Priorities for the future

- The Department of Transport (DoT) and the Department of Infrastructure (Northern Ireland) (DfI(NI)) are in the process of agreeing terms on an all-Ireland strategic rail study on faster intercity connectivity, improved regional connectivity and freight. The CDP should consider and support the outcomes of that study.
- The following high-level measures should be a priority for the revised CDP:
  - Prioritize the Public Transport and Active Travel schemes, with a particular focus on high capacity modes, which are carbon efficient.
  - Continue to expand heavy rail as a high capacity high frequency mode choice in Kildare with proven ability to attract private car users, as part of a wider GDA integrated mass transit system.
  - Promote Transit Orientated Development (TOD) with mixed-use high-density development at key rail nodes and along key rail corridors.

- Develop new rail stations in line with emerging spatial planning policy, subject to business case evaluation.
- Support ongoing investment in rail infrastructure.
- Develop an integrated, user friendly, and highly connected public transport network.
- Expand park and ride capacity at strategically located rail stations to encourage modal shift.

larnród Éireann outlined its priorities for key expansion projects and enhancements to the rail network of Kildare and the GDA.

- Further DART Network Extensions and Enhancements.
  - 1st element: DART Underground Project, which is defined as "an underground rail link through the City Centre, allowing DART services to operate on the Kildare line and travel through the tunnel, enabling passengers to connect with DART services on the other three rail lines".
  - 2nd element: Build on the DART+ Programme by extending the DART network further, which will facilitate a greater catchment for Kildare County.
  - Iarnród Éireann will look at further extending the electrified area across each of the lines and providing enhancements.
- Accessibility Programme
  - The new CDP should support the further expansion of our Accessibility Programme which provides more accessible stations on the rail network.
- Customer Information Services

- The development of Customer Information Services (CIS), should be supported by the CDP as it is a vital customer experience capability.
- Multimodal Facilities for Sustainable Interchange Programme
  - The CDP should support the implementation of the Sustainable Interchange Programme. The aim of the programme is to provide an improvement of mobility options at Kildare County stations. This in items such as car parking, cycle provision, electric charge points.
- Park and Ride 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.
- Electrification
  - The Development Plan should include provision for a further expansion and enhancement of the DART network in Kildare County.
  - Iarnród Éireann will include the outcomes on Intercity and inter-regional connectivity from the strategic rail study by DoT/DfI(NI) as part of this priority once they are known. The Development Plan should support the electrification of Intercity routes.
- Rail Freight
  - larnród Éireann is in the final stages of developing a revised rail freight strategic plan, the CDP should consider the findings of the report.

# Impact of COVID-19

		<ul> <li>It is important to note that while development of public transport infrastructure and service can aid economic recovery from the COVID-19 pandemic, and demand is currently suppressed, it does not change the objectives of larnród Éireann and therefore larnród Éireann believe the demand is there and the benefits of our proposals are not limited to economic recovery.</li> </ul>
183.	Richard Godsil Edward Frisby	This submission was made on behalf of the owners of Leinster Mills in Naas.
		<ul> <li>Recognises the requirement to protect heritage assets such as protected structures and conservation area but requests a pragmatic approach to the adaptive reuse of such buildings.</li> </ul>
		<ul> <li>The CDP should support the adaptive reuse of vacant and underused Protected Structures for a viable use. Ensuring a new viable use for such buildings would ensure that they are brought back into use and protected for future generations.</li> </ul>
		<ul> <li>The CDP should examine the zoning of land on which undeveloped protected structures are located to examine whether the existing zoning is sufficient to encourage development and if not a new zoning with more permitted uses should be considered.</li> </ul>
184.	Grainne	Sustainable Mobility
	McGlinchey	The Naas Inner Relief Road was defeated by a democratic vote by the Naas MD in June 2019.
		The Gallops Avenue like the Naas IRR will move thousands of vehicles close to quite mature residential estates.
		Congestion will move from current traffic junctions to the new proposed junctions at The Gallops.
		<ul> <li>The proposed route also traverses Naas Racecourse, which must be preserved for recreational purposes as the 'Green Lung' of the town.</li> </ul>

- The new Kildare CDP should include the following objective:
- "To provide an outer ring road for the eastern/north-eastern side of Naas, to cater for by-passing traffic, linking the Blessington Road with the Dublin road close to the Junction of the latter with the N7. This outer ring road will be routed, so as to not traverse or cut through existing residential areas and will provide a long-term development boundary to the east/north-east of the town of Naas."
- This objective is to replace the "inner relief road, Naas" objective of the current Kildare CDP 2017-2023.
- Such an objective would be consistent with the existing objective MT 15 of the CDP, which seeks to channel HGV traffic associated with landfill and extractive sites onto the general regional and national road network insofar as possible.

# Other issues facing Kildare

#### Education

- Naas Primary and Secondary school places are limited.
- The CDP should include additional education campuses within the town's environs, which encourage students to walk or cycle to school.

#### **Active Leisure**

 Residents may value increased linkages between Kerdiffstown Park, the planned park at Sallins, the Naas/Sallins Greenway, and perhaps improved utilisation of the canal as a Blueway between Naas and Digby Bridge, ultimately heading for the river Liffey. Excellent for cycling, walking, or running.

# **Development of downtown Naas**

		<ul> <li>In line with the National Retail Guidelines, the CDP should prohibit development of retail over 1,000 sq. metres gross floorspace outside the Centre of Naas.</li> <li>Naas town centre should be designated as a development zone with incentives for the creation of "Living over the Shop".</li> <li>How can we support and protect traditional on – street retailing with the increase of online shopping and encourage new business looking to locate within our town centres?</li> </ul>
		<ul> <li>The CDP should include a policy, that all comparison retailing, and all other retail but local convenience (i.e. up to no more than 1,000 sq. metres gross floorspace) is not permitted outside town centres.</li> <li>No sites should be zoned as district centres, as the definition in the Retail Planning Guidelines is far too</li> </ul>
		<ul> <li>Ioose and it's unsuitable for the scale of the towns in County Kildare.</li> <li>The town centres of the key towns, the self-sustaining growth towns, and the self-sustaining towns should be marked on maps in the local area plans. Brownfield land with potential for regeneration should be included within the boundaries, if located within the town centre areas.</li> </ul>
		The CDP should not permit comparison retailing, and all other retail but local convenience in any retail warehousing development, whether by new build or by conversion.
		The Monread shopping centre has clearly shown that permitting large scale retail in peripheral locations, has done huge damage to traditional on-street retailing in the town.
185. B	ord na Mona	<ul> <li>BnM expect to publish "Bealach Úr, Bealach Glas - The Future use of our Peatlands" in the coming months.</li> </ul>
		Economic Opportunity

- Opportunities exist to support industries that require scale on Bord na Móna's landholding.
- Cutaway peatlands have enormous potential to provide quality recreational areas for local and national users.
- BnM provides funding through the community benefit schemes for investment in rural, town and village regeneration supported by commercial renewable energy developments with the potential to draw in additional matched funding under the Renewable Electricity Support Scheme (RESS).
- BnM is transitioning to become a climate solutions company ensure the new CDP plan supports the opportunities this change presents.

#### Climate Action

- Government's declared a climate emergency in May 2019 and published the Government's Climate Action Plan in June 2019.
- The overall target of the plan is achieving 70% renewable electricity by 2030.
- NPF objective to transition to a competitive low carbon, economy by 2050 and to shift to predominantly renewable energy sources.
- RSES calls out the need for us to "better leverage [our] natural resources to increase our share of renewable energy... and harness the potential for a more distributed renewables-focused energy system".
- The NPF specifically mentioned the potential for utilising BnM landholding to support renewable energy generation. Bord na Móna continue to work to harness this potential through various projects.

• The CDP should consider all beneficial uses of Peatlands including energy, commercial, social and environmental.

## **Enhanced Amenity and Heritage**

- The Action Plan for Rural Development Realising our Rural Potential highlights the potential of activity tourism to contribute to economic growth in rural areas.
- The Government committed to a Peatlands Climate Action Scheme (PCAS) with Bord na Móna.
- Kildare County offers significant potential to deliver a unique and expansive ecotourism experience. Central to this offering is the provision of quality cycling, walking and hiking routes connecting strategic tourism infrastructure, towns and villages.
- Bord na Mona's future development and decarbonisation strategy presents potential amenity opportunities that were previously unattainable.
- These opportunities recognise that the development of Greenways, Blueways and Peatways offer a unique alternative means for tourists to enjoy rural Ireland.
- The new Kildare CDP should support appropriate commercial and industrial development on Bord na Móna's land which can be harmoniously co-located within a biodiverse and ecologically rich rehabilitated peatland landscape.
- Future BnM land-use strategies and commercial development will support the Kildare CDP in the development of green infrastructure.

# **Making it Happen**

	<ul> <li>Bord na Móna estate currently supports nationally and regionally significant waste management and resource recovery infrastructure.</li> </ul>
	<ul> <li>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.</li> </ul>
	<ul> <li>Significant potential for Bord na Móna to support further resource recovery operations and enabling the transition to a more sustainable future.</li> </ul>
Cllr Vanessa	
Liston	<ul> <li>In addition to the positive principles set out in the RSES, put the UN Sustainable Development Goals at the core of the planning process.</li> </ul>
	<ul> <li>Need a transformative vision for Kildare - a strong vision that is meaningful and memorable by the residents of Kildare.</li> </ul>
	Healthy Placemaking
	SHD's are putting enormous pressure on community infrastructure and resources and are reducing communities' sense of place and power.
	<ul> <li>Strong and detailed policies are needed, to ensure that the right development happens in the right place.</li> </ul>
	<ul> <li>Use clear and unequivocal language in the CDP's requirements on standards for infrastructure and the protection of heritage.</li> </ul>
	Types of development
	Cllr Vanessa Liston

- New developments should make a positive contribution to community, landscape, connectivity, vibrancy, and service delivery.
- Adopt the Heritage-led approach.
- Scenario-test assumptions and approaches in the development of the draft.
- New developments should have higher requirement for open space, higher standards of landscaping, and meaningful space and play areas for children.
- Mature trees and hedgerows must be retained and built into the design to the maximum extent possible.
- All developments should have a maximum riparian setback and landscaping features.

# Socio-spatial justice

- A lens of socio-spatial advantage/disadvantage is critical to achieving fairness.
- For example, Celbridge lack basic provision of health services, they must travel to Naas or Athy with no public transport. Gaps in the accessibility of services.
- The perspective for development should be enhancement of social equality, the enhancement of community and social capital, fostering of young people and the promotion and protection of culture and the environment.

# Community and connection

Pilot an anti-loneliness (or pro-connection) approach to our town centres.

- The Community Call was an example of community mobilisation and connection.
- Explore what can be learned from our Covid experience to promote community connection.
- Potential further benefits in terms of the relationship between planning and public health.
- Include objectives on Universal Housing Design and facilitating lifelong living, especially for older people, in their own homes.

# Alternative housing types

- Include an objective to support low cost and eco-friendly alternatives to housing.
- The CDP needs to be both ambitious and creative in exploring ways to support alternative types of accommodation.

# **Sustainable Mobility**

- Ensure that all new developments are fully permeable for walking and cycling.
- For existing neighbourhoods, set objectives for the retrospective implementation of walking and cycling facilities, in consultation with stakeholders.
- All towns and villages should be developed for mobility for our most vulnerable users.
- Adopt a pedestrian- and cyclist-first approach to planning.
- Establish and communicate a methodology that will allow the best access and uptake of charging points.
- Prioritise active travel and reducing the reliance on cars, specifically the reduction of urban congestion.

- Aim for maximum impact on the national transition to net zero carbon by 2050.
- 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.
- Work with the NTA and other stakeholders to drive a human-centred approach to the provision of transport infrastructure.
- Include a clear objective and target for providing infrastructure for safe travel to school.
- Also, an objective for incentivising and enabling new measures to support active travel to school.
- Bring forward proposals for the creation of new public rights of way to promote walking and enjoyment of our natural environment.

#### **Economic Opportunity**

- Reference the European Green Deal as the roadmap for achieving a sustainable economy and as our framework for promoting economic transition and development.
- Pursue economic development in a way that promotes not only innovation but also incentives transition from old practices of consumption, production and product lifecyle.

#### Innovation

• Include a policy to support cross-sector collaborations between Maynooth University, local businesses, and communities in developing green technologies and social innovations.

Support the development of all types of ecosystems that enable the sharing of ideas, data, knowledge
and supports among people in businesses, communities, education establishments, public bodies and
local government.

#### Tourism

- Promote sustainable tourism.
- Need strong policies and objectives around the circular economy and include a clear definition of the concept and its relevance.
- Reference and include the objectives of 'The Waste Action Plan for a Circular Economy'.
- Need incentives for Kildare businesses to take the lead on circular economy practices.
- Set an objective to encourage and incentivise environmentally conscious and responsible tourism.

## Live-Work-Play communities

- Aim to achieve 'live-work-and-play' communities.
- Include policies on remote-working hubs.

## **Enhanced Amenity & Heritage**

- Set out strong policies and objectives on the protection and recovery of nature and wildlife.
- Support national moves (the current review of the NWPS and the new National Biodiversity Action Plan) to conserve and protect our heritage through strong objectives.

- NH1 should be reworded as: Facilitate, maintain, and enhance to the maximum extent possible the
  natural heritage and amenity of the county through the preservation and retention of woodlands,
  hedgerows, stonewalls, rivers, streams and wetlands. Where the removal of such features is
  unavoidable, appropriate measures to replace like with like must be provided.
- NH2 should be stronger: Carry out habitat assessments to inform the design of new developments in
  order to ensure that proposals for development integrate the protection and enhancement of
  biodiversity and landscape features to the greatest extent possible, by minimising adverse impacts on
  existing habitats (whether designated or not) and by including mitigation measures, as appropriate.
- NH3: Should state that compliance with Article 10 of the Habitats Directive is mandatory regarding [..]
   the management of features in the landscape which are of major importance for wild fauna and Flora
- NH02: Remove the reference to 'subject to the availability of funding'. The objective must be clear in implementing the actions contained in the County Biodiversity Plan through the identification of priority actions and this can be achieved 'by working with all stakeholders and mobilising all resources to ensure achievement of the targets'. There should be no statement around nature recovery and protection, nor climate action that implies that less than the highest ambition and maximum standards are required. Reflect that the period of the new CDP must result in a huge restoration of natural environment and an annual reduction in carbon emissions of at least 7% p.a.
- NH03: Instead of 'integrating considerations' the new plan must Ensure that all LAP's, programmes and activities prioritise an expansive recovery of nature and wildlife in a way that promotes biodiversity.

#### Trees

- The new CDP should have strong objectives prohibiting the felling of mature trees and hedgerows.
- Request Tree Management Plans according to BS standards, and ensure trees are incorporated into the design of new developments.

- Mandate the protection and preservation of existing hedgerows. Where removal is necessary, the CDP should ensure the highest-standard methodology is used for the assessment, removal, and protection, and seek replacement with new hedgerows of native species indigenous to the area.
- Where trees are removed these must be replaced in suitable locations at a ratio of 4:1.
- Include an objective for the development of a tree planting policy.

#### Also

- An Ecological Impact Assessment should be required when a proposed development have a significant impact on rare and threatened species.
- Explore an ecosystems services scoring approach to inform planning decisions.
- The assessment of planning applications for the impact on natural heritage, wildlife and protected species must be strengthened as a core objective.
- The guidelines of the Inland Fisheries 'Planning for Watercourses in the Urban Environment' should be implemented as policy.
- Include clear objectives around connecting parks and open spaces via green corridors.
- Include objectives around promoting community supported agriculture (CSA), allotments and community gardens.
- Include an objective to promote the transition to pollinator friendly green spaces.
- New developments should be required to ensure all open spaces include landscaping with native trees and plants, the integration and enhancement of natural amenities and natural playgrounds for children.

- Include urban forests and urban greening as a key objective and provide support to communities who wish to advance such greening projects.
- Include an objective on the protection and enhancement of heritage gardens and demesne landscapes. Support the provision of public access to these sites.
- Include an objective against development that would adversely affect historic parks, gardens and demesnes of heritage significance, their views, and vistas.
- Include a policy on raising public awareness and understanding of Kildare's natural heritage, wildlife and biodiversity. Support and encourage community-led initiatives.
- Include an objective for implementing the All-Ireland Pollinator Plan.
- The Tree Preservation Order process must be clear and a list of all TPOs included. Data must be published as open GIS data for community use also.
- Include a policy highlighting the European Landscape Convention and objectives to implement the objectives and actions of the National Landscape Strategy 2015-2025.
- Articulate a goal to effectively manage features that are essential for the protection and restoration of wild species numbers and diversity.
- Acknowledge and raise awareness of the negative impacts of artificial lighting on wildlife.
- Include an objective that requires lighting fixtures to provide only the amount of light necessary for personal safety.

## **Amenity & Arts**

• Strengthen the commitment to provide a performing arts space in upper North Kildare.

- Celbridge is a clear example of lack of arts infrastructure, with its association with the literary heritage of Jonathan Swift.
- Develop clear objectives around meeting the needs of young people.

#### **Protected Structures**

• Reference Vanessa's Bower in Celbridge Abbey in the Record of Protected Structures.

#### Climate Action

- The statement that the CDP needs to 'mainstream climate action through all policies and plans and integrate into all operations and functions of the local authority' needs to be more specific.
- Reflect the current situation regarding climate, nature degradation, wildlife loss, pandemics, and the rapid social and economic change.
- Deliver within term the concrete achievement of 7% p.a. reduction in carbon emissions as a minimum.
- Set a key goal to contribute, to the maximum extent, our share of the national commitment to protect 30% of the Earth's lands and seas by the end of the decade.
- State clear key targets on climate emission reduction and protection of lands and measure all actions in the plans against their contribution to deliver on these targets.
- Aim to align with the new National Biodiversity Action Plan.
- Set clear objectives regarding our obligations and commitments to new targets for recovering our county's natural environment, wildlife and biodiversity.

# **Buildings**

- Building and cement industries are particularly intense carbon emitters.
- The CDP has an opportunity to pursue low carbon and sustainable materials for development.
- Should be policy coherence across all aspects of Local Government activities and investments.

#### Metrics

- 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.
- Communicate these to the public in addition to other targets and progress indicators.

#### Decarbonisation zones

• Include an ambitious target to increase the number of decarbonisation zones, following the initial pilot in 2021.

Climate Action Plan and Climate Adaptation Plans.

- Reflect and amplify the objectives and aim to exceed the objectives and ambition in the CAPs, SECAP, and CAPs.
- Introduce a new approach by focusing on adapting and learning based on the feedback from current plans and changes through the lifetime of the plan.
- The Plan should set a specific objective to incorporate new methodologies, data and insights as they
  become available and to use this to actively adapt actions to achieving our climate, biodiversity
  recovery and land protection targets.

#### Peat

- Protect designated peatland areas and landscapes.
- Conserve the ecological, archaeological and cultural heritage of bogs.
- Support the phase out of peat extraction for horticultural use.
- Include objectives around bog restoration and conservation projects.
- All actions in the CDP should prioritise actions that have a high impact on carbon emissions reduction and nature and biodiversity recovery.

# Sustainable and clean energy

- Provide opportunity for innovations and trials in the energy sector.
- Actively promote and support Sustainable Energy Communities and develop a programme to increase awareness and participation in local outcomes.

#### **Creative Places**

- The process over the next two years should aim to rethink and support the relationship between experts, officials, and local knowledge.
- The language of planning could be more community centred. As example, in detailing the achievements of the last CDP, new playgrounds are listed. However, playgrounds as material structures themselves are not an achievement, rather the opportunity for communities and children to have new spaces to meet, connect and safely play.

# Public consultation & engagement

• Specific actions regarding public consultation and engagement, specifically incorporate objectives to adopt the Gunning Principles in all consultations.

## **Engagement of Young People**

• Set an objective to support the new pilot engagement framework that will be developed in the Celbridge-Leixlip MD.

#### Citizen Science

- Include an objective to support, promote and use open data created by communities.
- Minister Noonan highlighted the importance of citizen science for biodiversity.
- Enable communities to develop knowledge on their areas, communicate their needs using that data, and use it to explore options and approaches with relevant local government departments and public bodies.
- Include a commitment to commissioning data in an Open Data format with no license limitations on reuse by communities.

#### Inclusive communities

- Explore ways to make communities more inclusive.
- A Town-Centre first policy is a positive framework for ensuring that all communities feel welcome and can equally access services and facilities.
- Include objectives to celebrate diversity.

		<ul> <li>Towns should be developed from the perspective of our most vulnerable users.</li> <li>Include objectives to ensure all policies and plans proposed do not negatively impact on minority and minority ethnic communities.</li> <li>In the UK all new policies and plans must be accompanied by an equality impact assessment. The policy development process also engages with stakeholders likely to be most affected by the proposed change.</li> </ul>
		Include an objective on equality proofing the CDP and all planning related proposals or policies.
187.	Se Dolan & Linda Ryan	The "Naas Inner Relief Road" was rejected in 2019 by the Naas MD.
		The draft Naas/Sallins Transport Strategy failed to address the issues.
		The two options put forward in that strategy, namely: Milbridge Street, and Northwest Quadrant Link Street would impact directly on Finlay Park.
		<ul> <li>The Millbridge Street option, links the Sallins Road to New Caragh Road, both arteries of the existing Naas Ring Road.</li> </ul>
		The Naas Ring Road was designed to avoid exactly the type of congestion which will be inevitable.
		The construction of such a road would lead to motorists avoiding the centre of Naas town and a dramatic rise in vehicular trips through Finlay Park, a private residential estate.
		<ul> <li>The environmental effects would also be extremely worrying, as Finlay Park is surrounded by farmland, wetlands and woodlands.</li> </ul>

		<ul> <li>Building an additional road parallel to or near the Grand Canal and Millennium Road would destroy habitats containing a wide diversity of wildlife.</li> <li>The existing Naas Ring Road adequately caters for traffic volumes in the areas it covers.</li> <li>Consider the construction of a suitable "Relief Road" in the North-Eastern side of Naas town to alleviate the obvious traffic congestion issues around the Dublin Road-Blessington Road area at peak times.</li> </ul>
188.	Brendan Kenny	Strategic Planning to meet housing needs
		<ul> <li>Developing villages and smaller towns should be explored, rather than more housing in existing towns struggling with the necessary infrastructure and open areas.</li> </ul>
		The small rural villages and towns could benefit from proper planning and a population increase to make them more viable and self-sufficient.
		This would also negate the need for unintended/ undesirable one-off housing in these areas.
		<ul> <li>In many cases new developments seek to access the open spaces of existing estates to avoid providing adequate and sufficient open spaces, this should not be tolerated.</li> </ul>
		Sporting and healthy exercise facility availability
		<ul> <li>Sporting clubs are competing with development/land prices to keep their facilities going.</li> </ul>
		<ul> <li>Need planning support: for example, Naas GAA is becoming increasingly landlocked by housing development and is serving a huge membership on an insufficient footprint.</li> </ul>

		<ul> <li>KCC should support sports facilities for ladies. Kildare Camogie, should at a minimum, have its own central training facility for its teams. Kildare LGFA warrant similar.</li> </ul>
189.	Alan Kelly	Sustainable Mobility
		Gaps in sustainable transport options within and between the towns of North East Kildare.
		Resulting in social disconnection and reliance on motor.
		<ul> <li>Focus on interconnectivity and the development of existing and new routes between towns for walking and cycling.</li> </ul>
		<ul> <li>Castletown Estate should act as a locus of interconnectivity for sustainable transport options, in addition of:</li> </ul>
		<ul> <li>a cycle way connecting Celbridge Main Street to the Barnhall and M4 exits.</li> </ul>
		<ul> <li>a cycle way between HP and the M4 which allow for a connection to the existing motorway bridge at HP as well as interconnectivity with existing paths and cycle ways on the Royal canal and Intel Road connecting all three towns with a specific focus on areas of parkland and natural heritage.</li> </ul>
		<ul> <li>Implement sustainable transport options for all new housing and school developments before and during development.</li> </ul>
		<ul> <li>No provision is made for the transport needs of the 500+ students of the planned CCS school on the Southern bank of the Liffey in Celbridge.</li> </ul>
		<ul> <li>A new pedestrian / cycle bridge at the slipway by Castletown gates would provide a solution as well as joining Castletown parklands to the proposed park area at Donaghcumper.</li> </ul>

#### Climate Action

### **Native Woodland Expansion**

- Rescue, manage and expand existing woodlands to increase coverage.
- The submission provides an overview of accepted techniques to maximize the increase in coverage.
- Example: Extensive Woodlands exist in Castletown Estate.
  - Not effectively managed or optimized for wildlife or as an amenity.
  - Significant areas adjacent to the woodland are under cultivation despite being zoned as amenity lands.
  - Allow area to act as an expansion buffer for an increase in woodland.
- Details of organizations that work with County Councils to promote expansion of Native Woodlands are provided in the submission.
- Severe lack of native woodland and a history of misuse of native wetlands and bogs in KCC. Provisions should include:
  - Native Woodlands:
    - 1. An audit of all Native woodlands.
    - 2. A ban on clearing Native forest and hedgerows with enforcement.
    - 3. A maintenance allowance for the upkeep of permanent native woodlands.
    - 4. Identification of all publicly owned Native Woodlands that would benefit from management and potential expansion.
    - 5. Consideration of funding to allow the natural expansion of woodlands into adjoining fields where practical.

		Naas centric.  General Introduction
190.	John Kavanagh	The submission formed two parts, a general introduction, and an attached document, cited as being mainly
		organizations.
		5. Organized clean-up days (with closure of affected roads) by Tidy Towns and Resident
		4. Review of the use of possible deterrent such as cameras and drones with signage.
		3. Strict enforcement of maximum allowable fines and fine increase based on by-laws.
		action and follow up by KCC to the reporter.  2. Review of dumped material for evidence of origin.
		enforced SLA (Service Level Agreement) for collection of the material as well as confirmation of
		1. An easy to use website (and/or app) to report small scale / household dumping with an
		Implement the following steps:
		<ul> <li>The means to deal with illegal dumping are poor to non-existent.</li> </ul>
		Healthy Placemaking
		4. Funding for the clean-up and rewetting of intact wetlands.
		3. A ban on any further draining of intact wetlands.
		2. A water quality assessment of all privately owned wetlands.
		An audit of private bogs and wetlands.
		Bogs and Wetlands:
		7. A funding scheme to allow for the opening up of private land to the public.
		of existing woods.
		6. An environmental stewardship grant for the planting of new native woodland or the expansion

- We must create green traffic routes that encircle and pass through towns. These routes must be for humans but also the flora and fauna for the town.
- Not just build schools but provide safe routes to schools facilitating older student's safe car free routes.
- Green belt areas must not exclude access, the erection of big fences exclude man and animal.
- KCC when considering maintenance contracts should look at award criteria not just cost but maintenance of biodiversity and natural heritage, the accidental prevention of the spreading of invasive plants and damage to hedgerows.
- The issue raised of cycling safely along routes now compared to the past, and quiet walks with the absence of cars.
- Encourage diversity of age in the layout of housing estates.
- Developers not to clear sites of nature and replant later but maintain throughout and work with natural heritage.

# Completion of parklands around the town and county

- Many areas that were to be become parklands or amenity open spaces have not been completed.
- The Harbour area in Naas was going to be a town park and should be designated as a park continuing the linear green nature and public friendly 50 metre clear way along the banks of the canal.
- We need to promote throughout the county the use of our canals and rivers as natural open road free spaces where people can exercise and escape from the stresses and strains of modern living and breathe clean air, escape from the noise of life.

- A cycleway would also provide a safe family friendly link, the submission suggests linking Odlum's and estate in Sallins and the new school in Millennium Park.
- The submission also suggests we integrate safe routes for our children to and from school throughout the county using canal pathways and reopening links that allow car free safe routes for commuters, students and walking families or runners, joggers.

# Silence Is golden

- Low noise spaces are declining and are becoming more important as housing densities increase and apartment living families become more normal.
- Concerned the Naas plan doesn't mention Bats and other declining species and the legal protection applied to their roosting and breeding sites in the towns and their environs.

## Passive green development and conservation during housing development

- Need to ensure builders don't cut down hedgerow and trees, the biodiversity and preserve green assets when granting planning permission.
- KCC must actively pursue those who fell without the appropriate permits in place.
- Developers need to integrate the maintenance of existing wildlife corridors as part of their plans and should form part of the CDP.
- Our parks should plan for biodiversity.
- Provide car free routes around and through our towns.
- Walking routes should be planned through estates linking estates.

## **Noxious invasive plants**

- Active strategy on the elimination of Japanese Knotweed.
- Grass cutting contractors removing signs (in Naas) and cutting over the Knotweed and spreading it further.
- KCC and others must act to ensure that in awarding contracts that the contractors know what they are
  doing and act responsibly in protecting the counties biodiversity and do not act as a vector for
  spreading noxious weeds. This should be borne in mind when writing tenders for county grass cutting
  contracts

# **Biodiversity and green corridors**

- Increase the preservation of area between the Naas racecourse and Kingsfurze estate to the highest level as it is one of the few areas of uncultivated meadows.
- The submission makes reference to animals spotted in the area and differing flowering and grass plants.
- The submission suggests putting in safe walking/ cycling routes but a no car route.

#### Schools and other facilities for our children

- Supporting Infrastructure is needed.
- Suggested wording for the CDP "development will not occur unless the necessary educational and healthy lifestyle promoting assets/infrastructure is in place".

#### Roads

		The ring road proposed through the racecourse should be located on the far side of the racecourse.
		The proposed road is grossly inadequate for the traffic needs.
		The submission proposes a walking ring pathway around Naas.
		<ul> <li>A pedestrian/cycle only route through the racecourse to the Gallops is recommended in the submission.</li> </ul>
		Building regulations / planning permissions – planning for safety, biodiversity conservation and leisure
		<ul> <li>Plans should allow for changes in demographics and ensure buildings and the surrounding areas should allow for the same.</li> </ul>
		Encourage age diversity.
		<ul> <li>Encourage multiple generations in one residential space by including a mix of 2-4-6-bedroom houses and housing types.</li> </ul>
191.	Anthony Lawlor	Economic Opportunity
		<ul> <li>The Naas area which includes Johnstown, Kill and Sallins should continue to be a net inward employment hub and that consideration be given to increase the amount of land zoned for commercial activity to cater for all types of industry/employment.</li> </ul>
		Healthy Placemaking
		<ul> <li>Future housing development should occur along existing public transport corridors such as Rail and Bus and that park and ride facilities be provided along these routes for sustainable living.</li> </ul>

		<ul> <li>Consideration should be given to retirement villages for independent living to cater for our aging population. These should locate close to existing communities and along existing public transport corridors.</li> </ul>
192.	Louise Donnelly	Gallops Avenue / Naas Inner Relief Road
		<ul> <li>The Naas Inner Relief Road was a priority in the 2017-2023 County Development Plan and was rejected by the elected members of Naas MD in June 2019 and this decision should be upheld. To include such a proposal is an insult to the democratic process and undermines the decision taken by Naas MD.</li> <li>The Gallops Avenue was introduced by a non-statutory Naas/ Sallins Transport Strategy and is like its predecessor the "Naas inner relief road" in that it will move thousands of vehicles (including HGVs) to quiet residential areas where more people are living. The strategy states the road will "relieve congestion on Main Street and the Dublin Road", however it is contended it will simply move congestion to new junctions and not solve any traffic congestion in Naas.</li> </ul>
		<ul> <li>During the consultation process on the Naas/Sallins Transport Strategy the council state in the submissions report that "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". This statement is taken as an admission by the council that the proposed route will not relieve congestion and is merely directing it into residential areas instead of the town centre.</li> </ul>
		<ul> <li>A considerable portion of the route which follows an almost identical line to the previous proposal traverses by Naas Racecourse. This area must be preserved for recreational purposes as it forms a "Green Lung" for the town. It is suggested that a Greenway along this route instead of a road would improve permeability connecting housing estates with schools, shops and leisure offering a safer way of accessing the town. The Gallops Avenue proposal is a dated unsustainable solution which prioritises car use. A greater emphasis should be given in the new plan for a greener, cleaner town with more incentives / infrastructure to walk or cycle.</li> </ul>

		<ul> <li>An alternative solution for the Gallops Avenue route is to provide an outer ring road for the eastern/north-eastern side of Naas, linking the Blessington Road close to the junction of the N7. This outer ring road will be routed, so as not to traverse or cut through existing residential areas and will provide a long-term development boundary to the east/northeast of the town of Naas. This would replace the "inner relief road, Naas" objective in Table 6.1 of the current Kildare County Development Plan 2017 - 2023 and would be consistent with the existing objective MT 15 of the county development plan, which seeks to channel HGV traffic onto the regional and national road networks insofar as possible, which the defunct Naas Inner Relief objective does not.</li> <li>Healthy Placemaking</li> <li>Several issues are highlighted in Naas which are considered barriers to healthy lifestyle choices i.e., walking and cycling. These include a lack of cycling routes from residential areas to schools, poorly maintained footpaths, a lack of safe crossing points and traffic calming measures.</li> <li>It suggested that investment is needed to make footpaths and cycle lanes safer and that walking and cycling needs to be promoted. Schools should be fully accessible to pedestrians and cyclists from surrounding areas and the council needs to stop promoting private car use as this leads to traffic congestion.</li> </ul>
193.	Celbridge Community Council	<ul> <li>Transportation</li> <li>Need for investment in physical infrastructure including public transport, a second Liffey crossing and orbital route around the town, prioritisation of safe cycling and pedestrian routes.</li> <li>Safe cycling route to be promoted between Celbridge and Maynooth.</li> <li>Cycle lanes need from Celbridge to the Grand Canal Greenway.</li> <li>Include bicycle lanes and bike parking facilities.</li> </ul>

- Transport strategy for the North East Kildare region is needed.
- Public transport connections between the N-E Kildare towns is poor.
- Improve transport links between towns throughout the county and across county boundaries.
- Footpaths in town centres should be widened.
- Establish accessible parking at the edges of the town centre.
- Provide space to allow for eMobility in towns.
- Provide for disabled parking.
- Provide for 'Park and Stride' locations.
- Provide for footpaths in towns/villages.
- Provide for e-charging points e.g. car parks.

