

Tionól Reigiúnach Oirthir agus Lár-Tíre Eastern and Midland Regional Assembly

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Draft Naas Local Area Plan (LAP) 2021 - 2027

The Eastern and Midland Regional Assembly notes the publication of the Draft Naas Local Area Plan (LAP) 2021 – 2027 and sets out hereunder submissions and comments on behalf of the Assembly. This submission has been prepared by the executive and approved by the members of the Eastern and Midland Regional Assembly at the meeting of 16th April 2021.

Regional Spatial and Economic Strategy (RSES)

The Council will be aware of the finalisation of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region which was made on 28th June 2019. The RSES, prepared in accordance with the National Planning Framework, sets the context for each local authority within our Region to develop their county and city development plans in a manner that will ensure national, regional and local plans align. The RSES identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. At this strategic level it provides a framework for investment to better manage spatial planning and economic development throughout the Region.

Context

The Regional Assembly is not required under Section 27 of the Act, to prepare a submission and observations on a local area plan prepared by a local authority as is the case for development plan, or variation thereof. However the Regional Assembly considers that regionally important and strategic plans should be commented upon by the Assembly, and in this case a plan for a designated Key Town is considered as such. In this regard the Assembly makes this submission and the comments hereunder to be taken into consideration by the local authority in the making of the Naas Local Area Plan.

Submission

The Assembly would like to acknowledge the extensive work that the Local Authority has carried out in order to prepare the draft LAP and, in particular, that this work follows a period of considerable change, within a planning policy context, that included the publication of the National Planning Framework (NPF), the RSES and the establishment of the Office of the Planning Regulator. Accordingly, the Assembly welcomes the overall approach and effort of Kildare County Council to coordinate and incorporate policies and objectives, so that they are consistent with the RSES and NPF.

It is recognised that this draft LAP is being published in the midst of a County Development Plan review process for the plan period 2023-2029 where adoption is expected in early 2023. Ideally there would be a cascade of plan making as articulated in Figure 2.2 Hierarchy of Spatial Planning

Context and that the local area plan making would follow the adoption of the County Development Plan. However given the context of the previous draft local area plan for Naas 2019-2023 which was not made by the local authority, there is a requirement for a LAP for this Key Town, as the previous land use plan was the Naas Town development Plan 2011-2017. To ensure that there is primacy of policy making in the development plan, and a top – down consistency of policy making, objective CDP 1.1 is welcomed and supported by the Assembly to commit to Align the LAP, if necessary, to the Kildare County Development Plan 2023 – 2029, by way of a statutory amendment to the Local Area Plan.

1.0 Context and Vision for the plan

The draft LAP sets out the policy context for the preparation of the plan and welcome reference is made to the spatial planning context of Project Ireland 2040 – National Planning Framework and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region. It is further strengthened by replication of the relevant RSES Map and Regional Policy Objectives, RPOs 4.48-4.53 refers, which establish the policy framework for the draft LAP.

The Vision for Naas consisting of Guiding Principles of Seven Core Themes is clear and strategic and well presented. The key priorities of the plan expressed in the themes, such as Core Regeneration Areas, the Key Development Area and in the longer-term vision to the Northwest Quadrant, are welcomed. In this regard a key driver of the draft LAP should be the integration of the “employment arc” into the town and improved connectivity and accessibility, it is considered that the long term delivery of the Northwest Quadrant in a planned fashion, can achieve this aim.

Whilst Environment and Climate Change is a specific theme the vision and these strategic element of the draft plan would benefit from a demonstration of response to Climate Change and protection of Biodiversity across all seven core themes.

2.0 Consistency with the RSES

The current Kildare County Development Plan 2017-2023 was varied in 9th June 2020 by way of Variation No.1 to ensure consistency with the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region. In accordance with the RSES this Variations designated Key Towns of Naas and Maynooth – large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres. The adopted Variation also stated that Kildare County Council will prepare Local Area Plans for Naas and Athy to provide more detailed planning policies for these areas. This formed the basis for the draft Local Area Plan (LAP) that is currently placed on consultation.

The growth target for Naas is set out in the Kildare County Development Plan 2017-2023 (as amended) under Table 3.3 Settlement Hierarchy – Population and Housing Unit Allocation 2020-2023, as a target increase of 5,866 persons from 2016 to the year 2026 and a dwelling target of 2,095 units to 2026. This is reflected in Table 3.2 in the draft LAP, and further extrapolated to 2027 (as the LAP plan period) using an annualised figure. This is then converted to housing units using the same approach as the Kildare CDP. The population targets set out here are consistent with the Kildare County Development Plan 2017-2023 (as amended) and the transitional population

projections in the Implementation Road Map for the NPF, issued under DHPLG Circular FPS04/2018. This is further enhanced by the welcome inclusion of Objective CSO 1.2 to monitor constructed and permitted development to ensure compliance with the core strategy.

