



12th September 2024

First Revision to the National Planning Framework Consultation,
Department of Housing, Local Government and Heritage,
Custom House,
Dublin 1,
D01 W6X0.

RE: Kildare County Council submission on the First Revision to the National Planning Framework

Dear Sir/Madam,

Kildare County Council (KCC) welcomes the publication of the Draft First Revision to the National Planning Framework 2018-2040 (NPF) and the opportunity to submit observations and recommendations on behalf of the Council in this regard.

It is noteworthy that local authorities, including through their plan making and development management functions, are critical vehicles for the continued implementation and realisation of the policies and objectives of the National Planning Framework at county and local levels. Planning authorities are uniquely positioned in understanding the range of issues arising from the translation of national and regional policy to actions and developments on the ground.

At the outset, it is noted that the Draft First Revision to the NPF is not accompanied by associated draft updates to the NPF Implementation Roadmap. This is disappointing and, to a large extent, a lost opportunity for collaborative engagement with key stakeholders and members of the public. Given the fundamental interdependence between the NPF and the Implementation Roadmap, a further consultation opportunity should be provided following its publication in a draft format. This would ensure the meaningful engagement of all stakeholders in formulating Ireland's plan led response to significant and evolving challenges at national, regional and local levels.

This submission contains a brief overview of the county (Section 1), general observations relating to Kildare County Council's experience in the implementation of the NPF to date (Section 2) and a series of recommendations/observations for consideration in the finalisation of the revised NPF (Section 3). Kildare County Council considers that its recommendations/observations are essential in enabling the further delivery of the NPF policies and objectives at a local and county level.

1. Kildare in Context

Kildare is an inland county of approximately 169,550 hectares and incorporates a range of distinguished landscapes, natural and built heritage features, urban areas of varied scales and roles, and active rural communities.

Kildare is one of the most urban and at stress counties in the State, with 70% of the population in predominantly urban areas and 30% in rural areas and smaller rural settlements. This represents a complete reversal over a 30-year period whereby 70% of the population lived in rural Kildare in the early 1990s. The urban structure of Kildare is concentrated along the main rail and road transport corridors of the county. Metropolitan towns in the north-east of the county include Maynooth, Leixlip, Celbridge and Kilcock; the large towns of Naas, Newbridge and Kildare Town are located centrally in the county, and Athy is situated to the south. Kildare also contains an expansive range of more moderately sized and small towns (ranging from c.1,700 – 8,200 population), villages and rural settlements (total of 47 moderate and smaller settlements), along with an attractive countryside of active rural communities.

Kildare, along with other counties in the mid-east have experienced exceptionally high rates of population and housing growth over the last 30 years. According to the latest census results, Kildare has the fourth highest population in the State (247,774 persons – 4.85 of the State population 2022) and experienced one of the highest population growth rates in the country (11.4%) between 2016 and 2022. This growth is broadly balanced between natural increase due to a high birth rate, and a high level of net in-migration. Geographical proximity and accessibility to Dublin continues to be one of the key factors influencing in-migration and population growth - noting that c.4000 people moved from Dublin to Kildare within the year prior to Census 2022.

Data from the 2022 Census indicates that, notwithstanding an ageing population across the State, Kildare has a high proportion of young persons and working age families with young children. Approximately 35% of the resident population of Kildare are within the 0-24 age range, 28% are in the 25-44 age range and 25% are in the 45-64 age range. Only c.12% of Kildare's resident population are 65 years of age or older. The age profile of the county is youngest in the urban settlements, with more rural parts generally having an older age profile. Accordingly, there is an ongoing high demand for childcare, schools, recreational facilities and specialist supports, particularly in urban areas to respond to the needs of children and young persons. The continuing trend of an ageing population across the country will also lead to an increased demand for specialist housing, supports and facilities for older persons.

Kildare County Council (KCC) actively seeks to manage the ongoing exceptional demand for housing in accordance with the key principle of NPF to facilitate the sustainable and compact growth of existing settlements. As such, 47% of all new dwellings (2,720 dwellings) in Kildare in 2023 are situated within the Built-Up Area (BUA) of existing settlements, as defined by the Central Statistics Office. This exceeds the 30% target for all new homes to be delivered within the built-up footprint of existing settlements (other than the five Cities and their suburbs) under National Policy Objective 3c.

