Maynooth and Environs Joint Local Area Plan 2024 – 2030

Report on Submissions Received During the Pre-draft Consultation Stage









8th March 2023











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Appendix A: Public Notice of Pre-draft Consultation

Appendix B: Images of Pre-draft Public Consultation Event

1. Introduction

Kildare County Council and Meath County Council have commenced the preparation of a Joint Local Area Plan (Joint LAP) for Maynooth and Environs. The new Joint LAP will cover the period from 2024 – 2030 and is intended to replace the Maynooth Local Area Plan 2013 – 2019 (as amended), and the written statement and accompanying zoning objectives for Maynooth Environs contained in the Meath County Development Plan 2021 – 2027.

The Joint LAP will be guided by national and regional planning policy and shall be consistent with the respective core strategies of the Kildare County Development Plan 2023 – 2029 and the Meath County Development Plan 2021 – 2027. The Plan will play a key role in achieving the objectives contained in respective county development plans of Kildare and Meath County Councils.

The preparation of local area plans is guided by Section 28 *Guidelines for Local Authorities* on *Local Area Plans* and the companion document *Manual for Local Area Plans* were published by the Department of Environment, Community and Local Government in 2013. Planning authorities must have regard to these documents during the local area plan preparation process. The Guidelines state that local area plans are the level of forward planning closest to local communities and accordingly emphasis must be placed on the need for the local community to be involved in the Plan preparation process to ensure the Plan is based on effective public participation and consultation. They also highlight that the locally elected members are a critical element as the democratically elected representatives of the local community¹. The purpose of this report is to summarise the submissions and observations received during the pre-draft public consultation exercise carried out as part of the preparation of the draft Joint LAP. It is intended that this report will assist in the development of a more informed and robust plan for Maynooth and Environs.

2. Overview of the Pre-draft Consultation Stage

Section 20.— (1) of the Planning and Development Act 2000, as amended states that;

"A planning authority shall take whatever steps it considers necessary to consult the Minister, the Office of the Planning Regulator and the public before preparing, amending or revoking a local area plan including consultations with any local residents, public sector agencies, non-governmental agencies, local community groups and commercial and business interests within the area."

Having regard to the above, pre-draft consultation for the Joint LAP was undertaken in order to gain an understanding of the key issues which the local community, public sector agencies, non-governmental agencies and commercial and business interests, consider important for Maynooth and Environs.

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¹ Local Area Plans: Guidelines for Planning Authorities (2013, p24).

As part of the pre-draft consultation exercise a Pre-Draft Public Consultation Issues Paper was prepared for the Maynooth and Environs Local Area Plan 2024 – 2030 which identified a number of the key planning and development matters that the Plan could address. A public notice (see Appendix A) was published in the Irish Independent (30th September 2022), the Liffey Champion (8th October 2022) and the Meath Chronicle (8th October 2022) notifying the public of the intention to make a Joint Local Area Plan for Maynooth and Environs inviting submissions over a period of 6 weeks from 30th September to 11th November 2022 inclusive. Groups registered with the Kildare Public Participation Network in the Maynooth area and a number of stakeholders, were notified of the consultation and received a copy of the Issues Paper. The notice and Issues Paper were also referred to the Prescribed Bodies as

listed in the Planning and Development Regulations 2001, as amended. Copies of the Issues Paper were also available for public inspection at the following locations:

- Public Counter, Planning Department, Kildare County Council, Áras Chill Dara, Devoy Park, Naas;
- Public Counter, Planning Department, Meath County Council, Buvinda House, Dublin Road, Navan;
- Maynooth Community Library, Main Street, Maynooth.

The Issues Paper was also published online on the Maynooth and Environs Joint Local Area Plan's dedicated public consultation portal: https://consult.maynooth.ie/. This provided the facility to make an online submission.

Figure 1: Pre-draft Issues Paper



An informal public 'drop-in' event was held at the Glenroyal Hotel in Maynooth on Wednesday 12th October between 1pm – 8pm. This event was attended by approximately 58 people. Social media (Facebook, Twitter and LinkedIn) were used as a mechanism in spreading awareness of the pre-draft consultation stage and the public consultation event along with posters located at prominent public places throughout the town. A number of photographs were taken of the event and can be viewed

3. Submissions Received and Summary of the Issues Raised

3.1 Submissions and Observations Received

in Appendix A.

During the public consultation period a total of 65 submissions were received, one of which was subsequently withdrawn, leaving a total of 64 submissions which have been summarised and responded to in this report. The list of persons, prescribed bodies, groups and stakeholders who made submissions is listed in Table 1 (see overleaf). A summary of each submission as well as the Councils' response to the main issues raised are listed in Tables 3 and 4 of this report. Kildare County Council and Meath County Council would like to take the opportunity to thank those who attended the public consultation event along with all those who made written submissions at the pre-draft stage.

Table 1: Persons/Organisations who Made Submissions

1.	Steve Power
2.	Steve Power
3.	Inland Fisheries Ireland (IFI)
4.	North Kildare Basketball Club
5.	Michael Costelloe
6.	Department of Public Health -
	Health Service Executive (HSE)
7.	Michael Murphy
8.	Pirowell Ltd.
9.	County Kildare Chamber
10.	OPW – Flood Risk Management
11.	Valarie Kennedy
12.	Mike O'Neill
13.	Ray McTernan
14.	Transport Infrastructure Ireland (TII)
15.	Grainne O'Rourke
16.	Eileen O'Rourke
17	Christopher O'Rourke
18.	Department of Transport
19.	Dublin Airport Authority (DAA)
20.	Department of Education
21.	Land Development Agency (LDA)
22.	John and Paul Doyle
23.	Maria Carty-Mole
24.	Health Service Executive –
	Environmental Health
25.	SSC Sustainable Community Ltd.
26.	Olympic Cars Ltd.
27.	Camgill Property a Se Ltd.
28.	John Geoghan
29.	Paul Dormer
30.	Kildare Greens Maynooth Group
31.	Demid Tishin
32.	Eoghan Murray
33.	Mary McGaver

34.	Justin Moran
35.	Social Democrats
36.	Demesne Architects
37.	Westin Homes
38.	Derrinstown Stud Ltd.
39.	Demesne Architects
40.	Kilcloon Environmental Action
	Association (KEAA)
41.	Ann Moran and the Moran Family
42.	Pat and Michelle Farrell
	(submission withdrawn)
43.	St. Patrick's College Maynooth
44.	Sherwood Homes Ltd.
45.	Dept. of Environment, Climate and
	Communications
46.	Farrell & Montane Developments Ltd.
47.	Electricity Supply Board (ESB)
48.	Carton Demesne (Moygaddy Lands)
49.	Randalswood Holdings Ltd.
50.	Maynooth University
51.	Andre Düsterhus
52.	Sky Castle Ltd.
53.	Brian McArdle
54.	Maynooth Community Council
55.	National Transport Authority (NTA)
56.	Irish Water (IW)
57.	Maynooth Access Group
58.	Saint John of God Hospitaller Group
59.	Cairn Homes and Satchwell Family
60.	M.P.A. Lavin
61.	Office of the Planning Regulator
	(OPR)
62.	Shane O'Duffy
63.	Corcom Development Partners
64.	Cllr. Angela Feeney
65.	Dept. of Housing, Local Government
	and Heritage

3.2 Issues Arising for the Various Themes

There are a number of recurring planning related issues raised in the submissions and these have been grouped together, where appropriate, for the purpose of addressing the various themes arising. The following table represents the frequency of the topics referred to. It should be noted that many submissions received addressed multiple themes.

Table 2: Frequency of Themes Raised in Submissions/Observations

Theme	Number
Vision	3
Homes and Communities (including open space and amenities)	19
Economic Development, Tourism and Retail	11
Movement and Transport	33
Climate Action	13
Green Infrastructure and Biodiversity	15
Urban Regeneration and Placemaking	8
Infrastructure	18
Built Heritage	5
Zoning of Land (including specific zoning objectives relating to building height and density)	31

Notwithstanding the issue of land use zoning and associated requests relating to building height and densities, the key issues raised related to the themes of movement and transport (33) and homes and communities (31). Figures 2 and 3 (see overleaf) provide a further breakdown regarding specific topics raised within individual submissions in relation to these two key themes. Again, it should be noted that many submissions raised multiple issues within specific themes.

On the theme of movement and transport it is interesting to note that the vast majority of the topics raised related to the need to enhance sustainable travel options within Maynooth, including the promotion of active travel (walking and cycling) as well as improved public transport provision. The theme of homes and communities includes a diverse range of topics but issues raised relating to a lack of community facilities and recreational amenities within the town were the most prominent.

