

Ireland 2040
National
Planning
Framework

Submission of Kildare County Council



Planning and Strategic Development Department

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1.0 Introduction

Kildare County Council welcomes the publication of the draft National Planning Framework (NPF), and the opportunity to make a submission in respect of same.

Given the proposed directional shift in the national development strategy and the range of issues addressed in the NPF, the extended timeframe for submission is welcome.

The Draft Framework presents opportunities and uncertainties for County Kildare and this report focuses on these significant issues.

This report concludes with a series of recommendations which we hope will influence the final Framework.

2.0 Overview of Draft NPF

2.1 Positives/Opportunities

There are many points to be welcomed in the NPF, including a drive towards more compact and sustainable settlements, a rebalancing of development towards the south and west of the country and a progression towards a low-carbon, climate resilient society. The emphasis on sustainable development, quality of life for citizens, and an integrated approach to the future of the country across the government and its agencies is welcome.

Kildare County Council support the need to develop and strengthen policies towards village and town consolidation to counter-balance the trend of single rural housing. The development pressure on the open countryside to accommodate housing and the proposal to restrict housing to demonstrable economic need in areas under urban influence is recognised.

2.2 Uncertainties

There are, however, uncertainties arising in certain areas of the draft NPF which are a particular cause for concern, such as growth allocations for larger towns in the Eastern and Midlands Region and the limited emphasis for economic development in Kildare (and the surrounding counties of Dublin) to support the significant resident population in the county.

Kildare, as a fundamental part of the Dublin City metropolitan area, needs to play a part in accommodating the future sustainable growth of Dublin, including acknowledging the position of our large towns to support sustainable population and economic growth based around an integrated regional transportation system. County Kildare is ideally placed to support economic development in the Greater Dublin Area, the Midlands and the South East.

2.3 Kildare's Strengths

The strengths of County Kildare should be recognised as a location for attracting foreign direct and national investment, as a centre for excellence for the equine industry, as having a significant and growing population with an excellent third level institution and as a county which is well served by public transport to the city of Dublin and other regional centres. The county's connectivity in terms of road, rail, air and proximity to sea ports provides Kildare with a unique advantage in terms of location of business and ancillary supports such as housing and education.

2.4 Scope of the National Planning Framework

It is worth referencing the scope of the National Planning Framework initially envisaged by the Planning and Development (Amendment) Bill 2016. Draft legislation states that the NPF will be required to address:

- *“(a) the identification of nationally strategic development requirements as respects cities, towns and rural areas in relation to employment, future population change, and associated housing and commercial development requirements;*
- *(b) the indication of national infrastructure priorities to address the strategic development requirements referred to in paragraph (a) as regards transportation (including public transportation), water services, waste management, energy and communications networks and the provision of educational, health care, retail, cultural and recreational facilities;*
- *(c) the promotion of co-ordination of development between the terrestrial and marine sectors, having regard to Directive 2014/89/EU of the European Parliament and of the Council of 23 July 2014 establishing a framework for maritime spatial planning², and of any measures taken by the State to give effect to that Directive;*
- *(d) the conservation of the environment and its amenities, including the landscape and archaeological, architectural and natural heritage, and;*
- *(e) promotion of sustainable settlement and transportation strategies in urban and rural areas including the promotion of measures to reduce anthropogenic greenhouse gas emissions and to address the necessity of adaptation to climate change.”*

While it is accepted that the NPF represents a shift to a more sustainable development approach than the National Spatial Strategy and generally seeks to address the items listed above, it is considered that the NPF falls short in comprehensively addressing the items above. In order to provide greater clarity to those projects/priorities as they relate to transportation (including public transportation), water services, waste management, energy and communications networks and the provision of educational, health care, retail, cultural and recreational facilities, it would be useful that a table is provided under each of the headings of the projects which are prioritised, including those relating to retail, cultural and recreational facilities.

It may be the case that the National Investment Plan will detail the projects and priorities required for strategic development, however, it would have been useful to have these

comprehensively listed in the draft NPF to facilitate appropriate levels of specific feedback.