It is recognised that ongoing population and housing growth is to be underpinned by the development capacity of each settlement considering, inter alia, the availability of employment opportunities, accessibility by public transport and sustainable modes, and infrastructure availability (including physical, social, community, educational, recreational/amenity and medical infrastructure). As such, Kildare County Council has consistently sought to expediate the delivery of essential infrastructure in its settlements and rural area through its plan making, policy formulation and development management functions. In addition, the local authority has undertaken, and continues to progress, a series of dedicated projects, pilot studies and infrastructural developments in the County to address existing deficiencies to facilitate sustainable population and employment growth, as resources allow.

Notwithstanding the efforts of Kildare County Council to date, co-ordinating population, housing and employment growth with strategic and local supporting infrastructure remains an acute difficulty, in part, due to:

- (a) An historic legacy of rapid unplanned population growth;
- (b) Delayed investment;
- (c) Insufficient funding and resources at the county level for both the local authority and other service providers; and,
- (d) Limited co-ordination between national agencies and local authorities in the delivery of infrastructure, arising from a lack of defined roles in progressing delivery and leading in co-ordination.

2. Submission

Kildare County Council supports the plan-led approach of Project Ireland 2040, which combines the ambitious vision and implementation strategy of the current and draft NPF with the enabling investment and funding strategy of the National Development Plan (NDP).

It is noted that the NPF has been revised to:

- a. Reflect the contextual and demographic changes since the NPF was published in 2018, including the provision of revised population projections to 2040;
- b. Highlight and outline the progress made in the introduction of supporting institutional, legislative, policy and funding measures;
- c. Provide a renewed focus on climate and environmental challenges, including the delivery of renewable energy through the provision of ambitious electrical capacity allocation targets; and,
- d. Reflect associated changes in national policy and guidelines since the publication of the NPF in 2018.

Kildare County Council is generally supportive of the proposed amendments to the NPF. However, as an integral stakeholder in the delivery of the NPF at a local level, KCC has identified the following fundamental impediments to the full realisation of the vision and strategy of the NPF at a local level:

- 1. Insufficient funding and resourcing to address legacy and local level deficiencies in all types of essential supporting infrastructure.
- 2. The need for improved co-ordination between stakeholders involved in the delivery of strategic enabling infrastructure and important key services, including water services, transport, education, childcare and healthcare.

These issues are addressed below and should be considered as a matter of priority as part of the first NPF review.

2.1 Local Infrastructure Funding

While the Regeneration and Development Funds (URDF & RRDF) and other measures (e.g. CLÁR programme, Croí Cónaithe Towns Fund, TVRS etc) have been vital in resourcing certain projects in some urban settlements, the competitive bidding process between local authorities and settlements with differing requirements is not yielding the infrastructure or local developments required to support underlying population ambitions and quality of life outcomes of Project Ireland 2040, particularly for a county like Kildare that has 7 URDF qualifying settlements, each with their own specific infrastructural deficits and requirements.

Noting this, Kildare County Council is adamant that there is an acute need for dedicated funding mechanisms to be made available for local authorities to deliver essential local improvements to physical and social infrastructure, and services, in urban and rural settlements of all types and sizes. A range of local deficiencies and impediments to growth have been identified through detailed audits and assessment (incl. Social Infrastructure Audits) undertaken by Kildare County Council as part of and to inform its plan making function. For example, the Social Infrastructure Audit for the Draft Maynooth & Environs Joint Local Area Plan 2025-2031 (June 2024) identified existing deficits in the settlement and the need to potentially provide for the following critical infrastructure in conjunction with the projected population growth over the plan period:

- 1,102 additional primary school pupil places.
- 1,248 additional post-primary pupil places.
- 979 additional childcare places.
- 26 additional general medical practitioners.
- 243 bed spaces in dedicated residential care facilities for older persons.
- A new urban neighbourhood park.
- Play facilities in new residential developments, together with an additional playground in the southern part of the town.
- A new urban neighbourhood park and a Multi-Use Games Area (MUGA) in the town.
- A Municipal Sports Facility on a site of approximately 23 hectares.
- 6 additional community facilities.
- A new cemetery.