Figure 2: Key Topics raised relating to Movement and Transport

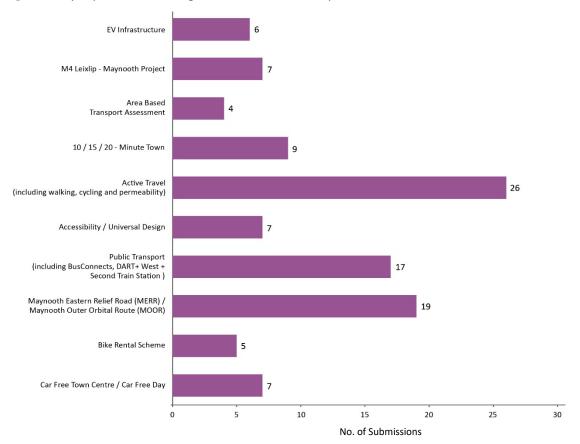
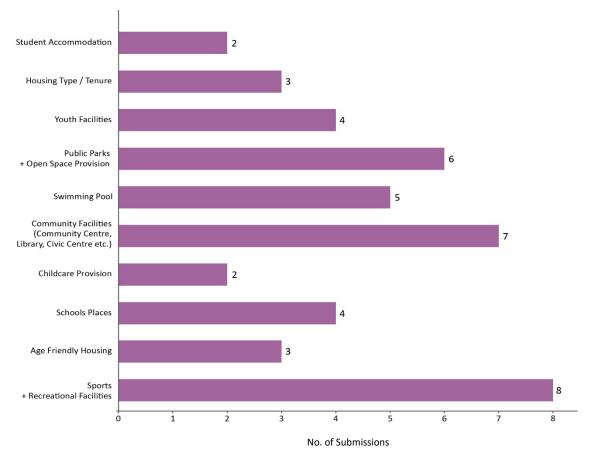


Figure 3: Key Topics raised relating to Homes and Communities



4. Overview and Response to Key Issues Raised

This section seeks to provide a brief synopsis of the key issues raised in the submissions received as well as an overview of the responses from Kildare and Meath County Councils to these issues.

4.1 Zoning of Land (Including Specific Objectives Relating to Height and Density)

Overview of Key Issues Raised

Many submissions were received which related to the zoning of land the majority of which sought a change to the existing land use zoning designation of specific sites. A map of the submissions that related to specific land use zoning requests is outlined in Figure 4 (see overleaf). The majority of such requests refer to lands which currently have an agricultural zoning or are un-zoned, to be zoned in the Joint Local Area Plan (JLAP) for new residential or employment purposes. Other notable requests related to applying site specific objectives to lands to require or provide for increased density and building heights.

Response to Key Issues Raised

All lands which have been zoned in the Maynooth Local Area Plan 2013–2019 (as amended) and in the Maynooth Environs plan (Meath County Council 2021–2027) will be reviewed as part of the preparation of the Joint Local Area Plan (JLAP). The review of zoned land will be underpinned by, inter alia, an infrastructure assessment for the town in accordance with National Planning Objective (NPO) 72 a-c and Appendix 3 of the National Planning Framework (NPF) and section 4.5.2, Settlement Capacity Audit, of the *Development Plan*, *Guidelines for Planning Authorities* (2022). All land use zoning requests that have been received, regardless of their location in relation to any previous plan boundaries, will be included in the Settlement Capacity Audit (SCA) to determine their suitability to accommodate particular uses in comparison to other potential sites within the town. The SCA will seek to identify and prioritise the development of Tier 1: Serviced Zoned Land in the first instance, in order to grow the town in a sustainable manner in keeping with the principles of compact growth and sequential development, as set out in the NPF and in the Development Plan Guidelines (2022). The SCA will be published as a supporting document to the JLAP.

Overall, it should be noted that proposed land uses will be determined on an evidence-led basis and therefore, in addition to the SCA, the Plan will be accompanied by a number of other supporting studies which will provide a detailed analysis with regard to the availability and capacity of required physical and social infrastructure within Maynooth and Environs over the life of the Plan. Such evidence-led studies to be published alongside the JLAP will include, inter alia, an Area Based Transport Assessment, a Social Infrastructure Audit, and a Habitats Survey and Green Infrastructure Mapping Exercise. These supporting documents will also be critical in providing safeguards which will be incorporated into an overall infrastructure delivery schedule included in the Plan. This will ensure that where lands are selected as being suitable for residential or employment purposes, their development will be dependent on the delivery of identified key serving and community infrastructure, either prior to, or in tandem with development. In addition to the above a targeted jobs ratio, included as part of the Economic Development Strategy of the Plan will assist in determining the quantum of lands proposed to be zoned for employment purposes.

In relation to the issue of increased building heights and densities in Maynooth, it should be noted that both Kildare and Meath County Council's respective county development plans identify particular locations within Maynooth and Environs as being suitable for taller buildings and increased densities, as per the requirements of the relevant Section 28 ministerial guidelines. It is the intention that these provisions will be incorporated into the JLAP and will be expanded on in further detail.

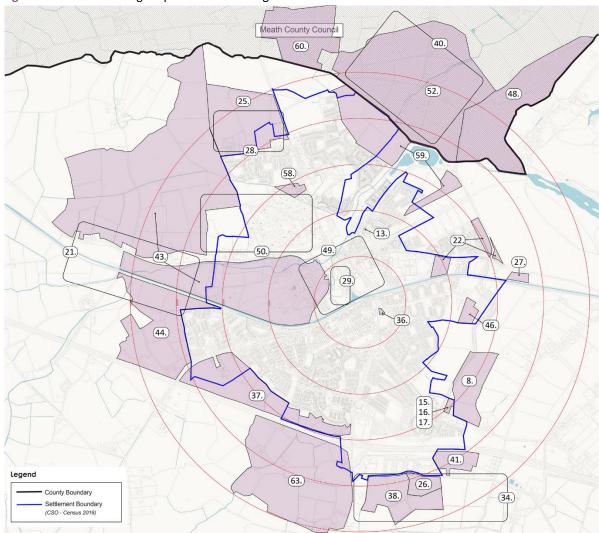


Figure 4: Land Use Zoning Requests Made During the Pre-Draft Public Consultation Exercise

Submission Number

- 8. Pirowell Ltd.
- 13. Ray McTernan
- 15. Grainne O'Rourke
- 16. Eileen O'Rourke
- 17. Christopher O'Rourke
- 21. Land Development Agency
- 22. John and Paul Doyle
- 25. SSC Sustainable Community Ltd.
- 26. Olympic Cars Ltd.
- 27. Camgill Property a Se Ltd.
- 28. John Geoghan
- 29. Paul Dormer
- 34. Justin Moran
- 36. Demesne Architects
- 37. Westin Homes

- 38. Derrinstown Stud Ltd.
- 40. Kilcloon Environmental Action Association
- 41. Ann Moran and the Moran Family
- 43. St. Patrick's College Maynooth
- 44. Sherwood Homes Ltd.
- 46. Farrell & Montane Developments Ltd.
- 48. Carton Demesne (Moygaddy Lands)
- 49. Randalswood Holdings Ltd.
- 50. Maynooth University
- 52. Sky Castle Ltd.
- 58. St. John of God Hospitaller Group
- 59. Cairn Homes and Satchwell Family
- 60. M. P. A. Lavin
- 63. Corcom Development Partners

Not on Map

- 54. Maynooth Community Council
- 61. Office of the Planning Regulator

4.2 Housing / Population Growth Targets and Extent of Residential Zoning

Overview of Key Issues Raised

A number of submissions referred to the population and housing targets contained within the respective core strategies of the County Kildare and County Meath County Development Plans, along with the additional population allocation of up-to 10,000 persons over the period to 2031, as provided under National Policy Objective (NPO) 68 of the National Planning Framework (NPF) and applied to Maynooth (County Kildare) by the Metropolitan Area Strategic Plan (MASP) Implementation Group. Many submissions outlined concerns regarding the high levels of population growth targeted for the town over the life of the Plan. These concerns related to the capacity of the existing servicing, transport and social infrastructure of the town to sustainably absorb and adequately cater for such development over the life of the Plan. Other submissions however welcomed this anticipated growth and noted that it aligned fully with Maynooth's designation in the Regional Spatial and Economic Strategy 2021-2023 (RSES) as a Metropolitan Key Town. Some submissions considered that the growth allocation was based on outdated population data and did not take into consideration the elevated averaged household occupancy rate in Maynooth which meant that the town had a greater housing requirement than has been provided for in the respective core strategies. Submissions also contended that the results of Census 2022 need to be factored into the growth targets and further additional new residential lands are now required to be zoned in Maynooth to cater for this higher level of population growth and consequential housing need.