2.5 Statutory Context

It is necessary to expedite the legislative framework for the National Planning Framework and the Office of the Planning Regulator to ensure the statutory context of the NPF and to ensure compliance with the delivery of the framework at a local level. In this regard the Minister is urged to progress the Planning and Development (Amendment) Bill 2016.

3.0 Strategic Development Framework

The Framework includes planning mechanisms at a regional, metropolitan and urban level to accommodate the projected growth in population. These mechanisms will have a direct impact on the planning (and electoral) landscape of County Kildare.

The Framework also includes growth parameters for large towns, small towns and rural areas which will dramatically influence the future growth of County Kildare.

3.1 Regional/Metropolitan/Urban

3.1.1 Metropolitan Area Strategic Plan for Dublin

The NPF introduces a proposal to develop a new 12 year plan for the city metropolitan areas. The Dublin plan area is to replicate the area of the NTA Transport Strategy for the Greater Dublin Area, which includes Kildare, where consideration will be given to establishing an appropriate level of political and administrative oversight. It is acknowledged that the strategic plans are intended to form part of the relevant Regional Spatial and Economic Strategy (RSES).

Given the imminent drafting of the RSES, it is unclear how the metropolitan plans are intended to be developed in tandem with the RSES, particularly if they require the establishment of a layer of political and administrative oversight. The NPF should set out clearly how it is intended to develop these plans, including the envisaged oversight mechanisms.

The introduction of guidelines is considered necessary to underpin the development of these strategic plans, together with a legislative framework to formalise their standing.

It is noted that a number of key future growth enablers are listed for Dublin, including:

- *“determining a limited number of accessible locations for significant people-intensive employment;*

- *relocating less intensive uses outside the M50 ring in particular and from the existing built up area generally.”*

Kildare County Council has identified strategic employment sites along the Dublin-Cork and Dublin-Sligo rail corridors. Strategically located land banks that are close to the existing railway network have been in areas such as Collinstown in Leixlip and Millennium Park in Naas and offer significant potential for consolidated plan led growth over the medium to long term. The NPF should acknowledge the role of strategic sites along rail corridors and prioritise these areas for growth.

With respect to relocating less intensive uses outside the M50 ring, Kildare County Council is not in favour of accommodating land hungry less intensive uses which would serve to continue the cycle of urban sprawl beyond the city. It is not considered realistic or appropriate to push lower land value uses out to the adjoining counties. Intensive development with high employment profiles should first be considered for areas like County Kildare, where there is a significant population base. Their establishment would help redress existing commuting patterns and replace it with an improved quality of live.

3.1.2 Metropolitan Regions

The NPF defines a city region as the commuter catchment from which at least 15% of the relevant city area workforce is drawn. In light of the development approaches proposed it is considered that the NPF should be accompanied by maps for the 5 metropolitan regions detailing the relevant commuter catchment/zone of influence. This would minimise misinterpretation of data and enable robust policies to be formed and decisions made.

3.1.3 Urban Area Plans

It is noted that it is intended to create distinct electoral areas based closely on a number of larger urban centres and assigning an enhanced range of local authority functions to those areas.

It is not apparent what the inherent difference envisaged would be between urban area plans and local area plans. The function of an urban area plan as distinct from the function of a local area plan needs to be clearly set out in the NPF. It is difficult to form an opinion around the limited narrative on the concept of urban area plans in the NPF. Kildare County Council would, however, question the added value of introducing a new form of urban plan which presently seems to be another name for a local area plan, while simultaneously proposing a reversion to the town council model, which was recently abolished.

The introduction of guidelines is considered necessary to underpin the development of these plans, within a legislative framework. Provision should be made for these in the NPF.

The NPF introduces the concept of urban area plans for certain towns (over 15,000 people), which shall be joint plans where towns straddle different local authorities. It is considered imperative that legislation is brought forward that requires adjoining planning authorities to make joint plans as appropriate.

With respect to making urban/local area plans in general, it is submitted that decisions at full council enable a strategic overview of proposed plans to be considered, which could be facilitated by a supporting advisory role provided at Municipal District level. In this regard, Kildare County Council would welcome a requirement that urban/local area plans are made by full council.