It is anticipated that such funding would assist local authorities in removing local impediments to the delivery of targeted and compact population growth, the delivery of strategic employment opportunities, recreational amenities, and the subsequent delivery of sustainable communities in existing settlements. In addition, it is considered that such funding would also contribute to the delivery National Policy Objectives (NPO) relating to:

- The application of a tailored approach to urban development, with a particular focus on addressing the legacy of rapid unplanned growth (NPO 15);
- The creation of high-quality urban places, sustainable and integrated communities and a diverse society. Achieved through the regeneration and rejuvenation of settlements, improvements to the provision of services, and

the timely delivery of childcare facilities and schools that act as a key enabler for housing development (NPO 12, NPO 39 and NPO 42);

- Sustaining vibrant rural communities and reversing decline in the core of small towns and villages, including supporting proportionate growth and regeneration (NPO 24, NPO 25 and NPO 27);
- Enhancing and protecting the value of built heritage assets through appropriate investment and conservation (NPO 26);
- The greater integration of land use and transportation planning, and promoting sustainable mobility in existing communities and future developments by prioritising walking and cycling as alternatives to the car (NSO 4 and NPO 38);
- Prioritising the provision of new homes at locations that can support sustainable development at an appropriate scale relative to location (NPO 44).
- Supporting the retrofitting of existing environments to cater for surface water run-off through the use of nature-based solutions (NPO 80).
- Focusing on the on the timely delivery of enabling infrastructure to priority zoned lands in order to deliver planned growth and development (NPO 101).

2.2 Strategic Enabling Infrastructure Co-Ordination

Whilst recognising that progress has been made since the publication of the NPF in facilitating consultation and collaborative engagement in the delivery of essential enabling infrastructure, KCC considers that the revised NPF should further reinforce (on an NPF policy and implementation basis) the need for enhanced coordination, resourcing, and co-operation at all levels, particularly between infrastructure delivery agencies/institutions/departments and local authorities.

Kildare County Council consistently and proactively engages with infrastructure delivery agencies, governmental departments and relevant institutions through statutory mechanisms and non-statutory consultation. KCC seeks to ensure that this collaborative approach is undertaken in the timely and efficient delivery of strategic enabling infrastructure to accommodate for growth, taking local considerations into account.

Notwithstanding the ongoing efforts of Kildare County Council and relevant agencies in maintaining consistent engagement, substantive difficulties remain in the delivery of functional collaboration and priority cohesion between the local authority and relevant agencies in essential enabling infrastructure to accommodate growth. It is considered that such difficulties in effective collaboration primarily arise as a result of:

- (a) Insufficient internal resourcing within local authorities and at institutional levels to facilitate coordination and collaboration from project inception;
- (b) Limited clarity from national level in relation to the coordination and delivery roles of infrastructure agencies, regional authorities and local authorities;
- (c) A focus on the use of existing statutory public consultation mechanisms as a primary form of engagement between infrastructure agencies, regional authorities and local authorities.
- (d) A lack of clear communication, monitoring and reporting mechanisms between institutions and authorities to ensure that local and regional priorities for

enabling infrastructure are efficiently identified, actioned, planned and appropriately resourced in a targeted manner.

In this regard, the revised NPF notes the reports and recommendations of the ESRI, OECD and the Expert Group for the First Revision in relation to the implementation of the NPF. All of the expert reports identify the need for the strengthening of NPF implementation and monitoring procedures through additional resourcing, greater clarity on the role and function of key stakeholders and enhanced collaboration between institutions, regional and local authorities.

Accordingly, Kildare County Council considers that the NPF should be further revised to include text which clarifies and explicitly outlines the range of reforms and actions aimed at addressing the identified constraints to the implementation of the NPF.

A particular focus should be on building capacity and enhanced co-ordination at national, regional and local authority levels in relation to the planning, timing and delivery of essential strategic and enabling infrastructure to accommodate population growth (incl. transport, water services, education facilities, flood/climate change management, etc). Any such reforms and actions should identify the key role of local authorities in implementing on the ground changes, incorporate provisions to ensure appropriate resourcing and should be underpinned by appropriate National Policy Objective(s).