Response to Key Issues Raised

The population and housing targets proposed in the Joint Local Area Plan (JLAP) are required to align with the provisions of the respective core strategies of Kildare and Meath County Councils and the RSES. It should be noted however, that if capacity/infrastructural constraints are identified in the town, which cannot be resolved over the life of the Plan to 2030, then the figures for growth (particularly in relation to the NPO 68 allocation) will be reduced accordingly, to ensure the growth of the town does not exceed the capacity of both its servicing and social infrastructure. An order of priority will therefore have to be introduced in accordance with Section 28 Guidelines to ensure that appropriate housing numbers and zoning and included in the plan. On the issue of the household occupancy size, it is noted that the town has an average occupancy size of 2.98, which is higher than the recorded national average of 2.75 (Census 2016). This is due to the presence of third level institutions in Maynooth and the fact that many students either share rented accommodation or are in digs arrangements with families already living in the town. The Kildare County Development Plan (CDP) 2023-2029 sets an average occupancy size target in the county at 2.75 over the life of the Plan. The Plan will be required to comply with this target for lands in Maynooth located in County Kildare. A reduction in the unit occupancy rate towards an average of 2.75 is considered to be both an appropriate and realistic target for the town over the life of the Plan.

Issues raised relating to the preliminary results of Census 2022 are noted. It is understood that the Department of Housing, Local Government and Heritage will be updating both the NPF and the Housing Needs Demand Assessment toolkit following the publication of the population statistics from the Central Statistics Office. In this regard, it should be noted that Objective CS O19 of the Kildare County Development Plan (CDP) 2023–2029 provides Kildare

County Council with the opportunity to align the CDP with any subsequent changes to population and housing growth figures when they become available, as necessary.

4.3 Development of Maynooth Environs (Moygaddy, County Meath)

Overview of Key Issues Raised

A number of submissions refer to the development of lands at Moygaddy in County Meath. The submission from the Office of the Planning Regulator (OPR) highlights the ambitious population and housing targets set for Maynooth under the RSES and the Dublin Metropolitan Area Strategic Plan (MASP) arising from the reallocation of population growth from Dublin city and suburbs to the metropolitan key towns. While the core strategy of the Meath County Development Plan (CDP) 2021-2027 provides for population growth of 1,000 people, it notes that the preliminary figure was half of this and therefore clarity is sought regarding the population growth assigned to that portion of the settlement with County Meath, considering existing and planned infrastructure so that the settlement grows in a sustainable manner.

Concerns were also raised by the OPR and Irish Water (now Uisce Éireann) relating to the lands not being serviced or serviceable over the plan period, notwithstanding their identification in the RSES for future development.

Response to Key Issues Raised

The Meath County Development Plan 2021-2027 outlines provision for population growth in the Maynooth Environs.

With regard to the lands zoned for Maynooth under the Meath County Development Plan 2021–2027, while the lands in the Maynooth Environs are not currently serviced, it is understood from discussions with the respective property developer and Uisce Éireann that these lands can be serviced, provided such services are developer driven. Notwithstanding this, an Infrastructural Assessment will be carried out in the form of a Settlement Capacity Audit of the upcoming Draft Plan which will encompass the lands in the Maynooth Environs to allow them to be tiered accordingly. It is acknowledged that future upgrades will be required to accommodate additional growth across the town of Maynooth.

4.4 Climate Action and the Joint Local Area Plan

Overview of Key Issues Raised

Many of the submissions received referred to the urgent need for Maynooth to transition to a low carbon model of development and that the Plan should be cognisant of the impending designation of Maynooth as a Decarbonisation Zone (DZ). The submissions received contained an array of suggestions and requests as to how Maynooth could be developed as a low carbon town. General requests relating to low carbon development included the need to bring forward an integrated land use and transport strategy as part of the Plan, the requirement for compact growth and the need to reduce transport emissions, the need to apply for funding to make the transition to a low carbon environment and to set targets for local renewable energy production and increase building energy efficiency.

Response to Key Issues Raised

It is noted that there was a level of confusion in the submissions as to the exact role and purpose of a Local Area Plan and its limitations as a locally implemented land use plan. Many of the requests made relating to climate action are outside the remit of a land use

plan but could be considered as part of the preparation of Decarbonisation Action Plan which will be prepared on foot of the official designation of Maynooth as a DZ. Other requests relate to development management standards which would be more appropriately dealt with at county development plan level.

It is acknowledged that all aspects of the Joint Local Area Plan (JLAP) will need to be considered in light of the requirement to plan for a substantial reduction in greenhouse gas emissions and to promote low carbon development in the town, in line with national targets, including National Strategic Outcome No. 8 of the National Planning Framework relating to the need to transition to a low carbon and climate resilient society. Accordingly, the JLAP will incorporate provisions to support inclusive and comprehensive climate action in Maynooth and Environs, insofar as its remit extends. In this regard, the Plan will incorporate an evidence-led and data driven integrated land use and transport strategy. This will be based on a number of supporting documents which will be published alongside the Plan. One of these documents will be a Maynooth and Environs Area Based Transport Assessment (MEABTA) which will provide an understanding of the existing constraints and modal share whilst also identifying the interventions required within the Plan area and in the wider context. This is in order to effectively accommodate the anticipated increase in demand in the town and ensure that optimal transportation interventions can be put in place to drive a long-term shift towards sustainable movement. Targets for increasing modal share for sustainable modes of travel will align with those contained in the Greater Dublin Area Transport Strategy 2022-2042. Furthermore, the finalised MEABTA will be informed by the outputs of a decarbonisation report which will outline a range of measures that can be implemented to assist with the decarbonisation of the town's transport and movement sector.

It should be noted that the town's impending designation as a DZ will require the preparation of a Decarbonisation Action Plan which will be progressed separately to the process in which the Joint Local Area Plan (JLAP) is prepared. The Decarbonisation Action Plan may incorporate many of the requests contained in submissions to the pre-draft consultation exercise, including the setting of specific targets relating to local renewable energy production and building energy efficiency. An objective will be included in the JLAP to support the full implementation of any Maynooth Decarbonisation Action Plan, with regards to its goals, objectives and actions relating to planning and development within Maynooth Decarbonisation Zone. The JLAP will include a general objective supporting the development of energy efficient buildings.

In planning for a 'low carbon town', the JLAP will seek to implement the principles of compact growth and sequential development, as well as maximise opportunities with regard to the access and usage of public transport services planned as part of the DART+ West and BusConnects projects. In this regard, the Plan will incorporate a range of provisions to facilitate active land management, with particular emphasis on the delivery of residential development on appropriately located lands and at sustainable densities within the town centre, and along existing and planned high-capacity public transport routes. Furthermore, the Plan will seek to ensure that other uses, including employment uses and community uses, are zoned at accessible locations within the town.

4.5 Economic Development, Tourism and Regeneration

Overview of Key Issues Raised

Many submissions received note Maynooth's designation as a Metropolitan Key Town within the Dublin Metropolitan Area and state the need to appropriately develop and expand the town's economic base over the life of the Plan in order for the town to fulfil its intended role outlined in the Regional Spatial and Economic Strategy 2019-2031 (RSES). Several submissions noted the need to develop the sites that were identified for employment purposes in the RSES, including those located in Moygaddy (Maynooth Environs) and to the west of the university. Other submissions noted the need to further develop and expand on the existing employment lands located in the Maynooth Business Campus in the south of the town.

A number of submissions stressed the importance of Maynooth University to the future development of the town and requested that this be acknowledged by the Plan. Other submissions reflected on Maynooth's many built and natural heritage assets, including the Royal Canal, St. Patrick's College, Maynooth Castle, the Carton Estate and Moygaddy Castle and requested the measures be incorporated in the Plan which would support their further enhancement as tourist attractions within the town. Other submissions noted that the regeneration of the town centre and the Canal Harbour areas had the potential to increase the overall attractiveness of the town as a key tourism destination within the region.

Response to Key Issues Raised

It is the intention of the Joint Local Area Plan (JLAP) to incorporate a comprehensive economic development strategy for the town which is consistent with both the RSES and the Kildare and Meath County Development Plans. A priority of the strategy will be to ensure that employment lands are developed in a plan-led, orderly and sequential manner. Furthermore, the Plan will seek to create the right jobs in the right places by placing a particular emphasis on achieving greater alignment between where people live and work, to reduce the need to travel and facilitating sustainable travel modes.

