



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

9th March 2026

Senior Executive Officer,
Planning Department,
Kildare County Council,
Áras Chill Dara,
Naas,
County Kildare,
W91 X77F.

**Re: Proposed Material Alterations to Proposed Variation No. 3 of the Kildare County
Development Plan 2023-2029 (as varied)**

A chara,

Thank you for your authority's work in preparing the proposed Material Alterations (material alterations) to the proposed Variation No. 3 (proposed Variation) of 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 accordingly¹.

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

¹ Chapter 5 of Part 3 of the Planning and Development Act 2024, which relates to the preparation of development plans and variations by planning authorities and the assessment by the Office, was commenced on 31st December 2025. However, section 69(2) provides that the variation of a development plan under section 13 of the Act of 2000 shall continue under that Act after the repeal of section 13 of the Act of 2000.

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.

Response to Office's submission on proposed Variation

The Office acknowledges the extensive work undertaken by the Planning Authority in addressing the issues raised in the Office's submission on the proposed Variation, as well as the clarity provided in the Chief Executive's (CE's) Report.

In its submission, the Office recommended that the Planning Authority explore options to ensure sufficient short-term development opportunities for housing delivery. These options included zoning additional residential lands that are not subject to infrastructural constraints and identifying parts of existing landbanks that could be advanced earlier.

The Office therefore welcomes the proposal to zone additional land for residential development, facilitating the delivery of approximately 2,300 additional homes. This includes land to accommodate a further 1,300 residential units in Leixlip, Kilcock, Sallins, Clane and Blessington in locations that support compact and sequential growth. When combined with the lands previously proposed under the Variation, this approach will enable the provision of 7,722 additional homes specifically in response to the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines).

In relation to Recommendation 1(i) of its submission to the proposed Variation, the Office welcomes the proposal to rezone the Phase 1a lands at Leixlip (Confey) to facilitate the

immediate development of 450 homes in advance of the Urban Development Zone (UDZ) process. The Planning Authority's response in respect of Celbridge is addressed further below, however the Office remains firmly of the view that additional residential zoned lands should be zoned to ensure that a sufficient supply of zoned and serviced land is available to support housing delivery in the settlement.

In relation Recommendation 1(ii) of the Office's submission to the proposed Variation, as noted above, the Office welcomes the proposed rezoning of additional New Residential lands in Clane (251 units) and Blessington (100 units). In relation to lower tier settlements, the Office notes the Planning Authority's approach in providing a balanced and proportionate delivery of growth across the county by focusing on proposed New Residential zonings in undeveloped lands in Villages and Settlement expansion areas in Rural Settlements. Approximately 35 ha of land has been identified, with the potential to deliver over 1,000 residential units. With the exception of the flood-risk concerns identified below in relation to Kildangan (MA 21), the Office has no objections to these proposals.

The Office also welcomes the commitment to prepare a Masterplan for the Naas Northwest Quadrant in 2026 and to incorporate it into the County Development Plan by way of a variation. This will establish a robust planning framework to guide any subsequent UDZ process, including the delivery of necessary infrastructure, and will offer greater clarity and certainty for the medium-term development of this strategically important area.

Turning to Recommendation 1(iii) (Phase 2 lands) of the Office's submission to the proposed Variation, the Office notes the response of the Chief Executive which clarifies that the only Phase 2 lands which cannot be developed in the short-term are the recently zoned Transit-Orientated Development lands in Maynooth, which will be phased and delivered in tandem with the delivery of both DART+ West and Maynooth West Train Station. As such, the Office is satisfied with the Planning Authority's explanation at this point in time having regard to the infrastructure dependencies and the opportunity to review this zoning objective as part of the forthcoming review of the County Development Plan.

In relation to Recommendation 1(iv) (Settlement Plans) of the Office's submission to the proposed Variation, the Office welcomes and notes MA 5, Objective CS O31, which confirms the Planning Authority's commitment to the preparation of a number of settlement plans including Monasterevin, Kilcock and Sallins for Q1 and Q2 2026.

Overview – Other Material Alterations

In relation to other material alterations proposed, the Office is seeking clarification and minor modifications relating to the table 2.8A Core Strategy Supplementary Tables for revised National Housing Growth Requirements (2025) and further consideration of a number of proposed alterations to policy objectives on housing densities, as well clarification on the rural local needs criteria and the rationale for the rural node redesignation at Newtown.