3. Recommendations

In addition to, and building upon, the general observations provided above, this section provides a series of further recommendations and observations for consideration in the finalisation of the First Revision.

NPF Chapter	Recommendation
<p>Strategic Vision</p>	<ol style="list-style-type: none"> 1. As detailed in Section 2 above, there is an acute need for dedicated funding mechanisms for local authorities to proactively deliver essential physical and social infrastructure, and services in settlements of all types and sizes, where deficiencies have been identified. In this regard, a commitment to review NPF funding and resourcing mechanisms for local authorities should be included in this chapter, potentially under the '<i>Strengthened and more Environmentally Focused Planning at Local Level</i>' heading. 2. In line with its commitment to the EU Covenant of Mayors, it is considered that the revised NPF should incorporate mapping which aligns the EU Sustainable Development Goals (SDG's) with the National Strategic Outcomes. This policy mapping would also assist to implement NPO 14, as updated in the Draft First Revision, to ensure progress towards the national achievement of the UN SDGs, including aligning sustainability with subordinate policies.
<p>A New Way Forward</p>	<ol style="list-style-type: none"> 1. A new National Policy Objective should be included in the NPF to undertake a review of established funding mechanisms available for local authorities, together with

	<p>the establishment of a dedicated funding mechanism for local infrastructural improvements to enable planned population and employment growth at national and regional levels.</p> <ol style="list-style-type: none"> 2. A new bullet point should be inserted under '<i>Compact Growth</i>' in Section 2.2, referencing the provision of enhanced support for local authorities to proactively address legacy and anticipated local infrastructural deficiencies to achieve compact growth in existing settlements. 3. The revised NPF identifies a need for approximately 50,000 additional houses per annum to 2040 for the country, provides revised population figures for each region and acknowledges the "<i>significant unmet demand for housing in Dublin and the Mid-Eastern Region in particular</i>". Accordingly, the housing figures required to accommodate the desired population growth should be set out per local authority area in the updated 'Implementation Roadmap'. The roadmap should be published alongside the Draft First Revision to the NPF and be subject to a public consultation process. 4. Section 2.6 of the NPF - relating to the tackling of legacy issues through holistic social and physical regeneration, should be amended to include additional text regarding the importance of catch-up delivery of essential infrastructure in existing settlements. 5. Considering the potential for the delivery of Transport Orientated Development within the Metropolitan towns of Kildare (incl. Leixlip/Confey and Maynooth), Section 2.4 and NPO 10 should be revised to clarify that such developments will be located in appropriate settlements outside the five cities with appropriate but specific funding mechanisms provided for.
<p>Strategic Development of Ireland's Regions</p>	<ol style="list-style-type: none"> 1. The text relating to the Mid-East should be amended to include increased cross-departmental support for the relevant local authorities in addressing the legacy of rapid growth and under-investment in quality-of-life infrastructure. 2. The text in the '<i>key future planning and development and place-making policy priorities for the Eastern and Midland Region</i>' should be amended - to note that a funding mechanism will be made available to local authorities to address local community, amenity and essential infrastructure delivery.
<p>Making Stronger Urban Places</p>	<ol style="list-style-type: none"> 1. Section 4.3 and NPO 15 of the revised NPF should be amended to note that an additional funding mechanism (separate to the RRDF & URDF) will be made available to local authorities for essential local upgrades to physical and social infrastructure and services in settlements of all