The JLAP will also seek to ensure that the town acts as a key economic driver in the region that maximises the potential for synergies with Maynooth University and takes full advantage of the presence of a highly educated workforce in order to further develop the employment base within the town. The Plan will therefore acknowledge Maynooth's unique status as Irelands only university town and the vital role that Maynooth University has in promoting enterprise and advancing the knowledge economy, and will proactively support its strategic long-term expansion, in addition to supporting the development of its ongoing activities in the areas of research and development, the development of spin-off businesses, enterprise incubation and increased levels of collaboration with industry.

This Plan will seek to incorporate provisions which support and promote the many tourism opportunities in Maynooth and Environs, acknowledging the potential of the tourism sector to contribute to economic growth and its role in creating sustainable locally based employment. The Plan will also contain a range of provisions relating to the regeneration and development of the town centre and Canal Harbour, including supporting alternative uses such as dedicated remote working hubs.

4.6 Biodiversity and Green Infrastructure

Overview of Key Issues Raised

Several submissions received outlined the importance of increasing the levels of biodiversity of the town and acknowledge the critical role that green infrastructure can play in carbon sequestration, climate mitigation/adaptation, active travel and creating a sense of place. A number of submissions highlighted the potential difficulty of enhancing biodiversity in the town given competing objectives for housing and employment growth. Submissions received also referred to the need for appropriate riparian setback distances to support the attainment of high ecological status for water bodies, the conservation of biodiversity and provide buffer zones for flood plains. A number of submissions have identified specific locations within the town including the Ryewater and Lyreen River corridors as critical elements of any green infrastructure network in the town.

Response to Key Issues Raised

The Joint Local Area Plan (JLAP) will seek to balance the requirement of strategic development and growth, with the need to protect and enhance natural heritage assets. Furthermore, the Plan will recognise the multifunctionality of the role green spaces have in terms of climate mitigation, reducing flood risk, enhancing biodiversity and providing for active travel routes. As part of the preparation of the JLAP, a Green Infrastructure Survey and Habitat Mapping Exercise will be undertaken. This exercise will result in a number of recommendations to protect and enhance the overall level of biodiversity within the Plan area to assist in the implementation of the National Strategic Outcome No. 7 of the National Planning Framework, relating to delivering enhanced amenities and heritage. It is envisaged that the Plan will also contain provisions to require biodiversity net gain (BNG) on specific sites to encourage the development of natural habitats in the town and to promote increased levels of biodiversity and carbon sequestration.

The Plan will also include a Green Infrastructure Map, based on the Habitat Mapping Exercise which will illustrate 'Notable Green Infrastructure Routes'. This will be accompanied by a series of objectives providing for their protection and enhancement. It is anticipated that key waterbodies such as the Lyreen and Rye Water will form the core of the green infrastructure network in Maynooth. The Plan will seek to support the implementation of the Maynooth Biodiversity Action Plan which has a range of actions relating to promoting and safeguarding natural heritage in the town. With regard to applying development set back distances within riparian areas, the Plan will seek to align with Inland Fisheries Ireland's Urban Watercourses Planning Guide (2020).

4.7 Provision of Social Infrastructure

Overview of Key Issues Raised

The general theme of social infrastructure provision was raised in many submissions received. It was widely considered that Maynooth has an existing deficit in social infrastructure provision and concerns were raised as to this problem being exacerbated if the targeted population growth in the town is not accompanied by the delivery of much needed community facilities, to cater for planned population growth.

Response to Key Issues Raised

The Joint Local Area Plan (JLAP) will be accompanied by a Social Infrastructure Audit (SIA) which will examine the current context with respect to social infrastructure provision in Maynooth and will identify the future requirements of the town, including the making of recommendations on priority areas for investment within the Plan area, to cater for planned population growth.

4.8 Sports and Recreation Facilities (Including Public Open Space)

Overview of Key Issues Raised

Several submissions raised concerns relating to the lack of dedicated sports and amenities infrastructure in Maynooth noting that many sports clubs were forced to use schools' facilities in the town or travel to other adjacent settlements in order to train or compete in events. A submission from Maynooth University outlined its intentions to create a landmark sports campus which would promote partnerships with sport's governing bodies and the local community. A number of submissions raised concerns regarding the lack of publicly owned open space within the town and stated that key recreational areas such as campus of St. Patrick's College or the Carton Demesne are privately owned and could be closed at any time to public access. Several submissions outlined the need for a new public park or 'city park' in Maynooth and suggested different locations in the town including a new linear park along the Lyreen and Rye Water Rivers, and a park along the eastern or north-western portions of the ring road.

Response to Key Issues Raised

The Kildare County Development Plan 2023–2029 has included a specific objective in Chapter 10 'to proactively seek suitable sites within the Key Towns of Naas and Maynooth for the provision of Municipal Sporting Facilities where shared amenities are provided for sports clubs and the general public.' It is envisaged that the Plan will seek to advance this objective through the identification of a suitable location within the town for such a facility to be developed, potentially in collaboration with third level institutions in the town. Furthermore, it should be noted that any identified or designated location for such a facility must be in keeping with the 10-minute settlement principle and therefore easily accessible for residents in the town. As outlined in section 4.7 above, the JLAP will be accompanied by a Social Infrastructure Audit (SIA) which will determine the needs of the residential population of the town with regard to the provision of recreational and amenities infrastructure, including open space. It is intended that the outputs of the SIA will be crucial in informing the Plan on the need for particular types of open space (i.e., playgrounds or neighbourhood parks). It should be noted however that the JLAP will seek to place emphasis on the quality of public open space rather than solely applying any particular qualitative figure. In keeping with the principles of the 10-minute town, accessibility and distribution of open space within the town will be a key consideration. The potential of developing a new linear park along the Lyreen River and Rye Water will also be investigated as part of the preparation of the Joint Local Area Plan.

4.9 Community Facilities (including Community Centre, Civic Centre, Library and Youth Facilities)

Overview of Key Issues Raised

Several submissions received relate to the lack of a community centre or civic centre in the town noting that this was concerning given the size of the settlement and its anticipated future growth. A number of these submissions highlighted the huge potential for regeneration of the current fire station site to contain such uses given its central and convenient location beside the Canal Harbour and the fact that it was already in public ownership. Submissions requested the development of a range of community facilities on the site including a community centre; a new and expanded library; a community garden; a community-run crèche; a recreation facility similar to Leixlip Amenities Centre; a swimming pool and a centre for youth amenities. Other submissions raised the issue of the lack of youth facilities in Maynooth.

Response to Key Issues Raised

An important component of the Plan will be to provide for the long-term regeneration of the Canal Harbour area of Maynooth, in keeping with the provisions of the Regional Spatial and Economic Strategy 2019-2031. This will include support for alternative uses for the Fire Station site when it becomes available. It is envisaged that the development of a key community use or a mix of community uses on the site will form a key element of any rejuvenation plan for the area. The Plan will consider the potential for supporting youth café or centres in the town.

4.10 A Swimming Pool for Maynooth

Overview of Key Issue Raised

A number of submissions outline the need for a publicly owned municipal swimming pool to be developed in Maynooth.

Response to Key Issue Raised

It should be noted that the Kildare County Development Plan 2023-2029 has included an action to progress plans for the provision of a new fully accessible regional swimming pool in North Kildare in conjunction with other relevant bodies. This issue will be examined further by the Council in the context of the preparation of the Joint Local Area Plan and the identification of a proposed location for a municipal sports facility in the town.

4.11 Provision of School Places

Overview of Key Issues Raised

Several submissions raised concerns relating to capacity and availability of schools' places at both primary and secondary levels given the level of population growth envisaged for the town over the life of the Plan. One submission raised concerns relating to the need for additional school places in areas subject to regeneration and brownfield redevelopment.

Response to Key Issues Raised

It should be noted that as part of the overall preparation of the Plan a Social Infrastructure Audit (SIA) will be undertaken for Maynooth. This will, inter alia, examine the anticipated demand for school places in the town at both primary and secondary levels, taking into

consideration the targeted population growth over the life of the Plan. The Joint Local Area Plan will also include a specific objective in relation to supporting the delivery of schools in Maynooth at appropriate locations, in keeping with the principles of the 10-minute settlement. Kildare and Meath County Councils will continue to engage and work closely with the Department of Education to ensure adequate provision for schools in Maynooth, in accordance with the provisions of the Memorandum of Understanding agreed between the City and County Managers Association and the Department.

4.12 Student Accommodation

Overview of Key Issues Raised

A number of submissions noted the need to provide an increase in the quantum of purpose-built student accommodation within the town in order to cater for the continued expansion of Maynooth University and St. Patrick's College. Various submissions requested that such accommodation would be provided across a number of locations, including the town centre, within the North and South Campus of the university, within the Maynooth Environs (Moygaddy) and adjacent to the proposed second train station to the west of the town.

