

27th November 2025

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

Re: Proposed Variation No. 3 to the Kildare County Development Plan 2023-2029

A chara,

Thank you for your authority's work in preparing the Proposed Variation No. 3 (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 Variation has been made in a manner consistent with the recommendations of the Office and whether the Variation sets out an overall strategy for the proper planning and development of the area concerned.

Overview

The Office notes that the proposed Variation includes changes to the County Development Plan to apply section 28 guidelines published by the Department of Housing, Local Government and Heritage, specifically the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines), Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024), and Design Standards for Apartments, Guidelines for Planning Authorities (2025).

The Housing Growth Guidelines require planning authorities to vary their development plans to reflect the housing growth requirements set out in the first appendix to the Housing Growth Guidelines and to provide for additional provision in terms of residential zoned land.

Furthermore, the recently published housing plan, Delivering Homes, Building Communities 2025-2030, emphasises the need for a strong pipeline of zoned and serviced land to support the delivery of 300,000 new homes to 2030, stating:

...Government will ensure that new homes are built in the right locations, with the necessary services and community facilities in place, in keeping with our climate action goals, and the wider spatial growth of the State.

The Office commends your authority on the clarity and quality of information provided as part of the Variation process. It is clear that a transparent and evidence-based approach has been followed. The proposed Variation also appropriately identifies long-term and strategic and sustainable development sites at Confey and Naas Northwest Quadrant. These lands are well-located to facilitate the urban expansion of the existing towns, and in the case of Confey with a particular focus on accessibility to a high-quality rail corridor.

Based on the information provided, the Office notes that the proposed Variation provides for the relevant housing growth requirements, including additional provision at the county level. However, at the level of individual settlements, the Office observes that housing delivery will be constrained in certain settlements in the short-term due to significant site-specific infrastructure constraints. This issue is particularly evident in Leixlip/Confey and Celbridge. While the Office is aware of the efforts of your authority to actively address these issues, this does mean that housing delivery on these lands is unlikely to be completed within the plan period.

Reflecting these circumstances, the Office makes a recommendation to align with the Housing Growth Guidelines, which emphasise the need to focus on the likelihood of lands identified for residential development coming forward for development within the remaining period of the plan. For example, the Office recommends that the Planning Authority consider options to facilitate short-term housing delivery, including zoning additional lands in certain settlements, and making all Phase 2 Residential lands available for development

Additional amendments proposed as part of the proposed Variation include changes to the density ranges, car and cycle parking standards, public and private open space requirements, unit mix, overlooking and overshadowing policies, and separation distances. The Office is satisfied that these development management amendments are consistent with the relevant section 28 guidelines. In addition, the Office welcomes the inclusion of objective CS O25 to ensure that all future settlement plans identify categorised areas for the purposes of identifying appropriate residential density.

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 one (1) recommendation under the following key theme:

Key theme	Recommendation	Observation
Implementation of the housing growth requirements	Recommendation 1	-

1. Implementation of the housing growth requirements

The Office notes table 2.4B of the proposed Variation which sets out a housing growth requirement of 12,398 units to the end of the plan period, including 50% additional provision. This is consistent with the Housing Growth Guidelines and is welcomed by the Office.

The Chief Executive's Report, prepared prior to publication of the proposed Variation, indicates that sufficient undeveloped New Residential zoned lands exist within the county to accommodate approximately 13,795 units over the remaining plan period, thereby meeting the stated housing growth requirement.

The proposed Variation introduces supplementary core strategy tables (tables 2.8A and 2.8B) which identifies a total of 7,826 units for short, medium, and long-term delivery. However, it would appear that lands at Celbridge (Simmonstown and Ballyoulster) and Leixlip (Confey) have been double-counted and should not form part of the proposed additional capacity figure, and this should be reviewed or clarified.

Regardless, the Office has practical concerns regarding the deliverability of certain lands due to significant transport and access infrastructural constraints in Celbridge (Simmonstown and Ballyoulster), as identified in the Settlement and Site Capacity Audit submitted with the proposed Variation. Similarly, in Leixlip/Confey the Confey lands are identified as long-term strategic and sustainable sites subject to a future designation of an Urban Development Zone (objective CS O32). These circumstances mean that it is unlikely that these lands will come forward within the current plan period. Consequently, there appears to be limited capacity for additional residential development in these settlements in the short- term.

Where the Planning Authority considers that lands may not come forward for development within the remaining period of the plan, the Housing Growth Guidelines (section 3.1) state that it may be necessary to consider the zoning of alternative lands where there is capacity to deliver housing in the short to medium-term.

Accordingly, the Office recommends that the Planning Authority consider options to bridge this delivery gap until these constrained lands become available. This may include zoning additional residential lands that are not so infrastructurally constrained, or specifying opportunities for parts of these landbanks to be brought forward earlier.

The Office welcomes the identification of additional zoned lands as part of the proposed Variation, along with the supporting objectives to release these lands on a phased basis (objectives CS O29, CS O30, and CS O31).

In particular, objective CS O29 provides for the immediate release of Phase 2 Residential lands, which are stated to have capacity for 1,921 units. However, based on the Settlement and Site Capacity Audit accompanying the proposed Variation, the Office has concerns regarding the immediate delivery of lands identified in Kildare Town (Ruanbeg and Southgreen) due to infrastructural constraints, such as access through third party lands, road improvements, and water supply. Furthermore, lands at Blessington/Tipper Road in Naas are already under construction and therefore do not provide additional residential capacity. In this context, the Planning Authority should review opportunities to similarly release Phase 2 Residential lands in other settlements to increase the likelihood of residential development coming forward over the remaining period of the plan.

The Office also notes objectives CS O30 and CS O31, which propose the release of additional lands for residential development in Athy, Monasterevin, Kilcock, and Sallins through the review and preparation of settlement plans. While the Office appreciates the need for resources to prepare these plans, the Planning Authority should set out timeframes for the plans that reflect policy and objective 3 of the Housing Growth Guidelines to ensure that the objectives of these guidelines are incorporated within development plan as quickly as possible.

Recommendation 1 - Implementation of the Housing Growth Requirements

Having regard to the need for development plans to be updated to reflect the new requirements of the National Planning Framework First Revision (2025) (NPF) in respect of housing, and in particular to:

- NPO 42 of the NPF to target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2042;
- NPO 43 of the NPF to prioritise the provision of new homes at locations that can support sustainable development; and

- the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines), including policy and objective 3 to incorporate the objectives of the Housing Growth Guidelines within development plans,

the Planning Authority is recommended to:

- (i) revise tables 2.8A and 2.8B to omit or clarify the inclusion of lands at Celbridge (Simmonstown and Ballyoulster) and Leixlip (Confey) in the calculation of the capacity of residential zoned lands;
- (ii) taking account of the likelihood that the lands identified for residential development in Celbridge and Leixlip/Confey will not come forward for development for the remaining period of the Kildare County Development Plan 2023-2029, consider zoning additional residential lands that are not so constrained, or specifying opportunities for parts of these landbanks to be brought forward earlier;
- (iii) revise objective CS O29 to release Phase 2 Residential lands in all settlements viable for development; and
- (iv) revise objective CS O30 and CS O31 to include a timeframe for the timely review of the settlement plans for Athy, Monasterevin, Kilcock and Sallins to ensure residential delivery within the remaining development plan period.

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 recommendation 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