3.1.4 Active Land Management

The NPF places emphasis on the need for active land management, and indicates the establishment of a national land development agency to enable urban, infill and brownfield development. In addition, Strategic Policy Objective 68 is recognised which states:

“Planning authorities will use compulsory purchase powers to facilitate the delivery of enabling infrastructure to prioritised zoned lands, to accommodate planned growth.”

Given the protracted and cumbersome procedures relating to compulsory purchase, the government is urged to swiftly introduce a system which streamlines and speeds up the mechanism to compulsory acquire property, which would also serve to reduce legal and professional advice fees.

3.1.5 Land Zoning Methodology

A new methodology to be put in place for core strategies is also intended to address the differentiation between zoned land that is available for development and zoned land that requires significant further investment in services for infrastructure for development to be realised. It is intended that planning authorities will make a reasonable estimate of the full cost of delivery of the specified services and identify the responsible delivery agencies.

With this in mind, it is considered necessary that during the making of a development plan or local area plan that relevant agencies should be statutorily required to indicate an earliest / realistic timeframe that a specific project or service can be delivered. This will contribute to a robust tiered methodology.

With respect to the tiered approach and the prioritisation of land, it would be clearer if the terminology was used and graphics were used to illustrate the approaches proposed in the NPF.

3.2 Spatial Parameters for County Kildare

3.2.1 Kildare's Large Regional Towns

Kildare had six large towns with a population >10,000 persons in 2016. It is noted that the NPF proposes a population increase of 20-25% to 2040 for larger towns in the Eastern and Midland and Southern Regional Assembly areas. Larger towns in the Northern and Western Regional Assembly however, have a projected growth of 40%.

The population targets and growth envisaged for Kildare's larger towns is much reduced from that envisaged in the Regional Planning Guidelines for the Greater Dublin Area (RPGGDA) and appears at odds or disconnected with other government initiatives such as LIHAF and Rebuilding Ireland, both seeking to deliver significant volumes of urban housing in the country.

The description of Large Growth Towns as set out in the RPGGDA is still considered applicable:

*"They [Large Growth Towns] will accommodate significant new investment in transport, in economic and commercial activity and in housing. These towns act as important self sustaining regional economic drivers for the GDA, capitalising on their international connectivity and high quality connections to Dublin City Centre, whilst also supporting and servicing a wider local economy, and for some this extends beyond the GDA into surrounding Regions. They are important centres for delivery of public services, with hospitals, Courts, Local Authority and Civil Service offices located within the town; alongside IDA promoted companies, high order retail businesses, supported enterprise centres and active Chambers of Commerce providing a strong commercial hub within the town and environs."*¹

Naas is Kildare's county town and is offered as case study in this submission to demonstrate the impact the proposed growth allocation and economic focus within the M50 ring, as set out in the draft NPF, would have on Naas, and the county as a whole.

Naas: A Case Study in the context of the draft NPF

Kildare County Council is currently embarking on a review of its Local Area Plan for Naas 2018/24. With a current population of circa 21,600 and based on the National Spatial Strategy and the Regional Planning Guidelines for the Great Dublin Area (RPGs) a trajectory of growth is underway following a significant economic pause in recent years. This trajectory was underpinned in the RPGs which envisaged that Large Growth Towns I, such as Naas, would plan for scale of 50,000 persons.

In the economic downturn Naas as the only Tier 1 Town and the County Town is developing appropriate and adequate infrastructure to support significant projected

¹ Pg 94 of the Regional Planning Guidelines for the Greater Dublin Area

growth to 2040. This is reflected in the LIHAF agreements and projects. In addition, approximately 1,000 residential units are underway and a further 1,000 units are in the planning process. The road infrastructure together with water, waste water, energy and broadband are now all but completed, creating the environment for significant growth.

With 40% of our working population leaving Kildare to work daily there is high potential to match jobs with living communities and reverse the loss of time and quality of life by offering people the chance and opportunity to work and live within the same community.

