

16th October 2025

Senior Executive Officer,
Planning Department,
Kildare County Council,
Áras Chill Dara,
Naas,
County Kildare.

Re: Proposed Variation No. 2 to the Kildare County Development Plan 2023-2029
(Newbridge Settlement Plan)

A chara,

Thank you for your authority's work in preparing the Proposed Variation No. 2 (proposed Variation) to the Kildare County Development Plan 2023-2029 (County Development Plan).

As Kildare County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The Office has evaluated and assessed the proposed Variation under the provisions of sections 31AM(1) and 31AM(2) of the Planning and Development Act 2000, as amended (Act) and this submission has been prepared accordingly.

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. Planning authorities are advised by the Office to action an observation.

A submission also can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. Planning authorities are requested by the Office to give full consideration to the advice contained in a submission.

On adoption of the Variation, the Office will consider whether the plan has been made in a manner consistent with the recommendations of the Office and whether the plan sets out an overall strategy for the proper planning and development of the area concerned.

Overview

The Office commends the extensive preparatory work carried out by the Planning Authority to inform the proposed Variation. This includes a Settlement Capacity Audit (SCA), a nature-based solutions study, Surface Water Management Strategy (SWMS), a Social Infrastructure Audit and a Habitat Mapping Report for Newbridge and Environs as well as the necessary statutory environmental screenings and reports.

In particular, the Office welcomes the detailed and logical approach the Planning Authority has taken with the SCA for housing lands and furthermore notes and welcomes the inclusion of a similar approach to Employment lands in Newbridge. It is also noteworthy that the proposed Variation has a strong focus on regeneration and compact growth principles, addressing vacancy and promoting a Town Centre First approach. The Office welcomes also the Urban Design Frameworks for the Newbridge Central Settlement Consolidation Site, Littleconnell strategic employment area, Greatconnell North Key Development Area and Newbridge North Key Development Area.

The Office also supports the emphasis placed on the provision of social, community and educational infrastructure in the SWMS and consideration of how the scale of requirements and phasing of such facilities shall integrate and be delivered in Newbridge.

Similarly, the Office also commends and supports the focus on active travel measures and objectives in the proposed Variation, of particular note are the School Safe Zones identified outside all schools, Transport Mobility Hubs, Key Destination Hubs, and Local Interchange Hubs, new active mode bridges, cycle path measures and bicycle parks, and a park and stride facility. The proposed Variation has also proposed a number of positive road and parking objectives including MATO 4.4 promoting car free or low car developments in opportunity sites in the Newbridge Central Settlement Consolidation Site and MATO 4.6

providing car sharing schemes integrating appropriate space for new residential developments.

In general, the Office commends the legibility and coherence of the proposed Variation, which is logically set out and links well to various documents, maps and appendices.

The Office notes that this is a transitional variation, and acknowledges the challenges involved in co-ordinating this process with the separate variation to apply the recent section 28 guidelines for the National Planning Framework First Revision (2025) (NPF) Implementation relating to the revised housing growth requirements.

Reflecting these changes to the policy context, the Office has made a recommendation in relation to the quantum of New Residential Phase 1 housing lands in light of the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Requirements).

The Office also makes a recommendation regarding the provision of the Newbridge Area Based Transport Assessment (NABTA) information, modal share targets, identification of active travel measures on the Implementation Map and other site-specific issues at North Newbridge Key Development Area and Crostanstown.

Finally, the Office has raised a number of matters to be addressed relating to flood risk management, including the need to provide an accurate map depicting the Flood Zones based on current risk within appendix A of the proposed Variation, the wording of the Plan Making Justification Test (Justification Test) for managing flood risk and the need for the identification of a watercourse and flood extents at Littleconnell Strategic Employment Area.

The submission below has been prepared to provide a strategic level input to your authority in finalising the proposed Variation. It is within the above context that the submission sets out three [3] recommendations under the following key themes:

Key theme	Recommendation	Observation
Consistency with core strategy and housing requirements	Recommendation 1	-
Integrated transport and land use planning	Recommendation 2	-
Flood risk management	Recommendation 3	-

1. Consistency with core strategy and housing requirements

The proposed Variation clearly sets out the context for housing and population growth in Newbridge against the core strategy of the County Development Plan, including details of housing completions, extant permissions and current applications for planning permission. This analysis demonstrates that housing delivery in Newbridge has successfully met the targets set out in the core strategy, providing for compact and sustainable growth in a self-sustaining town on a public transport rail corridor.

The proposed Variation to provide a development framework for Newbridge up until 2028, including the zoning of lands for housing, is being carried out alongside a future variation to implement the Housing Growth Requirements (NPF Variation). The Office notes that the timeframes for the preparation of both variations is likely to align at the material alterations stages, and would therefore encourage the Planning Authority to reconsider the need for phasing at this point in time, and instead rezone the Residential Phase 2 lands as Phase 1 in order to provide flexibility in delivery of sites to meet the housing growth requirements as set out in the Housing Growth Requirements.