The Office has also identified matters regarding flood risk management which should also be addressed prior to the adoption of the proposed Variation.

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 two (2) recommendations and one (1) observation under the following key themes:

Key theme	Recommendation	Observation
Implementation of the housing growth requirements	MA Recommendation 1	-
Flood risk management	MA Recommendation 2	-
Rural housing and settlement hierarchy	-	MA Observation 1

1. Implementation of the housing growth requirements

The Office notes the response in the CE's Report to its recommendation that the Planning Authority re-examine the need for additional residential zoned lands in Celbridge given the limited capacity for short-term housing delivery on existing uncommitted zoned land.

MA 5 (Objective CS O31) indicates that a settlement plan for Celbridge is to be prepared in 2026. As outlined above, the Office remains firmly of the view that additional residential zoning will be required as part of this process. Furthermore, while the Office appreciates the resource constraints within the Planning Authority and the commitment to also prepare settlement plans for Monasterevin, Kilcock and Sallins, it is considered essential that a clear and accelerated timeline should be provided for the completion of the Celbridge settlement plan, noting that it is to be incorporated into the County Development Plan through a variation process.

As part of the material alterations process, the Office notes and acknowledges the revisions to the table 2.8A Core Strategy Supplementary Table for revised Housing Growth Requirements (2025) at MA 3 to include the additional zoned lands. However, there appears to be an anomaly with the revision to table 2.8B indicating Short to Long term Strategic and Sustainable Development Sites Additional Provision. Given that Northwest Quadrant in Naas and Leixlip/Convey phases 1b and 2 are not available for release as part of the proposed Variation, this table should be amended to Medium to Long term accordingly. The recommendation below also includes a number of other minor modifications to provide clarity regarding table 2.8A Core Strategy Supplementary Tables for revised National Housing Growth Requirements (2025) .

In relation to MA 6 which proposes to further amend section 3.10 of the County Development Plan relating to housing densities, while the Office appreciates the aspiration of providing further flexibility for housing densities within particular scenarios and possible exceptions in the county at MA 6, the Office is concerned this may be misinterpreted and undermine national policy guidelines set out in Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) (Compact Settlements Guidelines). The density ranges set out in these guidelines make provisions for local site circumstances and exceptions and therefore, no clear justification has been provided as to why due account has not been taken of the Compact Settlements Guidelines. Therefore, the Office is recommending that the Planning Authority make a minor modification to MA 6 to include reference to the specific relevant sections of the Compact Settlements Guidelines.

MA 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;

- 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; and
- Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024),

the Planning Authority is recommended to:

- (i) make minor a modification to MA 5 Objective CS O31 to provide a clear and accelerated timeline for the completion of the Celbridge settlement plan / Variation to the Kildare County Development Plan 2023-2029;
- (ii) make a minor modification to the title of table 2.8b from 'Short to long term' to 'Medium to long term' in order to provide clarity regarding the timeframes for housing delivery on zoned lands;
- (iii) make minor modifications to clarify MA 3 table 2.8A Core Strategy Supplementary Table for revised Housing Growth Requirements (2025) and amend housing provision of 480 units from Strategic Reserve to New Residential for Athy and update the overall additional housing provision to 7,722 units and include the estimated additional 1000 residential units to lower tier settlements as part of this Variation;
- (iv) make a minor modification to MA 2 table 2.8 Core Strategy Table or MA 3 2.8A Core Strategy Supplementary Table for revised Housing Growth Requirements (2025) to include additional lands for New Residential zonings in Village and Rural settlements in the county; and
- (v) make a minor modification to MA 6 to amend wording to omit the text in red and include the text in green below:

*Where it can be demonstrated that an imbalance of housing typologies exists within a settlement, lower densities **within the density ranges set out in the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities 2024, 3.3.3 - 3.3.6 may be considered.** ~~on a case by case basis~~*

2. Flood risk management

In addition, it is noted that the Office of Public Works national datasets do not cover the watercourses in Kildangan and therefore the County Development Plan's Strategic Flood Risk Assessment (SFRA) has used indicative mapping only for the settlement of Kildangan. MA 21 includes two new Residential sites within the vicinity of the watercourse where, in the absence of the a stage 3 detailed flood risk assessment, these lands are located within Flood Zone A or B and potentially at risk from flooding. A stage 3 detailed flood risk assessment is therefore required and any land zoned New Residential identified in that assessment as at high or moderate risk of flooding should not be zoned for vulnerable uses.