Naas had a population of 21,597 in 2016. As Table 1 below demonstrates, a 25% increase in population would enable an increase of just 5,399 up to 2040, which equates to 245 persons per year over 22 years (or 102 residential units per year). These targets are not considered to be realistic to allow for natural growth and to enable sustainable communities to be developed into the future. The ability to deliver housing requirements under the government strategy of Rebuilding Ireland is called into question, whereby any one of the current strategic housing pre-applications currently in the system, could simply swallow up the allocation for a particular town in a given year.

Table 1: Projected Population Growth for Naas Urban under the draft NPF

Current Population (2016)	21,597
25% increase in population envisaged in draft NPF	5,399
Total Population in 2040	26,996
Number of additional persons per annum to 2040	245
Number of housing units per annum to 2040	102

To set the above implications in context, the current Kildare County Development Plan, envisages a growth of almost 15% for Naas over the period 2016-2023, which would enable a population of 28,111 by 2023. This figure includes a headroom up to 2026, the figure is derived from the Regional Planning Guidelines.

It should be noted that we have recently adopted and are presently going through the process of adopting a number of Local Area Plans for our large towns where population growth targets were a specific issue for all parties concerned. The proposed ground shift in population projections would require significant amendments to the core strategy and various local area plans.

A projected growth of 25% for all our large towns, up to the period 2040 is a significant concern for Kildare County Council. Apart from the fact that it would seem to be contrary to the stated aim of consolidating and developing our towns, the growth of Kildare would be severely limited.

3.2.2 Small Towns

Ireland 2040 sets an overall population growth target of 15% for small towns of less than 10,000 people and rural areas in each of the three Regional Assembly areas to 2040. In 2016 Kildare had ten towns with a population between 1,500 and 10,000, thus the impact of such a target would have significant implications on the future development of these towns and the county in general.

Kill: A Case Study in the context of the draft NPF

Kill is offered as an example in Table 2 below to demonstrate the growth implications for Kildare’s small towns. Kill had a population of 8,598 in 2016. A 15% increase in population would enable an increase of just 1,286 up to 2040, which equates to 58 persons per year over 22 years (or 24 residential units per year).

This projection does not seem to be a realistic approach to developing and sustaining our towns and villages, which the NPF states it wants to achieve. It is submitted, that at these rates, the development of our small towns will be hindered. Kildare County Council therefore raises significant concerns regarding the proposed growth allocations for our towns.

Table 2: Projected Population Growth for Kill under the draft NPF

Current Population (2016)	8,598
15% increase in population envisaged in draft NPF	1,286
Total Population in 2040	9,884
Number of additional persons per annum to 2040	58
Number of housing units per annum to 2040	24

There are currently strategic housing applications in the system (at pre-planning stage) for a number of smaller towns which would seem to contradict the growth allocations set down in the NPF. Careful consideration is therefore required to ensure that towns and villages can grow to sustain existing and future populations and in order to counter-balance demand for rural single housing.

3.2.3 Rural Housing

Kildare County Council recognise that the continued trend of single rural housing in the open countryside is unsustainable. The pressure for this form of development was recognised and evidenced in the Kildare Rural Housing Study (AIRO, 2016). With this in mind, the proposal to facilitate rural housing in areas under strong urban influence to those with demonstrable economic need is welcome, and considered necessary in order to focus development into our villages and towns. To this end, a definition of 'demonstrable economic need' should be set out in the NPF. While attributing economic need as a factor (in assessing an application for a single rural house) the over-riding consideration should be based on environmental constraints, supported by evidence based data. The evidence based data, should project forward using trend analysis, to inform sustainable rural housing policies. This 'bigger picture' approach should be supported in the NPF.

The proposal to develop a programme for 'new homes in small towns and villages' with local authorities, public infrastructure agencies 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 is welcome. Kildare County Council would very much welcome an opportunity to participate in a pilot project in relation to this policy objective.

3.2.4 Green Infrastructure

The NPF recognises the importance of green infrastructure as an asset that can have multiple benefits, and for which connection to green spaces must be linked and planned for through appropriate planning. Green belts and open spaces are also referenced to prevent coalescence of settlements. National Policy Objective 59 states:

“Promote the integration of Green Infrastructure (GI) and ecosystem services including landscape, heritage and biodiversity in the preparation of statutory land use plans.”