## **Environmental**

- Change from septic tanks to collection networks where feasible.
- Provide the Civic Amenity facility in Celbridge that has been through the Part 8 process.
- Develop a county wide network of multi-material recycling centres, bring centres and re-use centres.

# **Social & Community Infrastructure**

• Need for facilities for performing arts, childcare facilities, schools, medical practices.

- More swimming pools needed (3 countywide, 2 in N-E Kildare).
- Provide for community centres.

## **Amenity**

- Need for sports and recreation, open spaces.
- Prioritise the completion of the Grand Canal Greenway and specifically the 4.6k section on the Dublin-Kildare border.
- Liffey Valley Strategic Open Space should be developed/made accessible for recreational purposes.
- Provide for outdoor dining spaces during the summer months by taking up parking spaces (Appendix included relating to number of swimming pools in various towns throughout the country).

# **Employment**

- Need for town centre renewal.
- Space to be allocated for employment.
- Support working from home through adaptable house design in new residential schemes.
- Develop co-working spaces/ hubs.
- Prioritise and delivery opening of equine and food hubs.
- Undertake an audit of infrastructural deficits that are impeding economic development.
- Prioritise and deliver opening of the Digital Hub.

- Limit number of data centres in the county.
- New data centres must be district heating supply-enabled (e.g. Amazon data centre SDCC) and must supply own renewable energy.
- Improve broadband.

### **Tourism**

• Develop Celbridge Abbey House & gardens and Celbridge Manor Hotel & gardens for tourism/recreation.

## Housing

- The CDP must set the vision for how the settlements will develop.
- Town architect needed.
- Need for housing choice i.e. mix, type and range (including opportunities for 'downsizing' and 'rightsizing').
- Need for sheltered housing
- Support change of use of vacant commercial space into residential use.
- '10-minute' neighbourhood concept.
- Housing developments should comply with the 'Sustainable Residential Development in Urban Areas' Guidelines.

# **Settlement Strategy**

- Celbridge should be recognised as a 'Self-Sustaining Town' subject to improvements in physical and social infrastructure.
- Vision for each town needed that demonstrates alignment with the objectives of the NPF and RSES (examples of other LA approaches such as Fingal which states what the priorities are for each settlement).
- Suggestions provided relating to how towns could be addressed in the CDP (pg 5).

## Heritage

• Threat to town's heritage by e.g. development and traffic.

### **Biodiversity:**

- Ensure the protection of existing mature trees in new developments.
- New developments should be landscaped in order to maximise both recreational and biodiversity benefits.
- Tree cutting should not be permitted.
- Existing hedgerows should be retained (Clare Co. Co. cited as good practice example).
- More planting, fewer plazas.
- Implement the objectives of the Biodiversity Action Plan.

# **Climate Change**

		<ul> <li>Include policies that support the use of low carbon construction materials, support the SEAI Sustainable Energy Community Initiatives, Encourage Small Scale Wind Energy Schemes, include a District Heating Policy to use waste heat from industrial, electrical generation, hospitals etc to heat residential properties.</li> <li>Need for a greener public realm and greening of buildings (roofs/walls).</li> <li>Use up to date flood mapping.</li> </ul>
		Prioritise electrical vehicle infrastructure.
194.	Umeras Community Development CLG	<ul> <li>Seeking to promote sustainable development primary projects are promoting the development of Umeras Peatlands Park on the decommissioned Bord na Mona Umeras Bog and to pay farmers in the midlands for results-based biodiversity enhancement on their farms. The submission has an emphasis on Climate Action, Amenity, Heritage and Biodiversity.</li> <li>Interested in how the Plan can contribute to a "just transition" for the midlands and west Kildare. Putting people and the environment at the centre of policy and practice is also one of the main concerns. In this regard it is suggested the issues paper does not have a sufficient emphasis on Climate, Natural Heritage, Biodiversity.</li> <li>The content of the submission has an emphasis on climate change, biodiversity, tourism and protecting the bogs from excessive wind development proposals.</li> </ul>
		Tourism
		<ul> <li>Proposed Umeras Peatlands Park: The objective is to transform the Bord na Mona Umeras Bog into a peatlands park as a local and tourist amenity. The plan is for the park to be free for local people to visit, create direct employment in building / managing the park while also creating demand for cafes,</li> </ul>

restaurants, pubs, shops, bike / kayak hire, horse riding, accommodation etc. in Monasterevin and Rathangan. The mark is being modelled in Lough Boora Discovery in Offaly. This park attracts over 100,000 visitors per year.

- The Umeras bog (600 acres) has no direct link to larger bogs and is ideal for rewetting and carbon capture creating a patchwork of lakes/scrub/grassland/woodland for biodiversity. Bord na Mona has not allocated any land use to the bog providing an opportunity for a community run project. A feasibility study has been requested to enable Bord Na Mona decide on its future use.
- The park would be an ideal location given its proximity to public transport (train station in Monasterevin only 3km from the site) with links also available for walkers and cyclists on the Blueway (linked to Dublin).
- Barrow Blueway: 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.
- Is recommended the council recognizes the importance of Monasterevin as the Blueway arrival town and invest additional resources into developing the town into a heritage and nature tourism destination with the Blueway, Ballykelly Mills and Umeras Peatlands Park in development. The Blueway between Monasterevin and Rathangan should be recognized as a strategic tourism area in the County Development Plan.

# **Nature Protection & Biodiversity**

Peatlands / Biodiversity & Policy

• It is noted that RSES document recognises the importance of landscape considerations and the new plan should recognize that peatlands now have an elevated importance in this country. RSES notes Peatlands are unique landscapes which can act as amenity areas supporting a variety of outdoor

activities that can bring economic benefits to remote areas. Peatlands are also noted for their value to biodiversity. The Guiding Principles and Objectives on Peatlands (outlined in RSES) should be incorporated into the new Plan (i.e., RPO 7.27, 7.28 and 7.29).

- The Plan should reference the National Peatland's Strategy produced by the Department of Arts, Heritage, and the Gaeltacht and the NPWS aims to provide a long-term management framework to optimize the social, environmental, and economic contribution of all peatlands in the state.
- The council is urged to adopt new biodiversity objectives such as (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.
- The council should also work with Bord na Mona and Umeras Community Development to transform Umeras Bog and the boundary Coillte land into a Lough Booratype park which will be a positive step to create new biodiversity and amenity areas beside the Barrow SAC and Grand Canal NHA.
- The council should ensure priority is given to bogs located to existing biodiversity areas such as the Barrow SAC and Grand Canal NHA and areas of Coillte forestry so that larger connected biodiversity reserves can be created which will result in less fragmentation of habitat for nationally important species such as Curlew, Hen Harrier, Lapwing and Whooper Swans which are rare and declining in County Kildare.

## **Peatways**

• The council should include maps and detailed proposals for potential peatways through the peatland areas of Kildare. The RSES contains objectives to support the interconnection of Greenways, Blueways and Peatways. Public land that is currently in the ownership of Coillte and Bord na Móna can be used to provide such interconnections.

A new section should be included in the CDP relating to the interconnecting of our Greenways,
Blueways and Peatways and It should provide concrete plans and maps, describing the associated
benefits. Two areas where this is possible are at the Lullymore / Lullybeg and Umeras areas and should
be recognised in the Plan as strategic tourism areas. The council should also work with Offaly and Laois
local authorities to link Monasterevin to Portarlington and then to Mount Lucas through the bogs and
the rest of Offaly.

## Management and Designation of SAC's

• Kildare has only two National Heritage Areas (NHAs). Both are raised bogs. These bogs must be protected and restored if their value is to be protected.

## The proliferation of one-off houses

The proliferation of one-off houses in rural areas is a concern for a range of reasons biodiversity being
one. Retention of existing hedgerow consisting of biodiverse, native plant species should be conditional
in planning consents. Inappropriate planting of non-native hedging and walls are visually incongruous
and results in biodiversity loss. Tree-planting plans should comprise native species from indigenous
sources. It should also be conditional that water courses be maintained and not filled in.

# Grants for new housing developments

• Grants for new housing developments should contain specifications for planting that contain only native tree and shrub species for the open areas. Grasslands should be seeded with a range of native plants suited to the site.

Management of hedgerows along public roads

Hedgerows are of great biodiversity value. Correct management is crucial for biodiversity maintenance.
Cutting in an A-shape is recommended. Cutting should be carried out during the appropriate period,
between August 31st and March 1st, unless safety requires cutting outside this time. Cutting in
February is recommended to avoid loss of forage for birds over the winter months. It is also
recommended some areas of hedgerow are left uncut in any given year to allow invertebrates that lay
their eggs on hedges to survive.

## Recruitment of staff for a Biodiversity Office

• Employment of ecologists to staff a Biodiversity Office in Kildare, to review planning issues, engage with the public, schools, environmental NGOs, promote Kildare's biodiversity and support the Heritage Officer. This office should publish material and signage to promote biodiversity both digitally and in hard copy and physical signage.

#### **Smaller Wetland Areas**

• It is important that wetlands are protected from unauthorized development such as drainage where areas over 2 ha of wetland habitat are affected. Even if considered sub-threshold, the impact on the environment of any development should require at a minimum EIA screening in accordance planning regulations. The discharge of drains to the River Barrow SAC drainage should, at minimum, require Appropriate Assessment screening.

#### Quarries

• There are many quarries in the county which support important wildlife habitats, and some are used for illegal dumping which could have serious impacts on ground and surface water. There are also quarries which were excavated below the water table and into the aquifer which are an important source of water for people. Some quarries have filled with water and the overflow of water is connected to the drainage of rivers such as the Barrow SAC.

- Quarries need to be secured to prevent local youths visiting which presents a significant safety
  concern. A safety review of the quarries in the county should be undertaken by the council to ensure
  that the landowner puts measures in place to ensure the area is securely fenced to prevent access for
  young people swimming and those engaging in illegal dumping practices. Materials dumped in quarries
  have potential to pollute local groundwater. Illegal dumping practices can also disrupt the wildlife and
  affects the tourism potential of the county.
- Quarries should not be permitted or operated near the Grand Canal scenic route or any other
  important tourist amenities and the council should not grant any further permissions to quarries in the
  vicinity of important scenic routes or amenities.

# Water Management

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.

## Wind Energy Strategy for Kildare

- 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 alterative 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.
- 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

		<ul> <li>Plan6 is to also develop a major windfarm on the bogs south of the Mount Lucas (28 turbines) and Cloncreen (21 turbines) windfarms towards Portarlington (30-50 turbines). In total this would result in between 130 and 200 turbines on Bord na Mona Bogs in the east midlands region.</li> <li>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.</li> <li>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.</li> </ul>
195.	Seamus Caulfield	Issues Raised
		This submission relates to transport hubs in general and sequential development with several questions posed regarding where the focus should lie (i.e., nearer to train stations or town centres). There is an emphasis on the potential role of "the most advantageously placed" rail hub in Ireland at Celbridge.
		Sequential Development & Transport Hubs (involving mainline rail)
		The following questions are posed to the council regarding sequential development:
		Where does potential development within ten minutes walking distance of any train station in the county stand in relation to distance to a town centre when deciding on sequential development?
		Does proximity to a train station precede other potential development land that may be closer to a town centre but outside the 10-minute (1km) walking distance of the train station?

- If the station is within 1km of the current zoned boundary of a town, should this land be considered "infill" as it is contiguous to both existing zoned land and the station without any "leapfrogging"?
- Should levels of service and destination options at stations define its importance and development in its proximity?
- Should a train stations status play a part in defining the status of the town it serves?
- Should development at stations bordering other counties be planned for on a shared basis or by the local authority area it is in?

It is contended that the Celbridge/Hazelhatch train station is the best serviced rail hub in Kildare and Ireland as it has direct and frequent access to both stations in Dublin (Connolly and Heuston) with access to the entire rail system. Local trains provide access to central and south Kildare which allows access to intercity train routes from Waterford around to Ballina. The Celbridge / Hazelhatch service is often sold short by emphasis of what is coming, in the future (i.e., DART terminus) when an excellent local service already exists superior to any station outside of Dublin. It is suggested that this hub should be used to its full advantage in the new Plan and can benefit most from the considerable investment already gone into the Kildare Route Project and the Phoenix Park tunnel route.

Two further questions are posed about the rail hub in Celbridge while also offering an opinion on what the answers are / should be. They are:

- Should development at the Celbridge hub be by Kildare OR in partnership with South Dublin County Council?
  - It is valid to argue that the best interests of both would be if Kildare going it alone as it is in the most urbanised corners of Kildare and the most rural part of South Dublin. There is an immediate need to provide for continued growth of Celbridge while Dublin has decades of development land

196.	Labour Party Group	<ul> <li>Finally, it is stated that previously, 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.</li> <li>Issues Raised</li> </ul>
		The submission goes into significant technical detail to show that the level of flooding modelled in the "Hazelhatch Further Study" is deeply flawed and error lies in the main in this study while errors are also noted in the other studies.
		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, models the CFRAM report indicate the same lands are immune to 1,000-year flood events.
		The submission compares the "Hazelhatch Further Study" with the OPW data in 2001, Irish Rail in 2007 and CFRAM report. It is noted that the Hazelhatch Study was the most recent of these studies.
		<ul> <li>Should the current location of the station should be abandoned? A recent flood study (if accepted) would raise questions about its suitability due to the level and frequency of flooding now modelled for the Hazelhatch and Shinkeen watercourses.</li> </ul>
		<ul> <li>Adamstown provides a good model for Celbridge / Hazelhatch where the new station and rail line were not seen as a centre for future development, but the southern boundary of infill between Adamstown and Lucan.</li> </ul>
		available at Adamstown and elsewhere along the rail line which would be prioritised before the Hazelhatch area.

This submission primarily centres around healthy placemaking and creative places while other themes are also addressed which include Climate Action, Amenity and Heritage.

### **Healthy Placemaking**

#### Vision

- "By 2030 Kildare can grow to become one of the best counties in Ireland to live, learn and work. A county that supports and enables all current and future residents to have a decent quality of life, regardless of stage of life, gender, ethnicity, socio-economic background, relationship status and / or (dis)ability".
- A strong proactive local government (members, staff, and citizens) is key to realising this vision.

# Affordable Housing

- Lack of access to affordable housing is an issue for thousands in our county. By 2030 we need to end homelessness in Kildare.
  - Reduce the 10-14 year wait for social housing to zero.
  - More homes are needed for those with additional needs (advancing age, physical, or intellectual disabilities) and people with lower incomes who are unable to rent or buy on the private market.
  - More one and two bed units of public housing are required.
  - Much of the housing need in Kildare could be met by the council providing good quality homes at affordable rents i.e., less than 30% of people's income.

#### **Rural Nodes**

• Consideration should be given to the development of clusters and serviced sites for those who have a local need in rural nodes. A suitable number of houses should be allowed to maintain population numbers and facilities in the area.

## Age Friendly

- A percentage of public housing should be allocated for older people. Empty nester schemes to support older people to sell their homes to the council, in exchange for housing with less maintenance and closer to services. The growing number of people affected by dementia in the county should also be supported.
- The Plan should actively encourage and develop age friendly and disability friendly housing with access to local shops and services allowing them to live as independently as possible.

#### **Town Centres**

- The Plan should actively encourage conversion of vacant commercial units to residential units in towns and villages. Incentives should be given to encourage the return of derelict buildings into liveable spaces.
- There should be height limitations on high rise developments. No building should exceed the height of the tallest building in the town or village (or tallest adjacent building) unless the site is being developed next to a high-quality public transport corridor (train station). In relation to this the language used in the Plan is vital and using the term "must" instead of "should" is recommended for clarity.

# Quality of Life

 Housing developments must be delivered concurrently or after development of local infrastructure and amenities to support and improve the quality of life for current and future residents. 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.

- In this regard by 2030 a public leisure centre and swimming pool should be developed in North East Kildare and Kildare Town. More recreation areas, playgrounds, dog parks and connectivity to walking/hiking/cycling trails such as blue-ways and greenways are required throughout the county. Expanded library services, arts centres, community spaces and playing fields are also needed. Town centres also need to be walkable and not dominated by cars, reducing traffic congestion will improving air quality and have a positive impact on quality of life.
- Consideration should be given to zoning land for community playing fields in each town and village under the patronship of the local authority. The size and quantity of which will be dependent on population (i.e., 20,000 / 25 acres, 10,000 / 15 acres, 5,000 / 8 acres etc.)

# **Sustainable Mobility**

- In the Plan there needs to be a greater emphasis on the provision of safe walking routes and the provision of cycleways. A connected network of these routes with transport hubs / rail links should be implemented where possible.
- Projects that would support sustainable mobility include delivery of a second rail station in Maynooth, delivery of the eastern link road and second river crossing for Celbridge to include segregated cycle lanes and walkways, delivery or second bridge for Newbridge and upgrading the Athy / Waterford Rail link.
- Other suggested measures include working with NTA on new fare charges for South Kildare commuters and continuing to deliver new routes for local link bus service reducing rural isolation and providing greater connectivity for citizens.

The council should also actively develop co-working hubs and spaces within towns and villages to
reduce the need to travel which will also help rejuvenate these areas. Access to high-speed broadband
must be ensured throughout the county.

#### **Creative Places**

- Availability and affordability of childcare is a growing concern in Kildare due to low income, high costs
  and lack of professional recognition of the sector. In the Plan the council should ensure that childcare
  facilities are delivered as proposed and approved to meet the growing population, support widespread
  community childcare, and ensure that provision of childcare facilities in new developments are
  completed in phase 1 with a strict minimum provision to be adhered to in line with needs of the local
  community.
- In the Plan the council should provide burial grounds (all faiths and none) including the provision of eco-friendly "natural" burial grounds and columbarium's.
- The council should actively engage with other agencies to ensure there is capacity within schools in Kildare to cater for the population growth.

# Climate Action, Biodiversity, and leadership on the environment

## Biodiversity

• The plan should take every opportunity to protect and promote biodiversity in our natural and built environments which could include, species mapping (to track and protect species diversity in areas), reducing frequency of grass mowing (to aid pollinators), planting wildflower meadow, and wildflower "rivers" on approaches to towns / villages, 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) and working with local community to identify other opportunities for biodiversity and climate action.

## Carbon Emissions / Clean Energy and Energy Efficiency

• It is also requested that the Plan; ensures the councils carbon emissions are monitored, recorded, and published annually; includes provision to restore the carbon sequestration of bog lands and support the development of other carbon capture and storage technologies; makes commitments in relation to retrofitting existing housing stock to higher BER standards; fits out council buildings with green energy infrastructure (EV chargers, solar panels, windmills, heat pumps etc.) and rolls out fast EV chargers in every town and village in the county and tourist attractions.

## **New Technologies**

• The council is asked to consider permitting (experimentally) and then promoting the building dwellings of good quality with smaller ecological footprints than traditional dwellings (i.e., cob houses, log houses, earth ship dwellings.

### Waste Management

Provision needs to be made to improve management of waste disposal and this should include a
commitment to maintain clean streets, make use of effective enforcement tools to tackle the scourge
of illegal dumping, re-municipalise waste collections services, provide more public or community bins,
recruit community / dog wardens to monitor dog fouling.

## **Amenity and Heritage**

• Kildare has a unique history and heritage and there is a neglect of lesser-known protected structures in the county that are equally as important to the county's heritage as National Monuments are. The council through the MD committees need to be vigilant in policing and safeguarding these structures and should enact the law where necessary to ensure corrective action is taken. Some important parts of our history/heritage are in danger of being lost to dereliction.

		<ul> <li>Economic Development / Tourism</li> <li>Given the number of Blue-ways and Greenways being developed in Kildare the council should develop a special casual trading license around these locations. Taking account any displacement of existing business, number of licenses for similar business and trading hours.</li> </ul>
197.	Liz Collins	A variety of issues are raised under several themes outlined in the issues paper. The submission primarily centres around heritage, conservation and tourism with other issues also addressed such as rural development, infrastructure, and housing.
		<ul> <li>The Plan must aim to end homelessness in the county and endeavour to encourage the supply of sheltered housing for the elderly in each village. The plan should allow / help people to live near their families to assist with home care, shopping etc. as family members age. The plan should also encourage building/attaching granny flats to homes in both urban and rural areas.</li> </ul>
		<ul> <li>Growth areas must include age related facilities and at a minimum have an updated/working community centre. Rejuvenation of vacant premises should also be encouraged. Bond issues also need to be reviewed due to issues in some estates within the county.</li> </ul>
		Economic Development, Enterprise & Tourism
		<ul> <li>When liaising with Bord Na Mona the main emphasis should be on Peatland conservation and returning the bogs to the people. The bogland wilderness should be promoted for tourism. 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.</li> </ul>

• 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. It is also stated that the government has not carried out SEA on the National Renewable Energy Action Plan (NREAP).

#### Retail

• Urban regeneration is welcome in derelict premises.

## **Movement & Transport**

- The local road network is in dire need of repair for residents (Carbury & Drehid area). Industrial facilities create large volumes of HGV activity on the local road network. These facilities should not be allowed to increase.
- Counties should be encouraged to reduce waste loads and dispose waste in a more environmentally friendly way as this could reduce HGV movements around the country.

## **Waste Management, Dumping & Clean Initiatives**

• Money back facility for cans, bottles, and clear plastic bottles. Provide 1 day every week or month to take these in.

# **National Security**

• 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.

### Infrastructure

• Broadband networks need to be upgraded in many areas. The covid-19 lockdowns highlighted discrimination regarding home-schooling and working from home.

## **Amenity & Heritage**

- The council is legally obliged to protect the ecological status of river catchments and channels. It is the opinion of the South Eastern Rivers Fisheries Board that the River Cushalling is an important tributary or the Figile and the Barrow. It is a salmonid system with populations of trout and possibly Lamprey. The CDP should include a clear policy on the use of clear-span structures on fisheries waters and these policies should be discussed with Inland Fisheries Ireland (IFI). River Liffey, flooding issues need to be monitored and updated during the life of the Plan.
- Tributaries to the River Barrow SAC and River Liffey must be protected from all possibilities of
  contamination. The council is asked to continue to protect the county in a responsible manner
  including the unique habitats and landscape of boglands many of which are SAC's and NHA's. It is also
  important to recognise the landscape of the county & its environmental & heritage value. Adding to
  and expanding heritage week would be worthwhile as is its very informative for all ages and is good for
  tourism.

# **Architectural & Archaeological Heritage**

• Carbury Castle should be restored as it has a rich heritage with links back to the Queen Mother through the Colley-Wesley family. It also has Jacobean Chimneys which are a unique architectural feature.

		<ul> <li>Energy &amp; Communications</li> <li>All homes and buildings should be retrofitted where possible. Further investigation into deep geothermal technologies should be explored.</li> <li>Social Community &amp; Cultural Development</li> <li>It is necessary to have age-related facilities in each area i.e., playgrounds, swimming pools and</li> </ul>
198.	Kildare PPN	community centres/halls.  The submission addresses each of the 7 themes outlined in the issues paper. 22 groups contributed to the
		submission with varying backgrounds and interests (i.e., climate action, tidy towns, resident's, and community associations).
		<b>The vision</b> outlined for Kildare centred around health, sustainability, climate action and communities.
		Healthy Placemaking
		Sustainable Communities & Active Travel
		<ul> <li>Towns in 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. To do this and to strengthen community resilience initiatives such as identifying space for community allotments and providing active travel infrastructure would encourage people to look to towards using more local services and support the local economy. Other initiatives include designating car free days and providing bike spaces outside cafes, restaurants, and shops.</li> </ul>
		Accessibility for all

• 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. It is recommended that the objectives in the Kildare Access Strategy (2020) are implemented as part of the new Plan.

## Air Quality

• Monitors to be installed at schools and playgrounds in larger towns to monitor pollution from traffic.

# **Economic Opportunity:**

### **Tourism**

• The viability of establishing a county Museum (given Kildare's steep history and heritage) should be investigated as this would be a valuable resource for residents of Kildare and encourage more tourism.

# Sustainability

• The local enterprise office should support enterprises throughout the county by providing clinics and advice on how to make their operations more sustainable and environmentally friendly.

### Retail

• The Shop Front Improvement, Accessibility and Age Friendly Grant Scheme should be retained and promoted for businesses to improve premises and enhance town centres. Showcasing local products in council offices should be expanded within the new Merits building. Business could be supported through an indoor pop-up market style setting.

### Local Labour Clause

• As part of the social responsibility required of developers the council should include a local labour clause in future planning applications. This approach has been shown to work well in disadvantage urban areas providing training and employment opportunities for long term and young unemployed.

### Climate Action

### Circular Economy

- As the council strive to be leaders within the community on Climate Action, the circular economy should be adapted and encouraged throughout the county.
- It is recommended the council look to establish a "Library of Things" based on current library service model whereby people are given the opportunity to borrow items required for use on an occasional basis instead of purchasing these products (i.e., specialist cooking equipment, tools, and gardening items). By borrowing these items, it reduces the need for material production and consumption, potentially saving significant waste going to landfill.
- The council should look to establish a centre like the Rediscovery Centre (National Centre for the Circular Economy). This would host several different social enterprises focusing on sustainability that offer practical solutions to adopting a more environmentally friendly lifestyle i.e., repair sheds and upcycling hubs where items can get repaired or upcycled diverting waste from landfill.

## Biodiversity

• The Plan should recognise the importance and opportunity for restoring natural places and recovering lost biodiversity. It should also try to achieve the essential rebalancing of the economy and nature through actions like (1) identifying large scale biodiversity space for nature, (2) creating new green corridors connecting existing protected areas with new areas for biodiversity, (3) allowing nature to recover (peatlands), (4) ensuring rivers and waterways are free from pollution (effluent discharge and nutrient run-off), (5) requiring the planting of native trees in all new developments, preservation of

existing hedgerows and promotion / adoption of the National Pollinator Plan as well as (6) managing and restoring to good status designated and proposed NHA's and SAC's.

### Restoration of Peatlands

• This is crucial to our efforts in combatting climate change, enhancing biodiversity and achieving our climate targets. More resources should be invested to increase the % of bog rehabilitation and remediation projects throughout the county. The value of Peatland is vital in terms of their potential for climate resilience i.e., biodiversity, carbon storage and alleviation of flooding.

## **Community and Climate Action Groups**

• Many groups are taking on climate action projects and promoting climate action in their communities. The council should support these groups by discussing possible collaborations on projects and providing advice when they come up against barriers and how to access funding.

## **Sustainable Mobility**

# Solar Panels and EV charging points

• The council need to support government target of 936,000 EV's on Irish Roads by 2030 by providing adequate infrastructure and ensuring more public charging points are installed throughout the county. The council should explore the possibility of integrating solar power with EV charging in public car parks. Space on roof tops of public buildings and bus shelters could also be utilised for solar energy.

### Park and Ride Facilities

• In towns like Maynooth with a high % of commuters, park and ride facilities should be developed on the edge of the town to encourage people to use public transport, thereby relieving traffic congestion and emissions. The viability of Park and Ride facility should be investigated on the ring road in Naas.

### Accessible Public Transport

• The council needs to work closely with the transport authority of Ireland to ensure public transport is accessible to all and can facilitate people with limited mobility.

### Naas Rail Line

• With the growth of housing developments in Naas and lack of parking infrastructure at Sallins Train Station, the council should investigate the viability of creating a light railway line connecting Naas to Sallins Station to encourage use of public transport.

### **Creative Places**

Protection of Public Open Space

• The council should have a strict policy to protect and maintain public space in their ownership. A more proactive approach to acquiring land for public spaces should be pursued to ensure adequate space for amenities and community use.

Audit of Service and Infrastructure for young people

• Given the significant number of young people in Kildare (0-25 years) adequate provision needs to be made for education and childcare services. A full needs assessment led by the council should be undertaken to ensure there is adequate supply of school and childcare places to meet demand.

Housing options for older and disable people

• A comprehensive needs analysis should be completed for housing of older and disabled people in the county.

### Community Department Residents Association Grant

• Currently limited to the maintenance of open spaces within estates only. It is suggested this is widened to allow it to be used toward community engagement within the estates to build resilience and help people feel they belong to their community.

# Mapping of Accessible Site within Kildare

• In line with the Kildare Access Strategy 2020-2022, it is recommended a directory or interactive map is developed illustrating details of the accessibility of amenities, public buildings, and recreational facilities throughout Kildare. This could be a helpful tool in promoting tourism also.

### **Enhanced Amenity & Heritage**

## Tree Felling / Planting

• The public should be notified of any future tree felling planned by the council and given an opportunity to object (where a safety reason is not an issue). 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.

### Establishment of Boardwalks on Peatlands

• As an important part of Kildare's heritage Peatlands have potential to be utilised as walking amenities. The council should support the creating of boardwalks through peatlands in north west Kildare using the disused Bord na Mona railway lines to create walking trails. This would add to the overall recreational offer in the area while improving the health and well being of local communities. These routes could be linked with existing blue-ways or greenways to create a substantial network or walking routes thus providing a significant tourist attraction. Such projects are consistent with National and Regional Policy.

### **Accessibility of Recreation Amenities**

• The council need to work with Irish Waterways on the removal of kissing gates as these are inaccessible for wheelchair users. Parking barriers and poles in car parks of amenities can prevent access of wheelchair users and their vehicles. Everybody should have the right to gain access to enjoy our natural heritage.

## **Making it Happen**

### Energy

• The Plan should compel Grid Networks Ireland to ring-fence grid connection capacity for community energy projects in the county. It is also recommended that the Plan ensures 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.

## Sustainable Energy Communities (SEC's)

• 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.

### Water

• 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.

# Development in Kildare

• 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 balance 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.

## Compliance with Environmental Planning

In relation to development charges the council should consider introducing a levy/bond to be refunded
to developers on completion of inspections to certify compliance with environmental planning
conditions in the context of illegal hedge / tree removal and provision of compensatory habitat arising
from development.

## The Council and the Community

 The importance of strengthening relationships between the council and the community through PPN should be highlighted as well as facilitating meaningful communication and consultation with the community. The council should look to increase the level of paid staff (adept at sourcing / applying for finance) dedicated to liaising and working with community groups. The council should also look at devising a Welcome Pack for people moving to the area.

## Monitoring and Evaluation

• To ensure accountability targets need to be set within the Plan. A system should be put in place to track progress and made available to the public at lease once a year.