Response to Key Issues Raised

The projected growth of both Maynooth University and St. Patrick's College and the corresponding increase in demand for student accommodation is acknowledged. Accordingly, the Plan will seek to complement the existing policy measures already outlined in the respective county development plans by incorporating a range of provisions to facilitate active land management, with particular emphasis on the delivery of residential development and purpose built student accommodation on appropriate lands and at sustainable densities within the town centre, and along existing and planned high-capacity public transport routes, in keeping with national and regional policy. The Plan will also include specific provisions to support the development of student accommodation at appropriate locations (including within potential identified sites) in Maynooth, subject to planning and design considerations.

4.13 Housing Type and Tenure

Overview of Key Issues Raised

A number of submissions raised issues relating to achieving an optimal mix in the type and tenure of new housing in Maynooth, and in particular delivering an adequate quantum of housing appropriate for needs of older people and people with disabilities.

Response to Key Issues Raised

A key aim of the Plan will be to ensure that Maynooth grows and develops in a socially inclusive manner. Central to this is the incorporation of a comprehensive suite of measures to support, promote and ensure an appropriate mix of types and tenures to meet the long term needs of the population of the town, including older people and people with disabilities. Such provisions will also need to have regard to the contents of the respective county development plans of Kildare and Meath County Councils to avoid unnecessary policy duplication.

4.14 Maynooth as An Age Friendly and Universally Accessible Town

Overview of Key Issues Raised

The potential of Maynooth becoming an age friendly and universally accessible town was the subject of several submissions received. Many submissions noted the need to create age friendly transport and movement infrastructure as being critically important in delivering inclusive development within the town, particularly given the overall aging of the general population.

Response to Key Issues Raised

A key element of the Joint Local Area Plan (JLAP) will seek to implement universal accessibility with regard to transport infrastructure in the town, in accordance with the principles of people-centred urban design and healthy placemaking. It is envisaged that the Plan will incorporate a range of provisions both through overarching objectives and specific measures to support universal movement throughout the town. Furthermore, it is intended that Kildare County Council will, in conjunction with the Maynooth Access Group, undertake a Walkability Audit during 2023 which will focus on ease of movement for both pedestrians and people who have impaired mobility within Maynooth Town Centre. It is intended that the Plan will include an objective to support the implementation of any recommendations contained in the Audit.

4.15 Maynooth as a 10-Minute Settlement

Overview of Main Issues Raised

Several submissions received related to the implementing the principle of the '10-minute', '15-minute' or '20-minute' settlement within the town in order to reduce congestion and carbon emissions along with delivering improved liveability for its residential population. These submissions cited the need to provide improved sustainable movement options in the town along with delivering homes and local services proximate to public transport services. One submission requested that Maynooth be developed as 'quarters' around new and existing service clusters in the town.

Response to Issues Raised

The Plan will actively seek to implement the 10-minute settlement concept in Maynooth to both spur the transition to a model of low carbon development and to improve the overall liveability and experience of place for residents and visitors to Maynooth. It is considered that the aspiration of the 10-minute settlement will be realised through an evidence-based and integrated land use and transportation strategy which will seek to promote a culture of active movement between key destinations within the town, whilst also making longer distance trips via public transport services more accessible to pedestrians and cyclists. A key element informing the overall strategy of the Joint Local Area Plan (JLAP) is the Maynooth and Environs Area Based Transport Assessment (MEABTA), which is currently being prepared. The outputs of the MEABTA will include both a walking strategy and a cycling strategy which will seek to create a comprehensive high-quality pedestrian and cycle network in the town, in order to initiate a permanent shift away from private car use. This will assist in greatly improving sustainable movement between residential areas and key destinations including the town centre, train station, schools, neighbourhood centres (existing and proposed) and employment areas. The Plan will also seek to maximise

opportunities in terms of access and usage of high capacity and high frequency public transport services planned as part of the DART+ West and BusConnects projects.

4.16 Active Travel (Including Walking, Cycling and Permeability)

Overview of Key Issues Raised

A range of submissions were received relating to the subject of active travel in Maynooth. Submissions were generally concerned with the need to improve the walking and cycling infrastructure of the town, including providing high quality off-road connections which would expand on the example of the Royal Canal Greenway. Several submissions referred to the need to make the town more permeable to increase the attractiveness of active movement travel options. The need to increase the number of students making their journeys to school and college on foot or by bicycle was also noted. A number of submissions highlighted specific examples at various locations within the town of where new pedestrian and cycle linkages could be created.

Response to Key Issues Raised

As part of the preparation of the Joint Local Area Plan (JLAP) a Maynooth and Environs Area Based Transport Assessment (MEABTA) is being prepared. The outputs of the MEABTA will include a range of actions to promote sustainable movement options in the town, which will be incorporated into the JLAP. This includes a walking strategy and a cycling strategy which will seek to create a comprehensive high-quality active movement (pedestrian and cycle) network in the town. The MEABTA will place a particular emphasis on ensuring that walking and cycling to both school and university can become a more realistic, convenient and safer option for pupils and students alike. The potential to create more permeable, shorter and more direct routes to facilitate active travel in the town is noted and will be fully acknowledged in both the MEABTA and within provisions of the Plan.

4.17 Public Transport (Including BusConnects, DART+ West and a Second Train Station to the West of the Town)

Overview of Key Issues Raised

A number of submissions were received relating to the future of public transport provision in the town. Some concerned the delivery and expansion of bus services including the proposed BusConnects network in Maynooth, as well as Local Link services connecting the town with its surrounding rural hinterland and adjacent settlements. Several submissions outlined support for the DART+ West proposal and for the development of a second train station to the west of the town. A number of submissions referred to the development context within the southwest of the town and outlined the need to coordinate the development of the new train station with the delivery of the Maynooth Outer Orbital Route (MOOR) along with the M4 Motorway upgrade project in this location. Further submissions proposed the development of a 'park and ride' facility to be located adjacent to the new train station to the west of the town.

Response to Key Issues Raised

Whilst it is outside the remit of the local authorities' plan-making process to provide for public transport services, it is noted that the Maynooth and Environs Area Based Transport Assessment (MEABTA) which will be published alongside the Joint Local Area Plan (JLAP),

has examined both inter-settlement movement and potential role of public transport in rural areas which could serve Maynooth.

As part of the second round of the public consultation for the MEABTA (advertised as the Draft Transport Strategy for Maynooth and Environs) a public transport strategy is proposed which outlines the potential for a series of short-, medium- and long term measures to promote modal shift away from the private car to bus or rail, particularly for medium/long distance trips linking with adjacent towns and to other more rural settlements in the wider catchment area. The local authorities look forward to discussing these proposals in more detail with the National Transport Authority (NTA) in the finalisation of the MEABTA.

An objective will also be included in the JLAP to support the enhancement of Local Link Rural Transport services which will connect Maynooth with its wider rural catchment area, subject to demonstrable demand, in consultation with the NTA.

Whilst the delivery and operation of the BusConnects project is outside the remit of the JLAP, it will include an objective to support its ongoing implementation in Maynooth. Given that the DART+ West project is supported by national and regional policy, the Plan will include a specific objective to support the delivery of the project, including ancillary supporting infrastructure, subject to planning and environmental considerations. In keeping with the Greater Dublin Area Transport Strategy 2022-2042, the Plan will also support the delivery of a second train station to the west of Maynooth. On the issue of a 'park and ride' facility for Maynooth, it is noted that Figure 9.1 of Greater Dublin Area Transport Strategy 2022-2042 provides for such a development to be located either at 'Collinstown OR Maynooth Depot'. Accordingly, the Plan will include provisions to support the potential development of a 'park and ride' facility at this general location.

The various issues relating to the delivery of transport infrastructure within the west/southwest of the town are acknowledged. In this regard, the JLAP will include an objective which seeks to support the co-ordinated delivery of such critical transport infrastructure in the area, including DART+ West, the Maynooth West train station, the MOOR and upgrades to the M4.

4.18 Maynooth Outer Orbital Route (MOOR) and Maynooth Eastern Ring Road (MERR)

Overview of Key Issues Raised

Several submissions were made with respect to the Maynooth Outer Orbital Route (MOOR) and the Maynooth Eastern Ring Road (MERR) seeking the completion of all sections the MOOR, including the MERR, and noted its potential in reducing car congestion within the town centre and key arterial roads. One submission outlined concerns regarding the delay in the construction of the MERR. A number of submissions expressed opposition to the existing short section of the MOOR (serving the Maynooth Education Campus) being integrated into the overall final route of the MOOR. These concerns relate to the increase in traffic congestion in the area and the safety of young children accessing the schools in the Maynooth Education Campus. Other submissions outlined requests relating to integrating the MOOR with the proposed bridge and access road to the DART+ West Depot located to the west of Maynooth.