It is considered that the policy objective should include reference to greenbelts, and that the NPF should seek, where appropriate, the creation of green belts around designated urban centres.

4.0 National Investment Plan

The NPF refers to a new ten year National Investment Plan (NIP) (2018 – 2027) which will be published alongside the finalised NPF. The proposed alignment of investment across a range of government sectors which seeks to establish firm links between the NPF and long-term capital investment is welcome.

Kildare County Council supports the proposed National Smart Growth Initiative. It is intended to apply for available funding under both the urban and rural initiatives as they become available. Kildare's location within the metropolitan area of Dublin, in an area under strong urban influence, with a growing rural and urban population is well positioned to benefit from such initiatives, particularly those which seek to consolidate settlements to act as a counter-balance to single rural housing.

As mentioned above, it would have been useful to have tabled the projects which will be given priority in the NPF for ease of reference.

There is a significant emphasis on road infrastructure in the NPF, such as seeking to reduce car commuter times, with limited emphasis placed on national rail infrastructure. The NPF should identify the public transport infrastructure projects across the country which should be delivered, in the interests of sustainable development and climate change obligations.

Kildare County Council seeks to have the projects listed below identified in the National Investment Plan as a priority.

(Please note this list is not exhaustive and would need to be aligned with the Irish Water investment programme to ensure that development can continue to be delivered in County Kildare.)

4.1 Park & Ride Facilities

The NTA needs to be provided with adequate capital funding to allow them to support suitably located Park & Ride facilities.

Park and Ride facilities should be provided near Kilcock, Maynooth, Sallins/Naas and Newbridge and other locations should be investigated such as interchanges. These Park & Ride facilities should be attractive to car poolers, train users and bus customers.

In addition a large bus hub is required in North Kildare, in close proximity to the M7 or M4, (or both), to encourage motorists to use public transport where available, until such time as we can rebalance the employment options available in Kildare.

4.2 Cycling and Outdoor Recreation Network

Continuation of Capital Funding towards the **Dublin Galway Greenway** is vital to ensure completion of this invaluable project. The return on investment will be very strong in terms of tourism, employment, positive health – both physical and mental, additional transport links for pedestrians and cyclists and overall quality of life.

Equally the **Barrow Blueway** needs capital funding supports to provide all the same benefits as mentioned above, however in terms of economic benefits the Barrow Blueway would be a tremendous catalyst for much needed economic benefits along its route.

Other Cycling routes that need capital funding include:

- Naas to Sallins
- Naas to Kill
- Kilcullen Road, Naas
- Dublin Road, Naas

4.3 Leinster Orbital Route

The National Roads Authority, (now TII), was charged by Government with the task of carrying out a Feasibility Study in respect of a possible Leinster Orbital Route (formerly known as the Dublin Outer Orbital Route).

The conclusion of the work undertaken has been the identification of a corridor linking Drogheda to Navan to Naas as being the corridor that most closely reflects the ambitions set out in the various policy documents for the region and that best achieves the outcomes required from such a route.

The Feasibility Study Final Report, (available on the TII website), provides an examination of the feasibility of the identified project from a policy, economic, engineering and environmental perspective. Its conclusions can be summarised as:

1. The route is strategically beneficial for the region in terms of strengthening the links between key development centres, assisting the economic development of these centres and improving the overall regional transport network;
2. The route is economically viable. The work done to date indicates that the benefits of the project are significantly greater than the project costs; and
3. The route is technically feasible. While there are numerous constraints throughout the corridor area and adjacent to the corridor, it has been identified that a proper and satisfactory alignment can be developed to deliver the project.

Arising from the favourable conclusions of the Feasibility Study Report, the Authority, (now TII), has recommended to Government that the scheme, which has been retitled as the “Leinster Orbital Route” (previously the Dublin Outer Orbital Route) to reflect the positive impacts of the scheme extending well beyond Dublin, be progressed to the next stage of development – the preparation of the statutory documentation for the project. This would ensure that the scheme would remain protected and would be ready and available for implementation at any stage in the future, when required. In addition, it would prevent new constraints from emerging that would render the project unavailable, or significantly increase its costs, in the future.²

4.4 Regional Parks

It is considered appropriate that the NIP include provisions for the delivery and funding of Regional Parks for areas which have experienced significant growth and for which significant growth is planned. There are many social and environmental benefits to be accrued from Regional Parks which the NPF should address.