# 199. National Asset Management Agency (NAMA)

## **Compact Growth**

• It is stated that in preparation of the Plan, it is important that a sequential approach is taken to identifying land that is appropriate for development. Serviced sites on the edge of the built-up area of town centres should be prioritised and developed in advance of sites further away supporting compact growth and NSO 1.

# **Housing Demand / Supply**

• ESRI reviewed housing supply targets in December 2020 and noted there is a more pressing need now than ever to increase supply to meet existing / unmet housing demand whilst also accommodating projected demand. It was estimated that it will take up to 2 years to recover lost ground due to the pandemic (only 20,000 houses delivered in 2020). In effect this means targeting an output of 33,000 homes per annum between 2020 and 2031. In meeting this challenge, it is critical new homes are built where demand is greatest and where there is good accessibility to employment, public transport, and other services / amenities.

## **Sustainable Mobility**

• Priority needs to be given to sites that can deliver development close to public transport. Moving away from reliance on the private car to public transport, cycling and walking is the cornerstone of sustainable mobility (NSO 4). Establishing a statutory context for lands adjoining public transport by preparing masterplans or framework plans ensures such sites are comprehensively developed to support the business case for significant public investment in sustainable infrastructure.

# **Creative Places / Placemaking (Amenities and Social Infrastructure)**

• Priority needs to be given to sites capable of providing the appropriate balance of socio-economic and physical infrastructure to support healthy place-making. Delivery of schools and community infrastructure such as sports and recreation facilities, alongside residential development is an essential

		component of placemaking. Provision of infrastructure where safe transactional spaces are shared ensures residents are socially connected. This is key to creating quality neighbourhoods and fully aligns with NSO 10 which is to provide access to quality education and childcare facilities.
200.	County Kildare Chamber	The Chamber proactively work to identify and progress developments that are facilitative of economic and sustainable growth. The submission references and is influenced by the current pandemic and has been guided by our commitment to the UN Sustainable Development Goals. Five specific goals have been identified by the Chambers Ireland network which are actively advocated for and they are as follows:
		<ul> <li>Decent work and Economic Growth</li> <li>Climate Action</li> </ul>
		<ul> <li>Industry Innovation and Infrastructure</li> <li>Sustainable Cities and Communities</li> </ul>
		Gender Equality
		Kildare's advantages are the wide and varied mix of multinational companies coupled with indigenous SME's and clusters of HPSU's. Proximity to Dublin coupled with excellent road networks makes Kildare the ideal location for business. It is stated that Kildare excels in the tourism and hospitality sector and is renowned for its Arts, Heritage and Cultural offering, while Maynooth University (one of Europe's leading higher education institutions) ensures a talent pool of young people are job ready every year.
		While acknowledging that Kildare has all the necessary credentials to provide a solid foundation for anticipated growth, the provision of adequate fully serviced development land capacity within the county and the key centres to accommodate forecasted growth is critical and a clear strategy is required.
		Kildare needs to utilise existing brownfield sites whilst also continuing to promote placemaking and sustainable communities. The recent Covid-19 restrictions have demonstrated the importance of public realm in planning

and ensuring that people can continue to social distance whilst returning to pre-coronavirus economic activity. Creating a holistic and connected approach to placemaking and transport will be key to meeting sustainability and environmental targets.

Kildare has a large role to play in the climate resilience of the country with its natural energy resources and large renewable energy production capacity. We note that the objectives of the RSES is to support and seek to strengthen these assets which should be noted in the development plan.

## **Town Centres and Urban Capacity**

- Town centres are hugely important and ensuring their success will require bold thinking in the face of the current crisis. Dilapidation of streetscapes in many rural towns is an ongoing challenge and has become more challenging due to the pandemic as many businesses may not re-open. Improving town centres must be a key objective to attract people to live and visit.
- Amending public realm to accommodate cycling and walking will help return vibrancy in our towns as it will attract tourism and encourage spending. Public realm improvements are considered important in creating a sense of place. The council is commended for improving public realm in several towns and villages in recent years and implores the council to engage with the business community in future years to ensure the benefit of such initiatives can be maximised. This will be key in making a greener environment for citizens and reducing car dependency. The Chamber is ready to work with the council to ensure appropriate levels of support are provided by Government to improve public realm and streetscapes particularly in areas identified for growth in Kildare.

# **Economy and Employment**

• Kildare has a record of attracting and sustaining large scale indigenous and foreign direct investment in advanced manufacturing sectors (biopharmaceutical, ICT, medical and food technologies) and are cornerstone of our economy providing quality job and sustaining a network of supporting businesses.

- A major factor in attracting manufacturing FDI has been availability of high quality serviced lands in strategic town environ locations (i.e. Naas and Maynooth). However, the success of these locations has led to a reduction in viable greenfield sites for new investment. It is suggested the new Plan should review how it can support the future growth of manufacturing sectors and the established clusters of HPSU's in Naas and Maynooth.
- A review of available greenfield lands suitable for industrial development (quantum, status, and suitability) should inform a road map for ensuring Kildare remains one of the most attractive regions for business in Ireland.
- The Plan needs to be ambitious and look to be a driver of economic growth and welcome investment opportunities. It should identify potential locations and zone appropriately. Engagement is required with key stakeholders to ensure the plan is "Business Friendly", can attract FDI and retain the existing businesses.

## **Environment Climate Change and Energy**

- The chamber has created a body / committee (the Kildare Sustainability Council) to help businesses become more sustainable. It will offer a range of supports which includes training workshops among other initiatives. It is suggested the new Plan leads the way in tackling climate crisis and needs to be bold while ensuring the business community is engaged in the process.
- To achieve targets significant infrastructure improvements and changes are required. Additional
  infrastructure improvements are required as Gas Networks Irelands 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.

		<ul> <li>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.</li> </ul>
		<ul> <li>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 productiosn). 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.</li> </ul>
201.	Michael Madden (Receiver for Maplewood &	This submission was prepared by John Spain & Associates on behalf of Michael Madden.  Healthy Placemaking:
	Barina)	Several issues are addressed under this theme including Compact Growth, Sequential Growth of Towns, Population Growth, Housing Needs Demand and Headroom for zoning of lands.
		Compact Growth
		<ul> <li>Celbridge is a suitable location where additional growth should be directed given the planned infrastructure for the town (DART+ programme, Celbridge to Hazelhatch Link Road Corridor). This would be consistent with NPF and RSES.</li> </ul>
		<ul> <li>The RSES identifies Celbridge as a highly urbanised settlement in the wider Dublin Metropolitan Area.         The guiding principles for growth in the DMA, as set out in RSES include "compact sustainable growth and accelerated housing delivery" and "to accelerate housing supply to achieve higher densities in urban built-up areas, supported by improved services and public transport". It also aims to "focus growth along existing and proposed high quality public transport corridors".     </li> </ul>

 As Celbridge is a self-sustaining town in the CDP hierarchy with an allocated growth of 603 units to 2023, it is submitted that this allocation and others identified in Table 3.3. of the Plan do not fully reflect the RSES. The new Plan should prioritise growth into towns like Celbridge which have a good existing and proposed public transport provision. The Planning Authority is requested to increase the unit target allocation for Celbridge in the new Plan.

# Sequential Growth of Towns

- As the sequential growth of towns is advocated in the NPF and RSES it is submitted that the new Plan includes objectives to ensure lands proximate to town cores in settlements such as Celbridge are prioritised for development.
- The NPF (NPO 72a) sets out that Planning Authorities will be required to apply a standardised, tiered approach to differentiate between (Tier 1) zoned land that is serviced and (Tier 2) zoned land serviceable within the life of the plan. The RSES also supports a sequential approach to development whereby lands that are or will be most accessible by walking, cycling, and public transport (including infill and brownfield sites) are prioritised.
- It is important that the new Plan includes objectives to promote and identify suitable lands in the subsequent review of LAP's and to ensure lands which cannot be serviced are not included in the housing allocations.
- In accordance with sequential growth of towns sought by the NPF and RSES, the new Plan should include objectives to ensure lands proximate to town centres such as Celbridge are prioritised for development.

# Population Growth and Housing Needs Demand Assessment

 Based on recent projections by ESRI which informed the Housing Supply Target Methodology for Development Planning (Section 28 Guidelines) published in December 2020 it is contended that figures projected in the 2018 NPF Roadmap are outdated which predicts growth in Kildare to be 249,000-254,000 by 2026 and 259,000-266,500 by 2031.

- It is suggested the population growth is higher than that identified in the roadmap and the plan needs to take account of updated figures and the housing targets should also reflect existing unmet demand and future projected demand. Nationally, it is predicted 33,000 units per annum are required to meet demand to 2031.
- Based on other calculations using CSO and ESRI data it is predicted the population in the country could reach c. 6 million with counties surrounding Dublin in the mid-east likely to experience the fastest population growth. It is submitted that to address the current housing crisis, the new Plan should reflect the up-to-date position in relation to population growth and housing needs for the county. If not addressed this would result in an exacerbation of the existing housing crisis in the county (and region).
- The preparation of a HNDA, as required by NPO 37 (fundamental element to the review of the Core Strategy) should identify towns such as Celbridge for additional growth, given the planned infrastructure for the town and availability of spatially sequential lands.

### Headroom

- The Plan will need to ensure continuity of supply of zoned land. Section 28 Development Plan Guidelines (2007) state that "development plans will provide for sufficient zoned land to meet not just the expected demand arising within the plan period but also for the equivalent of 3 years demand beyond the date on the plan ceases to have effect".
- It is submitted the well-established approach set out in the National Section 28 guidelines to allow an element of headroom of the order of 50% of land requirement should be continued in the new Plan. Due to various constraints such as infrastructure, services, and unwillingness of some landowners to bring forward development consideration should be given to the length of time it takes from zoning land to completion of housing.

- Experience is that it can take on average 12 years or more. Therefore, it would be unrealistic to expect all residential land zoned to be developed in the life of the Plan. Most likely the level of delivery will be 50% on zoned land over 6 years. To strictly match housing land with housing need would lead to a significant under provision of housing in the county over the plan period exacerbating the housing crisis.
- The need for greater headroom is also considered essential, given the potential underestimate in terms of the level of population growth predicted in NPF Roadmap. 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.

# **Higher Densities**

• The new Plan should proactively support the provisions of the Building Height Guidelines 2018 (SPPR 4 greater mix of building heights and typologies) and the Apartment Guidelines 2020. Towns with good direct transport links (including Rail) such as Celbridge are well placed to provide a greater mix of apartments and houses in line with Government Section 28 guidance.

### **Sustainable Mobility**

- The Plan must integrate land use with a high quality, sustainable transport system that prioritises walking, cycling and public transport. It is also a guiding principle for growth in the DMA within RSES to do this and focus growth along existing and proposed high quality public transport corridors and support the delivery of the Dart expansion.
- The Dart+ programme aims to modernise and improve existing rail services in the Greater Dublin Area, including Hazelhatch and Celbridge. It will provide a sustainable, electrified, reliable, and more frequent rail service, improving capacity on rail corridors serving Dublin. The DART+ Programme also includes the purchase of new train fleet.

		<ul> <li>The council is progressing additional transport infrastructure such the Celbridge to Hazelhatch Link Road Route Corridor, will improve connectivity, reduce traffic congestion in the town, whilst also enhancing pedestrian and cycle links to the train station.</li> </ul>
202.	Kildare Climate Action Linkage Group	This submission is a lengthy, detailed submission which includes responses to all questions asked in the Issues Paper under each theme. The following key points are taken from the submission:
		The Plan should take a 'Climate and Biodiversity First Approach' to every decision.
		Reference to 'Climate Change' should be changed to 'Climate Breakdown' or 'Climate Emergency'.
		Biodiversity loss is critical and must be addressed.
		New housing models must be considered that are more energy efficient.
		<ul> <li>KCC requires additional professional experts in the following areas: An Ecology/Biodiversity Officer, an Education Officer; Multi-disciplinary teams to tackle key complex areas.</li> </ul>
		Build networks with NUI Maynooth.
		A transport link is needed between Naas and Maynooth.
		<ul> <li>Financial supports should be made available for green industries, start-ups, regeneration projects,</li> <li>Support working hubs in towns and villages.</li> </ul>
		Promote a County-wide heritage/biodiversity/green tourism strategy.
		Support local food production and food markets.
		Convert derelict town centre sites into remote working hubs to boost local economy.

- Air and water quality must be measured and monitored as part of the Plan.
- Set targets for GHG emissions.
- A dedicated Energy Agency is needed for County kildare.
- The plan should provide for Community Owned Renewable Electricity Generation.
- The number of Data Centres should be capped and they must be district heating supply enabled.
- Enable rather than promote active travel. Car dependency must be reduced. The DART must be extended to Kilcock.
- The actions of the Kildare Biodiversity Plan 2009-2014 should be implemented.
- Trees and hedgerows require stricter protection and better enforcement when removed.
- The structure of the CDP should include clear targets/goals and timelines for their achievement.
- The KCC website is difficult to use and should be improved.
- The public consultation process associated with the CDP could be better.

# **Healthy Placemaking**

- To deliver compact growth and regeneration, the following are suggested: Investigate the 15 minute town concept; Introduce wellbeing indicators; investigate living over commercial premises; develop clusters in villages.
- The expansion of rural housing is not compatible with many climate and biodiversity goals.
   Alternatives to one-off should be considered, using vacant or derelict buildings. Where there is a

genuine need, rural houses should use best technology, should not impact wetlands, should be climate proofed, retain hedgerows and habitats.

- Every town and village should have central independent housing facilities, which should be energy efficient with convenient links to services.
- To enable more active lifestyles, new developments should be considered holistically, consider connectivity, and safe active mobility.
- To address vacancy and dereliction, the Council must enforce the Derelict Sites Act (1990) and the Urban Regeneration and Housing Act (2015). A pilot scheme should be set up.
- The plan should address the housing crisis using creative solutions such as utilising vacant sites and living over commercial units.
- Covid 19 has highlighted the importance of natural world and open space to our wellbeing. KCC should improve its open space provision.
- Housing models should be considered which are self-containing (in terms of energy, by incorporating solar /renewable energy, rainwater harvesting and communal spaces); which provides quality communal safe open space. The Management Company model should be removed.
- The Plan should take a 'Climate and Biodiversity First Approach' to every decision. Those responsible for the CDP should be trained in climate and biodiversity, and expertise should be sought from a wide range of expertise.

# **Economic Opportunity**

• A 'Climate and Biodiversity First Approach' is suggested to future proof business. Environmentally sustainable should be promoted. With the right environment, progressive climate positive industries will be attracted here.

- Enterprise must be future focused if a strong economy is to be fostered. Collaborations (with third level education) and support structures (such as LEO) should be fostered with a focus on climate and biodiversity issues with a focus on emerging green economy.
- In relation to rural enterprise, the plan should support local farming, innovation hubs, maker spaces, market spaces etc.
- The plan should support the education sector by supporting educational programmes that result in local employment; liaise with NUI Maynooth, develop a centre of excellence for sustainable industries.
- The shortfalls hindering economic growth are sustainable travel, sustainable energy, broadband. The focus should be on reducing the need to commute.
- Financial support should be provided for start-ups. KCC should promote and educate on shopping local. Placemaking in town centres should be prioritised to encourage activity.
- Local Employment hubs should be provided within walking distance of homes, and in town centres. Broadband is essential.
- KCC should have an Education Officer to encourage innovation/enterprise. A transport link is needed between Naas and NUI Maynooth.
- The tourist potential of blueways, greenways, cycleways (connecting with neighbouring counties/former railway lines) should be investigated as part of a heritage/biodiversity based County Tourism Strategy. Tourism should be creative, community based (Kilcock of the Gardens). Naas harbour should be handled in an environmentally friendly manner.
- Town centres can be improved by preventing poor apartment complexes; enhancing green spaces; enforce Derelict Sites Act, greening the streets, promote active travel and permeability.

 To address the economic opportunities associated with climate change, local government should take radical direct convincing action. E.g. support green tourism/circular economy/sustainable enterprise.
 Convert derelict town centre sites into remote working hubs to boost local economy.

### **Climate Action**

- The Plan should adopt a 'Climate and Biodiversity First Approach'. Set criteria should be used to measure every element of the plan.
- Reference to 'Climate Change' should be changed to 'Climate Breakdown / Emergency'.
- Greenhouse gas emissions can be influenced in relation to how bogs, hedgerows, trees, buildings and transport are all handled. Carbon polluters should pay.
- Air quality must be addressed in the plan.
- Liaise with NUIM to support relevant projects; Progress a centre of excellence in circular research; implement green procurement.
- Progress Green Procurement and Green economy.
- To transition to a low carbon economy, the following is recommended: Improved public transport, target housing and industrial sectors where most carbon comes from; provide more funding; Tidy towns (and similar groups) should be better funded; Cut out waste in refurbishing council housing, recycle, reuse initiatives; All new businesses must have some form of bike parking; KCC to introduce a sustainability competition for estates/towns; KCC to ensure sustainability is a major factor for all funding applications; KCC to produce a list of sustainable practices to be implemented in homes and businesses and link the progress to local property tax/commercial rates; KCC to ensure measurable targets for GHG emissions are included; KCC to implement a school streets policy.

- To facilitate a balance between growth and protection of the environment, the following is suggested: Promoting coordinated spatial planning to conserve and enhance the biodiversity of our habitats and species; identifying and protecting green Infrastructure; employ experts on biodiversity and planning to inform the policies and plan; Protecting those parts of our environment that are most useful as carbon sinks and habitats for biodiversity; Rehabilitate bogs; Lack of dark spaces due to development is affecting biodiversity. Investigate use of energy efficient lighting that is suitable for nocturnal creatures; Support air quality monitoring and reporting throughout the county; The Council must plan for infrastructure which will enable increased cycling and walking to reduce environmental degradation from private cars.
- To address flood risk, the following is suggested: Flood plains and rainfall should be considered by planning Departments; a Nature first approach should be taken; SuDS should be considered; an interdisciplinary team should be established to address these issues; an assessment should be carried out to identify areas at risk and best international practice.
- In relation to renewable energy, 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; a windfarm strategy is needed; an interdisciplinary team should be established to address this in a holistic manner.
- To maximise renewable energy, the following is suggested: Conditions should be used to utilise roof space for solar panels.
- Developments should be looked at in a holistic manner to identify opportunities to develop renewable energy provision through solar, wind, or district heating; Local, community renewable energy projects should be encouraged and enabled by KCC.
- The main environmental issues facing the county are risk to biodiversity and pollution.

- 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.
- In relation to recycling facilities, the following is suggested: 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.
- In relation to water management, the following is suggested: Green and Biophilic Design should be encouraged among all new developments; developers should be required to retain and protect all existing hedgerows; Green roof technologies should be explored for mitigation of water run-off, Greening of streets is welcomed, however, the council needs to be cognizant of management issues.
- To support the protection of the environment in our daily lives, the following is suggested: All measures and strategies included in the Plan should be assessed for their environmental impact; Clear metrics should be identified to measure how KCC protects and enhances the environment; Decisions made by KCC should clearly outline how environmental considerations have been assessed; KCC need to lead by example; KCC should aim to be a Local Authority Climate Action and Biodiversity Leader.
- To support Sustainable Energy Communities, the following is suggested: A dedicated Energy Agency is required for County Kildare; the plan must lock in targets for emissions which should be ambitious, adequately resourced and regular updates on progress should be publicly available; 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; there should be a limit on data centres and supply their own renewable energy; Install district heating; critical analysis of biomass fuelled power stations is required; KCC should create a solar farm; all new rural houses should have heat pumps; provide guidance on retrofitting; there should be planning guidance for solar farms.

### **Sustainable Mobility**

- To promote active travel, the following is suggested: Enable rather than promote active travel; a multi-disciplinary team is needed; increase permeability; provide safe routes; develop a Strategic Cycling Plan; improve conditions for pedestrians; shared space can be problematic; Double storey car parking and cargo bike parking should be considered; Provide shared bus facilities to schools; install park and ride near public transport; there should be more car free streets; limit HGVS; slow traffic; incentivise car pooling.
- Kildare must future proof new transport developments and ensure they are compatible with climate change policies.
- In relation to transport infrastructure, the following is suggested: More investment in cycling infrastructure; Standards for new development should consider micro mobility (E-bike parking etc.); schools must be linked with public transport/cycling infrastructure to reduce car journeys; Cross county public transport is needed; Investment in better facilities for towns such as Athy, Naas (Sallins), Celbridge (Hazelhatch), Newbridge and Kildare; extend the DART from Maynooth to Kilcock; Support the extension of the electrified line from Hazel-Hatch to Kildare town; Provision of a light rail line from Sallins to Naas.
- In relation to cars and town centres, the following is suggested: Prevent cars entering historic towns and village centres; Traffic Management Plans should be designed to force traffic to keep to the "main roads"; Active travel should be prioritised on short direct routes; Examine the feasibility of creating a cycle town for Maynooth; Support provision for cycling within the county towns; The cost of parking in

our town centres should be high to discourage all day parking; the Council should divert HGVs away from towns, except for local deliveries.

- In terms of rural isolation, the following is recommended: Supports should be in place for elderly people, for such as provision of transport to weekly get togethers in community centres, through community meals on wheels.
- To create successful streets, the following is suggested: Increase the number of crossings (controlled and uncontrolled) for pedestrians and cyclists; Restrict motorised traffic; Provide high quality protected cycling facilities that enables Cycling for All; Implement ambitious school streets and school zones; the Council must prioritise active travel by switching traffic control lights to fixed times; Provide more outdoor seating in our streetscapes, recreation, and outdoor areas; Surface cycle tracks with red wearing course in the interests of road safety and road legibility.
- To better integrate transport and land use planning, the following is suggested: To effect change; By
  giving thought to the placement of new housing developments, schools, and factories; By surveying
  traffic; Create a bus/transport interchange in Naas at the depot at KCC yard beside Hedderman's car
  park.
- The Development Plan should set ambitious targets for roll-out of public EV charging across Kildare. It should be a condition of permission that EV charging points are provide for all houses, apartment schemes and commercial enterprises; EV charge Points should be located in strategic settings, based on journey data; Charging units should not be located on footpaths or cycle tracks.
- Park and stride facilities should be located a reasonable distance from schools; near Church car parks or supermarkets; near the new DART line/stops; Near public transport to encourage train and bus use.
- Footpaths and cycle tracks should be monitored to enforce them not to be used as car parks.

### **Creative Places**

- In relation to community facilities, there should be an accessibility audit carried out throughout the County; Use KCC's Access Strategy vision; Surveys community halls in towns and villages within the county; Include, childcare, shops, and pubs with new estate permissions along with other social requirements such as halls.
- To promote social inclusion and equality, the following is suggested: Promote environmentally sustainable jobs; Establish consultation processes that seek to hear from diverse voices and understand specific challenges and needs; Support the development of community supports to assist new citizens; promote universal accessibility in all new and existing community facilities; ensure that services and facilities are physically integrated with residential and employment areas, clustered to optimise accessibility and usage; To create safe, welcoming spaces for communities to gather; To ensure issues raised by citizens are taken, and responded to, with sincerity Including consultations.
- In relation to open space standards in new developments, the following is suggested: Ensure open spaces in residential areas are fully maintained; Ensure permeability throughout open spaces; Ensure space for teenagers is included.
- 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.

## **Enhanced Amenity and Heritage**

- Biodiversity loss is critical and must be addressed, as acknowledged by KCC's 'Climate and Biodiversity Emergency' June 2019.
- The County Kildare Biodiversity Plan 2009-2014 included many good objectives which do not appear to have been implemented. Public information is scarce on this.

- Suitably qualified biodiversity staff must be employed by KCC. A one-stop-shop on the Council website would be a great way to disseminate information.
- In relation to Council owned land, the Council should be exemplary in implementing biodiversity initiatives (such as the All-Ireland Pollinator Plan, banning pesticide/herbicide use etc.). The Plan should include a statement to how KCC will achieve this. 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.
- On private land, developers must be required to retain existing hedgerows and trees; must provide designated areas for general/recyclable/green waste sorting at a minimum.
- Local planning policy should require developers to include green spaces (edible hedges, bramble, community orchards, wildflower meadows, mature trees to be retained, install community composting, community gardens, swift bricks and wild bee bricks) in all new residential estates; to leave hedgerows and trees in place; owners should maintain hedgerows along waterways in a biodiversity appropriate manner.
- There should be financial penalties for non-compliance when it comes to tree or hedgerow removal.
- There should be a Tree Strategy for County Kildare. More native tree planting should be encouraged. An inventory of woodlands should also be carried out in the County. Small urban copses and woodlands could be created.
- Conservation of peatland in the county is required. Bord na Mona rail infrastructure could be upcycled
  and maintained as walking trails, with conservation corridors connecting pockets of remaining native
  woodlands and peatland. All peatlands in the county should be assessed.

- 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.
- Biodiversity Action Plans are needed for the County's towns.
- The Biodiversity and Heritage Action Plan must be reviewed.
- Kildare needs a full time professional Ecologist.
- Foster agriculture and industry where Irish production does not contribute to habitat destruction and depletion of resources/ Refuse planning permission for solar/wind farms and other developments which would contribute to the decline of rare habitats and prime agricultural land.
- In relation to Green Infrastructure, the following is recommended: 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; Install and enforce a sufficient planning bond to deter developers from removing hedgerows, trees or other natural features; identify small woodland schemes in towns and villages that are not required for children to play.
- Vacant Protected Structures could be used as Working Hubs.
- To enhance biodiversity and natural heritage, an Education Officer should be employed by KCC.
- To provide greater access to amenities, the following should be considered: Explore other sites such as Boora Bog in Offaly; Expert guidance needed on walking and cycling routes; Education to cover information about habitats in their area, and their responsibilities for them; Information about active transport.

- To promote creative places, the following is suggested: A county-wide heritage based tourism strategy; Support the KCC biodiversity plans; Greater protection for trees; higher level of protection for hedgerows and trees with heavy enforcement fines.
- Correct management of hedgerow cutting.
- Identify commons land and provide access to it to communities; provide every town with space for allotments or community supported agriculture.
- Support for developments such as Umeras Peatlands Park where sustainable tourism can be created that also supports local biodiversity and wildlife habitats.

## **Making it Happen**

- Infrastructural deficits include: Sustainable travel; Sustainable energy provision; Broadband etc.
- Kilcock does not have the social infrastructure (schools, retail, social, sport) to support the current or planned population. A Cross border Local Area Plan is required.
- 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 potection of water quality but also necessitates the
  protection and maintenance of physical habitat and hydrological processes/regimes.
- 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.

- 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.
- 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.
- 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.
- 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.
- The impacts of poorly designed river/stream crossing structures can be serious in terms of habitat loss.
  he 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.
- The plan should include measures to address water conservation.
- All development proposals should have regard to SUDS.
- River Management Policies should be an integral part of any County development 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.

- 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.
- The County Development Plan should ensure that Kildare's water infrastructure has sufficient storage capacity to ensure sufficiency of supply during droughts.
- The CDP should also include mandatory water harvesting in all new buildings/developments.
- 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.
- 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.

### Miscellaneous

- Community Engagement: KCC should have a policy of engaging citizens in climate and biodiversity action.
- 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.
- Information is not easily accessible from the website and should be improved.

		<ul> <li>Many questions are asked about the consultation process, such as what are its goals, what results are hoped for, etc. All submissions should be bullet pointed and marked 'accepted for further consideration' or 'not considered' and briefly explained why.</li> </ul>
203.	Ballymore Eustace Community	A comprehensive list of issues (55 in total) relating to specific projects and proposals in the Ballymore Eustace area are outlined in this submission. The issues are grouped into the relevant themes as discussed in the issues paper.
	Development Association	Healthy Placemaking / Protection of Amenities & Heritage:
		<ul> <li>Prior to 2009, Ballymore Eustace was defined as a Special Village and later generically defined as a key village. It is suggested that the council consider protecting the village in terms of its unique characteristics (landscape, scenery, and architectural heritage) again. These characteristics must be protected in the new Plan.</li> </ul>
		<ul> <li>Since the development of a modern wastewater treatment plant, 180 dwellings were granted permission in the space on 1-year. No further land should be zoned in the area before 2027 and these developments needs to be delivered in a phased manner to facilitate local needs.</li> </ul>
		Sustainable Mobility
		<ul> <li>Vital to retain and enhance services of Dublin Bus. The N81 is a very important public transport route (Bus No.65). Consideration should be given to the erection of bus shelters in the village square and at Poulaphouca.</li> </ul>
		<ul> <li>Proposals to improve road junctions at three locations are requested in addition to developing and improving footpaths leading to amenities (i.e., GAA grounds, Band Hall). Improving walking and cycle infrastructure to amenities would encourage people to use more sustainable modes of transport as</li> </ul>

opposed to making short car journeys because it is unsafe to walk or cycle at present due to the lack of such infrastructure. Several areas are then highlighted where footpaths are needed.

• N81 Road Upgrade Project: It is requested that the route selection process accounts for proposed walking routes in the area including provision of crossing points where necessary. Safety of residents and amenities in Poulaphouca is essential when designing the route. Location of safe and convenient locations for bus stops along this route should also be considered. The N81 can be a busy route for cyclists and the upgrade should incorporate safe cycle lanes considering bikes are prohibited on the M4, M7 and N11. The route is also discussed in the context of Blessington and the provision of services underground i.e., fibre.

## **Amenity & Recreation / Tourism**

- The community has started to develop walking facilities in the area (i.e., River Walk Linear Park) therefore any plans for the area should facilitate and encourage expansion of such facilities.
- 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.
- Seven lanes are then highlighted for protection / right of ways to enable development of walking trails and connectivity with other proposed and existing walking trails. Potential for significant walking and cycling tourism opportunities. The community has already met several organisations / bodies in relation to these proposals and requests the council to play their part in bringing these to fruition. A walking or trail plan for the village and its environs should be established that will protect rights of way and establish new links.

# **Biodiversity**

• The council needs to carry out some biodiversity and tree planting in the vicinity of the old wastewater treatment plant site (now a pump station) as it sits in the core of the village Liffey linear walk and path.

- A suitable riparian buffer zone all along the Liffey and other watercourses should be an objective of this CDP to protect biodiversity.
- An opportunity exists to set significant objectives regarding biodiversity for the village. The Community Development Association would like to suggest that in terms of protecting biodiversity, the following locations are investigated with a view to listing them for protection: (1) The old disused railway bridge at Rochestown/Mullaghboy. (2) Parts of the old disused Tullow railway line. (3). The Poulaphouca Bridge and valley below. (4). St John's Church and grounds. (5). Wetlands below Mountcashel.

### **Water and Wastewater Pollution**

- The area experiences higher levels of wastewater discharge than other similar sized areas as it facilitates Blessington. The council needs to stop any additional development on the Upper Liffey that causes further pressure on the section of the Liffey running through Ballymore Eustace. The council are requested to carry out detailed feasibility studies on how best to manage wastewater discharges to the Upper Liffey. Four options are then proposed for consideration.
- The water treatment plant has been a major source of pollution in Ballymore Eustace. Expansions at this facility (Dublin City Council Water Treatment Plant) have a direct impact on the village in terms of increased potential for pollution and visual impact. The sources of water (Poulaphouca and Golden Falls Reservoirs) must be protected from pollution and this should be an objective in the plan and should be classified as a vulnerable watershed.
- Circa 100 acres owned by Irish Water and managed by Dublin City Council at the Ballymore Eustace
  Water Treatment Plant includes an area of outstanding beauty located in the East Kildare Uplands with
  several heritage features. The community fought hard over a decade with IW and DCC to develop a
  5km walking trail around the village of Ballymore Eustace on this land which is expected to be delivered
  in 2021. The council needs to support further operation and maintenance of this 5km walk. The council
  is also asked to ensure IW and DCC provide their share of community to the area.

### **Landscape Protection**

• The protection of the significant/unique landscapes in the area should be strengthened in the Plan particularly lands adjacent to the River Liffey. The council should note the sensitivity of landscape features and recognise that Ballymore Eustace lies in a beautiful river valley and consider the area to be a landscape character area. A landscape plan for the village should be drawn for implementation by the council and the local tidy towns.