Response to Key Issues Raised

Given the stated policy support at regional level, the Joint Local Area Plan (JLAP) will include a specific objective supporting the delivery of the Maynooth Outer Orbital Route (MOOR). The importance of the MERR is acknowledged by both local authorities and will also be supported by provisions of the Plan. Its development is being advanced by Kildare County Council and as of early 2023 has reached Compulsory Purchase Order (CPO) stage.

On the issue of the route of the MOOR, it should be noted that its general layout and route through the north of the town has been fixed for the last number of decades. For example, it is identified on Map No. 1: Land Use Zoning and Specific Objectives in the Maynooth Town Development Plan 2002. The purpose of this is to give long term certainty to residents, landowners, developers and other key stakeholders and it is not envisaged that the identified route of MOOR in the north of the town will be altered at this stage.

Regarding the issue of safety, it should be noted that the MOOR will be designed as an urban street, in keeping with the provisions of the Design Manual for Urban Roads and Streets (updated 2019). The MOOR will incorporate high-quality cycle lanes and pedestrian footpaths and will have limited speeds for vehicular traffic. Issues relating to the alignment of the MOOR and its interaction with access arrangements with the proposed DART+ West Depot are outside the remit of the Plan. However, the JLAP will seek to support the coordinated delivery of such critical transport infrastructure where there is potential for overlap, particularly within the southwest of the town.

4.19 M4 Motorway Upgrade

Overview of Key Issues Raised

Numerous submissions were received in relation to the upgrading of the M4 Motorway. Several suggestions were made regarding the potential development of a second or alternative junction serving Maynooth, and requests were also made as to how this new junction/access would integrate with the future layout of the Maynooth Outer Orbital Road.

Response to Key Issues Raised

On the issue of the M4 Motorway, it should be noted that the proposed upgrade is the subject of a separate M4 Maynooth – Leixlip Project which is outside the remit of the Plan. In this regard, Kildare National Roads Office (KNRO) has been appointed by Transport Infrastructure Ireland (TII), acting as the Approving Authority, to project manage the delivery of the project. The project currently has two options with regards to Maynooth, one of which involves upgrading the existing Junction 7 and the second envisages the closing of the existing junction and the construction of a new junction further to the west. A public display of the emerging preferred option is scheduled for Quarter 2 2023. Given that the M4 Maynooth – Leixlip Project is supported by both the National Development Plan 2021-2030 and the Greater Dublin Area Transport Strategy 20222042, the Joint Local Area Plan (JLAP) will include a specific supporting objective. It is also envisaged that the JLAP will also provide an objective which supports the co-ordinated delivery and integration of critical transport infrastructure in the town such as the MOOR and upgrades to the M4 motorway.

4.20 Delivery of Servicing Infrastructure

Overview of Key Issues Raised

A number of submissions noted the requirement to ensure the delivery of key servicing infrastructure alongside or prior to new development in the town. Such infrastructure cited included access roads (include sections of the Maynooth Outer Orbital Route), surface drainage infrastructure, footpaths and cycle lanes, along with water and wastewater services. Several submissions noted that the wastewater infrastructure of the town will remain constrained until 2026 when the Maynooth Wastewater Transfer Pipeline project is completed.

Response to Key Issues Raised

In accordance with Appendix 3 of the National Planning Framework (NPF), and the Section 28 ministerial Guidelines for Local Authorities on Development Plans, a Settlement Capacity Audit (Infrastructure Assessment) will be carried out to determine if specific sites are 'serviced' or 'serviceable' within the life of the Plan. The Joint Local Area Plan (JLAP) will be informed by an infrastructure delivery schedule which will be provided to ensure that specific and critical pieces of servicing infrastructure including roads, footpaths, cycle lanes and water/wastewater services are delivered either prior to, or in tandem with development.

On the issue of surface water management, it is intended that an objective will be included in the Plan support the preparation of a Maynooth Surface Water Drainage Study for both existing and new development areas within the town to provide for a municipal-level, multisite nature-based solution(s) to surface water management. The Plan will support the ongoing upgrade and expansion of water supply and wastewater services to meet the future needs of Maynooth and Environs, including the delivery of the Maynooth Transfer Pipeline. Furthermore, the Plan will acknowledge the need for localised network upgrades in instances relating to brownfield and infill development within the existing footprint of the town.

4.21 Car Free Day / Car Free Town Centre

Overview of Key Issues Raised

A number of submissions requested the holding of either a regular car free day on Main Street or the realisation of a car free Main Street or town centre over the longer term. Many submissions noted the critical role the Maynooth Outer Orbit Route (MOOR) will have in achieving such an objective.

Response to Key Issues Raised

Whilst the implementation of a car free day is considered an operational (traffic management) issue not within the remit of the Plan, it should be noted that given the lack of alternative routes through and around Maynooth, it may not be feasible to hold a car free day on Main Street in the short term. However, a key aim of the Maynooth and Environs Area Based Transport Assessment (MEABTA) is to deliver reduced congestion in the town centre, particularly on Main Street over the medium to long term. As part of the second round of the public consultation for the MEABTA (advertised as the Draft Transport Strategy for Maynooth and Environs) a proposal envisages Main Street becoming accessible to public transport, pedestrians and cyclist only, with private vehicular traffic being prohibited. It is

noted however that this will depend on all sections of the MOOR being developed in order to provide alternative routes for people to access all destinations within and around the town.

4.22 Low/Zero Carbon Supporting Transport Infrastructure

Overview of Key Issues Raised

A number of submissions sought the delivery of an enhanced level of Electric Vehicle (EV) infrastructure, including more on-street charging points, fast charging facilities and dedicated EV car parking spaces. Several submissions were received with regard to the potential provision of a bike rental scheme in the town. Some submissions outlined suggested locations for rental stations such as the train station, the town centre, along the greenway and in the university.

Response to Key Issues Raised

It is acknowledged that the rolling-out of EV supporting infrastructure will assist in Maynooth's transition to becoming a low carbon town. In this regard, the Maynooth and Environs Area Based Transport Assessment (MEABTA) will include a range of measures to improve EV facilities within the town. These measures will be supported by specific objectives of the Plan. With regard to the development of a bike rental scheme, it is intended that the Maynooth and Environs Area Based Transport Assessment (MEABTA) will include a proposal for a bike rental scheme in the town which will be also supported by an objective of the Plan.

5. Next Steps

The Kildare County Council and Meath County Council in consultation with key stakeholders will prepare the Draft Joint Local Area Plan for Maynooth and Environs. It will be prepared in tandem with a number of assessments, as follows:

- Strategic Environmental Assessment (SEA)
- Appropriate Assessment (AA)
- Strategic Flood Risk Assessment (SFRA)
- Maynooth and Environs Area-Based Transport Assessment (MEABTA)
- Settlement Capacity Audit (SCA)
- Green Infrastructure Survey and Habitat Mapping Exercise
- Social Infrastructure Audit (SIA)

The Draft Joint LAP will be discussed with the Members of the Clane-Maynooth Municipal District and Ratoath Municipal District. The Draft Joint LAP will be placed on public display and members of the public, community groups, public bodies and other stakeholders will be invited to make written submissions and observations over a six-week display period. The key stages and timelines which guide preparation of the Joint Local Area Plan are set out in Figure 4 (see overleaf).