4.5 Other Infrastructure Projects

Naas

As a Tier 1 settlement town, Naas has secured a contribution from the LIHAF to develop the inner relief road. Other infrastructure works on the M7 include widening of the motorway at Naas, and new interchange. A case study of Naas is provided at section 3.2.1 above.

Maynooth

Currently KCC has secured a contribution from the LIHAF to construct the Maynooth Eastern Relief Road and Bridge, (Over the Royal Canal and Rail Line), connecting the Celbridge Road to the Leixlip Road.

Capital funding is required to complete the following sections of the Maynooth Outer Orbital Route:

- Straffan Road to the Kilcock Road
- Kilcock Road to the Moyglare Road
- Moyglare Road to the Dunboyne Road

² Excerpt from the National Roads Authority, (now TII), Leinster Orbital Route – Corridor Protection Study (2009) <http://www.tii.ie/tii-library/strategic-planning/strategic-reports/LOR-Corridor-Protection-Study.pdf>

In addition a new interchange off the M4 is required as the existing interchange is grossly over capacity and leads to long tail backs.

Maynooth must secure an Orbital Route in the medium term as the population of the town expands and to cater for the continued expansion of Maynooth National University.

Celbridge

A second crossing of the River Liffey is urgently required to cater for existing traffic volumes and to facilitate planned growth in addition to an upgrade of the existing bridge to allow for pedestrian and cyclist safety.

Leixlip

Leixlip has strong potential to relieve the pressure for accommodation in Dublin City; however a comprehensive coordinated effort is required by all the relevant stakeholders to provide access to lands North of Leixlip, (an alternative to Confey Bridge), and a connection from the M4 to the M4. These stakeholders include Kildare County Council, South Dublin County Council, Fingal County Council, Meath County Council, TII, Department of Housing, Planning and Local Government and the NTA.

Kildare Town

Kildare Town is ideally located to accommodate new employers and commuters with ease of access to the M7 and the Dublin - Waterford, Dublin - Cork and Dublin Limerick Rail Lines.

Expansion of residential development is currently hindered by the lack of access to lands North West of the Town. Road infrastructure improvements are required urgently to the Pigeon Lane Monasterevin Road connection, including substantial investment in an over bridge spanning the Rail Line.

Newbridge

Newbridge has become a popular location for the location of large scale employers e.g. Pfizer, Bord na Mona, Newbridge Silverware, Whitewater Shopping Centre, Lidl Distribution Centre, etc.

Quality of Life is under serious threat in regard to traffic congestion due in the main part to the need for a second crossing of the River Liffey as part of a southern ring road structure, in conjunction with the preparation of a medium term Transport Plan which prioritises options in regard to improving the attractiveness of using interconnected public transport, cycling and pedestrian modes of transport.

Clane

The Sallins bypass is due for completion in early 2020. This will be of significant benefit to Sallins, however traffic will then, almost immediately, hit another bottleneck as they have to pass through Clane.

Kildare County Council has made a lot of progress in regard to this project including the completion of the CPO process and construction of a section of the bypass. Capital funding is urgently required to complete the Clane Bypass thereby improving traffic flows and opening up lands for residential development.

Athy

The Athy Distributor Route has received approval from An Bord Pleanála and now awaits capital funding to progress to the final design and construction stages.

This Distributor Route will enhance quality of life for residents and visitors to Athy and breathe life back into Athy.

The NPF should encourage employment opportunities into both Athy and Kildare Towns as they are both serviced with Motorway and Rail Access. Both towns will deliver affordable quality accommodation and can act as service and employment centres for the Midlands and South East regions.