The Office also considers that the strategic reserve lands at Morristown and Crostanstown are generally well located to provide for a compact and sustainable growth with provision made for services and facilities such as schools, neighbourhood centre, and amenities in the vicinity. The Planning Authority should therefore reconsider the strategic reserve zoning of these lands in the context of the future NPF Variation and to facilitate the on-going pipeline for housing delivery.

Recommendation 1 - Residential zoned land

Having regard to need to provide sufficient housing lands and growth for Newbridge and the provision of new homes at locations that can support compact growth and sustainable development:

- NPO 3, NPO 9 of the NPF;
- RPO 3.1, RPO 3.2 of the RSES;
- the policies and objectives of the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Requirements); and

- section 6.2.3 of the Development Plans, Guidelines for Planning Authorities (2022);

the Office recommends that the Planning Authority:

- (i) amends the zoning objective for the Residential Phase 2 lands to the Northwest of the train station to Residential Phase 1 lands to ensure a sufficient quantity and flexible landbank of housing lands to meet the Housing Growth Requirements; and
- (ii) amends the Strategic Reserve zoning of the lands at Morristown and Crotanstown to Residential Phase 2 lands to facilitate the on-going pipeline for housing delivery, particularly where the housing delivery is coordinated with existing and proposed facilities to serve the needs of future residents.

2. Integrated transport and land use planning

The Office notes the high levels of car dependency for County Kildare generally, 74% in the County Development Plan and in particular 58% of Newbridge residents drive to work according to Census of Population 2022 and the severance challenges for active travel highlighted in the SCA including the railway line, River Liffey and M7 motorway.

The growth of the town in recent years has, however, been successful in supporting compact growth and consolidation with the in existing built-up area. The location of the train station in the town and the opportunities for the medium and long-term growth of the northern area of the town mean that there are clear opportunities to support sustainable mobility and a reduction in the modal share for car journeys. The Office therefore welcomes the target reduction for car dependency travel is to reduce by 7% for work trips by Census of Population 2040 or a reduction of 2.6% per annum within the plan period.

The Office welcomes the preparation of a NABTA in the SCA and the proposed Variation, however, a copy of the document has not been attached to the proposed Variation. Therefore, in the interest of transparency, the Office would recommend such document to be attached as an appendix to the proposed Variation.

Similarly, the Office notes the proposed Variation does not include a modal split baseline or target figures for other modes of active travel. As such, in order to provide clarity and promote modal shift for the town, the Office recommends that current baseline figures and

increased targets for walking, cycling and public transport are included within the proposed Variation.

While the Office welcomes the variety of active travel measures and proposals included within sections 7.5 and 7.6 of the proposed Variation and the associated maps within appendix A, the Implementation Map at the end of this appendix does not demonstrate how these interventions integrate with new land use zonings in the proposed Variation. Similarly, in the interests of providing transparency and clarity, the Office recommends that key short and medium-term active travel measures, including accessibility to public transport, are included on a separate Implementation Map alongside the new proposed key land use zonings for Newbridge. The Office also notes several transport measures are indicated outside the plan boundary and therefore in the interests of clarity, the Office has requested further information on the clarity of their status.

The Office also notes that the Variation proposes a number of new Education zonings: to the north periphery of the settlement at North Newbridge Key Development Area a post primary school, and to the south a new primary school at Crotanstown. Furthermore, the Variation proposes new sporting facilities and community facilities at North Newbridge Key Development Area and a new neighbourhood centre and sporting facilities to the south at Crotanstown. Further consideration should therefore be given to measure to link the proposed Education, Community and Neighbourhood Centre zonings with existing and future new housing provision to the south of the town. As such, the Office recommends a review of the proposed active travel measures adjoining new education sites at North Newbridge Key Development Area and to the south at Crotanstown to ensure that sufficient and positive patterns of movement are planned and integrated with the wider existing and proposed active travel network.

The Office notes a proposed circular bus route on appendix A Map Transport and Movement Public Transport measures and is aware that the National Transport Authority will be developing a new route to permeate and make further connections throughout the network. As such, the Office recommends that key areas of employment, such as the Littleconnell Strategic Employment Area, are included with any future proposals for bus service to the north of the town.