# **Architectural Heritage**

Railway line at Mullaghboy / Rochestown (Ballymore – Brannockstown Rd) should be protected as a
walking route. A stone bridge for the railway lines crosses over the river Liffey here and should be
protected along with the views from it.

### **Economic Opportunity / Village Centre**

- The provision of 180 houses will sustain the few remaining shops in the village and no further
  residential zoning should be expected in the area over the life of the plan. Care should be taken to
  ensure the shops in the village are not lost due to large shopping centres proposed in Naas and
  Newbridge. LAPs for Naas and Blessington could also affect existing services. Existing shops should be
  allowed to expand where possible and commercial applications should be encouraged in the village
  core.
- Tipperkevin is identified as a rural node in the current CDP with development limited for local need only. Development that may provide community / sporting facilities, employment opportunities or housing in this area should not be ruled out. Connecting Tipperkevin to St. Kevin's Way should be supported by the council.

#### Tourism

- As one of the gateway villages between Wicklow and Kildare, adjacent to the Wicklow Mountains and Poulaphouca Lakes and central to the Horseracing areas of Kildare, Ballymore Eustace should be earmarked as a potential area for tourism related infrastructure.
- It is also a superb location for film making and adverts and should be promoted due its outstanding beauty. Several previous films and adverts noted.

## **Amenity & Heritage (Poulaphouca)**

 The importance of the Poulaphouca settlement is noted in terms of architectural conservation and heritage, protected views and scenic routes, landscape and character areas, tourism, local needs housing, rural housing strategy, traffic management and amenities and the Plan needs to recognise this. The Route Selection Process for the N81 should also recognise the importance of protecting this settlement.

## **Sustainable Mobility (Poulaphouca)**

- Road safety is of paramount importance in relation to Poulaphouca as is development of a safe walking route within the settlement and along the reservoir. Poulaphouca is on the main N81 route with no footpaths between residential, amenity, bus stop and commercial areas and no traffic restrictions except a 60kph speed limit. This must be addressed immediately.
- The council must recognise the dangerous situation Poulaphouca's residents find themselves in regarding road safety and this can no longer fall between Kildare and Wicklow in terms of responsibility. Poulaphouca is also key to connecting the Ballymore Eustace 5km loop to the Blessington Greenway network and this should be fully supported by the council.

#### **Telecommunications**

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.

## **Agriculture and Bloodstock Industry**

• 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.

# **Creative Places / Inclusivity and Recreation**

It should be a policy of the CDP to support community groups that provide community facilities and to
encourage other areas of inclusion such as youth programmes/clubs. Additional provision of
community facilities should be supported. There is a lack of recreational facilities in the village (open
space, playground, sports centre) and the community is in the process of acquiring land and carrying
out a feasibility study to provide such infrastructure. The new Plan will be a key factor in the
deliverability of this project. It is important that areas of potential recreational zoning are now
identified.

## **Quarrying / Waste Management**

• Kimeens Quarry has substantially been restored and should be used by developers of proposed 180 units in Ballymore Eustance as a destination for all clean waste soils in the interests of sustainability.

## **Development Control Standards**

• The council should ensure new development in Ballymore Eustace is designed to a very high quality i.e., repair / retain stone walls, landscaping, running services underground and protection of watercourses.

### **Climate Change**

## Energy

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.

## Sustainable Planning

• As the village is now beginning to develop given previous lack of infrastructure it has the potential to demonstrate how a village can be planned right. In this regard numerous initiatives / design suggestions are put forward to help achieve high standards in terms of design, energy efficiency, and water conservation. The plan and subsequent LAPs should be consistent with the National Climate Change Strategy and consideration should be given to increasing densities where appropriate, minimising loss of agricultural land and prioritizing zoning on land where there is available / planned public transport. Lands in public ownership (significant in Ballymore Eustace) should be considered for rewilding, woodland development, renewable energy, biodiversity, and outdoor recreation / amenity.

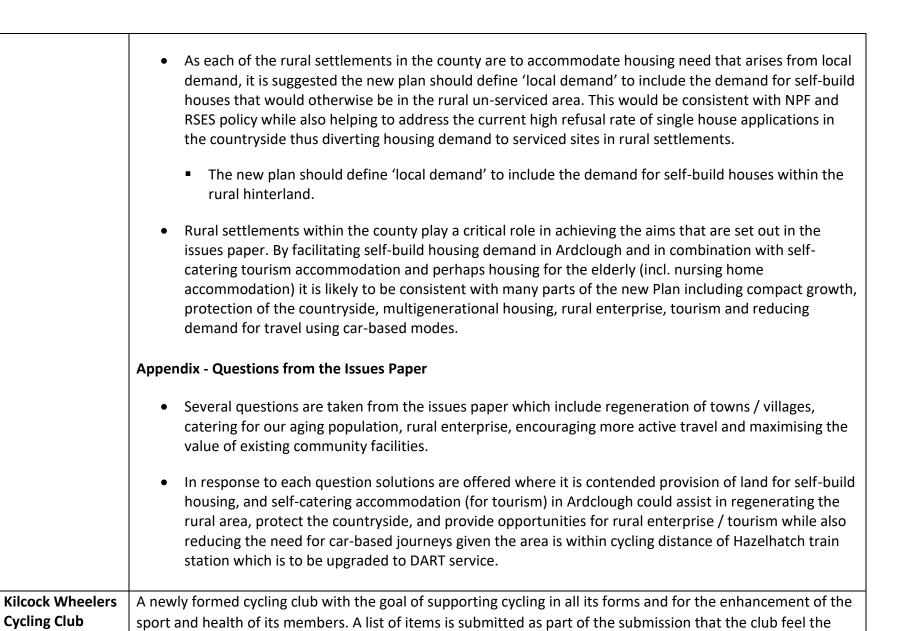
# Transportation

Plan must be in place to encourage sustainable transport in Ballymore Eustace i.e., Dublin Bus (No. 65).
 Community Network bus should also be encouraged to and from neighbouring towns. Walking and cycling should be encouraged, currently not safe to access facilities in the area using these modes.
 More footpaths required to service amenities.

		Public lands
		<ul> <li>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.</li> </ul>
		Waste Management
		<ul> <li>Various providers using same route to collect waste is not a sustainable way to collect waste and needs to be addressed. Appropriate bring centre sites should be identified to eliminate fly tipping and noise nuisance caused by bottle banks.</li> </ul>
		Decarbonising Zones
		The Upper Liffey Catchment is proposed as a decarbonising zone to bring a climate action focus to the region.
204.	Dee Scallan	Sustainable Mobility – Gallops Avenue / Naas Inner Relief Road
		The democratic decision of Naas MD members to reject the Naas Inner Relief Road should be upheld.
		<ul> <li>The Gallops Avenue was introduced in the recent Naas/ Sallins Transport Strategy claiming it will relieve congestion. It is contended that it will not and merely moves traffic including HGVs from current junctions to new ones near quiet residential areas.</li> </ul>
		<ul> <li>The proposed route would mean cutting through a very important green area in the town that should be protected for future generations. The concept is effectively 30 years old and out of date. An outer relief road that links the Blessington Road with the Dublin Road close to the junction for the N7 is what is required in Naas.</li> </ul>
		Permeability / Amenity / Education and Town Centre

		The new plan is asked to protect Naas from becoming a zone of walled in communities, hemmed in by
		roads that cuts through open spaces / recreational areas where children play and our elderly walk.
		<ul> <li>New educational hubs should be located near the town centre. This will be safer for children and makes it possible for them to walk or cycle to school which will also reduce traffic.</li> </ul>
		Retail and Town Centre
		Future commercial development must be close to town. The Monread Centre has taken life from the town centre.
205.	Valerie O'Brien	Climate Action
		<ul> <li>The biodiversity, climate and health crisis(s) are all linked and so are the solutions. This has become more apparent in the last year. Nature based solutions bring many benefits which include improving physical and mental health as well as economic opportunities.</li> </ul>
		<ul> <li>Commuting long distances (to Dublin) is not so necessary which makes towns such as Kildare Town more attractive places to live. The balance between nature and the need for more housing cannot be upset as nature is an ally in the struggle with climate change.</li> </ul>
		<ul> <li>The transformative change needed to protect our planet must have local communities at its centre.</li> <li>Innovative strategies are required to support healthy, sustainable towns.</li> </ul>
		<ul> <li>As Kildare has signed up to the All-Ireland Pollinator Plan it is suggested that the land from Wavertree to M7 be used as a flowering meadow, with insect hotels and ponds for pollinators. Community gardens for growing fruit and vegetables could be included if space allowed.</li> </ul>

		<ul> <li>Mobilizing citizens and local schools to engage in science projects linked to the meadow will provided a great platform to engage with citizens of all ages and see the difference a pollinator meadow can make to pollinator numbers.</li> </ul>
206.	Dr Louie Harris and Babette	Healthy Placemaking and the role of Rural Settlements
	Harris	<ul> <li>The submission addresses the potential role of rural settlements in the settlement hierarchy to provide serviced sites for self-build housing which would be consistent with both NPF and RSES policy. In addition, appropriate self-catering accommodation could provide post-pandemic domestic tourism opportunities. Reference is made to Ardclough's suitability throughout.</li> </ul>
		<ul> <li>Ardclough is highlighted as a suitable settlement to provide serviced sites with appropriate infrastructure and having regard to its proximity to the Grand Canal walkway it could also provide opportunities for rural based tourism. The recently developed Arthurs Way Heritage Trail demonstrates potential in this area while access to the village will be improved by the upgrading of the rail service to Hazelhatch.</li> </ul>
		<ul> <li>Ardclough should be defined as a rural settlement in the new Plan with a role as a local centre for the rural catchment and potential for tourism-based development including the provision of self- catering accommodation.</li> </ul>
		<ul> <li>The settlement of Ardclough is within the boundary of the MASP area and given its proximity to urban centres is under pressure for housing development while pressure is also likely to arise for one-off housing in the hinterland of the settlement.</li> </ul>
		<ul> <li>NPF and RSES policy is to divert demand for one off rural housing into settlements by providing serviced sites for self-build projects.</li> </ul>



207.

council must support. The list contains various aspects of cycling infrastructure and initiatives to promote cycling safety. These include:

- Developing a Strategic Cycling Plan with local targets and annual monitoring/reporting
- Erect signage showing the 1.5m passing margin for cyclists.
- Promote safe cycling and educating road users that the road is a shared space.
- Encourage cycling as healthy, safe pastime, and sustainable mode of transport.
- Lead a targeted road safety and respect campaign.
- Provide safe and secure bike parking in town centres and public transport locations.
- Allow cyclists turn left on red lights.
- Increase permeability through housing estates for pedestrians and bicycles.
- Attract people to use active modes of travel for short journeys (less than 5km) by providing high quality infrastructure.
- Engage with government to emphasise its policy to reduce car dependency.
- Design healthy streets that enable and prioritise more active travel.
- Ensure that re-designs include walking and cycling.
- Reduce the default speed limit in urban areas to protect vulnerable road users.
- Improve conditions for pedestrians with high development standards (wider footpaths)

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		Shared paths should not be an option for pedestrians and cyclists on main roads.
		<ul> <li>Shared spaces can only work where traffic volumes are less than 2,000 vehicles per day and are therefore inappropriate in many Kildare towns and villages.</li> </ul>
		Identify dedicated cycle networks or alternative ways of enabling cycling in Kilcock.
		Change traffic lights automatic sensors to detect cyclists (most only detect cars).
		Continue to maintain to the highest standard all canal cycle ways for safe cycling.
		Improve the transport cycling detail and keep the information on the website updated.
208.	Liz Donohoe	Sustainable Mobility - Gallops Avenue / Naas Inner Relief Road
		The democratic decision of Naas MD should be upheld. The proposed road will bring traffic near a quiet residential area. The original plan for this road is out of date and no longer viable.
		Recreation / Amenity
		Naas Racecourse should be preserved as a "Green Lung".
209.	Brian Connolly	Rural Housing Policy / Zoning in villages
		<ul> <li>The submission aims to introduce new zoning into the Plan to facilitate those who wish to build their own home in a rural setting adjacent to existing appropriate towns and villages.</li> </ul>
		The current policies in the Kildare County Development Plan relating to rural housing are highlighted along with National and Regional policy which indicates that obtaining permission to build a dwelling in

rural area may / will become even more difficult for many potential applicants in the coming years than it already is.

- An alternative solution is offered to one-off housing in the form of allowing cluster type developments (less than 10 units) outside village boundaries and facilitating this by zoning areas in the hinterland of Moderate Growth towns and other villages / settlements as set out in the settlement hierarchy (table 3.1).
- This could be achieved in several ways which include acting as a buffer/transition between urban type development in the town / village and the rural countryside AND/OR extending the town / village boundary to include these lands which would have a distinctive low-density zoning.
- It is envisaged that:
  - Sites would be developed and sold to prospective buyers as serviced sites and would not be developed as traditional housing estates.
  - There would be only one access point from the public road and access to individual sites would be provided by shared surface roads without footpaths in keeping with the proposed rural character.
  - Open spaces would be provided in a manner also in keeping with the rural character of the area.
  - These developments would be serviced by existing Irish Water foul sewerage systems and mains water supply.
  - In the absence of these facilities the site developer would be responsible for providing temporary communal facilities until Irish Water services become available. The temporary facilities would then be decommissioned.

		The provision of development such as these will contribute to the sustainability of schools, shops, bars, and other facilities in the adjoining town/village. The council is requested to give due consideration to this proposal in the preparation of the new Plan.
210.	Forensic Science Ireland	<ul> <li>FSI is moving from Garda HQ to Backweston, Celbridge with a growing staff of 800-1000.</li> <li>High proportion of staff live in the surroundings therefore investment in walkways and cycle routes is necessary.</li> <li>Ask that consideration and prioritisation is given to providing for cycle, walking paths and traffic calming measures between the campus and the nearest train stations (Hazelhatch, Leixlip Louisa Bridge and Leixlip Confey).</li> <li>The 12th Lock to Hazelhatch section along the Grand Canal also requires attention and is the missing link between South Dublin County Council border and Kildare County Council section along this greenway route.</li> </ul>
211.	Fiona OLoughlin	<ul> <li>Reducing commuter numbers should be explored identifying new opportunities for the future of work.</li> <li>Public transport linkages to smaller villages and towns is poor, and needs to be better.</li> <li>Needs to be a path/cycleway between Newbridge and Athgarvan.</li> <li>Broadband needs to be improved.</li> <li>A third level insititute at the Bord na Mona HQ should be considered.</li> <li>Need a renewed emphasis on tourism.</li> </ul>

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		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.
		Alzheimers care could be incorporated into other community facilities.
		<ul> <li>Need to identify areas of for "step down housing" where people can retire to like McCauley Place in Naas.</li> </ul>
		Need access to step down housing for domestic violence victims.
		No clear policy around wind/solar energy – need to ensure that there is not a proliferation.
		<ul> <li>One off housing - chapter 6 of the co dev plan needs to be reviewed given that many people can now work from home.</li> </ul>
		Need to revitalise town centres with supports to renovate etc.
212.	Frank Fogarty	Naas Inner Relief Road must not be included in the new CDP as it would be undemocratic.
		<ul> <li>The Gallops Avenue proposal as introduced in the Naas / Sallins Transport Strategy will merely move thousands of vehicles in very close proximity to quiet, mature residential estates impacting on the quality of life.</li> </ul>
		<ul> <li>New objective - To provide an outer ring road for the eastern/north-eastern side of Naas, to cater for by-passing tra6c, linking the Blessington Road with the Dublin road close to the junction of the latter with the N7. This outer ring road will be so routed, so as not to traverse or cut through existing residential areas, and will provide a long-term development boundary to the east/north-east of the town of Naas".</li> </ul>

213.	Brian Clohessy	Naas Inner Relief Road must not be included in the new CDP as it would be undemocratic.
		<ul> <li>The Gallops Avenue proposal as introduced in the Naas / Sallins Transport Strategy will merely move thousands of vehicles in very close proximity to quiet, mature residential estates impacting on the quality of life.</li> </ul>
		Naas racecourse must be preserved as a green lung and not impacted the Gallops Avenue proposal.
		<ul> <li>New objective - To provide an outer ring road for the eastern/north-eastern side of Naas, to cater for by-passing tra6c, linking the Blessington Road with the Dublin road close to the junction of the latter with the N7. This outer ring road will be so routed, so as not to traverse or cut through existing residential areas, and will provide a long-term development boundary to the east/north-east of the town of Naas".</li> </ul>
214.	Conor Winchombe	<ul> <li>A fantastic amount of funding is currently available to develop active travel in Kildare, with some ambition and good design principles we could boast a world class network of routes that would improve the health and connectedness of the county.</li> </ul>
		Two components to sustainable mobility – Active Travel Networks and the development of Links Between Towns.
		<ul> <li>30kmh is key to achieving active travel in urban areas with corresponding redesign of carriageway width and appearance to reduce speeds of motor vehicles.</li> </ul>
		Call on Kildare County Council to begin the implementation of The Greater Dublin Area Cycle Network     Plan especially the Rural cycle route map.
		Design is key when implementing these routes, no more painted verges and calling them "cycle lanes".
		Inadequate cycle lanes are more dangerous than no provision whatsoever.

		<ul> <li>Need to be ambitious with cycle lane design.</li> <li>An exemplar would be a slightly modified K15 route linking Naas to Newbridge.</li> <li>On smaller routes signage alerting motorists to the presence of active travel users, and directional signage for pedestrians and cycle users would be beneficial.</li> </ul>
215.	Etienne du Plessis	<ul> <li>Naas is in dire need of a road which will funnel traffic away from the town centre which does not simply move the congestion problems to other populated areas. An outer ring road would achieve this.</li> <li>Oppose any inclusion to the previously rejected Inner Relief Road.</li> </ul>
216.	Leo Moore	<ul> <li>Oppose any inclusion to the previously rejected Inner Relief Road.</li> <li>Should be like the current Millennium Park Route and take a wide arc on the far side of the race course.</li> <li>Dublin road junction should not be at the Gallops which is already a busy junction point but should be at an earlier point such as at the Fishery Lane/Naas Industrial Estate junction and go around the racecourse.</li> </ul>
217.	Brian McArdle	<ul> <li>Healthy Place Making</li> <li>Should adopt the 15 minute town principle for urban areas and villages, can easily cover 5km in 15 mins i.e. from one side of Naas to the other with E-bikes.</li> <li>Need safe, segregated and prioritised routes for cycling and walking to get us from our homes to schools, workplaces, shops, restaurants, doctors, etc.</li> <li>Pedestrian and cycle permeability should be prioritised in all instances.</li> </ul>

- Leixlip LAP has 6 proposed ped bridges but no progress on any of them.
- Permeability between older estates should be facilitated by knocking through where possible to create wide lanes and paths.
- To encourage a more active and healthy lifestyle, we must remove car dependency and car dominance from our towns.
- Same should be done between towns e.g. b/w Celbridge, Maynooth and Leixlip all of which are near to one another.
- Put in more one-way systems for motor traffic in towns and villages, and use the freed up space to create segregated two-cycle lanes.
- One off rural housing is not sustainable, people need to live in towns, villages and hamlets.
- Dedicated wild/green areas are needed across the county.
- Plant pocket forests and greenery on every space and patch of land roadsides, public lawns, etc. to promote biodiversity and carbon capture.
- Felling in urban areas should be limited and licensed if necessary.
- As well as a public open space, there should be dedicated biodiversity areas within developments.
- For every tree felled as part of construction, at least one more should be replaced on the ,finished site.
- There is nothing to stop a developer removing hedgerows and tress in advance of a planning application This loophole must be closed destruction of any hedgerow or tree must be subject to licence, even in urban areas.

- Incentivise homeowners to have more greenery.
- New developments should be a mix of housing types low- to mid-rise apartment blocks with ground "oor for elderly or people with disabilities and upper "floors for singles and couples, duplexes for smaller families and houses for larger families.

## **Economic Opportunity**

- We must make shopping in our main streets a pleasant experience with pedestrian areas where one can linger without feeling claustrophobic from noisy, polluting motor traffic and under canopies where feasible.
- Close the Main Street once a month to give online only retailers to promote their businesses at stalls.
- Promote tourism by recognising that the key to attracting tourists are accessible trails -cycling routes that are segregated or use defined quiet ways.
- Repurpose the bogs as biodiversity areas, carbon sinks and a natural amenity for residents and tourists.
- Use old peat railways to connect greenways and blueways and transform it into a de-facto national park.

#### **Climate Action**

- Across all aspects of the plan, anything which increases carbon emissions or furthers unsustainable lifestyles needs to be addressed and reduced or replaced.
- 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 any demolition. Those that discard large amounts of embodied carbon should not be granted.
- Community facilities should be built with minimal parking blue badge holders and loading bays only preferably with coach parking if appropriate.
- KCC should have a Biodiversity Officer role, and preferably an environmental officer in every Municipal District.
- Plant pocket forests and greenery on every space patch of land roadsides, public lawns, etc. to promote biodiversity and carbon capture.
- Within new developments, guidelines should be set for native pollinator-friendly species to be used in landscaping.

# **Sustainable Mobility**

- 30kph should be the default speed limit in all our urban areas.
- These new limits should be demarcated clearly to alert drivers that they have entered an urban area with extreme road narrowing, for example should be enforced with cameras.
- Should be designing our transport system around active travel with car traffic only as a secondary priority
- Encourage active travel with a meaningful cycle network in towns and between them
- NTA GDA cycling network plan should be prioritised, along with retrospective application of DMURS
  principles in every urban area in the county

- There should be a levy on car parks that don't provide an equivalent number of secure bike stands, including space for disabled and cargo bikes.
- Discourage car use in every way possible limited parking, pedestrian priority on village main streets, liberal use of zebra crossings.
- Any new through roads should be counterbalanced by removing access elsewhere e.g. the new Celbridge-Hazelhatch bridge is designed to remove congestion from Celbridge village. Thus Celbridge village should be pedestrianised with a high quality two-way cycle lane, with deliveries allowed before 11am or similar arrangements.
- The M4 should not be expanded, unless it is for a camera-enforced bus lane.
- The 'Roads' department (as cited on the KCC website) should be renamed Transportation, to re"ect a broader approach which prioritises active travel.

#### **Creative Places**

- Not enough parks.
- New developments need higher standards of public space particularly when it comes to playgrounds for small children.

## **Enhanced Amenity and Heritage**

- Has the Council fully implemented the 2000 European Landscape Convention as ratified in 2008? Needs to be prioritised.
- Tree preservation orders should be more widely used. At present it is unclear how the process works.

		Community and sports facilities should have hedgerows at their edges and wild areas in unused
		patches.
		Produce more excellent biodiversity plans.
		More CSA land should be made available like Derrybeg CSA farm.
		Energy, Infrastructure and Communications
		High speed broadband is essential.
		We should not be looking to link every household down every boreen, but rather encourage people to live closer to towns.
218.	Inland Waterways Assoiciation of	KCC should extend the Greenway to Corbally Harbour.
	Ireland	<ul> <li>IWAI Kildare would like to see the Corbally Harbour redeveloped as a first phase of this proposal and the feasibility of such be examined.</li> </ul>
		<ul> <li>Explore the possibility of restoring the Harbour buildings to make an amenity for the local community and to keep the heritage of the canal alive.</li> </ul>
		Would like to see some access given to kayaks and small boats via a slipway.
		<ul> <li>Provide bins, parking and toilets installed for those that plan to use the walkway or indeed just to come visit the Harbour itself.</li> </ul>
		Shore up the Harbour, entailing making sure the harbour walls are reinforced and that the quay is cleared away and structurally sound.

		Require signage or displays letting people know of the history of the Corbally Branch.
		<ul> <li>Engage with local history groups and County Kildare Towpaths.</li> </ul>
		Remove low bridge at Mooney's Bridge to allow navigation and replace with higher bridge.
		The original Mooney's Bridge needs to be restored as it is very dilapidated.
		<ul> <li>IWAI Kildare suggest that KCC work in conjunction with Waterways Ireland, Transport Infrastructure Ireland(TII) and IWAI on the feasibility of removing the culvert and building a bridge over the canal and restoring the tow path.</li> </ul>
219.	Damien Murray	Celbridge has been left behind Maynooth and Celbridge in terms of infrastructure, services and amenities
		Enhanced Amenity & Heritage
		Donaghcumper along the banks of the Liffey should be opened up to development as a public park like SDCC have done with St. Catherine's Park.
		Sustainable Mobility
		Improvement to the R403 between Celbridge and Barberstown
		Infrastructure, Energy & Communications
		<ul> <li>Celbridge needs more then just a single water feed as when it ruptured the whole town was left without water as there was no back up supply.</li> </ul>

Jenny Reynolds	
Tamiy Neynolds	<ul> <li>The Naas inner relief road was a roads priority in the KC Development Plan 2017 -2023 and was rejected and this decision must be upheld.</li> </ul>
	<ul> <li>The Gallops Avenue proposal is not appropriate will merely move thousands of vehicles, including large volumes of heavy goods vehicles in very close proximity to quiet, mature residential estates and is not supported.</li> </ul>
	<ul> <li>The Gallops Avenue proposal would traverse the racecourse which should be preserved as a 'green lung' for the town.</li> </ul>
	<ul> <li>Recommend the following policy "To provide an outer ring road for the eastern / north - eastern side of Naas to cater for bypassing traffic, linking the Blessington Road with the Dublin Road close to the junction of the latter with the N7. This outer ring road will be so routed, so as not to traverse or cut through existing residential areas, and will provide a long term development boundary to the east / north - east of the town of Naas".</li> </ul>
	<ul> <li>This objective is to replace the 'inner relief road' Naas, objective in Table 6.1 of the current Kildare County Development Plan 2017 - 2023 (page 137 of the plan).</li> </ul>
	<ul> <li>Plan should include a requirement to include additional education campuses within the town's environs, to encourage students to either walk or cycle to school.</li> </ul>
	<ul> <li>Aim to increase the linkages between the Park at KerdiEstown 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.</li> </ul>
	<ul> <li>Following opening of the Monread Centre the Council develop incentives to encourage retail life in the town itself.</li> </ul>
	Jenny Reynolds

# Newbridge 221. General Community Development Climate Action needs to be a central foundation for the Plan throughout every section and element. • KCC's commitments as part of the Covenant of Mayors should be central drivers of the Plan and also underpinning all other targets and actions. • The 17 Sustainable Development Goals should underpin the Development Plan and that each section of the Development Plan should include means of measuring our progress towards implementation of the SDG. CDP should be accompanied by both a Gender Audit and an Equality Audit carried out according to international best practice standards. CDP should be accompanied by a comprehensive outcomes report for the previous CDP. Contributions procured through Development Levies by the Local Authority should be "ring fenced" and provided as capital funding for public infrastructure and facilities within the local area (specific LEAs where possible). Council should include the development of a Participatory Budgeting process for a portion of the Local Property Tax collected in each Municipal District. **Healthy Placemaking: People and Places** • The Plan should commit to a Town Centre First approach. Conditions should be created to encourage carefully planned and managed town centre regeneration by encouraging town centre living and providing incentives for the revitalisation of vacant or derelict properties to this end.

- Requirement for proactive town centre management and forward planning strategies to ensure 'Commercial Streets', 'Shopping Centres" and 'Business Hubs' provide a rich tapestry of retail and service outlets.
- Town centre planning should eb architect driven.
- Higher density residential development in town centres, while desirable, must be accompanied by appropriate infrastructure and facilities if it is to be successful.
- There must be access to high-quality, biodiversity friendly green space within walking distance of all developments.
- Universal accessibility should be central to any design and development of public spaces including for outdoor dining and socialising according to the needs of the local business community while balancing those commercial uses with the needs of the wider public.
- The plan should have as an objective that ensures the Council identify open spaces and determine legal ownership of such spaces.
- More Community facilities in our towns, especially where there is a significant commercial pressure on land use. Land must be acquired by the Local Authority to safe-guard it for the location of Community infrastructure.
- Proper planning for locations to house these facilities for young people should be integral to our town planning In Newbridge there is a long-identified need for a multi-use centre for young people.
- The Plan should promote a child-friendly approach to planning our streets and urban centres.
- All new residential developments should include a play space proportionate to the size of the development, catering for a range of age profiles.

- The design of our public spaces should also take every opportunity to incorporate a celebration of local history and heritage.
- The Plan should include measures which ensure not only public consultation, but effective, proactive public participation in the planning process. Proven models such as the Heritage Council's Collaborative Town Centre Health Check can be utilised to inform local regeneration and renewal plans.
- Consultation processes around development plans should strive to include the voices of minorities and marginalised groups, with clear targets for engagement established and reached before consultation can be considered complete.
- The Development Plan should ensure that residential developments serve a mix of uses and prevent overconcentration of any particular model of housing.
- Every town in the county should provide opportunities for multigenerational housing for older people to choose appropriate housing in their communities when their requirements change.

## **Economic Opportunity: Innovation, Enterprise and Employment**

- The Plan should take steps to develop more local employment options for the thousands of workers commuting daily to Dublin city centre or other centres of employment.
- Flexible, well serviced co-working hubs should be developed, preferably in our town centres. In this
  regard there will be a requirement for additional provision of affordable, effective & reliable wi-fi
  services.
- Social enterprises which deliver social impact to address the various issues facing society today should be supported and promoted.

- Council needs to facilitate and promote an ambitious programme of training and up-skilling opportunities and business supports for people within the County.
- Tourism promotion should include a holistic approach which includes improving public-realm, way-finding and general presentation of our town centres.
- The Plan should include a joined-up, thematic approach which would allow smaller, individual visitor destinations to collaborate in a coherent way which would attract day-trippers and short stay visitors to explore a network of military history, natural heritage, or sites of mythological interest.
- There is an issue with the provision of adequate and appropriate school spaces offering parents appropriate capacity and choice in the education of their children.
- Similar issues with childcare and overreliance on the private sector.
- Local Enterprise Office, Chamber of Commerce and others, in cooperation with schools should promote the formulation of a panel of Kildare based employers willing to offer a meaningful period of work experience and exposure to the nature of their business to second and third level students, beyond the core Transition Year cohort.
- Provide spaces and facilities for markets throughout the county, showcasing both local food and locally
  produced crafts. On-street trading should be regulated in a way that does not overly burden the
  market sector while helping to ensure standards are raised and maintained.
- Plan should recognise its importance to our food sovereignty and resilience as a county.

## **Climate Action: Environment, Climate Change and Adaptation**

• Prioritise the implementation of Nature Based Solutions (NBS) to the challenges presented by our growing urban populations and the impacts of climate change.

- Must ensure that "Green Belts" which could be farmed ground, forestry etc. are maintained between major centres of development in the County.
- Sustainable Urban Drainage (SUDS) systems should be utilised where appropriate to manage issues of flooding. There should be a sensitive, evidence-based management of our water courses throughout the county.
- There should be a countywide strategy for the management of invasive species, participating in a whole of catchment approach where appropriate.
- Need to set detailed objectives devised to protect local biodiversity and Special Areas of Conservation (SACs) and other environmentally significant sites (bogs)(Curragh) across the county.
- Litter Management must be focused more on waste reduction, if not elimination, reducing the use of single-use packaging and focusing on the circular economy.
- Should be segregated bins in public areas and water fountains placed in public areas.
- Include allocations of land and targets for rewilding across the county focusing on native species and replacing what has been lost to development.
- Plan should consider the designation of the first 'low carbon town' in the county, following in the footsteps of Laois County Council and Portlaoise.

# **Sustainable Mobility: Movement and Transport**

- Should focus on driving a modal shift to sustainable, active modes of transport.
- Focus on walkways, cycleways and increased permeability for peds and cyclists.

- Prioritise design standards which combat the urge for high walls to address security concerns via principles such as Crime Prevention Through Environmental Design (CPTED).
- The 10 Minute Town Concept should be promoted, and clear ambitious targets should be set.
- A 'Walking and cycling first' approach needs to be taken when investing in our town centre infrastructure.
- Seek opportunities to link our recreational sites, and indeed our towns with both public transport and active transport routes.
- Implementation of the 2011 Liffey Park Plan should be a medium term objective.
- The eVehicle infrastructure needs significant investment and we need to see many more charging points across the county.
- Consideration should also be given to including provision of charging connectors as a condition of planning in residential developments.