5.0 Conclusions & Recommendations

- 5.1 There are many points to be welcomed in the NPF, including a drive towards more compact and sustainable settlements, a rebalancing of development towards the south and west of the country and a progression towards a low-carbon, climate resilient society.
- 5.2 The NPF falls short in proactively facilitating sustained population growth for our large regional towns (>10,000) by limiting population growth to 20- 25% over the period 2016-2040. This will have significant implications for Naas, Maynooth, Leixlip, Newbridge, Celbridge and Athy.
- 5.3 The NPF fails to enable sustainable growth for our small towns (< 10,000) by limiting population growth to just 15% over the period 2016 – 2040.
- 5.4 There is an over emphasis on re-balancing in favour of development / population projections in the Northern and Western Regional Assembly Area, to the detriment of the large and small towns in the Greater Dublin Area in particular.

The full implications of the proposed 're-balancing' have yet to be considered and assessed.

- 5.5 A greater percentage of population growth should be attributed to the large regional towns in the GDA. There is an inherent potential for these towns to grow based upon past investment: evident momentum for growth should be facilitated.
- 5.6 A greater percentage of population growth should be attributed to the small towns in the GDA, commensurate with the 'organic' growth nature of these towns. Many of these towns can cater for additional population growth and their continued development is considered necessary for sustainable communities.
- 5.7 There is a lack of emphasis on economic growth outside the Dublin City and suburbs. County Kildare is well placed to accommodate economic growth having regard to strategic employment sites along national and regional transport corridors. These sites should be exploited. In addition, there is a need to reverse existing outward commuting patterns. Significant employment growth therefore needs to be supported and facilitated in our large towns.
- 5.8 The NPF places an emphasis on low density and less intensive uses outside Dublin city and suburbs (i.e. beyond the M50 ring). This approach is not considered appropriate and will further exacerbate urban sprawl in surrounding counties.
- 5.9 There is an over-emphasis on the delivery of road infrastructure in the NPF, such as seeking to reduce car commuter times, with limited emphasis placed on national and regional rail infrastructure. The NPF should identify the public transport infrastructure projects across the country, particularly in the Mid-east, including Kildare, which should be delivered, in the interests of sustainable development and climate change obligations.
- 5.10 It is unclear how the metropolitan area plans are intended to be developed in tandem with the RSEs particularly if they require the establishment of a layer of political and administrative oversight. The NPF should set out clearly how it is intended to develop these plans, including the envisaged oversight mechanisms.
- 5.11 In light of the development approaches proposed it is considered that the NPF should be accompanied by maps for the 5 metropolitan areas detailing the relevant commuter catchment/zone of influence.
- 5.12 It is not apparent what the inherent difference envisaged would be between urban area plans and local area plans. The function of an urban area plan as distinct from the function of a local area plan needs to be clearly set out in the NPF. The added benefit of establishing distinct electoral areas based on larger urban centres needs careful consideration.

- 5.13 The development pressure on the open countryside to accommodate housing and the proposal to restrict housing to demonstrable economic need in areas under urban influence is recognised. A definition of demonstrable economic need should be included.
- 5.14 The proposal to provide serviced sites with appropriate infrastructure to attract people to build their own homes and live in small towns and villages is welcome. Kildare County Council would very much welcome an opportunity to participate in a pilot project in relation to this objective.
- 5.15 The NPF should require, where appropriate, the creation of green belts around designated urban centres, in particular around Dublin and other cities.
- 5.16 In order to realise the government's vision of active land management, an improved and streamlined regulatory system around land acquisition, compulsory purchase and arbitration needs to be introduced, including the role of the courts.
- 5.17 The land zoning methodology should require relevant agencies to indicate an earliest and realistic timeframe that a specific project or service can be delivered, in order to inform emerging plans.
- 5.18 There is a lack of clarity in the language of the proposed zoning and land prioritization methodology. It would be useful if graphics were presented to assist in clarifying the intentions of the Department in this regard.
- 5.19 Kildare County Council seeks to have a number of projects listed in the National Investment Plan as a priority. These projects include regional parks, park and ride facilities, the Leinster Orbital Route, cycling and outdoor recreation network and other infrastructure projects across a range of principal towns in County Kildare.
- 5.20 There needs to be a whole of government approach in the delivery of the NPF. The emphasis on sustainable development, quality of life for citizens, and an integrated approach to the future of the country across the government and its agencies is welcome.