	<p>scales, to enable the delivery of compact growth, infill/brownfield development and sustainable communities.</p> <ol style="list-style-type: none"> 2. Section 4.3 of the revised NPF, under the subsection <i>'Ireland's Towns'</i>, refers to the inclusion of Key Towns in NPO 15. However, it is noted that this reference to Key Towns has not been included in the wording of NPO 15. Accordingly, KCC recommends the inclusion of Key Towns in NPO 15, considering the important role of such large urban settlements in the development strategy of the NPF. 3. It is noted that the implementation of the Metropolitan Area Strategic Plans (MASPs) is not supported by any legislative framework or specific funding for essential infrastructure identified therein. The revised NPF should support the adoption of statutory and clear funding mechanisms that facilitates the co-ordinated implementation of local authority based projects within the MASPs.
<p>People, Homes and Communities</p>	<ol style="list-style-type: none"> 1. Chapter 6 of the revised NPF should include reference to the important role of local authorities in the delivery of improvements to the quality of life of citizens and healthy communities in urban and rural areas, particularly in terms of the quality of the built environment and access to social/community amenities and services. 2. Chapter 6 of the revised NPF should be amended to include reference to a dedicated funding mechanism for local authorities to proactively improve essential local social infrastructure, and services in settlements of all types and sizes to address identified legacy deficiencies and to secure the anticipated growth contained of the NPF. 3. The amendments to Section 6.5 of the NPF - relating to Childcare and Education are noted and welcomed by Kildare County Council. In this regard, a new NPO should be introduced to reinforce the need for enhanced co-ordination between DCEDIY, other relevant governmental departments and local authorities in forward planning, and in furthering the timely delivery of essential childcare and educational facilities in existing settlements (as a key enabler of housing development). 4. Considering the urgent requirement for additional childcare and educational (primary and post-primary) capacity throughout the country, a new NPO or appropriate revisions to NPO 42 should be introduced to progress urgent reviews of outdated Ministerial Guidelines for planning authorities relating to the delivery of childcare and educational facilities. Such an amendment should ensure that any review of such guidelines: <ol style="list-style-type: none"> a. Be based on a comprehensive review of historic and emerging trends of delivery (public and private), use and demographic changes. In this regard, the experience of KCC indicates that the current iteration of the Childcare Facilities Guidelines (2001)

	<p>primarily results in a pattern of new childcare facilities that are delivered on a pro-rata basis in individual new residential developments. Such a delivery pattern does not proactively address existing deficiencies in terms of childcare places or the specific childcare demands of the existing population (such as a deficiency in childcare places for very young children);</p> <ul style="list-style-type: none"> b. Incorporate methodologies for use by planning authorities and relevant agencies in auditing and assessing the existing and required capacity of a settlement based on existing and anticipated populations; c. Clearly define the role of planning authorities in the identification of capacity requirements and the delivery of such essential infrastructure; and, d. Provide for formal collaborative engagement and review procedures between planning authorities and relevant agencies where relevant. <p>5. NPO 47 – relating to the continued development of methodologies and data sources to monitor housing delivery and inform housing policy is noted and welcomed by KCC. A dedicated timeframe for the issuing of a methodology and guidance for monitoring and reporting to local and regional authorities should be established by the revised NPF.</p>
<p>Climate Transition and Our Environment</p>	<ul style="list-style-type: none"> 1. KCC notes the renewable electricity capacity allocations set out in Table 9.1. The successful implementation of this new process will be dependent on the publication, by the Minister, of clear up-to-date guidelines for local authorities relating to renewable energy and technical support. It is recommended that the revised NPF clearly outline a timeline for the delivery of such guidance. 2. Renewable electricity capacity allocations by local authority should be included in the 'Implementation Roadmap'. The roadmap should be published alongside the Draft First Revision to the NPF and be subject to a public consultation as part of the revision process. This should also be accompanied by a clear methodology for determining capacity allocations by local authority. 3. It is noted that NPO 85 relates to addressing no net loss of biodiversity as part of the plan making functions of planning authorities. Given the urgency in addressing biodiversity loss, the term '<i>No Net Loss</i>' in the NPO should be amended to '<i>Net Biodiversity Gain</i>'. In addition, the NPO should reference the important role of the development management function in the implementation and enforcement of this goal. The NPO should also be further amended to include the provision of detailed guidance and methodologies to planning authorities in relation to the