# **Creative Places: Social, Community and Cultural Development**

- Ensure provision of a number of both outdoor spaces and indoor places for art and artists and to facilitate outdoor entertainment, performance and various kinds of creative expression.
- Encourage and facilitate the events sector, whether professional or community based, considering specifically the question of licences and permits or bye laws which may apply.

# **Enhanced Amenity and Heritage: Landscape and Green Infrastructure**

- Objectives and commitments of the All Ireland Pollinator Plan should be reflected throughout the Development Plan.
- 5-year Biodiversity Action Plans need to be acted upon.
- Strive for an increased per capita allocation of green space in our town centres.
- Land must be appropriately zoned and acquired by the state to provide public parkland and flexible outdoor leisure space for growing urban communities.
- Plans should be put in place to 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.
- Such facilities should be accessible, physically and economically, and maintained to the highest standard.
- Public amenity spaces could be developed around our rivers and waterways in a manner which is sensitive to their nature and biodiversity value.
- Public amenity spaces should be managed to the highest possible standards of sustainability, such as demanded by the International Green Flag for Park.
- Target At least one public park shall be developed & maintained in each LEA to achieve Green Flag For Parks certification within the lifetime of this Development Plan".
- Opportunities should be sought to develop pocket parks in our towns, creating green corridors and chains in our urban centres.

- Many sites of significant heritage value are identified and mapped in the current (and hopefully in future) Development Plans and also in LAPS & similar, a scheme must be devised to ensure that they are correctly preserved & protected.
- Lands connected to the former British Army Barracks, in addition 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.

## Making it happen: Infrastructure, Energy and Communications

- 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.
- Plan should seek to designate land for the generation of renewable energy by communities for their own control and benefit.
- 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.
- Plan should include the development of more, local Civic Amenity sites for waste collection and recycling.
- Plan should provide for community composting facilities could be assisted with allotments.
- KCC should plan for an extensive programme of retrofitting of Local Authority housing stock aligned with the programmes of the SEAI and local SEC.
- Promote the roll out of more wi-fi hubs in public spaces.

222.	Stephen Coy	<ul> <li>Want to draw attention to the Curragh Camp and its important architectural and heritage value.</li> <li>This is an attempt to stop the destruction that is continually occurring at the site.</li> <li>Hope to initiate an evaluation of the site and all Defence Forces sites.</li> <li>The Curragh is a suitable primary case to stimulate a renewed interest in defence heritage as it is by far the largest camp in the country and possesses the most diverse range of existing building types.</li> <li>Heritage value is being lost regularly at the site but due to its status as a base it is not protected or listed.</li> <li>The Planning and Heritage Departments must intervene.</li> </ul>
223.	Fionnuala Corcoran	<ul> <li>Protection of the environment has to come first. This is not something that has "to be balanced with the growth of the County".</li> <li>The language and intent throughout the plan need to reflect that there is a Climate and Biodiversity emergency.</li> <li>Council to put up signage showing the 1.5 metre passing margin for cyclists - there is government funding for this, and many Councils are already doing this.</li> <li>Need to promote safe cycling, to educate all road users that the road is a shared space, and teach people to respect cyclists as happens in other countries.</li> <li>There is a prevailing issue in this country in the behaviour and attitude of certain road users towards cyclists who are vulnerable road users.</li> </ul>

224.	S. Fennin	<ul> <li>Road safety issues at the Blueway/Barrow Way adjoining public roads as they are too narrow and there is a lack of visibility on approaching bridges.</li> <li>Kildare County Council should be obliged to pay for safety features as a result of imposing these towpaths on private residents and vulnerable people living alongside the Blueway/Barrow Way.</li> <li>Blueway brings increased litter and disturbance to nearby residents.</li> <li>Water safety at the Blueway is being compromised by a lack of safety rings.</li> <li>Kildare County Council should invest money in proper swimming lessons for secondary school students and also should equip Transition Year students with proper lifesaving rescue skills.</li> <li>Kildare Leisure is charging far too much, and this should be worked out between the schools and the principals.</li> <li>The privacy of residents should be protected from tourism.</li> </ul>
225.	June Galligan	<ul> <li>Enhanced Amenity &amp; Heritage</li> <li>At the Canal need to focus on the preservation of the Grand Canal, management, and maintenance for this public amenity, e.g. improving the walkways.</li> <li>Planning for increased usage at the Canal e.g. extending pedestrian-only access.</li> <li>Build pedestrian through road from Naas to Sallins.</li> <li>Propose a community garden / new park for Jigginstown / Caragh Road location.</li> <li>Sustainable Mobility</li> </ul>

		<ul> <li>Develop direct cycling paths and safe pedestrian routes from the estates to schools so that parents can send children to school on their own.</li> </ul>
		<ul> <li>The Naas relief road was rejected at Council and should not be proposed again in its place the following policy should be inserted into the new CDP "To provide an outer ring road for the eastern/north-eastern side of Naas, to cater for by-passing tra&amp;c, linking the Blessington Road with the Dublin road close to the junction of the latter with the N7. This outer ring road will be so routed, so as not to traverse or cut through existing residential".</li> </ul>
226.	Kilcock 4 Climate Action	<ul> <li>Climate change and biodiversity loss should be central to the Kildare County Development Plan rather than being secondary to any economic objectives.</li> </ul>
		CDP should be structured with overall goals, specific realistic measurable targets with key performance indicators with target dates.
		Would like a reporting structure set up by KCC to communicate progress on these targets.
		Need more detailed feedback to community groups regarding unsuccessful funding applications.
		<ul> <li>KCC must liaise with and help facilitate the setup of local Climate Action and Sustainability groups, and make funding available to them directly.</li> </ul>
		Consider how ordinary citizens can be encouraged to volunteer.
		The Climate Emergency needs to be treated as an actual emergency.
		Council to make available land for allotments.
		Council to help and support develop a local food market.

- Council must encourage local food producers, regenerative farming etc.
- Provide land or facilitate land for a Community Supported Agriculture farm.
- Kilcock Local Area Plan to be implemented.
- The new Local Area Plan to have specific actions, dates, and regular reporting on achievement.
- Increase permeability of our existing estates.
- Impose conditions on local enterprises e.g. Musgraves to a)install solar panels on their roofs, or instal green rooves, b)take radical measures to reduce packaging and single use items, c) implement a plan to have bulk buy/zero waste as a norm for many items in supermarkets d) liaise more with local groups to provide support.
- Council managed estates to be required to install community composting.
- Encourage businesses to implement biodiversity plans for their premises and land. Consider an appropriate rates reduction, maybe graded for those making the most efforts, or rates increases for those not making any efforts.
- Liaise more with all residents associations make payment of grass cutting grant conditional on implementing specific measures to promote biodiversity recovery.
- Encourage residents associations to actively communicate with residents. Consider how residents can be encouraged to become involved.
- Liaise with schools and provide grant funding for schools to carry out projects. For example, a transition year project could look at a food waste project:
  - Carry out audit to see where and what food waste occurs in the town / area.

		<ul> <li>Analyse food waste and identify projects to minimise.</li> </ul>
		<ul> <li>Work with all restaurants in the town to get them to separate food waste for composting.</li> </ul>
		<ul> <li>Carry out audit of other waste produced in area – analyse and identify any re-use, recycling opportunities.</li> </ul>
227.	Celbridge Tidy Towns	Healthy Placemaking: People and Places
		<ul> <li>Need to ensure that appropriate population targets are clearly set and that they are also accurately reflected in the Local Area Plans and rigorously adhered to.</li> </ul>
		<ul> <li>As a Moderate Sustainable Growth Town, the LAP refers to erroneous pop targets for Celbridge – this needs to be corrected to be consistent with RPG target of ca. 23000.</li> </ul>
		<ul> <li>Account needs to be taken of the disproportionate impact on the scale of new development and additional population in Celbridge following ABP's SHD grant of permission and that a proportionate reduction in pop. growth needs to occur elsewhere in Celbridge.</li> </ul>
		Enhanced Amenity and Heritage: Landscape and Green Infrastructure
		<ul> <li>Urge that the objectives of biodiversity protection should be given strong emphasis in the Plan, for example, to ensure that there is an obligation in new developments to protect hedgerows, mature trees, etc, and where new planting is required, to plant only native varieties.</li> </ul>
		<ul> <li>There should be a renewed focus on actions and utilising The Celbridge Tourism and Heritage Forum to enhance the natural and build heritage of Celbridge and to maximise the benefit of its rich historical assets.</li> </ul>

228.	Anastasia Nadezhina	<ul> <li>Enhanced Amenity &amp; Heritage</li> <li>At the Canal need to focus on the preservation of the Grand Canal, management and maintenance for this public amenity, e.g. improving the walkways.</li> <li>Planning for increased usage at the Canal e.g. extending pedestrian-only access.</li> <li>Build pedestrian through road from Naas to Sallins.</li> <li>Propose a community garden / new park for Jigginstown / Caragh Road location.</li> <li>Sustainable Mobility</li> <li>Develop direct cycling paths and safe pedestrian routes from the estates to schools so that parents can send children to school on their own.</li> <li>The Naas relief road was rejected at Council and should not be proposed again in its place the following policy should be inserted into the new CDP "To provide an outer ring road for the eastern/north-eastern side of Naas, to cater for by-passing tra&amp;c, linking the Blessington Road with the Dublin road close to the junction of the latter with the N7. This outer ring road will be so routed, so as not to traverse or cut through existing residential".</li> </ul>
		The Naas and Corbally branches of the canal should be preserved as amenity/green areas.
229.	Kilcock tidy Towns	<ul> <li>General</li> <li>Want a review of the CDP process and need a review of existing Plan listing</li> <li>What's been achieved?</li> <li>How do we know?</li> </ul>

- Failures, what's not worked?
- What works well and what doesn't?
- What changes are needed?
- The Issues Paper key achievements is not considered a review of the Plan.
- It is not clear what, if any involvement the county may have had in shaping and influencing the NPF and the RSES.
- Not clear whether the county can go further and take greater measures than those outlined in the NPF and RSES if it believes these are required to address the issues facing us.
- Ensure the CDP and the LAPs identify not just what the Plan hopes will be developed, but is an actual fit for purpose plan identifying who is responsible for each action, when it will be achieved, how it will be achieved, what will achievement look like, how will it be measured and how will it be enforced.
- Public consultation is not working well. Many finding it very difficult to engage with the process so is not surprising we have seen little or no input from individuals in our communities. They are not experts and cannot engage knowledgably.
- The lack of a review of the existing Plan makes it difficult to engage with the new Plan.
- Request that KCC engage in a paid expert review of the Plan in climate science, biodiversity, renewable energy, sustainable land use etc.
- Some of the questions posed in the issues paper were difficult to address and do not instil confidence in the process and should be answered by experts or should already have been researched by the Council.

- Time required to read all 66 questions never mind carry out extensive research and prepare answers is an enormous barrier to engagement by the public, and volunteer community groups.
- Not an appropriate way to engage with community.
- To engage with community all submissions points should be answered comprehensively.
- All plans to be very specific and clearly articulate the actions being taken to achieve goals and targets.
- If KCC and the Plan is guided by the current Climate Adaptation Plan then it will not be far reaching enough to achieve climate goals.
- It is difficult to tell if the goals and proposals in the Plan are under the remit of the Council or not
  - I would ask that the council clearly identify where an action or proposal in the development plan is under council control or if it relies on others i.e. who is accountable? For all items, both under council control or accountable by others, I would ask for the plan to specify exactly how the items will be monitored and managed.
- CDP should Identify in the plan where the underlying assumptions come from.
- The Plan should begin with the end in mind and plan for the end of the century.
- The County should develop a set of criteria informed by experts against which to test all parts of their plan.
- Suggest removal of all references to 'economic growth' from the plan and replacement with 'sustainable development' or other suitable wording.
- The plan places much greater emphasis on sustainable growth, social inclusion, just transition, quality of life rather than a life of consumption.

- In the context of the pandemic every element of the Plan and our ability to change should be examined.
- Has Covid and the responses we see given us an opportunity to radically change something we thought could never change?
- The CDP should consider how we prepare for future shocks to the system such as another pandemic and how we could encourage and build community resilience to help adapt and survive.

## **Healthy Placemaking: People and Places**

- Rural housing there should be very stringent criteria to be demonstrated to prove a genuine requirement for rural housing. Expansion of rural housing is not compatible with many of the goals around climate and biodiversity. Rural housing should be developed as communities.
- 10 Minute Towns Need to identify how this will be done underpinned by a plan and not a vision with targets, budgets, community involvement and accountability.
- All planning permissions should to have strict enforceable conditions around all areas relating to Climate and Biodiversity.
- Development should not be developer led.
- The Council should impose strict requirements for: best practices for building a community, best practices for multigenerational communities, efficient use of resources.
- BER should be achieved with the initial premise that the residential and business development will be energy self-sufficient and this should be conditioned.

- Currently throughout Kildare we see developments being built which are not climate proofed, are not built to current best practice, have no natural flood management systems installed, and are currently ripping out hedgerows and destroying habitats.
- Development Management Standards around building regulations and development infrastructure and biodiversity preservation are contravened on a regular basis. If bonds from developers were increased would this improved enforcement.
- Need to provide housing that is attractive, practical and viable and should:
  - Have storage spaces for sports equipment.
  - Feature shared facilities and equipment.
  - Empower and involve people.
  - Provide sufficient open spaces/ green areas. Give residents autonomy over these.
  - Gradually change the model of housing estates and developments so that they are managed by a co-operative of the owners/tenants and all know their rights and responsibilities.
- Vacant site legislations should be pursued as it is currently not being enforced or implemented.
- Greenfield planning permissions should only be allowed when brownfield sites have been discounted.
- Capital allocation of infrastructure needs to be examined.
- Kilcock does not have the infrastructure to cope with current demand never mind the expansion.
- Kilcock needs a cross border LAP to include Meath.

### **Economic Opportunity: Innovation, Enterprise and Employment**

- Need to carry out review of County in terms of resilience and identify risks in terms of sustainability
  under headings of energy, food, water, employment, cultural, social, employment, infrastructure,
  human skills and expertise, health of community, engagement of community, capacity of community,
  preparedness, cohesion and cross community links.
  - This can then be analysed in terms of threats and opportunities.
- Support circular economy, green tourism, repair cafes, zero waste stores, and create a full-time position for a Circular Economy Development Officer.
- Zero rates on businesses that are set up for sustainability.
- Protection of on-street shopping in towns should be encouraged through the development of all the derelict buildings in the town centres.
- Introduce rules to make it easier for sustainable businesses to set up, and to make it harder for nonsustainable ones.
- Tourism Community has many ideas and they just need to be empowered and enabled, e.g. Kilcock community Gardens linked by a walking trail.
  - Relying on community alone is not appropriate therefore paid coordinators should be employed with a brief to create resilience in the community, empower the community and facilitate community activation and agreed projects.
- Need to look at industries in the County and assess them against standards required for sustainability, circular economy, social justice. Example would be meat plants and distribution centres where employees are poorly paid and are often migrant workers who are treated very poorly.

Help farmers to see that they have a role to play in the Climate Emergency promoting less
intensification, and incentivising methane capture from slurry, paying for herd reduction, monitor
fertiliser and pesticide use and employ an operative to oversee this, incentivise farmers to grow own
feed, beans etc from non-GMO sources and to set aside land to act as a carbon sink.

## Climate Action; Environment, climate change and Adaptation

- Addressing climate breakdown and biodiversity need to underpin every single part of the plan.
- Need to develop a criteria list to measure every element of the Plan against so as to achieve climate-proofing.
- Instead of 'climate change' the Plan should refer to 'climate breakdown' or 'climate emergency' to accurately reflect the urgency of the situation.
- Improved public transport.
- Encourage the set up of 'not for profit' businesses like Community Supported Agriculture where the people involved get a living wage. Encourage these by reducing costs, rates and other barriers to set up.
- Provide grants to businesses that set-up sustainable businesses, e.g. shared car schemes.
- Identify where our carbon emissions in the county arise from and target these areas first.
- Tying targets back to commitments made in other plans e.g. Reducing CO2 and other emissions in the county by 40% by 2030 per the Climate Adaptation Strategy.
- High speed broadband and initiatives like rent a desk to allow working from home.
- Support / campaign national government for lower speed limits.

- Re-wetting peat lands.
- Need sustainable land use.
- Increase broadleaf forestry, manage forests, no more clear-felling.
- Protection of flood plains and no building on flood plains.
- Ensuring sustainable drainage works.
- Encourage more tree and shrub planting in towns and on verges.
- Invest heavily in the conservation of insect life (Ireland is losing insect species at the highest rate in the EU).
- Reduce or carefully manage the dredging of rivers.
- Mitigation measures to be included in developments.
- Employ experts on biodiversity and planning to inform the policies and plan.
- By protecting those parts of our environment that are most useful as carbon sinks and habitats for biodiversity.
- Bogs are of utmost importance the first aim for all bogs in the county should be to rehabilitate them. Other use for bogs should only be considered where it has been established conclusively by experts that this alternative use will give better results for our climate and biodiversity goals.
- Make it a condition of Payment to Residents Associations for Grass cutting and upkeep that they have to commit to KCC or submit to KCC their agreement with landscaper which needs to include 1) a commitment to not use any glyphosate or other pesticides, herbicides.

- Plan to reduce mowing / create wildflower meadows.
- Lack of dark spaces due to development is affecting biodiversity. The replacement of street.
- Educate public about lighting many householders leave very bright external lights on all night.
- Support air quality monitoring and reporting throughout the county.
- Education of our horticulture and landscapers.
- Support the biodiversity plans developed by Heritage office / Green Pine Consulting for 10 towns in the county, and more to be developed this year. This could be supported by:
  - Having a full-time biodiversity officer to engage with the local community organisations.
  - Communicating with organisations, clubs, businesses and schools in the community to create awareness of the biodiversity plans.
  - Council grants (if any going from council to local organisations) to organisations to include conditions around implementing biodiversity plans.
  - Carbon credits available for organisations and businesses that implement biodiversity measures. This may be one for council to put forward to national government.
- Licence required for felling trees, enforceable and with large penalties for infringement.
- Plant trees properly Staking young trees is generally unnecessary.
- Identify commons land throughout the county and provide access to it to communities.

- Extend rights and recognition to non-humans bogs, trees.
- KCC to give either council land or organise to lease land in every town for allotments or community supported agriculture or both.
- Collaborate with the regenerative farming movement and identify how Kildare agriculture stakeholders can move more towards supporting biodiversity. Provision of education perhaps through KWETB.
- Investigate use of energy efficient lighting that is less bright.
- Public buildings are now lit up all night. Change these to be motion sensor lighting.
- Investigate if motion sensor lighting could also be done for lighting on motorways.
- All KCC land should become ARKs based on the Mary Reynolds model. See wearetheark.org for information.

# **Sustainable Mobility: Movement and Transport**

- Slow down the traffic on the streets in towns to make them safer.
- Safe secure bike parking at railway stations (there is none in Kilcock Railway station), and in the towns.
- Increase permeability between existing and new estates via planning condition.
- Coordinate with residents to overcome obstacles to increased permeability.
- Hierarchy of goals would be useful, e.g. climate and biodiversity take precedence over say fears about anti-social behaviour.

- Preface all communication about planned changes to streetscape with the overarching objective of Climate Breakdown mitigation.
- More electric vehicle charging points at car parks, GAA grounds etc.

### **Creative Places: Social, Community and Cultural Development**

- Education for existing inhabitants and new inhabitants. To cover their rights and responsibilities, how they can interact with their community, have a say in local community and county wide, information about habitats in their area, and their responsibilities for them, information about active transport, renewable energy choices.
- Revitalise town centres by providing pedestrian space and market/cultural event space.
- Community empowerment strategies to increase community interaction, engagement and self-efficacy.

# **Enhanced Amenity and Heritage: Landscape and Green Infrastructure**

- Conditions in all planning approvals that for every square meter of land built on a certain percentage of land needs to be provided in that development for biodiversity following guidelines like the All Ireland Pollinator plan.
- Need to ensure that quarries/extraction do not damage built and natural heritage as they are not sustainable.

# Making it happen: Infrastructure, Energy and Communications

• Sell smart meters cheaply to homeowners & incentivise a 10% reduction in electricity usage.

# **Suzanne Murphy** A summary of the issues raised in Ms. Murphy's submission are as follows 230. A healthy environment should underpin everything we do in the County. The CDP Goals need to be SMART, i.e. Specific, Measurable, Achievable, Relevant, Time-based. Regular check-ins should be completed to ascertain how Kildare is performing. In line with Ireland's commitment to conserve 30% of land by 2030, Kildare needs to conserve 30% of Kildare land. At a minimum the CDP should progress all proposed NHA's in Kildare to full NHA status. **Bogs** Conserve all peatlands for the following reasons: Protect endangered species of bird. Absorb carbon from the atmosphere. Reduce flooding in the county. Generate jobs in tourism and conservation. Do not allow windfarms to be created on bogs. Support the development of peatways and linkage to greenways and blueways by linking in with local communities. This has enormous potential in Kildare in Lullymore & Lullybeg and in Umeras Peatlands Park for biodiversity, heritage, tourism and the well-being of Kildare citizens. **Trees & Hedges**

- Erect signage at county border to say Welcome to Kildare, include Irish name and translated meaning "Church of Oak".
- Erect signage in all parks in the county describing the types of trees in the park for educational purposes.
- Do not allow any trees to be cut down in the county unless there is a critical reason for it. An environmental impact assessment should be completed. Planting new trees does not compensate for cutting down mature trees.
- Do not allow for any hedgerows to be cut unless there is a critical reason for it.
- Plant trees in wet areas or areas that are prone to flooding.
  - Oak trees have an expansive and efficient root-system for drawing water.

#### **Pesticides & Pollinators**

- Target 90% of roundabouts in the county to contain pollinator friendly plants.
- Do not permit the use of pesticides anywhere in the county by councils.
- Target all town bypass roads to contain pollinator friendly plants. i.e. plant "bee highways".

# Air Quality & Traffic

- Target Sundays as car-free days in town centres during the summer months.
- Provide bicycle parking spaces outside cafes and restaurants and shops. Encourage cycling into town.

- Install air quality monitors at schools and playgrounds in the larger towns in the county to monitor pollution from traffic.
- Prioritise pedestrian and cyclist access.
- Provide access for all by ensuring pedestrian crossings are provided in towns and villages.

#### **Plastic Waste**

- Install water dispensers in all Kildare towns to reduce plastic bottle waste.
- Reward businesses in Kildare that have plastic-free options.
- Bring-your-own schemes, e.g. coffee cups should be encouraged and supported to eliminate waste.

# Community

- Local markets situated in town centres to bring people back into the town.
- Provide public space for cultural events.
- Provide space for community gardens.
- "Green" our streets and prioritise development of green spaces as this has been shown to have mental health benefits.
- Ensure all communities have a local playground within walking distance.
- Do not allow the building of large service stations or retail parks outside towns or villages.

# **New Buildings & Estates**

		Support development of brownfield sites rather than greenfield sites.
		Vacant derelict properties in towns and villages should not be allowed.
		Living above shops/restaurants in towns needs to be made viable and attractive.
		Stipulate green roofs or solar roofs are a requirement for all new buildings.
		<ul> <li>It should be required that for any new estate or development, that pesticide-free fruit trees and hedges and an herb garden are planted for the residents. Fencing or walls should be designed to permit wildlife to freely pass through.</li> </ul>
		Quarries & Extraction
		The quarrying of the Hill of Allen should be stopped immediately as we are allowing our heritage to be destroyed.
		<ul> <li>More sustainable ways of supporting the housing and building industry must be found as we do not have a bottomless pit to quarry away here in Kildare.</li> </ul>
231.	Lydia Lee	Absence of a footpath from Newtown Crossroads heading towards Nurney.
232.	Fine Gael Branch Newbridge	The submission received from Fine Gael Branch Newbridge can be summarised under the following headings:  Creative Spaces: Social, Community and Cultural Development
		Open space and parks
		<ul> <li>Requirement for additional open space and parks suitable for the elderly and those with a disability, which is multifunctional and not exclusively used by any one group.</li> </ul>

Need for community parks in or near towns. In Newbridge Newbridge there are a number of open spaces options that should be considered such as extending the Linear Park to the opposite bank and to the north of the River Liffey. The area of Lakeside Park also has potential for further enhancement but only in consultation with the residents in the area.

#### Public Realm

 Prioritise the completion of the Public Realm project already designed and planned for Newbridge by the end of 2019.

# **Healthy Placemaking: people and Places**

- Social and Affordable Housing
  - Continue to ensure a sufficient quantity of social housing is built to meet the needs of the expected population growth.
  - The renovation of vacant or derelict houses should be considered for by KCC as part of the provision of social housing.

# **Sustainable Mobility: Movement and Transport**

- Include an ambitious target to significantly increase the number EV charging points throughout the county and in Newbridge.
- Ensure that the present capacities of rural transport be maintained and in the case of Rural Link extended to additional rural areas in the county for example Caragh village.
- Continue to develop cycle lanes in towns like Newbridge, a plan should be developed so that the number of cycle lanes are introduced throughout the town. There should also be plans to develop cycle

		lanes from Newbridge to some of the smaller urban areas near the town such as Athgarvan and Milltown.
		Economic Opportunity: Innovation, Enterprise and Employment
		<ul> <li>Emphasis should be put on the development of 'Peatways'. In this case of Newbridge, Roseberry and Mouds Bog are located on the edge of the town and are very suitable for the development of walking paths and trails and environmental education.</li> </ul>
		Climate Action: Environment, Climate Change and Adaption
		<ul> <li>Endeavour to reflect the advantages of energy efficient homes by continuing to incentivise residents to retrofit their homes to the highest energy rating that is practically possible. Benefits include:</li> </ul>
		<ul><li>Lower your heating bills.</li></ul>
		<ul> <li>More comfortable and safe during a blackout or disaster.</li> </ul>
		■ Job creation.
		<ul> <li>Direct and indirect health benefits.</li> </ul>
233.	Rathangan Tidy Towns	The following issues have been noted in the submission from Rathangan Tidy Towns:  Other issues facing Kildare
		Collaboration between KCC and community groups to combat illegal dumping through the use of CCTV.
		Climate Action

		<ul> <li>Less cutting of grass on roads verges, along watercourses, parkland and green spaces. Stricter rules to preserve hedgerows. Private landowners should be encouraged to plant native hedges and strict rules should apply to replant hedgerows that have been removed. Finally, hedgerow cutting should be banned from February to September and should be done every two to three years only.</li> </ul>
		<ul> <li>The Bog of Allen should become an area of conservation as a lot of rare species (moths, butterflies, birds, sphagnum, etc) live in our bog. It is also an area of importance for climate action and is of worldwide importance as a habitat.</li> </ul>
		Energy developments should be planned in areas that do not interfere with bog biodiversity conservation. The Bog of Allen also has green tourism potential that should be explored.
		Urge KCC to install recycling bins on the streets.
		Enhanced Amenity & Heritage
		The Curragh should get special protection as a unique site which is currently under pressure.
		Infrastructure, Energy & Communications
		Consider night wildlife when putting up new lights.
		<ul> <li>All new lamp posts/ streetlights should have a mechanism to either dim lights when no movement is detected or a cap to direct the light down to the footpath or road only.</li> </ul>
234.	Flora McDonnell	Infrastructure, Energy & Communications
		<ul> <li>Social infrastructure assessment must be completed for Celbridge and must precede any further approval of housing developments.</li> </ul>

		<ul> <li>Additional economic, energy, service infrastructure deficits must be assessed and an action plan developed and some actions completed.</li> <li>Spaces in creches and schools must be provided for all children living in a town within the town.</li> <li>Assign community or energy officer.</li> <li>Push for the resolution of the short-comings in funding for Kildare overall compared to most other</li> </ul>
		<ul> <li>Other issues facing Kildare</li> <li>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.</li> </ul>
235.	Bridget	KCC must specify as part of the CDP funding SMART goals and actions to achieve these to ensure county Kildare does not remain the most underfunded county in the state.  Ms. Armstrong's submission can be summarised under the following headings:
235.	Bridget Armstrong	<ul> <li>Ms. Armstrong's submission can be summarised under the following headings:</li> <li>Sustainable Mobility</li> <li>Ms. Armstrong has raised concerns in relation to the Naas Inner Relief Road.</li> <li>Proposal was defeated by the Naas Municipal District.</li> <li>Proposal will move thousands of vehicles in very close proximity to quiet residential estates and the environs of the canal and associated habitats.</li> </ul>

- Congestion will merely move from current traffic junctions on the Sallins Road to new proposed junctions at Finlay Park and Caragh Court.
- Proposal would bring vehicular impact, increased footfall, noise and pollution to residential areas such as Finlay Park.
- Canal area must be preserved a "green" portion of the Town.
- Any road developments in or around Finlay Park could have a detrimental effect on the residents in respect to potential Flood risks, being situated adjacent to the Naas and Corbally branches of the canal and streams in the Ploopluck area.
- Kildare County Development Plan include the following specific objective: "To provide an outer ring road for the eastern/north-eastern side of Naas, to cater for by-passing traffic, linking the Blessington Road with the Dublin road close to the junction of the latter with the N7. This outer ring road will be so routed, so as not to traverse or cut through existing residential areas".
- This objective is to replace the "inner relief road, Naas" objective in Table 6.1 of the current Kildare County Development Plan 2017 2023 (page 137 of the plan).

# **Healthy Place Making**

- Develop safe routes for active transport such as cycling or walking routes in Naas, e.g. Between Finlay Park and local schools, greenway projects along the canal.
- However, objects to permeability of Finlay Park Estate as there is a risk of anti-social behaviour.

# **Enhanced Amenity & Heritage**

Preserve the canal and maintain for recreational purposes.