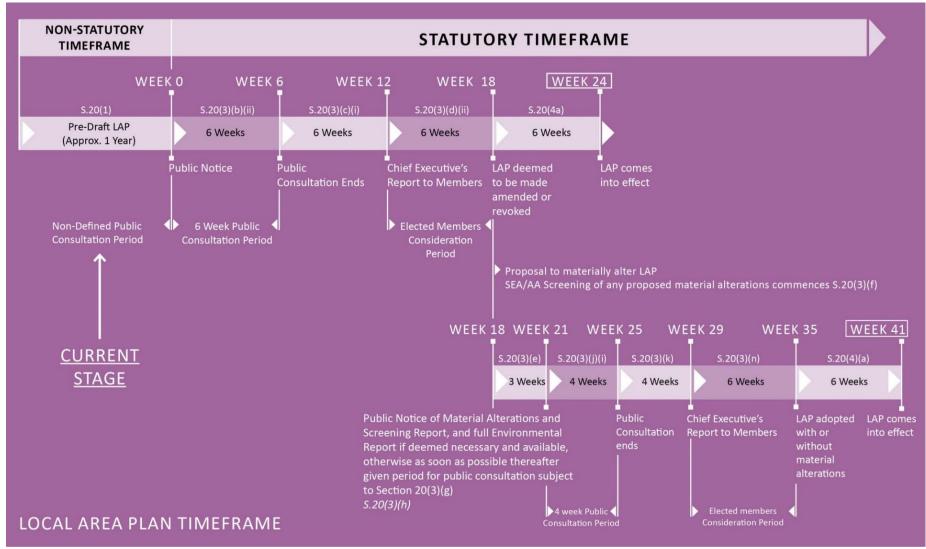


Figure 5: Key Stages and Timelines in the Preparation of the Joint Local Area Plan

Source: Guidelines for Local Authorities on Local Area Plans (DoECLG, 2013) (as updated and adapted)

6. Summary and Responses to Submissions Received

The following Tables 3 and 4 provide summary to each submission made during the pre-draft public consultation period for the Maynooth and Environs Joint Local Area Plan 2024–2030. Table 3 addresses the submissions from prescribed and state-owned bodies while Table 4 addresses submissions from all other interested parties and stakeholders. The response of the local authorities set out under each submission addresses the main issues raised in that submission and any considerations or provisions that will be made in the preparation of the Maynooth and Environs Joint Local Area Plan 2024–2030 as a result.

Table 3: Summary of Submission and Response to Main Issues Raised in Submissions from Prescribed and Public Bodies

Sub.	Name	Summary of Submission
No.		
3.	Inland Fisheries Ireland (IFI)	Submission from IFI notes that there are two watercourses within the Maynooth and Environs Joint Local Area Plan (JLAP), the Lyreen and the River Rye Water, both of which are migratory Salmonid rivers and which have the potential to be impacted by infrastructural development if proper safeguards are not adopted at all phases of a development. Submits that one of the greatest threats to the aquatic environment, which is in the proximity of urbanised growth and development, comes from discharges to the watercourse via the existing or new drainage network at all phases of development. Highlights issues relating to the lack of appropriate maintenance on interceptors, attenuation tanks and other SuDS measures on developments during the operational phases and requests that all proposed SuDS measures for new development in Maynooth should be robust and subjected to an independent audit report prior to being agreed to by the planning authority. Also encourages that it is mandatory for all new developments to enter into an ongoing contract for the maintenance of any SuDS features that will not be taken in charge by agencies, such as the LA's or Irish Water. Encourages that the application of nature-based solutions be incorporated as part of the drainage attenuation design for any new developments, where appropriate/feasible. States that the new interim guidance on Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas (DoHLGH, 2022) should be taken into consideration when designing drainage systems. Requests that the six-step decision framework for nature-based solutions should be considered in the Plan as a systematic and integrated approach through all stages of a development project cycle.



To protect the watercourses from the runoff of harmful substances during the construction of a project the submission recommends that any new development should be required to include specific measures to protect the environment within a CEMP, to be agreed with the planning authority and be specified in conditions in the final grant of planning. States that no development should commence until such time as all persons involved in the construction phase have been clearly informed of their environmental responsibilities in accordance with planning.

Submits that the JLAP will require close co-operation between the two local authorities in the decision-making process on any proposed development, particularly within the relative internal sections in both authorities that are required to comment or assess new projects. Notes that the River Rye Water forms the county boundary. Notes that proposed projects in either respective jurisdiction may have potential for direct/indirect impacts on the aquatic environment in the others area of control. States that this may be further complicated in relation to the enforcement of environmental legislation by both council's Pollution Control/Environment sections if an incident occurs. Concludes by stating that it may be helpful if any new planning application, irrespective of the planning authority, is distributed to both authorities for consideration and comment, and in particular seeking commentary on potential impacts on the aquatic environment.

Response to Issues Raised

The submission from Inland Fisheries Ireland is noted. The importance of waterbodies in the Plan area such as the Lyreen and the Rye Water from both an ecological and a recreational perspective is acknowledged. The contents of the Joint Local Area Plan (JLAP) will be screened for Appropriate Assessment (AA) during its preparation in order to ensure that there are no likely significant effects of the JLAP on the integrity of sites designated under the EU Habitats Directive. This is of particular relevance to the Lyreen and Rye Water rivers, given their direct hydrological connection to the Rye Water Valley / Carton Special Area of Conservation.

Furthermore, it is envisaged that the Plan will include a statutory objective to ensure that projects giving rise to adverse effects on the integrity of European sites (cumulatively, directly, or indirectly) arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall not be permitted on the basis of this Plan. The preparation of the Plan will also include a Habitats Survey and Green Infrastructure Mapping Exercise for Maynooth and Environs. The results of this assessment will provide the evidence for the development of a Green Infrastructure Map for the town which will illustrate 'Notable Green Infrastructure Routes'. This will be accompanied by a series of objectives providing for their protection and enhancement where appropriate. It is anticipated that key waterbodies such as the Lyreen and Rye Water will form the core of the green infrastructure network in Maynooth.

It is noted that the submission raises issues relating to pollution of waterbodies arising from development and building construction. This lies outside the remit of this land use plan. Such issues are dealt with by each local authority, either through the development management process, on foot of an application for planning permission, through the planning enforcement process, or through actions taken by each local authority's environment section. On the issue of cross boundary co-operation between Kildare and Meath County Councils, the main rationale for preparing this Joint LAP is to provide an overarching framework for the Maynooth area to promote greater co-ordination in planning for its sustainable growth and long-term development. It should be noted that best practice dictates that each planning authority would inform a neighbouring authority (as a prescribed body) if a proposed development could potentially have a cross-boundary impact.

The recently published interim guidance on *Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas* (DoHLGH, 2022) will be supported by a number of provisions in the Plan. This includes an objective which will support the preparation of a Maynooth Surface Water Drainage Study for both existing and new development areas within the town to provide for a municipal-level, multi-site nature-based solution(s) to surface water management.

6. Department of
Public Health –
Health Service
Executive (HSE)

Submission on behalf of the Department of Public Health HSE (Area B) states it has responsibility for identifying the public health needs of the population within its area. Notes that the key government framework on which this submission is based is *Healthy Ireland: A Framework for Improved Health and Wellbeing 2013 – 2025*. Submission notes other key plans to which this submission relates including Project Ireland 2040, the Climate

Act, the draft Kildare County Development Plan, national and county policies relating to cycling, the Urban Design Manual (2009) and Get Ireland Active! National Physical Activity Plan for Ireland. Notes its role as a prescribed public body whose remit includes public health.

Communities

Notes the importance of intervention in the community to improve social cohesion and liveability. Suggests the need to support communities that meet the needs of individuals in terms of housing, public service access and physical activity. Also suggests the promotion of health within the community by encouraging active and sustainable transport methods. Outlines the importance of design in creating pleasant and integrated communities, providing for citizens of different physical, social, cultural backgrounds. Notes the need for access to fast, reliable internet and to support local economies and draw tourists by fostering local culture heritage. Also notes the need to support the development of working from home options or at local hubs to reduce commuting along with access to green and blue spaces for residents and children. States that this a policy action in the Better Outcomes Brighter Futures Framework, which is promoted by the HSE's National Healthy Childhood Programme. Contends that childhood health should be supported through initiatives to promote and increase physical activity and active transport and to reduce exposure to pollutants and chemicals, including air and noise. Notes other initiates such as no fry zones around areas where children spend time and public advertising near schools, buses and transit routes and that measures to reduce obesity for all should be built into development plans, including suitable and accessible play and recreation areas for children and young people.

Housing

Refers to predicted population growth in Kildare and states that this will come with the need for quality housing, transport access and amenities access. Suggests that new developments should not be allowed without access to a full range of public services, including transport services and this goal should be mandated and be held to account. Also submits that the Plan takes into account air quality and noise pollution and notes that air pollution can be damaging at any level. Seeks that residential development avoid creating areas of deprivation by mixing social housing with private housing (i.e. mixed tenure), which is supported by national policies such as the Social Housing Strategy 2020.

Transport and Travel

Notes the importance of all people, inclusive of people with disabilities, to have equitable and safe access to transport services. Submits that provision of high quality public transport will help combat car dependency, an issue which the OECD has stated that Ireland needs to address. Outlines the need to enhance cycling and active transport infrastructure for reasons relating to sustainable mobility, health, social inclusivity, and climate action. Recommends several suggestions be incorporated in the Plan including placing public transport accessibility at the centre of all transport plans; making public transport and attractive and accessible option; increased public transport frequencies; developing the capacity of the rail network; encouraging of transport powered by electrical and renewable energy, reducing reliance on the private car and supporting the delivery of infrastructure which will promote sustainable movement.