Recommendation 2 - Integrated Transport and Land Use Planning

Having regard to the integration of land use and sustainable transport and in particular to:

- NPO37, NPO69, NPO93 of the NPF;
- RPO 8.1 of the RSES;
- Policy Objectives and actions TMP2 and TMA2 of the Kildare County Development Plan 2023-2029 to prioritise and promote the development of high quality and sustainable walking and cycling routes; and
- the Climate Action and Low Carbon Development Act 2015, as amended, mandatory target to reduce greenhouse gas emission by 51%, the Climate Action Plan 2025 and associated actions including the National Sustainable Mobility Policy (2022) targets to reduce vehicle kilometres travelled per year and the National Investment Framework for Transport in Ireland (2021),

the Office recommends that the Planning Authority:

- (i) attaches the Newbridge Area Based Transport Assessment as an appendix to the proposed Variation No. 2 (proposed Variation) to the Kildare County Development Plan 2023-2029;
- (ii) includes mode share active travel table and targets for Newbridge with an effective monitoring programme;
- (iii) identifies the short to medium term active travel measures highlighted in tables 7.1, 7.2, 7.3, 7.4 and associated maps in a separate Implementation Map in tandem with New Housing, Industrial, Economic Development, Education and Community zonings;
- (iv) clarifies the status of proposed transport and movement measures located outside the proposed Variation plan area identified at table 7.2 and map 7.1 and 7.2;
- (v) reviews and identifies need for future active travel measures to integrate a proposed post primary school E (4), Community/Sporting facilities F (2), E (4) and Open Space zoning F (3) at North Newbridge Key Development Area to ensure

improved accessibility to the wider active travel network and existing and future housing provision;

(vi) reviews and identifies need for future active travel measures to integrate a proposed primary school E (1), accessible community facility E (2) and new neighbourhood centre N (2) at Crotanstown to ensure improved accessibility to the wider active travel network and with existing and future housing provision; and

(vii) includes key employment areas such as the Littleconnell Strategic Employment Area within any future discussions and proposals for new bus routes for Newbridge.

3. Flood risk management

The Office notes the Strategic Flood Risk Assessment (SFRA) of the County Development Plan has informed the proposed Variation.

In regard to flood risk management, the Office is concerned that the proposed Variation is restricted to one Justification Test to cover the town of Newbridge, and plan justification tests should be an assessment for each zoning and scenario within the plan which may be subject to moderate or high risk of flooding in the proposed Variation. The Office also notes that the Justification Test, part 1. table 3-4 of SFRA for Newbridge, is not consistent with Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines). Each criterion of the Justification Test must be satisfied for a zoning to be considered justified. Should any of the criteria outlined in Box 4.1 of the Flood Guidelines have not been satisfied, the Justification Test has not been passed.

Furthermore, as set out in criteria 3 of the Justification Test, as part of the development plan process, a flood risk assessment to appropriate detail must have been carried out for the relevant zoning to demonstrate that the use or development of the lands will not cause unacceptable adverse impacts elsewhere. The approach used in the Justification Test of the proposed Variation, which is to redirect this as a requirement for an SFRA at the development management stage, is not consistent with this requirement. Therefore, the Office concludes that these requirements should be reviewed and amended accordingly in the proposed Variation.

The Office also notes that a watercourse located within the Littleconnell Strategic Employment Area to the north-east of Newbridge has not been identified on the Flood Risk Map or SFRA within the proposed Variation and as a result, the Flood Zones A and B identifying potential risk have also not been identified or fully considered. The Office would therefore recommend the SFRA and Variation maps are amended and if necessary, a further review of this site carried out to ensure the necessary flood risk extents are identified and considered for the various land use zonings as proposed.

Recommendation 3 - Flood risk management

Having regard to flood risk management, and in particular to:

- NPO 78 of the NPF;
- RPO 7.12 of the RSES to avoid inappropriate land use zonings and development in areas at risk of flooding;
- Policy Objective IN033 of the Kildare County Development Plan 2023-2029 to manage flood risk in the county in accordance with the sequential approach and requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines) when preparing plans; and
- the Flood Guidelines,

the Office recommends that the Planning Authority:

- (i) provides additional Plan Making Justification Test (Justification Test) for various land zonings and scenarios to determine appropriateness and assessment of moderate or high risk of flooding in the proposed Variation area;
- (ii) reviews approach for and wording text for the policy objective for Justification Tests, part 1. table 3-4 of SFRA for Newbridge, to replicate the requirements for Justification Test as set out in the Flood Guidelines; and
- (iii) amends maps in Strategic Flood Risk Assessment (SFRA) and appendix A to identify the watercourse and floodplain transversing the Littleconnell Strategic Employment area and review relevant technical data to inform SFRA and existing and proposed land use zonings affected by Flood Zone A and B within the Littleconnell Industrial zoning.

Summary

The Office requests that your authority addresses the recommendations outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 13 of the Act must summarise these recommendations and the manner in which they will be addressed.

At the end of the process, your authority is required to notify this Office within **five working days** of the decision of the Planning Authority in relation to the proposed Variation. Where your authority decides not to comply with the recommendations of the Office or otherwise makes the plan in such a manner as to be inconsistent with the recommendations made by this Office, then the Chief Executive shall inform the Office and give reasons for this decision.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through plans@opr.ie.

Is mise le meas,

A handwritten signature in dark ink, appearing to read 'AM O'Connor'.

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015