		Preserve flora and fauna, biodiversity, heritage of the canal area.
		Objects to bus route / station developed at the Harbour and along the canal.
		Improve existing walking/cycling routes/pedestrianizing the canal.
		Develop a community garden in the land opposite Caragh Court/ behind existing creche.
236.	Aidan Doorey	Mr. Doorey objects to the Naas inner relief road.
237.	Mary Gordon	Ms. Gordon has raised concerns regarding the Naas Inner Relief Road / Gallops Avenue. Her submission can be summarised as follows:
		<ul> <li>The Naas Inner Relief Road was a priority in the current CDP which was defeated by the Naas MD. This decision should be upheld.</li> </ul>
		<ul> <li>Road will move thousands of vehicles, including large volumes of Heavy Goods Vehicles in very close proximity to quiet, mature residential estates.</li> </ul>
		<ul> <li>Congestion will move from current traffic junctions to new proposed junctions at The Gallops, Tipper Road and Sunday's Well. On this basis, it will not solve any traffic congestion in Naas.</li> </ul>
		<ul> <li>Naas Racecourse area must be preserved as the "Green Lung" portion of the Town for now and for future generations. It must be maintained for recreational purposes.</li> </ul>
		Proposal is out of date.
		<ul> <li>Ms. Gordon has proposed a new objective for the CDP: "To provide an outer ring road for the eastern/north-eastern side of Naas, to cater for by-passing traffic, linking the Blessington Road with the Dublin road close to the junction of the latter with the N7. This outer ring road will be so routed, so as</li> </ul>

		<ul> <li>not to traverse or cut through existing residential areas, and will provide a long-term development boundary to the east/north-east of the town of Naas".</li> <li>This objective is to replace the "inner relief road, Naas" objective in Table 6.1 of the current Kildare County Development Plan 2017 - 2023 (page 137 of the plan). Such an objective would be consistent with the existing objective MT 15 of the county development plan, which seeks to channel HGV traffic associated with landfill and extractive sites onto the regional and national road networks insofar as possible, which the defunct Naas Inner Relief objective does not.</li> </ul>
238.	Tesco	<ul> <li>Avison Young Planning and Regeneration Ltd have prepared a submission on behalf of Tesco Ireland Ltd. Their submission can be summarised as follows:         <ul> <li>Request that KCC bring forward policies that support and promote the development of additional retail stores of an appropriate scale, at suitable locations in the County, in accordance with the projected population growth of the County.</li> <li>Highlights the importance of appropriately zoned land for additional convenience retail floorspace in line with future population projections.</li> <li>Supporting existing on-street retail operators helps to ensure the vitality of town centres.</li> <li>Safeguarding of deliveries, particularly early morning deliveries and access routes and spaces to undertake deliveries. Restrictions on deliveries must be avoided and adequate loading bay facilities and access routes should be maintained.</li> <li>Request that the delivery requirements of convenience foodstore operators are acknowledged and that policies providing for deliveries, including early morning deliveries, should be provided.</li> <li>The preparation of an updated retail strategy for the County/Greater Dublin Area in line with the Retail Planning Guidelines would be welcomed.</li> </ul> </li> </ul>

- Development Plan's Retail Hierarchy will require updating in line with the retail hierarchy as set out in the RSES.
- Consider the requirements of modern convenience retail operators, current trends in the retail market and new policy objectives that will spur growth in the sector whilst protecting the viability of existing centres and identify new locations for retail growth.
- Local Authority provide flexibility with regard to zoning policies, to facilitate the provision of retail floorspace at appropriate locations. The Town Centres are likely to continue to grow in accordance with the NPF and the RSES, and as such it is important that the growth of convenience and ancillary retail facilities are accommodated at appropriate locations in the County.
- Request the Local Authority continues to promote and encourage major enhancement and expansion
  of the retail offer of Athy to sustain and enhance its importance as a Sub County Town Centre Retain
  Policy R24.
- An array of factors will determine the attractiveness of a location for new retail development including
  - Quality of the public realm;
  - Retail layout achievable;
  - Traffic management and movement strategy;
  - Servicing / deliveries and accessibility;
  - Height /mix of uses;
  - Car parking;
  - Health and safety; and,

		<ul> <li>Planning policy restrictions.</li> <li>Table one of the submission details the needs of a modern retail convenience store.</li> <li>It is requested that the policies in the forthcoming Development Plan recognise that the design of modern retail formats are dictated by retailer's requirements, current Building Regulations, Fire Safety and Disability Access requirements.</li> <li>Policies which provide flexibility and allow for the development of modern convenience retail units</li> </ul>
		<ul> <li>must be included in the Kildare CDP.</li> <li>Submission highlights the importance of local retailing and click and collect facilities and to provide support as highlighted during the recent pandemic.</li> </ul>
239.	Peggy O' Dwyer	A submission has been received from Ms. O' Dwyer which focuses on Newbridge. It can be summarised as follows
		Creative Spaces: Social, Community and Cultural Development
		<ul> <li>A shared community park which is accessible to all and not specific to one age group is required for the community in Newbridge.</li> </ul>
		This should be a shared community park of approximately 20 acres to include.
		<ul> <li>walking and cycling trail, children's playground, two shared sports pitches and a biodiversity area. It is also envisaged that fishing and canoeing facilities could be developed and marketed as part of this community park.</li> </ul>
		<ul> <li>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</li> </ul>

by all the people in Newbridge. The development of the public realm project would contribute positively to the quality of life for residents in Newbridge.

### **Healthy Place Making**

- It is imperative that KCC strongly considers the development of housing for the ageing.
- Submission details statistics from the Dept of HP&LG, Housing Options for Ageing Population 2019, Policy Statement.

# **Enhanced Amenity & Heritage**

- Proper management of our peatlands.
- There are number of opportunities to socially develop parts of peatland areas while enhancing biodiversity of protected habitats including species and the natural landscape, e.g. Pollardstown Fen.
- In Newbridge, it is important that the Roseberry / Mouds Bog area continue to be designated as a special are of conservation.

# **Economic Opportunity**

- Greater emphasis should be put on the development of 'Peatways'.
- The success of Bora Bog in Laois /Offaly and Lullymore in Kildare are examples of how such developments can enhance tourism and create job opportunities in the community.

# **Sustainable Mobility**

• Regarding the disability sector in the CDP 2023 – 2029, Kildare County Council should give due consideration to the following:

		<ul> <li>That a standardised template is developed for accessibility in development of streetscapes.</li> <li>That adequate disability parking bays are provided throughout the county.</li> </ul>
		<ul> <li>Train stations need to accessible for the service used and the disability sector.</li> </ul>
		<ul> <li>Inclusiveness is most important through consultation.</li> </ul>
		Climate Action
		Highlight the benefits of solar energy.
		<ul> <li>Promote and encourage the use solar energy initially in smaller communities and public buildings such as schools and libraries.</li> </ul>
		<ul> <li>CDP should be ambitious in its promotion of solar energy by communities throughout the county and the Renewable Electricity Support Scheme (RESS). E.g. Community Power has been successful in assisting Claremorris Energy Coop in Mayo and Dunmore Energy Community in Galway.</li> </ul>
240.	Fergal Gordon	Objection to Naas IRR through the racecourse.
		<ul> <li>Proposed road joins the Blessington Road too close to the town, the Dublin Road end joins the Dublin Road about 1.5 km from the town centre, makes more sense to take traffic from this radius from the town centre and deliver it to the Blessington Road.</li> </ul>
		<ul> <li>Currently long tailbacks turning right from the Blessington Road onto Ballycane Road. This will be greatly exacerbated with the proposed road.</li> </ul>
		Main roads passing through residential areas have a tendency to divide a town.

		The road will discourage children from being able to walk to school resulting in more car journeys.
241.	Margharita Solon	Sustainable Mobility
		<ul> <li>The Naas IRR was a priority in the KCDP 2017-2019 and was defeated by a democratic vote of the Naas MD in June 2019.</li> </ul>
		The democratic decision must be upheld.
		Including it in the CDP flies in the face of the democratic vote.
		The Gallops Avenue that like its predecessor the Naas IRR will move thousands of vehicles close to quite mature residential estates.
		<ul> <li>Congestion will merely move from current traffic junctions to the new proposed junctions at The Gallops, Tipper Road and Sunday's Well.</li> </ul>
		<ul> <li>The Naas Racecourse should be preserved as the 'Green Lung' portion of the town, for recreational purposes.</li> </ul>
		The now defunct Naas IRR / Gallops Avenue is an approx. 30-year-old proposal out of date.
		<ul> <li>The submission requested the CDP includes and objective to provide for an outer ring road for the eastern/north-eastern side of Naas which should not traverse of cut through existing residential areas.</li> <li>It is recommended that this objective replace the IRR road for Naas.</li> </ul>
		This would be consistent with MT 15, which seeks to channel HGV traffic associated with landfill and extractive sites onto the regional and national road networks insofar as possible.
		Development of Downtown Naas

		<ul> <li>In line with the Retail Guidelines the CDP should include a provision whereby development of over 1,000sqm should be prohibited outside the centre of Naas.</li> </ul>
		<ul> <li>Naas Town Centre should be designated as a development zones with incentives for the creation of 'Living over the shop' to encourage the revitalisation of the town centre and to provide passive surveillance to reduce anti-social behaviour.</li> </ul>
		<ul> <li>CDP to include a specific policy to all comparison retailing, and all but local convenience retailing (i.e. up to no more than 1,000 sq. metres gross floorspace) is not permitted outside town centres. No sites should be zoned as district centres.</li> </ul>
		<ul> <li>Town Centres should be specifically identified in Key Towns, Self-sustaining growth and Self-sustaining towns.</li> </ul>
		The County Development Plan should make it clear that all comparison retailing, and all but local convenience retailing (i.e. up to no more than 1,000 sq. metres gross
		<ul> <li>floorspace) is not permitted, whether by new build or by conversion, in any retail warehousing development.</li> </ul>
		Covered seating areas should be provided in every town.
		<ul> <li>Community interaction supported if every planning application for housing developments over a certain number had to contain outdoor covered seating areas and land for allotments integrated in the area.</li> </ul>
242.	Carmel Geissel	Sustainable Mobility
		Objection to the Naas IRR now called the Gallops Avenue.

		The road does not relieve any traffic congestion in Naas, but merely moves the congestion from one
		area to another.
		<ul> <li>A road which gives a wider circumference, stretching from the N7 to the Blessington Road would be practical and long term in relieving any traffic congestion.</li> </ul>
		Healthy Place Making
		Green open space associated with Naas racecourse should be retained as both a racing commercial concern and as part of a local amenity.
		<ul> <li>Increased importance to readily available open green spaces, including cycle paths and walking linkages between estates.</li> </ul>
		Water spaces should not be included in total area.
		Economic Opportunity
		<ul> <li>Avoid the 'doughnut' effect of development away from town centre – revitalisation should be prioritised.</li> </ul>
243.	Elizabeth Geissel	Naas IRR / The Gallops Avenue a democratic vote already decided that the road was unnecessary.
		Renewal of the proposal goes against the vote of residents and politicians.
		A relief road may be needed but the suggested location will only bring about further difficulty for the community.
		Route will also not properly function as a bypass, as congestion will occur elsewhere.

		<ul> <li>A route further out is recommended.</li> <li>Racecourse is a treasured community facility.</li> </ul>
244.	Jana Drennan	<ul> <li>Objection to the inner relief road / Naas Inner Relief Road / Gallops Avenue as a Priority Road Project.</li> <li>Proposal defeated by a democratic vote.</li> <li>The Gallops Avenue /Naas Inner Relief Road will merely move thousands of vehicles, including large volumes of Heavy Goods Vehicles in very close proximity to quiet, mature residential estates, causing noise and air pollution.</li> <li>Reference is made to page 120 of the Naas / Sallins Transport Strategy stating that it will relieve congestion on the Main Street and the Dublin Road. However the submission states that congestion will move from to new proposed junctions at The Gallops, Tipper Road and Sunday's Well.</li> </ul>
		<ul> <li>Naas Racecourse must be preserved as a Green Lung, for recreational purposes.</li> <li>30-year-old proposal that is out of date.</li> <li>Requests an objective for 'an outer ring road for the eastern/north-eastern side of Naas not to traverse or cut through existing residential areas and will provide a long-term development boundary to the</li> </ul>
245.	Jennifer Murphy	<ul> <li>east/north-east of the town of Naas'.</li> <li>This would be consistent with MT 15, which seeks to channel HGV traffic associated with landfill and extractive sites onto the regional and national road networks insofar as possible.</li> <li>The Gallops Avenue Road is the rebranded Inner Relief Road.</li> </ul>

		Voted against by the local councillors.
		If decisions by the councillors are no upheld how can we trust the democratic process.
		The Gallops Avenue is based on an outdated 30-year-old plan.
		<ul> <li>An outer ring road should be proposed to go around the town which would relieve traffic congestion by bringing traffic away from the town.</li> </ul>
246.	Marie O' Neill	Naas Inner Relief Road
		Naas Inner Relief Road / Gallops Avenue will just move the bottle necks further out the Dublin Road.
		Thirty-year-old plan.
		<ul> <li>CDP include a relief road for the eastern/ north eastern side of Naas which would link the Dublin Road with the Blessington Road but join the Dublin Road close to its junction with the N7.</li> </ul>
		Development at the centre of Naas
		CDP should not allow large retail development outside the centre of the town.
		Learn from the mistake of Monread.
		Active Leisure
		Welcome the development of the Naas / Sallins greenway.
		Preserve the Racecourse as a green lung and the lakes for increased demand in walking routes.
		<ul> <li>CDP include a relief road for the eastern/ north eastern side of Naas which would link the Dublin Road with the Blessington Road but join the Dublin Road close to its junction with the N7.</li> <li>Development at the centre of Naas</li> <li>CDP should not allow large retail development outside the centre of the town.</li> <li>Learn from the mistake of Monread.</li> <li>Active Leisure</li> <li>Welcome the development of the Naas / Sallins greenway.</li> </ul>

247.	Adrian Geissel	Naas is a Key Town and it is vital for the future social and economic vibrancy that transport, and access
		are addressed at an appropriate scale.
		<ul> <li>Inner Relief Road based on socio-demographic date from 30 years ago which was defeated under Part 8 vote.</li> </ul>
		The Naas Sallins Transport Strategy renamed it the Gallops Avenue, was this an error or obfuscation.
		The Naas Inner Relief Road /Gallops Avenue must not be included in the CDP.
		<ul> <li>Retaining the route, is anti-democratic and anti-community.</li> </ul>
		<ul> <li>Significant traffic volumes, including HGV, close to residential neighbourhoods and the village of Ballycane is inappropriate.</li> </ul>
		<ul> <li>Racecourse is a Green Lung and a road will close off this amenity.</li> </ul>
		<ul> <li>Naas will develop to the South, provide for an appropriate, high capacity road system into this area, with efficient access onto the M/N7.</li> </ul>
		Not sited within existing town boundaries.
		Continued attempts to route connectivity through the existing Jn 9 will only complicate traffic flows.
248.	Michael O'Brien	Sustainable Mobility
		The democratic decision on the Naas Inner Relief Road must be upheld. Including it in the CDP flies in the face of the democratic vote of the Naas MD in June 2019.
		<ul> <li>Reference is made the Gallops Avenue and that like its predecessor the Naas NRR will move thousands of vehicles close to quite mature residential estates.</li> </ul>

		<ul> <li>Congestion will merely move from current traffic junctions to the new proposed junctions at The Gallops, Tipper Road and Sunday's Well.</li> <li>The Naas Racecourse should be preserved as the 'Green Lung' portion of the town, for recreational purposes.</li> <li>The now defunct Naas IRR / Gallops Avenue is an approx. 30-year-old proposal out of date.</li> <li>The submission requested the CDP includes and objective to provide for an outer ring road for the eastern/north-eastern side of Naas which should not traverse of cut through existing residential areas. It is recommended that this objective replace the IRR road for Naas.</li> <li>This would be consistent with MT 15, which seeks to channel HGV traffic associated with landfill and extractive sites onto the regional and national road networks insofar as possible.</li> </ul>
		<ul> <li>Healthy Place Making</li> <li>Support the planned park in Sallins and the greenway.</li> </ul>
249.	Marion Rackard	Sustainable Mobility
		<ul> <li>The democratic decision on the Naas Inner Relief Road must be upheld. Including it in the CDP flies in the face of the democratic vote of the Naas MD in June 2019.</li> </ul>
		<ul> <li>Reference is made the Gallops Avenue and that like its predecessor the Naas NRR will move thousands of vehicles close to quite mature residential estates.</li> </ul>
		<ul> <li>Congestion will merely move from current traffic junctions to the new proposed junctions at The Gallops, Tipper Road and Sunday's Well.</li> </ul>

- The Naas Racecourse should be preserved as the 'Green Lung' portion of the town, for recreational purposes.
- The now defunct Naas IRR / Gallops Avenue is an approx. 30-year-old proposal out of date.
- The submission requested the CDP includes and objective to provide for an outer ring road for the eastern/north-eastern side of Naas which should not traverse of cut through existing residential areas. It is recommended that this objective replace the IRR road for Naas.
- This would be consistent with MT 15, which seeks to channel HGV traffic associated with landfill and extractive sites onto the regional and national road networks insofar as possible.

#### **Active Leisure**

- Welcome the Naas/Sallins Greenway.
- Value in linkage between Kerdiffstown Park, the planned park at Sallins, the Greenway.
- Use the canal as a Blueway between Naas and Digby Bridge.

# **Development of Downtown Naas**

- Retail over 1,000 sq. metres gross floorspace should be prohibited outside the centre of Naas.
- Naas town centre should be designated as a development zone with incentives for the creation of "Living over the Shop" to encourage the revitalisation of the town centre.
- Town centres should, in turn, identified on maps in the various local area plans, including brownfield lands where there is potential for regeneration, provided that they are genuinely located within the town centre area.

		<ul> <li>All comparison retailing, and all but local convenience retailing (i.e. up to no more than 1,000 sq. metres gross floorspace) is not permitted, whether by new build or by conversion, in any retail warehousing development.</li> <li>Monread has done huge damage to retailing in the town.</li> </ul>
250.	Kate Solon	Sustainable Mobility
		<ul> <li>The Naas IRR was a priority in the KCDP 2017-2019 and was defeated by a democratic vote of the Naas MD in June 2019.</li> </ul>
		The democratic decision must be upheld.
		Including it in the CDP flies in the face of the democratic vote.
		<ul> <li>The Gallops Avenue that like its predecessor the Naas IRR will move thousands of vehicles close to quite mature residential estates.</li> </ul>
		<ul> <li>Congestion will merely move from current traffic junctions to the new proposed junctions at The Gallops, Tipper Road and Sunday's Well.</li> </ul>
251.	Declan Brady	Sustainable Mobility
		<ul> <li>The Naas IRR was a priority in the KCDP 2017-2019 and was defeated by a democratic vote of the Naas MD in June 2019.</li> </ul>
		The democratic decision must be upheld.
		The Gallops Avenue that like its predecessor the Naas IRR will move thousands of vehicles close to quite mature residential estates.

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		The racecourse should be preserved as an amenity for recreation.
		<ul> <li>Recommended objective for the CDP - to provide for an outer ring road for the eastern/north-eastern side of Naas which should not traverse of cut through existing residential areas, instead of persisting with a 30 year old proposal.</li> </ul>
		Objective consistent with MT 15, which seeks to channel HGV traffic associated with landfill and extractive sites onto the regional and national road networks insofar as possible.
		Education
		<ul> <li>Significant difficulties for parents in obtaining both Primary and Secondary school places for their children in Naas.</li> </ul>
		CDP include a requirement to include additional education campuses within the town environs, to encourage students to either walk or cycle to school.
252.	Joy Herron	Sustainable Mobility
		The Naas IRR was a priority in the KCDP 2017-2019 and was defeated by a democratic vote of the Naas MD in June 2019.
		The democratic decision must be upheld.
		Including it in the CDP flies in the face of the democratic vote.
		The Gallops Avenue that like its predecessor the Naas IRR will move thousands of vehicles close to quite mature residential estates.

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		<ul> <li>Congestion will merely move from current traffic junctions to the new proposed junctions at The Gallops, Tipper Road and Sunday's Well.</li> </ul>
		<ul> <li>The Naas Racecourse should be preserved as the 'Green Lung' portion of the town, for recreational purposes.</li> </ul>
		The now defunct Naas IRR / Gallops Avenue is an approx. 30-year-old proposal out of date.
		<ul> <li>CDP should include an objective to provide for an outer ring road for the eastern/north-eastern side of Naas which should not traverse of cut through existing residential areas. It is recommended that this objective replace the IRR road for Naas.</li> </ul>
		This would be consistent with MT 15, which seeks to channel HGV traffic associated with landfill and extractive sites onto the regional and national road networks insofar as possible.
		Healthy Place Making
		Value in linkage between Kerdiffstown Park, the planned park at Sallins, the Greenway.
		Use the canal as a Blueway between Naas and Digby Bridge, ultimately heading for the River Liffey.
253.	Aisling Twomey	Inner Relief Road democratically rejected and should not appear in the CDP.
		Route is outdated and does not meet the current and future traffic volumes.
		Outer ring road should be an objective in the CDP.
		<ul> <li>A relief road should not consist of junctions, traffic lights and traffic jams, will only move issues from one side of the town to another.</li> </ul>

254.	Richard Kearns	The Naas IRR was a priority in the KCDP 2017-2019 and was defeated by a democratic vote of the Naas MD in June 2019.
		The democratic decision must be upheld.
		Including it in the CDP flies in the face of the democratic vote.
		The Gallops Avenue that like its predecessor the Naas IRR will move thousands of vehicles close to quite mature residential estates.
		<ul> <li>Congestion will merely move from current traffic junctions to the new proposed junctions at The Gallops, Tipper Road and Sunday's Well.</li> </ul>
		The Naas Racecourse should be preserved as the 'Green Lung' portion of the town, for recreational purposes.
		The now defunct Naas IRR / Gallops Avenue is an approx. 30-year-old proposal out of date.
		<ul> <li>CDP should include an objective to provide for an outer ring road for the eastern/north-eastern side of Naas which should not traverse of cut through existing residential areas. It is recommended that this objective replace the IRR road for Naas.</li> </ul>
		This would be consistent with MT 15, which seeks to channel HGV traffic associated with landfill and extractive sites onto the regional and national road networks insofar as possible.
		Active Leisure
		Welcome Naas/Sallins Greenway.

		<ul> <li>Value in linkage between Kerdiffstown Park, the planned park at Sallins, the Greenway.</li> <li>Use the canal as a Blueway between Naas and Digby Bridge, ultimately heading to the River Liffey.</li> </ul>
255.	Cormac Ahern	<ul> <li>Object to Naas Inner Relief Road / Gallops Avenue in the CDP.</li> <li>Proposed almost 30 years ago and is not the required solution.</li> </ul>
		<ul> <li>Part 8 planning process for the road was defeated when it came before the Naas councillors.</li> <li>To include is lack of respect for the democratic process.</li> <li>Gallops Avenue is materially the same route as the Naas Inner Relief Road and should be removed.</li> <li>Replace with a solution that will not result in heavy traffic including significant numbers of HGVs being routed through residential areas.</li> </ul>
256.	Celbridge Guided Tours	<ul> <li>A submission has been received from Celbridge Guided Tours. It can be summarised as follows:         <ul> <li>Protect existing corridors and views along the river Liffey.</li> </ul> </li> <li>Submission includes examples of existing unspoilt views and wildlife corridors with have the potential to become Riverside Heritage Parks which can be opened to the public.</li> <li>Seek to create a Liffey Valley Heritage Park on disused lands along the Ardclough Road Celbridge incorporating Celbridge Abbey Grounds on the opposite side of the river i.e. along the Clane road. Both parcels of land are linked via the Rockbridge.</li> <li>Seek to create a Liffey Valley Heritage Park at Donaghcumper Demesne.</li> </ul>

		<ul> <li>New CDP should include policy (Update PSO 4) to include river views listed below at Celbridge Abbey owing to the importance of the abbey and it's links to Dean Jonathan Swift and Henry Grattan MP, e.g. views upstream from the Rockbridge at Celbridge Abbey beyond the weir, view downstream from the Rockbridge at Celbridge Abbey.</li> <li>Protect the heritage of Tea Lane in Celbridge, so that future developments do not detract from the character of the graveyard. Note that a conservation plan is being implemented.</li> </ul>
257.	Louise Quinn	<ul> <li>A submission has been received from Ms. Louise Quinn in which she has raised suggestions around multigenerational housing and communities. Her submission can be summarised as follows:         <ul> <li>Integrate policies relating to multigenerational housing and planning from the HSE&lt; social care and public health with an increase housing supply and more resilient and healthy neighbourhoods.</li> <li>Older people need not be segregated from the wider community.</li> <li>Plan housing that has a mixture of housing types for all ages.</li> </ul> </li> </ul>
258.	Ruth Murphy	A submission has been received from Ruth Murphy who has raised some points relating to climate action and Healthy Place Making. Ms Murphy's submission can be summarised as follows:  Climate Action  Small wind farms and solar panels should be added to council lands and electricity generators be placed at canal locks e.g. Design of a hydro-electric generator for river locks   Vlasios Leontidis  Install more electric car charging stations.  Convert streets to pedestrian only with landscaping.

		<ul> <li>Tree planting for wellbeing.</li> <li>Restore peatlands, CPO remaining private bogs and turn into parks.</li> <li>Healthy Place Making</li> <li>Provide additional allotments.</li> <li>Funding for community gardens.</li> </ul>
259.	Annemarie McGrath	<ul> <li>A submission has been received from Ms. McGrath in which she details issues surrounding economic development in Kildare. Her submission can be summarised as follows:         <ul> <li>Kildare is in a position whereby it has a number of large infrastructure projects in place while also being in close proximity to a cluster of Data Centres in Citywest. In addition, a number of large distribution / logistic centres are grouped close together also in proximity to Kildare.</li> <li>Upgrades to the N7 and less traffic using the roads will enhance the attractiveness of commercial activity in this area, especially as much of the infrastructure is already in place.</li> <li>Extending the existing Logistics, Distribution and Storage development along the N7 closest to Dublin (at Junction 6) would minimise the impact on traffic and our roads a plus for the environment compared to developing deep within our county.</li> </ul> </li> </ul>
260.	Cormac O'Donovan	<ul> <li>Mr. O' Donovan objects to the inclusion of the Naas inner relief road in the new CDP as it was rejected by the Nass MD councillors and TDs. A new orbital route is required to enhance future development.</li> </ul>

# 261. Gay Brabazon, Declan Browne, Karen Tyrrell

This submission focuses on the protecting and maintaining the Curragh Plains. It can be summarised as follows:

- Curragh is an essential space due to its environmental and heritage value.
- Management plans should be benchmarked with that of Dartmoor in the UK and be informed by the existing Curragh Acts, rather than enclosed parkland management.
- Recommendations:
  - Advance the designation of The Curragh from a pNHA to an NHA.
  - Formal and effective stewardship to monitor, educate and proactively enforce management policies.
  - Significantly reduce mechanical traffic provide properly surfaced parking facilities in proximity to the Plains with sensitively designed and placed physical barriers.
  - Interpretive Centre in a local town with satellite information points.
  - Signage to promote the desired behaviours that come with the privilege of access to the Plains.
  - Create an attractive leaflet outlining all aspects of the story of The Curragh and make it available to new and existing households.

#### Additional notes

- Lead the way as a Green County, with bold and impactful climate, sustainability and biodiversity action plans.
- Contribute to the State reaching legally binding targets in EU directives.

		<ul> <li>Make brave and innovative decisions when balancing the pressures of development with ensuring an enriching and protected environment.</li> <li>Form a productive relationship with the Department of Defence to protect the built heritage of the Curragh Camp. Include vernacular buildings, in addition to significant buildings which are worthy of inclusion on the RPS.</li> <li>Strategically and comprehensively address the future care of The Curragh Plains.</li> </ul>
262.	Keith Costigan	<ul> <li>Mr. Costigan has raised issues around traffic in north Kildare, particularly in the Maynooth area and the development of new housing estates. His submission can be summarised as follows:</li> <li>Sustainable Mobility  <ul> <li>The growth of North Kildare has led to growth in traffic volumes</li> <li>Suggested considerations:</li> <li>To restricting free movement of traffic to certain area's in these locations for certain periods at particular times of the day.</li> <li>Removing parking spaces from main streets for all but physically impaired drivers.</li> <li>One way systems that allow additional space for pedestrians and cyclists e.g. Parsons Street, Maynooth while at the same time facilitating easier movement of existing traffic flows. (Celbridge and Maynooth are obvious candidates for one way systems in this regard.</li> <li>Closure of back alleys, narrow side streets etc to traffic with the exception of access to residents/businesses where required etc. (Pound Lane &amp; Doctors Lane Maynooth.</li> </ul> </li> </ul>

		<ul> <li>Consideration of possible solutions to reduce the existing levels of traffic through the main and minor thoroughfares of what originally were quiet villages would be appreciated.</li> <li>Healthy Place Making</li> <li>Consideration of apartment buildings that can accommodate greater density without consuming</li> </ul>
		greenfield sites at the current rate.
263.	Mary Taaffe	<ul> <li>Ms. Taaffe notes that the Naas inner relief road will move thousands of vehicles, including large volumes of Heavy Goods Vehicles in very close proximity to quiet, mature residential estates. It was rejected by the Nass MD councillors and TDs.</li> </ul>
		<ul> <li>The solution is an outer ring road for the Eastern/North-Eastern side of Naas to cater for by-passing traffic, linking the Blessington Road with the Dublin road close to the junction of the latter with the N7.</li> <li>This outer ring road will be routed so as not to traverse or cut through existing residential areas and will provide a long-term development boundary to the East/North-East of the town of Naas.</li> </ul>
264.	Kevin Mullaney	The Naas inner relief road has been rejected and should not appear in the new CDP. A democratic vote was taken to comprehensively defeat the proposed road.
		An outer ring road should be a specific objective of the county plan and is what Naas needs.
265.	Edmund Murphy	<ul> <li>The Naas inner relief road will merely move thousands of vehicles, including large volumes of Heavy Goods Vehicles in very close proximity to quiet, mature residential estates. The only logical solution is an outer relief road which will bring the traffic out of the town environs and allow the town to develop.</li> </ul>

266.	Eilis Kavanagh	Ms. Kavanagh has raised issues around Sustainable Mobility, Infrastructure, Energy and Communications. Her submission can be summarised as follows:
		Sustainable Mobility
		<ul> <li>Requesting that a feasibility study be carried out on the Regional Road R416 from Milltown to Newbridge, with a view to addressing and delivering the following:</li> </ul>
		<ul> <li>Cycle Lane &amp; Pedestrian walkway be established on the Regional Road R416 from Milltown into Newbridge -The R416.</li> </ul>
		Infrastructure, Energy and Communications
		A review of the R416 From Newbridge to Milltown with regard to road lighting.
		Road Traffic congestion - Byrnes Crossroad on the R416.
		<ul> <li>Welcome evidence that sufficient infrastructure plans are in existence or underway to improve traffic flow to manage the continued and expected increased levels of traffic/congestion on the R416 once the new housing developments are completed and occupied.</li> </ul>
		Health & Safety -Logistical Traffic management requirement at Soil Na Naomh Uilg.
267.	Hughes Planning on Behalf of Helen O' Brien and The Donovan	<ul> <li>A submission has been received from Hughes Planning and Development Consultants on behalf of Helen O' Brien and The Donovan Family.</li> </ul>
	Family	<ul> <li>The submission requests the Council to consider protecting and maintaining the existing, non- developed, residentially-zoned lands of Celbridge due to the historic and expected future population growth of the town as set out in the NDP, RSES and current CDP.</li> </ul>

268.	McGill Planning Ltd. on Behalf of O' Flynn, Montane and O'Connor	<ul> <li>A submission has been received from McGill Planning Ltd. on Behalf of O' Flynn, Montane and O'Connor. The submission relates to development to the south of Celbridge to enable more sustainable development proximate to high quality public transport in the interest of a sustainable pattern of urban development.</li> </ul>
		<ul> <li>The submission includes an engineering services feasibility and constraints report for lands at Hazelhatch and a letter from the Department of Environment, Community and Local Government dated February 2017 in relation to the Draft Celbridge LAP.</li> </ul>
		• The submission requests that Celbridge is given a higher ranking in the next Settlement Strategy as a Self-Sustaining Growth Town, as per policies and population targets set out in the NPF, NDP and RSES. Furthermore, the future distribution of population and housing over the next 6 years has to be targeted toward Celbridge and the other main towns in the county, to ensure that the housing targets are reached and are also located optimally within these towns which have the required social and physical infrastructure to accommodate this growth.
		It is critical that the future growth of Celbridge extends southwards towards the existing.
		<ul> <li>train station so that future housing is located close to this prime public transport service as advised by the Department of Environment, Community and Local Government, in 2017.</li> </ul>
269.	CSR on Behalf of Mr. Brendan O'Donoughue	A submission has been received from CSR on Behalf of Mr. Brendan O'Donoughue.
	O Dolloughue	<ul> <li>The submission relates to the housing need in Newbridge and request that any new zoning prioritises infill opportunities are well located to existing services and public transport and where opportunities for compact growth can be maximised.</li> </ul>

		<ul> <li>Submission sets out the population targets for Newbridge and notes that the revised forecasts should mean that the Council look at zonings afresh in each of the settlements within the county where planning permission is not extant.</li> <li>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. We believe encouragement should be given to zoning sites that meet the sequential approach advocated in para 4.19 of the Ministerial Guidelines on Development Plans and also the following paras of the Ministerial Guidelines on 'Housing Supply Target Methodology for Development Planning' (2020) namely 4.5 (achievement of compact growth and consolidation of towns); para 4.6 (necessary support services and infrastructure for a new community and public transport accessibility); and para 4.7 (physical and social infrastructure such as water services, schools and public amenities, and recreational facilities and energy and communications networks). Any proposed zoning should also be cognisant of the '10 Minute City' for towns, as well as cities, whereby a range of uses for sustainable living are located within 10 minutes walking or cycling of proposed residential neighbourhoods.</li> <li>Sites that have accessibility train stations; are located close to town centres; that are surrounded by existing developed or zoned land; and are already partially zoned should be prioritised in accordance with the sequential approach.</li> </ul>
270.	Brian Connolly	Remote Working and the Implications for Zonings
		<ul> <li>The submission sets out how the objectives of the National Remote Work Strategy could be implemented on lands in towns and villages to provide for both residential village centre and enterprise / employment uses.</li> </ul>
		Below are the relevant parts of statutory documents and strategies, which are relevant along with the National Remote Work Strategy.