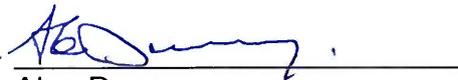
	<p>implementation and enforcement of this key environmental objective. For reference, the UK has recently introduced a statutory requirement for net biodiversity gain in planning applications, incorporating detailed guidance on assessment metrics.</p>
<p>Implementing the National Planning Framework</p>	<ol style="list-style-type: none"> 1. KCC welcomes the revised text in Chapter 10 which: <ol style="list-style-type: none"> a. Notes the co-ordination and capacity challenges in the implementation of the NPF, and b. Recognises the ESRI and OECD reports on enhancing NDP and NPF delivery, particularly in relation to governance and institutional arrangements. <p>In this regard, KCC considers that reference should be made to the recommendations of the recommendations of the Expert Group for the First Revision NPF in relation to NPF implementation.</p> 2. Chapter 2 of the NPF should include text which clarifies and outlines the range of reforms and actions aimed at addressing identified constraints to NPF implementation. A particular focus should be on building capacity and co-ordination at national, regional and local authority levels in relation to the planning, timing and delivery of essential strategic and enabling infrastructure to accommodate population growth (incl. transport, water services, flooding, etc). It is considered that any such reforms and actions should identify the key role of local authorities in implementing on the ground changes, incorporate provisions to ensure appropriate resourcing and should be underpinned by appropriate National Policy Objective(s). 3. KCC further welcomes the revised text in Chapter 10 which relates to the integration of spatial and transport planning, including the extension of legislation for transport strategies. Additional text should be incorporated to further reinforce the requirement for inter-departmental collaboration and stakeholder co-ordination regarding transport planning and infrastructure delivery. In addition, the revisions to the NPF regarding spatial and transportation planning needs to be further considered in the context of the revised legislative framework for Local Area Planning. In this regard, Area Based Transport Assessments (ABTA's) are essential in informing land use zoning and the capacity of all settlements to accommodate sustainable and appropriate growth, including in metropolitan settlements and other important Key Towns (e.g. Naas) with the capacity for enhanced growth. Accordingly, the text of the revised NPF should be further amended to consider the transport planning needs of settlements at all sizes (including reference to and support of ABTA's), ensuring equitable outcomes and the

	<p>sustainable development of varied urban and rural settlements of the country.</p> <ol style="list-style-type: none"> 4. The revised text regarding Transport Orientated Development (TOD) is also welcome noting the potential capacity for such developments in the metropolitan areas of Kildare (Maynooth and Confey-Leixlip) and along the other strategic transport infrastructure corridors in the County (e.g. DART+ Southwest). In order to capitalise on the potential of TOD, the necessary guidance, institutional and funding arrangements for TOD (as identified in NPO 95) should be prioritised for realisation and delivery. 5. KCC notes that NPO 68 of the original 2018 NPF has been replaced by NPO 92 in the draft revised NPF. NPO 68 of the 2018 NPF provided that MASP's may enable 20% of the phased population growth target in principal cities and suburbs to be accommodated in the wider metropolitan area. Such a reallocation of growth could only be achieved with local authority agreement and be in the form of compact development or sustainable urban extensions in existing settlements, that are served by high-capacity public transport and/or related to significant employment provision. This NPO and the MASP of the EMRA formed the basis for the development of the Draft Maynooth & Environs Joint LAP, being published for public consultation in June 2024. While text in Section 10.2 continues to support this principle (interrelated with the delivery of TOD), KCC considers that NPO 92 should be further revised to clearly include reference to: <ol style="list-style-type: none"> a. The capability for 20% reallocation of growth from cities and suburbs to the wider metropolitan area. b. That such growth reallocation is to be accommodated in: c. TOD opportunities along high capacity corridors, compact infill/brownfield development and sustainable greenfield settlement expansion opportunities along high capacity transport corridors. 6. Clarity needs to be provided in relation to the potential inter-relationship between NPO 17 and NPO 93 in the text of Chapter 10. 7. Considering the important role of Key Towns as drivers for
Appendices	<ol style="list-style-type: none"> 1. In reference to Appendix 2, the figures included in the revised NPF should be comparable to those in the 2018 NPF. Furthermore, the methodology for the calculation should be included in the Draft First Revision and any variation from the methodology applied in the 2018 NPF should be clearly highlighted.

4. Conclusion

Kildare County Council supports and actively seeks to deliver on the ambitions and plan led strategy of the NPF and welcomes the opportunity to engage on the first revision to the NPF. KCC trusts that the content of the submission will be considered in the finalisation of the First Revision to the NPF. KCC officials are available to discuss the matters raised in this submission and would welcomes further opportunities to engage in the statutory process of the making of the Draft First Revision of the NPF.

Yours sincerely,



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