National Policy Objective 78 (NPO 78) of the National Planning Framework First Revision (2025) (NPF) requires planning authorities to apply an evidence-based approach to flood risk management, ensuring that flood risk is appropriately identified, avoided and mitigated in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009). Furthermore, NPO 78 of the NPF requires planning authorities to take account of the potential impacts of climate change on flooding and flood risk, in line with national policy regarding climate adaptation. Having considered the zoning maps and the SFRA prepared by the Planning Authority, the Office has identified an increase in the overlap of the Catchment-based Flood Risk Assessment and Management mid-range future and high-end future scenario mapping future flood extents in proposed zoning change to New Residential and serviced sites in Castledermot, Johnstown and Kildangan. Therefore, the Office recommends the Planning Authority sets out how the effects of climate change will be managed in the SFRA.

MA Recommendation 2 - Flood Risk Management

Having regard to:

- NPO 78 of the NPF to avoid inappropriate development in areas at risk of flooding that do not pass the Plan Making Justification Test;
- RPO 7.12 of the RSES to seek to avoid inappropriate land use zonings and development in areas at risk of flooding in accordance with the requirements of

the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines); and

- the Flood Guidelines,

the Office recommends that the Planning Authority:

- (i) reviews flood extent mapping in Strategic Flood Risk Assessment (SFRA) including undertaking a stage 3 detailed flood risk assessment for New Residential lands for MA 21 at Kildangan. Following this review, if the lands are identified as being located within Flood Zone A or B then the proposed Variation should be made without MA 21 in respect of the residential zoning objectives; and
- (ii) reviews the future flood extents for proposed residential zonings at MA 12 in Castledermot, MA 21 at Kildangan and proposed residential and serviced sites at MA 19 and MA 20 in Johnstown and set out a strategy in the SFRA for how the effects of climate change will be managed in these areas.

The Planning Authority is advised to liaise with the Office of Public Works to address this recommendation.

3. Rural housing and settlement hierarchy

In regard to MA 7, relating to Serviced Sites Local Need Criteria, this proposed material alteration is likely to result in a slight relaxation in policy including a new definition of a person who has resided in a rural area in County Kildare, which would appear to allow for all those who presently live in designated Towns, Villages and Rural settlements to be potentially applicable. While the Office notes this revision, it is not clear whether this additional text included intends to include or discount such settlements as part of the criteria. Therefore, the Office suggests clarification on this point and given the slight relaxation in policy recommends a review of the effectiveness of this policy objective and criteria alongside the wider suite of rural policy objectives in the upcoming review of the County Development Plan.

MA 9 proposes to upgrade Newtown settlement from a Rural Node to a Rural Settlement designation as part of the material alterations. The County Development Plan presently has 12 Rural Nodes designated throughout the county. While the Office acknowledges at MA 4 that the Planning Authority proposes to undertake an evidence-based audit of rural nodes

for the county, no specific justification has been provided for the reclassification at this time in advance of any wider review of the settlement hierarchy for the county. Therefore, the Office suggests this reclassification of Newtown is considered somewhat premature and it would be preferable that this matter be considered in the wider context of the review of the settlement hierarchy as part of the forthcoming review of the County Development Plan, where such matters can be assessed in a consistent and systematic manner.

MA Observation 1 - Rural Housing and Settlement Hierarchy

Having regard to:

- NPO 28 of the NPF; and
- section 4.5.1 of the Development Plans, Guidelines for Planning Authorities (2022),

the Planning Authority is advised to:

- (i) clarify the position with regard to additional text relating to inclusion of 'persons living in the designated Towns, Villages and Rural Settlements' at MA 7 under the footnote which defines a 'rural resident', that those living in these settlements are considered applicable to this category at table 3.4 (a);
- (ii) carry out a detailed review of Serviced Sites Local Need Criteria policy as part of a wider review of the effectiveness of rural policies in the upcoming review of the Kildare County Development Plan 2023-2029 (County Development Plan); and
- (iii) review and postpone the reclassification of Newtown at MA 9 and give further consideration to this matter as part of the wider strategic review of the settlement hierarchy of all settlements in the forthcoming review of the County Development Plan.

Summary

The Office requests that your authority addresses the recommendations and observation 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,



Niall Cussen

Planning Regulator

Designated Public Official under the Regulation of Lobbying Act 2015