# 'Project Ireland National Planning Framework'

- National Objective Policy 18b; 'Develop a programme for new homes in small towns and villages with local authorities, public infrastructure agencies such as Irish Water and local communities to provide serviced sites with appropriate infrastructure to attract people to build their own homes and live in small towns and villages.'
- Section 6.6 (Housing) states 'The balance between work and home life also places altering demands on our houses as many people choose to work from home.'
- National objective 34; 'To support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.'

## 'The Eastern and Midland Assembly Regional, Spatial and Economic Strategy' 2019-2031

• Chapter 4.8 states: 'Support for housing and population growth within rural towns and villages will help to act as a viable alternative to rural one-off housing.'

# **Kildare County Development Plan 2017-2023**

- Volume 1: Chapter 3 and 4 of the KCDP2017-2023 sets out the Council's Settlement Strategy and Housing Policy.
- Volume 2: Local Area Plans for the small towns and villages identified in Table 3.1 of Volume 1.

# **National Remote Work Strategy (January 2021)**

- The Strategy identifies multiple benefits that can be derived from remote work, which help to achieve numerous public policy objectives.
- The Strategy recognises that remote work can help revitalise towns and villages.

- Public sector employers, colleges and other public bodies will be mandated to move to 20% home and remote working in 2021.
- It is proposed to create new zonings that amalgamate existing residential, village centre, employment and enterprise zonings (particularly in small towns and villages) to facilitate residential developments that are compatible with the aims and objectives of the National Remote Work Strategy.
- These new / amended zonings would have to include the creation of infrastructure and facilities in or adjacent to residential / town centre zonings to accommodate the concept of Hubwork referred to in the Strategy.
- Any new residential unit in this zoning would have to include a section of the residence to be dedicated solely for employment use. This type of arrangement would be in accordance with National objective 34 of the NPF which states 'To support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.'
- Modification of existing land use zonings is required when framing the draft KCDP2023-2029, in order to ensure delivery of the objectives of the National Remote Work Strategy in a sustainable manner.

#### Status of Clane

- Under the settlement hierarchy of the KCDP2023-2029, Clane should be designated a 'Self Sustaining Town' as directed in the Regional Spatial and Economic Strategy (RSES).
- The policies and objectives of the County Development Plan must align with National and Regional Policy.
- The RSES sets out the settlement hierarchy for the Region.

		<ul> <li>Clane is one of a number of Towns across the EMRA Region which are described under the heading of a Self-Sustaining Town in the RSES.</li> </ul>
		<ul> <li>The current Kildare County Development Plan 2017-2023 (as amended by Variation No. 1) and also the Settlement Hierarchy table included on page 2 of the Issues Paper for Kildare County Development Plan 2023-2023 describe Clane as a 'Town', which is a level below the designation prescribed in the Regional Policy.</li> </ul>
		<ul> <li>It is vital that Clane be correctly recognised as a Self-Sustaining Town within the KCDP2023-2029 as directed by the RSES.</li> </ul>
271.	Noel Stynes	The submission argues for the extension of the settlement boundary of Nurney.
272.	Eithne Ni	Enhanced Amenity & Heritage
	Fhatartaigh	Our native language should be widely visible on road signs and at cultural events throughout the county.
		The 9 primary schools and 2 secondary schools who teach through the medium of Irish should be supported as much as possible.
		The demand for education through Irish is increasing.
		Irish should be mentioned in the Culture and Heritage section of the County Development Plan.
273.	Venturis	Issues Raised
	Investments	<ul> <li>The submission provides a narrative on the context of Naas in terms of location, population, jobs and policy in the NSS, RPGs and the Naas Town DP (2005 &amp; 2011).</li> </ul>

- The longstanding policy context in Nass has underpinned significant public and private investment.
- Major infrastructure projects and policy that have been implemented / proposed for Naas have strengthened the development potential of the town.
  - Kildare Route Rail Project.
  - NTA Draft Integrated Implementation Plan.
  - Transport Strategy for the GDA 2016-2035.
  - The Naas Inner Relief Road.
  - Upgrades to the Osberstown Waste Treatment plant.

#### **National Planning Framework**

- The NPF provides for growth of towns such as Naas which have supporting infrastructure in place as sustainable centres with a balanced growth of employment and population with sufficient scale to attract foreign direct investment.
- Reference is made to the population projections in the NPF Roadmap and Table 2.4 of the Variation No. 1 of the KCDP 2017-2023.
- The Tiered Approach to Zoning from the NPF is also referred to.

# Regional Spatial and Economic Strategy 2019-2031

• The submission states that Naas has been designated as a Key Town and reference is made to the definition of a Key Town and outlines the six Regional Policy Objectives pertaining to Naas in the RSES.

#### **Observations**

- Naas as the county town and Key Town should be prioritised for development and capitalised on the existing and planned investments in infrastructure.
- Naas requires and enhanced role, an increase from its current role and function is required by regional policy.
- Development of Naas must not be lop-sided it must be allocated around the centre of the town rather than focusing on the northwest quadrant.
- KCC should examine the level of development planned for smaller settlements in the KCDP 2017-2023 and whether this development is dependent on fresh investment in enabling infrastructure.
- 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.
- Consideration should be given to the typology of the towns and consider the zoning and phasing of development lands to ensure that towns grow at a sustainable level appropriate to their position in there hierarchy set out in Tables 4.2 and 4.3 of the RSES.

# **Housing Figures**

- KCC should maximise the housing figures in line with the NPF and the Housing Supply Target Methodology for Development Planning a strong proportion should be allocated to Naas, in excess of what was allocated in the previous CDP to reflect its 'enhanced' role.
- Reference is made to the Minister's comments in the letter accompanying the Housing Supply Target
  Methodology, which effectively will see development curtailed in the 'commuter' towns while
  brownfield and public transport-led housing development at scale is developed in Dublin.

		<ul> <li>To reduce the delivery of housing in counties in Kildare in the emerging CDP will lead to a shortfall of suitable housing and an increase in house prices for residents of Kildare.</li> <li>Recommended that KCC seek to maximise the provision of housing in the CDP to provide homes to ensure continued growth.</li> </ul>
		Conclusion
		The CDP should support Naas and encourage its growth to become an important town economically and socially.
		Shortage of housing in Kildare could have knock on effects on attracting business and employers.
		Housing should be directed towards Naas as County Town and a Key Town.
274.	Queally Group	Issues Raised
		Queally Group Profile
		The submission outlines the long history of the Queally Group in Naas and the active role it plays in the local community in particular the Community Centre at Monread that was donated to KCC.
		Supports Naas as the main hub along a corridor of companies of the N7 (from Citywest to Newbridge).
		791 of the 1069 employees are from County Kildare.
		Many benefits of living closer to work; savings on transport costs, time, walking / cycling to work.
		Commentary and submission made on the Variation to the KCDP adopted June 2020

- Policy Objective proposed: Encourage and facilitate mixed use developments which incorporate living and working opportunities subject to quality design, appropriate transport alternatives and climate adaptation and mitigation measures.
- The submission quotes significant text from Section 3.2 of the CDP Variation in relation to the Setting the Context of County Kildare in terms of population growth.
- The submission requests that the repositioning of Naas, as a Key Town.
- Policy Objective proposed: Recalibrate the population and associated unit projections based on social, physical and community infrastructural investments that has taken place since Census 2016. Reestablish Naas as the county town and its Key Town Status.
- The Mid-Kildare cluster of Naas, Newbridge and Kilcullen with historical patterns of population, jobs and service capacities are well advanced to attract and absorb significant development and growth.
- The attractiveness of Mid-Kildare as a place to invest is evidenced by the major manufacturing, distribution and service enterprises.
- Naas alone has benefitted form over half a billion public and private investment in roads, water, wastewater, schools and related services and is primed for further investment.
- Naas has led the provision of new housing over recent years but maintaining this momentum will require matching jobs growth with availability of affordable housing.
- Policy Objective proposed: Promote and develop Naas in mid Kildare and Maynooth in north east Kildare as Key Towns to achieve the critical mass necessary across all service areas in order to attract and sustain employment, affordable homes and a quality living environment within accessible communities.

#### **Climate Resilient Kildare**

• Policy Objective proposed: 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.

#### **Local Area Plans**

- The submission notes that Naas and Maynooth are identified as Key Towns and quotes the definition.
- Policy Objective proposed: To promote and support development initiatives that reflect the preeminent classification of Naas and Maynooth as Key Towns through identification, servicing and promotion of strategic sites linked with these towns.

#### **Other Plans and Strategies**

- The submission references the County Heritage Plan 2019-2025, the County Biodiversity Plan 2009-2014 and the Kildare Age Friendly Strategy 2016-2018.
- Heritage, Biodiversity and Age Friendly Strategies are all complementary to Kildare's Corporate Plan.
- Policy Objective proposed: Promote and support development initiatives that translates Heritage,
  Biodiversity and Age Friendly Strategic objectives through collaborative ventures in particular live /
  work opportunities that regenerate areas and reuse / renew vacant or underused assets and / or
  housing stock.

# **Core Strategy**

 Planning is not an exact science and past or future projections of growth are not always evidenced by what actually takes place.

- Population growth or decline can be a function of many factors including infrastructural provision, housing affordability, employment, transport links, community facilities such as schools, retail offerings, leisure and amenity options.
- Where growth occurs is a coincidence of timing of infrastructural availability and service capacity to assimilate new demand levels.
- High levels of population and employment growth in Naas has been the product of over a decade of investment, with growth targets been surpassed.
- Policy Objective proposed: Facilitate the development of Naas and Maynooth as Key Towns to grow commensurate with their economic, social, cultural and physical capacities within the overall constraints of County Kildare's population and housing unit allocation.

#### **Growth Strategy – Regional Context**

- The prosperity of Kildare relies heavily of the performance of towns within Kildare to anchor development and drive future growth throughout the county.
- Apart from the significant contribution that international employers in the county make to Kildare the bedrock of our economy is the contribution made by the small and medium enterprise sector.
- Policy Objective proposed: Prioritise the growth and development of the key towns of Naas and Maynooth in terms of investment, promotion and development in order to secure critical mass and advance as lead attractions within their respective regions (mid-Kildare and north east Kildare) within the county.

Responses to Questions Raised in the Issues Paper

**Healthy: People and Places** 

- The mismatch between 3% involved in Agriculture and 23% living in rural Kildare reinforces the need for making living in settlements more attractive and affordable.
- Affordability challenge creates the demand for rural housing.
- Unintended consequence of rural living includes high levels of car usage, isolation as people age, providing services and reduce viability of services in smaller towns and villages, reduces the imperative for regenerating or reusing existing dwellings.
- To pursue compact growth.

#### Recommendations

- Create service centres in settlements to include serviced sites with water, wastewater services and broadband.
- Restrict rural development to towns, villages and / settlements.
- Use Rural Regeneration Fund to develop schedule of towns and villages as part of a regeneration and development programme.
- Include reuse of vacant sites and buildings and provision for elder living within these towns, villages and settlements.
- Ensure safe, attractive public spaces for people to linger.

## **Economic Opportunity: innovation, Enterprise and Employment**

• The pattern of travelling to and from Kildare, in particular the exodus from Kildare to Dublin is partially a function of this county acting as a more affordable housing option rather than living in Dublin.

- Reversing this trend requires identification and servicing of strategic industrial and commercially
  planned sites in the county. This cannot be replicated in every town so lead centres must be identified.
  Naas and Maynooth already identified as Key Towns.
- Preferred choice is working close to home.
- Reference is made to MERITS and the integration of network of facilities across a network of "hubs" linked through a necklace of places with flexible arrangements and well-managed standards would be welcome.
- Work with businesses to explore how such facilities could accommodate their own staff across these hubs.
- Facilitate business to undertake provision of accommodation to rent or buy close to their business.
- Reduce motorway building line constraints in the development plan (S.17.7.2) on land zoned and serviced for employment / commercial uses to ensure a compact and sustainable urban footprint.

# **Climate Action: Environment, Climate Change and Adaptation**

- Promote alternative energy sources.
- Limit rural housing as it requires a major investment in travel times, hinders land use efficiency and contributes to difficulties in introducing alternative energy options.
- Support improvement in services in designated centres of population.
- Impose levies on development based on land size, thereby encouraging higher densities (same approach would discourage one off rural housing).

- Adopt a strict policy of merging residential, commercial and industrial development into defined areas limiting sprawl.
- Protecting the environment while promoting growth requires policies that make it attractive to manage or control growth in all its elements (residential, community, commercial and or industrial) while encouraging respect for landscape and biodiversity aspects.
- Use of lakes and water bodies to attenuate flood waters.
- Planning applications including those to regenerate developments should include a condition to adopt a climate friendly / renewable energy element.
- Tree planting or a contribution in lieu should be a standard condition on development.
- Recycling facilities should be limited to properly managed civic amenity sites or only under licence at shopping centres / other establishments with CCTV.
- Communities should be encouraged to develop their own energy sustainment plans, part of which could be alternative energy supplies, waste recycling and surface water management.

# **Sustainable Mobility: Movement and Transport**

- Eliminate parking outside schools and introduce school bus alternatives.
- Create drop and safe parking zones close to but away from schools.
- Trial bus links between and in towns that offer low cost, frequent services.
- Request employers to consider staff transport schemes that commence with an audit of transport needs/habits/ timelines and investigate a menu of alternative options.

- Impose a % contribution from the major spending programmes and establish a "Public Transport Initiative" to pilot alternatives.
- Create pedestrian zones in towns. These do not have to be permanent and introduce set times for deliveries.
- Create public spaces and give precedence to people over traffic with options for occasional markets and enhanced public spaces.
- Widen footpaths and limit spaces for through traffic to enhance attractiveness for people to linger, dine in open spaces and allow nearby shop owners to use footpaths under licence.
- Prepare designs for villages and smaller settlements that includes public spaces, designated zones for housing and or mixed- use options with serviced sites.
- Offer preferred status to employers who source or provide accommodation to employees within 15 minutes of place of work.
- Adopt an EV policy for the Council's own fleet and investigate restricted access, under bye laws, for EV buses only.
- Park and ride options need a critical mass and removal of own car options to make it attractive to people and unattractive to car owners.
- Adopt a strategic approach to making towns more people friendly by undertaking trials in bigger towns based.

# **Creative Places: Social, Community and Cultural Development**

• Prepare social / community infrastructure audits.

- Identify community zoned in LAPs based on those audits.
- Ensure educational zones are adequate to incorporate primary, secondary and childcare as an option with amenity facilities.
- Include additional levy option to support childcare provision as an alternative to requiring a unit for every 70 dwellings.
- Identify sites for nursing homes and retirement.
- Encourage mixed use housing options, single living, extended family options and dwellings for older people.
- Provision of a range of open spaces and recreational areas and buildings becomes more critical as more people living in urban areas.
- 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.
- 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.
- Existing facilities need to be mapped and linked to a community assessment, to match scale and size with need. Communities have different needs depending on scale and bigger more expensive facilities need to be clustered or provided on the basis of a shared arrangement between settlements. i.e. one public swimming pool for north Kildare.

# **Enhanced Amenity and Heritage: Landscape and Green Infrastructure**

Develop a landscape plan for the county linked with greenway and blue way projects.

- Identify and support areas along tourist and walking trails for appropriate development as anchor
  points with appropriate facilities and localised business opportunities.
- Concentrate and consolidate development around towns, villages, settlements and nodes.
- Identify farmlands, peatlands, uplands, woodlands and wetlands through classification and designation for permitted development.
- Maintain an open ongoing process for listing / delisting protected structures.
- Use the URDF and RRDF to invite proposals and generate a schedule of candidate projects to establish a programme for funding and completion.
- Prepare and promote a heritage trail for visitors, walkers, schools and local communities and use the library network as a launch venue.

#### Making it Happen: Infrastructure, Energy and Communications

- Provision of the range of infrastructure necessary takes many years.
- Adopt a strategic approach to infrastructural planning coupled with a full programme of capital investment and community support.
- Work with the full range of utility providers and secure land use efficiencies in particular electricity, gas, water, wastewater, renewable energy, telecommunication and broadband providers.
- Consolidating development will help efficiency in provision but category of uses needs to be complementary and connected.
- 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.

	T	
		<ul> <li>The submission references the Naas Inner Relief Road as a case study, the road was identified as far back as 1999 and and because in was not delivered in advance of housing it was subsequently objected to by the residents who ultimately occupied these houses.</li> <li>Proper long-term planning should be locked in and not derailed by local interest as against the greater common good.</li> </ul>
		Section 4: Summary of Submission and Key Points Raised
		The submission restates the eight policy objectives that they proposed earlier in their submission. The various points across the themes in the Issues Papers were also reiterated.
		• The Queally Group have significant industrial, commercial, business, community and property interests in Kildare but more particularly in the Naas area. The agri-food sector is a cluster that has evolved around Naas / City West area. The Queally Group will seek to have employees within a 15-minute commute to work, investigate the provision of accommodation for employees at affordable prices and renting terms, consider best use of its undeveloped land banks in the Naas Area, maintain and develop strong partnerships with key developers similar to the partnership with Ardstone Homes.
275.	Pierce Greaney	Divert traffic from town centres, specifically Naas, this would have huge benefits for the amenity of the town centre/s.
		<ul> <li>Some of the road infrastructure recently installed, even with DMURS principles, still encourages cars to drive to quickly.</li> </ul>
		<ul> <li>The newly upgraded Naas - Kilcullen Road (R448) is an example of where a large investment has been made to cycle and pedestrian infrastructure but it is still dangerous as vehicle speeds are not monitored or enforced.</li> </ul>

		Additional traffic calming measures should be retrofitted or planned for future projects.
		The MT06.1 in the Naas LAP should be developed as quickly as possible.
		<ul> <li>Map all of the Biodiversity / Hedgerows / Woodland spaces that are in Kildare and work with responsible people to ensure that these areas are protected and enhanced.</li> </ul>
		<ul> <li>Greenways, Cycleways / Walkways and Strategic Open Spaces, although welcome, should not be to the detriment of existing biodiversity locations.</li> </ul>
		Appropriate 'Green Spaces' should be identified and protected from residential development.
		<ul> <li>The Naas LAP has identified a Strategic Open Space on the Kilcullen Rd. to support the significant number of people that have moved into the new housing estates. This land and the existing significant Biodiversity should be protected and developed for active recreation use. The potential of this space for Wetlands Development is huge.</li> </ul>
276.	Fonsall Ltd.	The DART+ Programme extension to Hazelhatch and Celbridge on the Kildare Line must be prioritised.
		<ul> <li>The development of the DART+ Programme would allow for the delivery of higher density new housing stock within a 1km radius of the Hazelhatch train station, in tandem with the provision of Sustainable Mobility.</li> </ul>
277.	Equitas	<ul> <li>The submission is made on behalf of Equitas Properties, owners of lands to the north and south of the M7 junction with Kildare town.</li> </ul>
		<ul> <li>The Issues Paper does not reference Kildare town, as a potential tourism asset of national importance even though a Tourism Hub was identified in Kildare Town in the current KCDP.</li> </ul>

- The draft KCDP should play a key role in identifying, as well as protecting, key tourism assets that have the potential to be developed for national tourism and recreational purposes.
- Where areas of potential occur near the national arterial road infrastructure, Kildare County Council
  has a role in identifying locations and engaging early in the development plan process with Transport
  Infrastructure Ireland/National Transport Authority under the provisions of the Spatial Planning and
  National Roads Guidelines (2012).
- Kildare town is one such location which can be identified as a national 'Tourism Hub' and where facilities can be sustainably developed in the town.
- The current Kildare County Development Plan Core Strategy sees that the main future opportunity for urban and economic development of Kildare town is tied in with the town becoming an important tourism destination.
- The Core Strategy in the Kildare County Development Plan 2017 2023 indicates that 'Kildare Town has the opportunity to develop and promote its economic base through the development as an important Tourism Destination.'
- The Kildare County Development Plan 2017-2023 contains policies, which identify opportunities for Kildare Town to develop and promote its economic base through tourism.
- The National Tourism Hub identified in the current KCDP is unsuitable.
- The NPF strongly advocates compact urban centres where activities are to be concentrated.
- 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.

# 278. Newtownsland (Kill) Limited

The submission is made on behalf of Newtownsland (Kill) Limited who are a significant landowner in the Kill area, with an interest in the Former Kill Equestrian Centre.

- Promote Kill as a compact town in accordance with the National Planning framework, with specific reference to National Policy Objective 6.
- Kill's large areas of underutilised land, which is available for redevelopment make it an ideal attractive location for people to set up businesses, live and work within the area.
- Kill is identified within the Issues Paper as a town, despite its comparable size to Kilcullen, The
  proposed level of new dwellings for Kill is more akin to Prosperous than Kilcullen. Prosperous has a
  population of 1,000 less people than Kill.
- The level of growth proposed for Kill is considered to be disproportionate to its size, the level of existing employment within the town, the quantum of brownfield land available for re-use and redevelopment within the town boundary and its proximity to the excellent transport infrastructure in the form of the N7.
- The target for Kill should be at least doubled in terms of housing, and sites should also be clearly identified for new employment development.
- 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.
- The improvement in the road network would result in Kill being an ideal location for future development in terms of employment and residential development.

Through the appropriate planning and development of sites within the existing urban boundary of Kill it could be a compact, smart, sustainable and inclusive town with both economic and residential growth for the area.

279.	Cill Dara le Gaeilge	<ul> <li>Enhanced Amenity &amp; Heritage</li> <li>The County Development Plan should emphasis that Irish is a very important part of the culture of the county.</li> <li>A Cultural Centre should be developed, which would be at the centre of celebrating the Irish cultural tradition and the Irish language in Kildare as well as an interpretive centre for local heritage.</li> <li>Capital funding is now available from central government for 80% of the cost of the development.</li> <li>The support for a Cultural Centre is very clear in the plan for the Irish Language 2019-2023, which was</li> </ul>
280.	Kevin Mullen	<ul> <li>published with the support of Kildare County Council.</li> <li>The Cultural Centre should be situated in Sallins and be easily accessible to visitors on the new greenway along the Grand Canal.</li> <li>The primary focus of the submission is related to Climate Change and Biodiversity loss.</li> </ul>
		<ul> <li>Healthy Placemaking: People and Places</li> <li>There must be a balance between compact growth and quality of life, this is especially the case in Celbridge where there is a shortage of community facilities.</li> <li>As far as possible no one-off rural housing should be permitted.</li> <li>Multi-generation housing schemes can be encouraged through educating the public. Houses that include 'Granny Flats' should be given priority and offered lower property valuations and property tax reductions.</li> <li>Green Walls such as the one at the Primary Care Health Centre on the Maynooth Road in Celbridge should be encouraged and would assist in reducing urban pollution.</li> </ul>

- Derelict buildings should be purchased and retrofitted by the council.
- Airbnb rentals should be prohibited.
- Opposed to any structure exceeding 4 stories in any urban area in Kildare. High density proposals must be targeted at the proper market.
- In relation to the Climate Change Crisis and the Biodiversity Crisis, it is vital that the strategic goals of the Aichi plan are fully enacted and the 20 biodiversity targets are accepted as core in the forthcoming Kildare Development Plan 2023-2029.

#### **Economic Opportunity; Innovation, Enterprise and Employment**

- Green Economics, Sustainable energy, renewable resources, and improving biodiversity outcomes is the economic way of the future and should be encouraged.
- The council must consider the repercussions of the withdrawal from Leixlip of the Intel plant and the necessary works required after this withdrawal.
- Seek to rollout Solar PV panels on every suitable house as smartmeters are installed. Ensure that local planning permits this. Encourage enterprise centres to act as learning centres for young entrepreneurs
- More can be done to encourage local small scale enterprises with financial aid and research into available EU funding.
- Actively encourage "co-working hubs".
- Embrace 3D technologies to further expand the retail experience in on-street shops.

- Maynooth University must become even more of a young business incubation centre and Kildare should strongly consider setting up another business oriented third level college in perhaps Athy or Newbridge.
- In relation to tourism we should transform and re-wet our bogs with ecologically sound interpretative centres and tourist paths.
- Green transport options should be facilitated to bring tourists to the many outstanding tourist locations throughout the county. Better marketing, for example a 'Kildare Way' could be explored.

# **Climate Action: Environment, Climate Change and Adaptation**

- Well-designed places and buildings can improve our resilience to climate change impacts and a reduction in carbon emissions can be achieved, through good physical connections with surrounding areas which encourages walking and cycling and by having easier access to public transport.
- The Plan can address the challenges of climate change by adopting the following policies; 1. Stop the use of fossil fuels in domestic heating. 2. Switch all ground transport to electric and properly filtered biofuels. 3. Rebuild or retrofit all existing buildings to use zero carbon. 4. Ban the use of coal and retrofit carbon capture to all industrial processes. 5. Ensure that any of our suppliers have adopted and develop greener processes for the production of aluminium, cement, steel and other materials.. 6. Shift agricultural production to foods that produce less methane and CO2. Increase forestry and reduce pasture. 7. Adopt a BECCS (BioEnergy with Carbon Capture and Storage) approach. Grow Biofuels and when you burn them for electric generation capture and sequester the CO2. 8. Encourage vegetarianism and low meat consumption through education. A move from beef to chicken would reduce carbon emissions by a factor of six. 9. Encourage car sharing schemes. 10. Encourage cycling by providing separated cycle lanes throughout the county. 11. Embrace energy efficiency by educating consumers on the proper use of energy efficient domestic appliances and heating systems. 12. Find ways to reduce demand. Probably the most difficult. We must educate our population to see the benefits from choosing green alternatives. 13. Stop plastic pollution.

- The quicker we move to embrace a protected sustainable environment the more commercial advantage we gain.
- In relation to flood risk, we need to ensure that nothing is built on flood plains through use of local knowledge and proper investigation prior to build.
- The roofs of domestic and industrial buildings should be used for solar energy production using PV panels. Invest in local district heating using geothermal technology. Study the following document, Guide to DH in Ireland Final. Homes and commercial buildings should be retrofitted.
- We should have a target of setting aside 30% of available land for biodiversity.
- In relation to water quality, ensure best practice in agriculture and industrial practice.
- We need more work to provide compost from domestic and agricultural waste to fill the shortfall from stopping peat harvesting for compost.
- Reducing air pollution is the main action that needs to be taken. Next is water pollution followed by ground contamination. Reducing air pollution can be reduced by embracing technologies which filter and capture pollutants.
- The CDP should encourage properly scoped and researched citizen science projects. These should be linked with Transition year projects to involve the youth of our county.

# **Sustainable Mobility: Movement and Transport**

• Provide separated cycle lanes which do not bottleneck or come to an end before a destination can be reached or journey can be completed.

- Air quality monitoring should be more widespread with the installation of displays showing current air quality similar to those advising traffic to slow down.
- More sheltered walkways to encourage people to walk to shops etc.
- Reduce the need to travel beyond Kildare by enhancing our local amenities such as swimming pools, cinema complexes and an enhanced local shopping experience.
- Develop an electric shuttle bus system to provide transport around the county instead of all of it heading to Dublin.
- Access to the Hazelhatch station could be vastly improved by a proper cycle path that goes all the way
  to the station. It could also be better served by an electric bus shuttle service that meets every train
  with adequate accommodation for all willing passengers.
- A way of managing private car access and parking in our towns while at the same time making our towns vibrant places would be to carry out the following measures; (1) Provide convenient multi-level parking centres with electric charging points in every space; (2) These centres should have numberplate recognition and payment systems; (3) The centres should have play spaces and creche facilities for children; (4) Retail shops should provide fast home delivery options guaranteeing delivery by end of day; (5) Retail should all be child buggy friendly as well as wheelchair accessible; (6) Pedestrianize the streets with sheltered walkways if possible to the car parks.
- High speed broadband should be available to everyone to counter rural isolation and make rural living more sustainable.
- 20km speed limits and the banning of HGVs at certain times from all towns and villages would greatly
  encourage cyclists and pedestrians.

- Electric Vehicles (EV) charge points should be provided in carparks and a number on streets where car parking is permitted. Facilities should also be provided for the charging of electric bicycles and scooters. The electricity supplying all these points should be from solar wind and other renewable sources. For those on longer journeys every service station should have at least 4 charging points.
- The most suitable locations for Park and Ride or Park and Stride facilities should be near train stations, at a variety of points near motorways and where safe parking can be provided for parents doing the school drop off.
- Sustainable and active modes of travel can be achieved by educating our populace to think foot first, cycle next, public transport next and car last.

#### Creative Places, Social, Community and Cultural Development

- Inadequate community facilities in Celbridge. No theatre, cinema and swimming pool.
- In relation to childcare and retirement living options; Facilities should be made available to the retired such as allotments. Multigenerational housing should be permitted that allows different generations to live separately but still under the same roof. This would make it easier for active retirees to help with childcare.
- In relation to social inclusion and equality for all citizens; Money should be spent on social studies to advise on solutions and how we can develop a more open welcoming society throughout the county.
- Current public open space provision is not adequate and the allocated spaces seem to be contracting.
   More and bigger play areas for children and adults are required. Outside gyms and outdoor spaces where adults can play should be promoted.
- Set up a standard that dictates the number of recreational areas and resources to be dedicated to each 1,000 of population and adjust the provision of such services in line with growth.

#### **Enhanced Amenity and Heritage; Landscape and Green Infrastructure**

- Biodiversity can be enhanced by the following measures; All roads and motorways should have underpasses that allow for animal transit. These should be regularly maintained and cleared. Invasive species should be removed and replaced with native species. Cherry Laurel in particular should be removed. Recover and re-instate natural environments and ensure that these are linked.
- 30% of land should be set aside for nature and rewilding.
- Green infrastructure and ecosystem services should be promoted by re-wetting our peatlands and encouraging more farmers to plant orchards. Beekeeping should also be promoted and would greatly help carbon capture and biodiversity.
- In relation to Protected Structures, the council should request the history department of Maynooth University to research and document buildings or structures that should be added to the Record of Protected Structures (RPS).
- 3D immersive tours and scale models can be used to obtain greater access to sensitive natural, built and archaeological heritage.
- Greater community involvement and ownership can enhance, integrate and protect our arts, culture and heritage assets.

# Making it happen; Infrastructure, Energy and Communications

• 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.

		<ul> <li>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.</li> </ul>
		Renewable energy should be encouraged at the expense of other considerations.
		<ul> <li>The use of renewable energy sources should be encouraged by making it cheaper and fossil fuels dearer.</li> </ul>
		<ul> <li>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. We should also ensure that they use electricity that is generated from sustainable sources.</li> </ul>
		<ul> <li>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.</li> </ul>
281.	Roisin Stewart	Sustainable Mobility
		The proposed Inner Relief Road / Gallops Avenue is unacceptable.
		Naas needs an Outer Relief Road and not an Inner Relief Road.
282.	Michael Moore	Mr. Moore's submission relates to the Inner Relief Road in Naas. His submission can be summarised as follows:
		<ul> <li>Proposed road will create unsafe conditions to its nearby residents and create hazardous road conditions for children, elderly, general public within the estates attached and rounding areas.</li> </ul>
		<ul> <li>On street parking by the public in the race course area could potentially limit the access and vision to the road.</li> </ul>

		A new road inner relief road would create hazardous fumes, noise, dust, and vibrations that in turn, can potentially affect the health and wellbeing of a community.
283.	Clyde Doyle	Mr. Doyle's submission relates to the Inner Relief Road in Naas. His submission can be summarised as follows:
		Proposal was defeated by the Naas MD.
		<ul> <li>Congestion will move from current trac junctions to new proposed junctions at The Gallops, Tipper Road and Sunday's Well.</li> </ul>
		Naas Racecourse area must be preserved.
		<ul> <li>Route and its design does not follow the guidelines set out by our own national authorities, see the Design Manual for Urban Roads and Streets.</li> </ul>
		<ul> <li>Include the following specific objective to replace the inner relief road, Naas objective in Table 6.1: "To provide an outer ring road for the eastern/north-eastern side of Naas, to cater for by-passing traffic, linking the Blessington Road with the Dublin road close to the junction of the latter with the N7. This outer ring road will be so routed, so as not to traverse or cut through existing residential areas and will provide a long-term development boundary to the east/north-east of the town of Naas".</li> </ul>
		<ul> <li>Traffic for residents leaving all the adjoining estates will increase (by 40% immediately to increase substantially over the coming years) and exiting will be far more difficult and dangerous.</li> </ul>
284.	Eilish Kavanagh	Ms. Kavanagh's submission relates to the request for a feasibility study be carried out on Regional Road R416
		from Milltown to Newbridge. Her submission can be summarised as follows:
		Create a Cycle lane and Pedestrian Walkway on the regional Road R416 from Milltown into Newbridge.
		Road Lighting on R416 from Newbridge to Milltown.