With regard to the approach to new residential zoning and the compact growth requirements expressed in NPO 3(c) and RPO 3.2 of at least 30% of new housing, has been well addressed. The Sustainable Planning and Infrastructural Assessment that accompanies this draft LAP is a well considered approach to the determination of zoned lands and is welcomed by the Assembly as it is a reflection of the asset based approach promoted in the RSES. It would also accord with NPO 72(a) and Appendix 3 of the NPF, where the Local Authority is required to set out a tiered approach to land use zoning. Furthermore the strategic approach to designate the land within the Northwest Quadrant as Strategic Reserve is welcomed and can allow for the comprehensive and sustainable long term approach to the realisation of these lands which can connect the significant employment lands in the edge to the town centre, RPO 4.48 refers.

3.0 Housing Approach

Table 3.2 in the draft LAP replicates the approach taken in the existing County Development Plan for conversion of population targets to housing units, using a household size of 2.8. Table 3.4 then takes into account units built since 2016 and extant permissions (planning permissions which have the potential to be implemented or completed during the life of the Plan). It also takes into account housing need by way of social housing that has been delivered, and unmet housing demand currently in the town. This approach of including an estimate of unmet housing demand would be consistent with the approach taken in the recent 'Housing Supply Target Methodology for Development Planning' issued as Guidelines for Planning Authorities under Section 28 of the Planning and Development Act, 2000 (as amended) in December 2020. Finally the draft LAP includes an Estimated Residential Capacity of Lands Zoned New Residential – Table 3.5 refers.

It is noted that the full implications of these recent section 28 Ministerial Guidelines have not be incorporated into the compliance with core strategy chapter of the draft LAP. As stated above the County Development Plan is currently under review and the hierarchy of plans above this draft LAP have not incorporated these Guidelines so they cannot be fully incorporated here.

4.0 Integration of Land Use and Transport

The draft LAP has been heavily informed by The Naas/Sallins Transport Strategy and its inclusion in the consultation documents is welcomed. The interventions and solutions to improve conditions for active modes, and public transport are supported. To ensure a sustainable and integrated transport system for Naas that address the car dominated movement patterns and puts a focus on walking, cycling and accessibility.

The transport interventions should be proofed against the Guiding Principles contained in Chapter 8 - Connectivity as required in RPOs 8.1 and 8.4, which require that land use plans within the GDA demonstrate consistency with the NTA's Transport Strategy for the Greater Dublin Area (currently under review), and with the Guiding Principles for Integration of Land Use and Transport set out in Section 8.3 of the RSES.

5.0 Other Comments

5.1 Enterprise and Economic Uses

The Assembly welcomes the approach as part of which considers both existing land use zoned for employment purposes, and the requirement for additional employment lands based on projected population, job ration and employment growth. Furthermore the use of the Sustainable Planning and Infrastructural Assessment is welcomed as is the identification of a masterplan led approach for Key Development Areas.

This approach could be further enhanced by cross reference to the Guiding Principles for the location of strategic employment and investment prioritisation (RSES Section 6.3) which include access to; suitable locations (depending on whether an enterprise is people or space intensive); serviced sites (energy, water, transport, communications networks); connectivity (including access to international markets via an airport/port); skilled labour force (proximity to third level and lifelong learning) and; local strengths (a diverse sectoral mix, research and technology centres, start-up incubators, emerging clusters or value chains). In particular the Guiding Principles should be considered as part of the decision on the location of additional commercial lands in peripheral locations therefore it is recommended that justification of same be stated as part of the LAP and .

5.2 Retail

It should be noted that RPO 6.11 of the RSES requires that future provision of significant retail development shall be consistent with the Retail Planning Guidelines for Planning Authorities 2012. Guiding Principles for Integration of Transport and Landuse also require the location of trip intensive developments such as large-scale retailing in accessible locations well served by high quality public transport. In this regard it is welcomed that EDO3.2 validates the sequential approach and this should be further emphasised with regard to the existing out of centre retail locations to protect the viability of the retail core.

5.3 Strategic Environmental Assessment (SEA) /Appropriate Assessment (AA)

The Assembly welcomes the preparation of the draft CDP in tandem with the required environmental processes, namely Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA).

The SEA environmental report states that the draft LAP was screened and then subject to scoping in advance of the preparation of the environmental report. The report itself sets out the iterative process to date including an assessment of the overall environmental effects arising from the draft LAP to provide a clear understanding of the likely environmental consequences of decisions arising from the LAP.

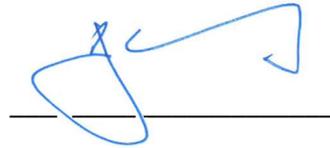
The draft LAP is subject to Appropriate Assessment (AA) and a Screening Determination has been prepared, it concluded that the draft LAP is not foreseen to give rise to any significant effects on designated European Sites, alone or in combination with other plans or projects. The AA process is ongoing and will inform and be concluded at adoption of the LAP.

Conclusion

It is considered that the Draft Naas Local Area Plan (LAP) 2021 – 2027, is generally consistent with the Regional Spatial and Economic Strategy (RSES) 2019-2031, and would be further enhanced by addressing the recommendations and observations set out above.

It should be noted that the officials of the Regional Assembly are available to discuss the matters raised above and The Assembly welcome further opportunities to engage in the statutory process of the making of the Draft Naas Local Area Plan.

Regards,



Jim Conway
Director
Eastern and Midland Regional Assembly
19th April 2021