		<ul> <li>Road Traffic congestion – Byrnes Crossroad.</li> <li>High risk element of possible potential accidents, health and safety in and around Scoil Na Naomh Uilig.</li> </ul>
285.	Ballymore Group	<ul> <li>A submission has been received from the Ballymore Group. Their submission relates to residential development in Kildare and can be summarised as follows:</li> <li>The aim of the new CDP should be to make housing as affordable as possible to as many as possible and to make the most efficient use of serviced zoned lands.</li> <li>With regard to promoting development in the MASP area, the submission urges the council to enable the development of lands in Confey in Leixlip as priority and to put place policies and objectives to bring forward applications on the lands.</li> <li>Potential for the development of a centre of sporting excellence and outdoor pursuits south of Pipers Hill in Naas.</li> <li>Residential demand in Kildare is focused on affordable family sized dwellings and for traditional houses.</li> <li>Minimum requirement for public open space be set at 10% of the site.</li> <li>In relation to parking requirements it is suggested that the PA carry out an audit of actual parking demand for each use class set out in Table 17.9.</li> <li>The PA should restrict itself to attaching conditions that are in line with the development plan and national planning policy rather than impose personal preferences as these conditions can have a substantial impact on costs.</li> </ul>
286.	Beans Group	A submission has been prepared by McGill Planning on behalf of Beans Land and relates to the promotion of Celbridge as a Self-Sustaining Growth Town.

		<ul> <li>The submission requests that Celbridge is given a higher ranking in the next Settlement Strategy as a Self-Sustaining Growth Town, as per policies and population targets set out in the NPF, NDP and RSES.</li> <li>Development should be focused on infill and around KDAs.</li> <li>Continuation of Crodaun as the Maynooth Road Gateway is considered an appropriate and key driver for development to the north</li> <li>Support for the proposed strategy, set out in section 12.2.4 KDA 4- Cradaun, to develop Cradaun as a gateway into Celbridge from the north should be facilitated.</li> </ul>
287.	Castledermot GAA	<ul> <li>A submission has been received from Castledermot GAA. This submission is based on the lack of facilities in the town of Castledermot to cater for their growing requirements. It is noted that they share facilities with the local schools and other recreational clubs as well as having to share facilities with other GAA clubs</li> </ul>
		<ul> <li>The club have asked that KCC include in the CDP for an increased area for recreation and amenities. In this area it would be possible to put playing pitches in for GAA and possibly other sports. It could also facilitate a running track for the community.</li> </ul>
288.	DAA	The DAA have no comment to make at this time.
289.	Yvonne Codd	Ms. Codd's submission raises concerns regarding the Naas Inner Relief Road.
		Road was rejected by Naas MD and subsequently confirmed in Dail proceedings by Bernard Durkan
		Future development plans to incorporate an outer orbital route for Naas to support sustainable mobility.

290.	Pat O' Mahony	A submission has been received from Mr. Pat O' Mahony who's concerns are related to the provision of housing needs of older citizens. It can be summarised as follows:
		<ul> <li>The submission highlights the housing need for older citizens which stems from Project Ireland 2040 - National Planning Framework, Choices for Older People in Ireland – Time for Action (ALONE), Housing for Older People – Thinking Ahead and a survey from Cluid which surveyed the housing and support needs of its older tenants.</li> </ul>
		<ul> <li>The new CDP provides an opportunity to address the lack of housing for older people by providing age appropriate accommodation.</li> </ul>
		<ul> <li>A solution would be retirement villages e.g. those in Australia and New Zealand. This would free up housing for both private and social housing use.</li> </ul>
		See https://retirementvillagesireland.ie/
		Requirements:
		<ul> <li>Zone lands for retirement complexes.</li> </ul>
		<ul> <li>CPO land to accommodate retirement complexes.</li> </ul>
		Develop building and design regulations for retirement villages.
		Incentivise developers.
		Demonstrate the benefits of such complexes.
		<ul><li>Extend existing schemes.</li></ul>

		<ul> <li>Incentivise senior citizens to move to retirement complexes.</li> </ul>
		<ul> <li>Ensure that bridging finance is available.</li> </ul>
		<ul> <li>Require retirement village operators to put arrangements in place for both health and home care.</li> </ul>
		<ul> <li>Collaboration between those who reside in a retirement village and their local community on projects.</li> </ul>
		Encourage and facilitate approved housing bodies to assist in the provision of such complexes.
		<ul> <li>Establish a representative body representing older people.</li> </ul>
		<ul> <li>The identification of suitable sites for retirement villages should be a priority for the Land Development Agency.</li> </ul>
291.	Roadstone	<ul> <li>Roadstone has the following property assets within the Kildare County Council administrative area.         These are located at Allen Quarry; Clane; Kilglass Sand Pit; and Redbog Sand Pit. The property assets at Allen Quarry, Kilmeague and Kilglass Sand Pit, Broadford contain significant aggregate resources These locations are capable of providing significant socio-economic benefits to the area and should be regarded as central to achieving the wider county development targets and objectives.     </li> </ul>
		National and Regional Policy Context
		<ul> <li>The National Planning Framework (NPF) and the Regional Spatial and Economic Strategies (RSES) acknowledge the importance of extractive industries, specific reference is made to the following Policy Objectives NPO 23 and RPO 6.7.</li> </ul>
		Importance of Extractive Industries

# Essential Aggregates – Providing for Ireland's Needs to 20401 prepared by the Irish Concrete Federation (refer to copy appended to this submission)

- The objective of this document is to highlight to Government the need for a national planning policy for aggregates, which will underpin local and regional planning policy and ensure the sustainable supply of aggregates for Project Ireland 2040 and beyond.
- The document highlights three important points that statutory planning policy needs to address at all spatial scales. These are: 1. Importance of Extractive Industries and Aggregates; 2. Identifying and Protecting Reserves; 3. Enabling Extraction of Aggregates.

#### **Current Development Plan Policies**

• The relevant policies and objectives of the current Plan, which relate to the extractive industry are listed in the submission. It is noted that the socio-economic benefits of the quarry and extractive industry are not described in Chapter 5 Economic Development, Enterprise and & Tourism.

## Kildare County Development Plan 2023 – 2029: Issues Paper

• It is noted that the benefits of the quarry and extractive industry are not mentioned in the Economic Opportunity: Innovation, Enterprise and Employment Theme of the Issues Paper. It is further noted that there is no reference to the benefits of the quarry and extractive industry within the overall Issues Paper. This is especially concerning considering the county's population growth projections as set out in in the Healthy Placemaking: People and Places Theme.

#### **Submission Comments**

• The publication of the Draft CDP should adequately outline the economic value and significance of the aggregates and minerals sector in County Kildare, emphasising the sectors significance and added value in terms of the local, regional and national economy.

		<ul> <li>Mineral extraction and the wider aggregate industry is important to the economy of Kildare in terms of employment generation and providing raw materials to the construction industry. The Plan must allow the aggregates sector to continue to facilitate its central role within construction and development supply chains.</li> </ul>
		<ul> <li>Kildare has significant but finite mineral resources and it should be the aim of the proposed Draft CDP to safeguard areas of significant resources from incompatible developments to ensure the continued viability of the extractive industry, whilst ensuring that environmental, rural, scenic and residential amenities are protected.</li> </ul>
		<ul> <li>The extractive industry provides the necessary raw materials for the majority of building and infrastructure development in Ireland.</li> </ul>
		<ul> <li>Aggregate extraction can only take place where suitable aggregate resources exist; aggregates are a     'tied' resource. It is considered, therefore, that planning policies should be carefully constructed to     avoid adverse effects on aggregate resources and the related extractive industries and added-value     production that are essential for our built environment, infrastructure and future economic     development.</li> </ul>
		<ul> <li>it is important to ensure that the future interpretation of County Development Plan policies does not result in the sterilisation of aggregate resources and does not prevent the secure, long-term supply of construction aggregates and related value-added products, such as concrete blocks and road and house making materials.</li> </ul>
292.	John Duggan	Enhanced Amenity & Heritage
		The Curragh's designation should be changed so that it is afforded protection in law.
		Outline a management and maintenance plan for the Curragh amenity area.

		Provide dedicated hard standing parking areas within the Curragh.
		<ul> <li>Provide maintenance of fencing and buildings in the Curragh camp area, which is currently falling into a bad state of repair.</li> </ul>
293.	Statkraft	Introduction
		<ul> <li>Statkraft is a global company in energy market operations and the Group produces hydropower, wind power, solar power, gas-fired power and supplies district heating.</li> </ul>
		<ul> <li>Statkraft Ireland's aim is to play a significant role in Ireland's transition to becoming a low carbon economy.</li> </ul>
		<ul> <li>As a member of the Irish Wind Energy Association (IWEA), Statkraft Ireland supports the IWEA response to this consultation process and would like to highlight that each Local Authority has a part to play in Ireland's Future climate ambitions and central to this – achieving 70% renewable electricity by 2030.</li> </ul>
		Regional Spatial and Economic Strategy (RSES)
		<ul> <li>One of the three key principles underpinning this Strategy is climate action, and one of the main objectives of the RSES is to support renewable energy. The new KCDP will need to include policies to encompass this principle and to deliver the Regional Strategic Outcomes for the Strategy.</li> </ul>
		The National Climate Action Plan (CAP) 2019
		70% target for renewable energy production out to 2030.
		<ul> <li>Based on the CAP assumptions, onshore wind will provide the majority of the required electricity yield out to 2030.</li> </ul>

- 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.
- 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.

## Response to the Issues Paper by KCC

- Statkraft believe that 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".
- County, Kildare has not contributed significantly to onshore wind development over the past number of decades and this should be addressed.
- The Office of the Planning Regulator (OPR) have stated that they will "act resolutely on any policy breaches" by Local Authorities who try to effectively ban the roll-out of sustainable energy development within their Counties.
- 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.
- KCC failed to produce a Renewable Energy Strategy for the County under the current KCDP (2017-2023).

# Wind Energy Strategy (WES)

- 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.
- 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.
- 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.
- 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.
- 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 un-suitable for renewable energy development at project inception.
- 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.

294.	Cllr. Seamie	Priority Road Project
	Moore	<ul> <li>Include a road objective to complete the last section of the IRR by selecting a previously considered and much favoured Route 6, through undeveloped lands between Blessington and Tipper Roads, through Naas Racecourse farmland and onto the Naas-Dublin Road at the Fishery Lane Roundabout.</li> </ul>
		Since the Chief Executive promoted route was constitutionally overturned in 2019. General
		<ul> <li>Objective to obtain a Southern Axis Business Corridor Designation in the next National Development Framework Plan from the National Development Agency.</li> </ul>
		KCC representatives to the Regional RSES Authority should be:
		<ul> <li>Nominees from the Strategic Policy Committee on Planning &amp; Economic Development.</li> </ul>
		<ul> <li>One each from North, Mid and South Kildare Areas.</li> </ul>
		<ul> <li>Must promote the adopted SPC policy positions of KCC.</li> </ul>
		<ul> <li>Planning &amp; 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.</li> </ul>
		<ul> <li>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.</li> </ul>
		Economic Development: KCC should form its own high-powered promotional and marketing group to encourage and bring high investment.
		Kildare needs to divert from its high dependency on Dublin based employments.

		<ul> <li>Kildare's suitability needs to be promoted at the highest levels of national and international business against the backdrop of changing work patterns, with a worldwide employee base.</li> </ul>
		Tourism Industry
		<ul> <li>Formation of a Tourism Destination Centre, sited adjoining and in collaboration with HRI, DoD, Curragh Racecourse and Tourism Investor Groups, where a combination of equine and military related events, Casino, food exhibition and entertainment centre and the widespread availability of smaller local tourism attractions, could be combined with the calendar of bloodstock racing, as a Tourism Rendezvous Centre, similar to created tourism bases in Fota Island, Centre Parcs, Tayto Park or Titanic Centre, where no previous tourism related bases previously existed.</li> </ul>
295.	Jennifer Doyle	<ul> <li>KCC should develop a plan for the provision of public parks in the county to serve large towns. The towns of North Kildare are growing fast and there is not enough outdoor space within 5km of people homes (such as regional parks/neighbourhood parks like in Dublin). Having these amenities close to towns means less cars on the road.</li> </ul>
296.	Ballymore	Environmental – Pollution
	Eustace Trout & Salmon Angler's Association	<ul> <li>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.</li> </ul>
	Association	Concern re pollution of Liffey as it enters Co. Kildare.
		Request that Golden Falls Lake become a healthy place for recreational activity.
		<ul> <li>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.</li> </ul>

		<ul> <li>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.</li> <li>A number of appendices have been included many of which relate to pollution occurrences as well as a document titled 'Eastern River Basin District – Programme of Measures Pilot Study: Upper Liffey (2009)'</li> </ul>
297.	HOJYAR	Employment
		<ul> <li>Consider area around Junction 6 on the N7 for 'logistic areas of excellence', near Dublin, on the main arterial road.</li> </ul>
298.	Naas Community Men's Shed	<ul> <li>The submission provides a background on Naas Community Men's' Shed.</li> <li>The objectives of the Shed are to advance health and well-being of its members and make a positive</li> </ul>
		contribution to the society in Naas.
		<ul> <li>The shedders would love to see Naas develop its infrastructure so that all its citizens and visitors would feel safe and secure whether walking, cycling, shopping, or socialising in the town environ.</li> </ul>
		<ul> <li>The CDP to include restoration of heritage infrastructure, huge economic benefits and enhancing well- being of citizens.</li> </ul>
		<ul> <li>The continued development of the heritage trails, the canal and harbour areas St David's Castle,</li> <li>Jigginstown Castle.</li> </ul>
		<ul> <li>Policy of extending pedestrian and cycle lanes is positive, as well as providing additional outdoor seating like Poplar Square.</li> </ul>
		Requirement for smaller house units available for purchase in house building developments.

299.	Kildare Environmental Network	<ul> <li>Housing</li> <li>Need for environmentally and climate change friendly affordable houses.</li> <li>Mix of housing type and design to be encouraged.</li> <li>McAuley Place cited as a good example of an Intergenerational living space.</li> </ul>
		Biodiversity
		Importance of protecting the landscape.
		KCC should adopt and implement positive biodiversity actions.
		Map and monitor endangered species in Kildare.
		Map the carbon sequestration of the soils in Kildare.
		Energy efficient measures including green roofs should be promoted.
		Living walls, hedgerows, trees should be introduced/retained in urban areas for biodiversity.
		Rail infrastructure to be used as nature corridors.
		Map all existing hedgerows in Kildare.
		<ul> <li>Include existing hedgerows in any planning application and include native hedging where new hedging is proposed.</li> </ul>
		Importance of protecting trees.

- Include pollinator friendly planting in all public spaces.
- Lighting should be of low Lux or only used during certain times so that fauna behaviour is minimally interrupted.

#### **Environmental**

- Rainwater harvesting should be encouraged.
- Plastic and drinking cans return banks should be encouraged.

# **Amenity**

- Request that KCC 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.
- Grand Canal overflow near Sallins is in a poor state of neglect and should be restored.

# **Bogs**

- Support the rewetting of bogs (Ummeras cited).
- Bogs need to be preserved as they are an invaluable carbon sink.

# **Employment**

- Bord na Mona HQ (Newbridge) as a location for an Innovation Hub for employment and training.
- Town centres need to be rejuvenated.

		<ul> <li>Regular markets should be encouraged in towns/ villages.</li> <li>Community facilities</li> <li>Allotments should be provided in towns/villages.</li> </ul>
300.	Sinn Fein	<ul> <li>Recognition for the social history of Newbridge.</li> <li>We need a stronger designation for Athy and Newbridge in terms of RSES. We should be planning towards providing the infrastructure to allow both of these towns to become Key Towns.</li> <li>There should be better local employment opportunities. Land should be zoned to provide opportunities for businesses to establish in Kildare. A business incubation centre and hubs in rural areas that are connected to decent broadband would reduce commuting.</li> <li>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.</li> <li>The plan must address dereliction in our towns and provide help to owners to bring them back into use.</li> </ul>
		<ul> <li>To address climate change, we need to protect bees, provide more cycle lanes, more electric car chargers and retro fit public buildings to reduce carbon footprint.</li> <li>Rail electrification should be extended to the south of the county. The frequency of trains stopping at Monasterevin needs to be increased and Newbridge should be within the short hop zone. A park and ride should be provided near Newbridge/M7.</li> </ul>

- New bridges are needed in Celbridge and Newbridge.
- Infill development should focus on homes for single people. We need an emphasis on homes for our older people too. We need to prioritise the building of public homes on public land, along with the delivery of affordable homes for purchase and rental.
- We should 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 in the County, particularly in the Kildare town area.
- All towns and villages should be working towards 'Age Friendly' status.
- We need to zone areas in our rural areas for community use. Lackagh/Mountrice Ellistown has a vibrant community spirit and would benefit from a Community Centre.
- The Councils rural housing policy should reflect the Flemish Decree. Every effort should be made to assist families that wish to build in their own communities, in a sustainable manner.
- We need a swimming pool in the Newbridge Kildare area. Provision should be made for sports clubs in towns and villages, and multi-sports campus accommodation in our towns.
- There is an imbalance in funding in many areas between the North and South of the County which needs to be addressed.
- Graveyards must be kept in good repair. We need to ensure that our Architectural Heritage is protected. The Courthouse in Kildare Town should be brought back into daily use. A Cultúrlann should be built in the County to promote the Irish language, music and culture.
- Childcare needs to be factored into the planning of large estates.

		We need to plan ahead so that school provision matches population growth. A new secondary school in the Curragh, Kildare Town and Newbridge are urgently required.
301.	Cllr O Cearuil	Sustainable Travel
		<ul> <li>To provide a safe and attractive commuting route along the Royal Canal Greenway to Dublin City Centre.</li> </ul>
		To extend the Dublin Bike scheme along the Royal Canal.
		Employment
		Promote remote working hubs.
		Transportation
		Develop the ring road in Maynooth.
		Promote charging points for Electric Vehicles.
		Local Area Plans
		Joint LAP for Maynooth, Leixlip, Celbridge and Kilcock.
		Social Infrastructure
		Develop a community centre in Maynooth.
		Develop a Sports Centre of Excellence in Kildare.

		<ul> <li>Develop an Arts Centre in North Kildare.</li> <li>Develop a playground in Straffan &amp; Rathcoffey.</li> <li>Build a primary health centre in Maynooth.</li> <li>Develop a Palliative Care Centre in North Kildare.</li> <li>Housing</li> <li>Develop housing schemes for older people.</li> <li>Provide additional housing for disabled persons.</li> </ul>
		Provide additional housing for members of the traveller community.
302.	Umeras Community Development	<ul> <li>Ummeras Bog</li> <li>Concerns regarding rewetting of Umeras Bog and oppose it</li> <li>Opposed to any use of a particular laneway in the ownership of Ms Kirwan to access the bog</li> <li>Opposed to property being used as part of any amenity use associated with the bog</li> </ul>
303.	Seamus Lenehan	<ul> <li>Housing</li> <li>Promotion of cluster type development in towns/villages at to counteract rural off-off housing (ref NPFI NO18b re serviced sites &amp; NO19).</li> </ul>
304.	Ray Nolan	Housing

		<ul> <li>Promotion of cluster type development in towns/villages at to counteract rural off-off housing (ref NPFI NO18b re serviced sites &amp; NO19).</li> </ul>
305.	James Kelly	Housing
		<ul> <li>Promotion of cluster type development in towns/villages at to counteract rural off-off housing (ref NPFI NO18b re serviced sites &amp; NO19).</li> </ul>
306.	Colin McKenna	Housing
		<ul> <li>Promotion of cluster type development in towns/villages at to counteract rural off-off housing (ref NPFI NO18b re serviced sites &amp; NO19).</li> </ul>
307.	O'Flynn Group	Housing
		<ul> <li>Sufficient lands to be zoned in Celbridge for housing (ref NPF; NPO 33) and that sufficient headroom be built into overall housing targets.</li> </ul>
		Future zonings should prioritise areas which promote sequential development and compact growth.
308.	EL Prendergast	Executive Summary
		<ul> <li>Client is responsible for the strategically sustainable development of lands within the Naas Northwest Quadrant.</li> </ul>
		<ul> <li>Policy documents identified NWQ as the primary opportunity to deliver the coordinated and comprehensive development of enterprise, commercial, housing and associated recreational, educational and community facilities.</li> </ul>
		Logical extension to Naas.

• The submission outlines ten specific text/objectives to be included in the Draft CDP.

#### Introduction

- Client invested significantly in public infrastructure on their lands in the NWQ on the basis of long-standing public planning policies. Reference is made to a range of policy documents.
- Major infrastructure is now in place or under construction, as follows:
  - 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).
- CDP provides opportunity to update planning policy for the NWQ.

# **Development of Naas – Policy Context**

- The submission examines the historical transport and land use policy framework that has guided Naas to set the scene of the strategic opportunities now enjoyed by Naas.
- Reference is made to Naas' designation as a Primary Development Centre in the NSS and the Naas
  Integrated Framework Plan for Land Use and Transportation (2003) (IFPLUT) which included the
  development of the NWQ as a focus of new employment with a new public transport route that links
  Naas and Sallins Train station through Millennium Park. The 2005 Naas Development Plan recognised

the NWQ as a major opportunity. NWQ Masterplan 2007 – urban extension of the town with a public transport service from town centre to Sallins Train Station and network of cycle and pedestrian routes.

- Vision for the NWQ has been brought forward by major a range of infrastructure (as referred to previously) and the delivery of Phase 1 of the Kildare Route Project, commencement of planning of Phase 2 of the Kildare Route Rail Project, primary infrastructure in NWQ is in place.
- Client has provided funding for the delivery of the NWQ infrastructure and towards the M7 Interchange and Sallins By-pass.
- Opportunity to maximise benefits associated with the large-scale investment that has been made and build on the existing early development within the NWQ, by including the particular inclusions in the submission in the Draft CDP.

#### **Current Planning Policy**

The submission details various policies and objectives across a range of documents which support the development of Naas with regard to integrated land use and transport planning. However, it is stated the current CDP does not provide adequately for population within Naas.

#### NPF and the RSES

- The submission refers to the NPF supporting the creation of strong urban communities and housing should primarily be built on employment growth, specific reference is made to NPO 4 and NPO 5.
- Reference is made to the RSES and Naas's designation as a Key Town.
- The need to align population, employment and housing growth and promote sustainable growth in the right locations is clearly recognised in the RSES.

 Reference is made to the six specific Regional Policy Objectives in the RSES that relate specifically to Naas.

Transport Strategy for the Greater Dublin Area 2016-2035

- Provides for specific transport upgrades which improve connectivity and support the growth of Naas, including reconfiguration of M7 from M50, M7 widening, Core bus network regional corridor on the N7 /M7. Rail upgrades in Dublin that will benefit Naas, Phoenix Park Tunnel (no open). DART expansion and DART underground.
- The Strategy states with regards town in hinterland areas that 'these towns will have high levels of employment activity, high order shopping and full range of social services, with good road and bus linkages to other towns and by high quality public transport to the City and play key roles in serving the surrounding rural communities and smaller towns and villages."

Kildare County Development Plan 2017-2023

- Reference is made to the population target for the county and Naas and that the level of population growth and housing in Naas is not considered to be consistent with its designation as a key town.
- It is noted that the variation was made prior to the Housing Supply Target Methodology Guidelines which were published in December 2020.
- The CDP supports employment growth in Naas through Policy CS5, ECD 5(i) and ECD 14.
- The CDP supports the growth of the NWQ through a range of existing objectives and policies supporting infrastructure and services.
- CDP notes that a strategic land bank has been zoned at the NWQ and the "Sectoral Opportunity" for "High quality high-density indigenous and Foreign Direct Investment" in the NWQ.

## Naas Town Development Plan

• Contained several objectives which provide explicitly for the development of the NWQ.

# Update of the NWQ Masterplan

• 2017 Masterplan Update sought to provide vibrant and bustling town expansion, wholly integrated with the fabric of Naas. The design themes underlying this vision very much with the themes identified in the CDP Issues Paper.

#### Sallins LAP 2016-2022

• The objectives supporting the Kildare Route Project to Sallins and the priority bus route from Naas to Sallins trains Station support the development of the NWQ.

## **Commentary on the Issues Paper**

# **Healthy Placemaking: People and Places**

- Naas is suitable for significant population growth.
- CDP offers opportunity to reconsider population growth informed by the Housing Supply Target Methodology Guidelines.
- Recommendation: Provide for an increased rate of population growth in County Kildare in the period 2023 2029 and increase the percentage of the housing units allocated to Naas reflecting its designation as a Key Town.
- The full potential of the Canal Harbour is not being realised.

 Recommendation: Support the development of the Grand Canal and Canal Harbour Naas for amenity, recreation and sustainable transport purposes including the Naas to Sallins and Naas to Corbally Harbour greenways and linking these to the national Grand Canal Greenway.

# **Economic Opportunity Innovation, Enterprise and Employment**

- c.79,130 resident workers and only 62,985 jobs in County Kildare.
- Recommendation: The northern section of the town contains a significant land bank for growth and
  represents a key part of the vision for the development of Naas. The development of these lands
  should complement the consolidation of the town centre. The land in the NWQ represent a major
  opportunity to achieve the coordinated and comprehensive development of enterprise, commercial,
  housing and associated recreational, educational and community facilities in Naas.
- Additional environmental and economic benefits associated with the use of by-products associated with the treatment process from the Osberstown WwTP, such as being used for commercial / industrial cooling purposes.
- Broad Run Water Reclamation Facility in Virginia treats municipal wastewater and supplies local data centres with up to 3.5 million gallons of reclaimed water each day for cooling purposes.
- Harvesting the methane gasses from the Osberstown WWTW could also be undertaken for the purpose of producing the power for the operation of a data centre.
- Recommendation: It is recommended that lands should be identified in the vicinity of the Osberstown WWTW for a potential new data centre in the Draft Development Plan.
- Need greater focus on the use of sustainable building material and methods.

# **Climate Action: Environment, Climate Change and Adaptation**

Recommendation: It is a Policy 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).

#### **Sustainable Mobility: Movement and Transport**

- KCC should continue its commitment to focusing on the need to underpin the planning process with an integrated approach to sustainable transport.
- Need to prepare an updated transport strategy for Naas, the vision in the IFPLUT with growth focused in the NWQ serviced by pedestrian, cycle and public transport linkages to the town centre and Sallins and Naas Railway Station, remains the appropriate overarching strategy.
- Naas/Sallins Transport Strategy (2020) has unfortunately failed to address the real long-term challenges that Naas faces over the coming decades.
- Modify the development model investing in sustainable transport infrastructure.
- Re-connecting Naas Town Centre to the national railway network is a necessary aspiration.
- The Naas/Sallins Transport Strategy identified a potential location for the development of a train station and larger strategic park and ride facility on a greenfield site approximately 1.1km to the west of the existing Naas & Sallins train station.
- CDP should include an objective to lobby for the delivery of such a multimodal interchange, but lands should also be specifically safeguarded for the delivery of this station within the CDP.
- Link the station to Naas by a sustainable movement corridor consisting of a high-quality bus service and direct, attractive walking and cycling links.

- Recommendation: Lands should also be specifically safeguarded for the delivery of a train station, park
   8 ride and transport interchange at Naas and Sallins within the Draft Kildare County Development Plan
   2023-2029.
- The extension of electrified DART services on the Kildare Line has now been an objective of national and regional transport planning policy documents for over twenty years.
- Client welcomes the re-commencement of planning and design work on the provision of DART services on the Kildare line.
- Recommendation: Promote and support the upgrading of the Kildare rail line and provision of DART services as far as Kildare Station, in co-operation with the NTA.
- Three railway line serve Kildare which provide an opportunity to enhance local public transport services. Enhanced local public transport services connecting towns and rail stations should be provided and integrated with rail services in Naas and other towns.
- Recommendation: Proposed Objective Seek to address urban congestion with particular emphasis on facilitating improved bus transport movement and reliability and improved links to bus and railway stations.
- Examine existing public transport links within the county with a view to promoting and facilitating improvements where feasible.
- The use of the M7 Osberstown Interchange and R407 Sallins Bypass to support the development of the NWQ has been expressly acknowledged in local statutory planning policy documents and in the An Bord Pleanála Inspector's Report for the M7 Osberstown Interchange and R407 Sallins Bypass Scheme (ABP Reg. Ref. 09.HA0046 M7, 09.MA0013 and 09.KA0031).
- Reference is made to an Inspector's Report which states the following:

		<ul> <li>"I consider that the Osberstown Interchange Sallins Bypass Scheme is supported by a range of policies at national, regional and local level."</li> <li>"In relation to policies at a national level, I note in particular the provisions of the National Spatial Strategy and the fact that the development facilitates access to zoned lands within the primary development cluster from the national road network."</li> <li>"The scheme provides for better regional connectivity, benefits human beings and the environment of Sallins in particular and is supported by development plan policy. The relief of congestion is a significant issue. The interchange benefits economic development in particular. However, the benefits of the interchange are reinforced and optimised by the construction of the Sallins Bypass, which would allow for development of the Naas north-west quadrant in a more sustainable manner".</li> <li>Recommendation: The Draft Kildare County Development Plan 2023-2029 should include an acknowledgment that the M7/J9a Millennium Park Interchange has been constructed inter alia with</li> </ul>
		the purpose of facilitating the development of Naas and the NWQ in an environmentally friendly and sustainable manner.  Conclusion and Recommendations  The submission reiterates the ten recommendations that were made throughout the submission.
309.	Adrian McAndrew	Housing     Additional housing should be provided for in the village of Cooleragh and serviced sites should be considered. Capacity of WWTP at 2,000 P.E. would suggest capacity for additional growth.
310.	Alan Byrne	Housing

		<ul> <li>Additional housing should be provided for in the village of Coill Dubh and serviced sites should be considered as the WWTP has significant spare capacity to accommodate future growth.</li> </ul>
311.	Hubert	Housing
	Beaumont	To consider lands for housing at Brannockstown.
312.	Devondale Ltd	Employment
		To consider lands for town centre expansion in Celbridge.
		Housing
		To consider additional housing in Celbridge on appropriately located lands.
		To build in greater flexibility with respect to housing targets.
		To consider the concept of serviced sites.
313.	Core Industrial	Employment
	NEP Ltd	To consider additional employment lands related to 'NE1' (Industry/Warehousing) of the current CDP.
314.	Makros	Housing
		<ul> <li>Population projections and housing need targets are outdated and are not reflective of demographic trends.</li> </ul>
		The proposed population figures will frustrate the delivery of affordable homes.

	1	
		Development should follow available infrastructure (reference to Kildare town).
		Appendix enclosed titled 'Kildare & Emra Housing Needs Assessment' (Nov 2019)
315.	Castletown Homes Ltd & Janus Securities Ltd	<ul> <li>Employment</li> <li>Consideration to be given to addressing underutilised lands close to motorway interchanges in the county for a high-quality research and development park (reference to J6 on M4).</li> </ul>
316.	Pirowell Ltd	Housing
		Strategic role of Maynooth should be recognised in the CDP.
		Sufficient headroom should be allocated for housing.
		<ul> <li>Lands to be considered for housing development to south east of Maynooth which supports compact growth and infrastructure such as MERR.</li> </ul>
317.	Aidan Kelly	Housing
		To consider additional lands for housing in Castledermot.
318.	Lidon Group	Retail/Commercial
		Request that zonings would reflect current land uses (ref Mayfield, J14).
319.	Patricia Gammell	Transportation
		Opposed to any reference of 'The Gallops Avenue' in the CDP.

		Request for an Outer Orbital route for Naas outside of existing residential areas.
320.	Kieron Gammell	Transportation
		<ul> <li>Opposed to any reference of 'The Gallops Avenue' in the CDP</li> <li>Request for an Outer Orbital route for Naas outside of existing residential areas</li> </ul>