Environment and Climate Change

Notes the huge challenge of climate change and states that the responsibility for climate action lies with all organisations and every individual. Notes recent climate initiatives such as the European Green Deal. Submits that the Plan should include policies and provisions to encourage sustainability and emission reduction in all developments, expand electric vehicle (EV) charging infrastructure and increase areas which should be set aside for environmental preservation and re-wilding and rapid reforestation to enhance biodiversity and aid carbon sequestration. Submits that green and blue areas should be accessible in a nature-friendly and low-emission so that individuals are able to enjoy the benefits of spending time in nature. Also seeks support in the Plan for local produce which support local communities and reduce emissions along with robust systems to decrease the need for transport of waste to and recycling of waste in other jurisdictions. Further seeks the expansion of data systems to inform population health in the form of health intelligence, such as air and noise quality monitors, and people movement statistics to inform public transport upgrades.

Energy

Seeks that the Plan should align with national plans around renewable energy, and low-emission technology and energy production. Encourages the expanding of possibilities for local, sustainable energy production (i.e. solar and wind). Also seeks robust plans for sustainable energy generation with regard to digital infrastructure, especially in relation to data processing and server facilities and that consideration should be given to planning for local, sustainable energy generation around these facilities.

Social Determinants of Health and Health Promotion

Submits that the social determinants of health are factors which impact the lives and health of individuals, but are generally outside of their control, and may not be recognised as having an impact on health. States that attention to these determinants, should be considered in policy planning, especially in terms of communities, housing, energy and economy and that health should be promoted in any policies that could have health implications. Recommends that a stringent health risk assessment and consideration in policy and development decisions, with a view to promoting health. Further recommends that policies to reduce/avert the burden of social determinants should be considered in all policy and development decisions.

Response to Issues Raised

The contents of the submission by the Department of Public Health of the HSE are noted. Considering the national and regional policy context regarding climate action, healthy placemaking and sustainable mobility it is envisaged that the Joint Local Area Plan will seek to deliver liveable communities by ensuring compliance with the principles of people-centred urban design providing increased opportunities for active travel, physical activities, and social interaction, through the development of compact neighbourhoods which feature high-quality pedestrian and cyclist connectivity, accessible to a range of local services, amenities and open spaces. On the issue of No Fry Zones, it is considered that this is a development management issue that is not supported in the Kildare County Development Plan 2023-2029 and therefore not considered appropriate to introduce at Local Area Plan level in the absence of a wider and more considered evidence base being undertaken of at county level.

A key function of the JLAP is to provide for the zoning of an adequate quantum of appropriately located serviced and serviceable land to provide for residential development, in keeping with the provisions of the respective core strategies of Kildare and Meath County Councils and the Regional Spatial and Economic Strategy (RSES). The Plan will seek to implement the principles of the 10-minute settlement within Maynooth so that key neighbourhood services are accessible within a 10-minute walk or cycle from peoples' homes. The Plan will also be accompanied by an infrastructure delivery schedule which will require that specific and critical pieces of servicing infrastructure and amenities are delivered either prior to or in tandem with development. On the issue of air quality, it should be noted that while there are objectives relating to the protection of air quality in each local authority's respective County Development Plan, the Environmental Protection Agency (EPA) is the

competent and principal authority in charge of the enforcement of air quality standards in Ireland. The Plan will include an objective supporting the implementation of each local authority's Noise Action Plan. The JLAP will also include an objective to support mixed tenure in house developments, as per national policy.

The Plan will seek to implement universal accessibility with regard to transport infrastructure in the town, in accordance with the principles of people-centred urban design. The local authorities are both keenly aware of the role that a comprehensive universally accessibly transport system can play in promoting health lifestyles and realising integrated communities. The Plan will be accompanied and informed by a Maynooth and Environs Area-Based Transport Assessment (MEABTA) which will seek to implement a long-term shift in movement patterns in the town towards sustainable movement options and away from the private car. In this regard, it should be noted that the MEABTA will include both a cycling strategy and a walking strategy which will seek to create a comprehensive high-quality active movement (pedestrian and cycle) network in the town. Whilst public transport enhancements lie outside the remit of this Plan, it should be noted that the overall development strategy will seek to maximise opportunities in terms of access and usage of high capacity and high frequency public transport services planned as part of the DART+ West and BusConnects projects.

It is recognised that all aspects relating to the development strategy in Maynooth need to be considered in light of the need to plan for a substantial reduction in greenhouse gas emissions and to promote low carbon development in the town, in line with national targets. Accordingly, the Plan will include provisions to support inclusive and comprehensive climate action in Maynooth and environs, insofar as its remit extends. It is envisaged that the Plan will also contain provisions to require biodiversity net gain on specific sites to encourage the development of natural habitats in the town and to promote increased levels of carbon sequestration. The JLAP will include support for the continued rollout of EV charging infrastructure.

The Plan will include provisions to support renewable energy and low-emission technology along with supporting local renewable energy production. It should be noted that the impending designation of Maynooth as a Decarbonisation Zone (DZ) will require the setting of targets relating to the development of locally generated renewable energy in Maynooth which will be proposed as part of the Decarbonisation Action Plan for the town. An objective will be included in the Plan to support the full implementation of any Maynooth Decarbonisation

Action Plan, with regards to its goals, objectives and actions relating to planning and development within Maynooth Decarbonisation Zone. Office of Public The submission from the OPW notes its role as lead agency for flood risk management in Ireland. Submission 10. Works (OPW) states that reference should be made to the Guidelines on the Planning System and Flood Risk Management Flood Risk (DHPLG/OPW, Nov 2009), Circulars and Technical Appendices, to ensure that the key principles of flood risk Management management and sustainable planning are adopted. Notes that the sequential approach to managing flood risk within the planning system should be considered at the earliest stage, and where uncertainty exists the precautionary approach should be taken or further detailed assessment carried out before decisions are made, rather than delegating decisions to the development management stage. Submission outlines the contents of the Guidelines including its three-stage process, as follows: Stage 1: Flood Risk Identification Stage 2: Initial Flood Risk Assessment • Stage 3: Detailed Flood Risk Assessment) to identify whether flood risk may exist, and the degree to which it is an issue. Recommends that particular attention is paid to specific sections of the Guidelines including Chapter 3 – The Planning Principles, Chapter 3 – The Sequential Approach, and definitions of Appropriate Development and Chapters 3 and 4 The Plan-making Justification Test. Advises that clear commitments and strategic objectives regarding flood risk and the principles of the Guidelines are included in the Plan, and that persons with the relevant expertise review any flood risk assessments. Submission outlines the role of the Sequential Approach and the Justification Test of the overall process. Regarding Justification Tests, it is recommended that the local authorities should specify the structural or non-structural measures as prerequisites to development and provide information on the residual risks that would remain and how they might be managed. Further states that inappropriate development that does not satisfy all criteria of the Justification Test should not be considered at the plan-making stage. The Flood Risk Management Plans and Flood Maps Notes that the OPW, in conjunction with all local authorities, undertook the National Catchment-based Flood Risk Assessment and Management (CFRAM) Programme, through which Flood Risk Management Plans (FRMPs) and

flood maps were prepared. Also notes that the implementation of these Plans is an objective of the RSES, and that

Kildare and Meath County Councils adopted the FRMPs relevant to their administrative areas. Further notes that the CFRAM Programme included analysis of flood risk in Maynooth. Requests that the local authorities have full regard in the preparation of the Plan to the proposed development of a flood relief scheme in Maynooth and that a specific objective in this regard is included in the Draft Plan. Notes that OPW has a statutory duty to maintain flood relief schemes completed under the Arterial Drainage Acts, 1945-1995. Requests that the local authorities have full regard to the protection, and the need for maintenance of such flood relief schemes. Suggests that Kildare and Meath County Councils might also consider including a register of key flood risk infrastructure in the County Development Plan (CDP) where it would not otherwise be readily identified or protected from interference or removal. Notes planning authorities should have regard to the flood maps produced under the CFRAM Programme. Further notes that where physical changes have occurred and where there is evidentially robust additional information, this can and should also be included in the making of spatial planning decisions. States that flood maps, including those for potential future scenarios taking account of the possible impacts of climate change, are available to view on the OPW portal, www.floodinfo.ie, and may be obtained in GIS format from the OPW Data Management Section via email (flood data@opw.ie).

Map Review Programme

Notes that in certain areas physical changes may have occurred since the preparation of the flood maps under the CFRAM Programme that would affect the Flood Zones. States the models may have been based on limited information in some areas, whilst in other areas more recent flood events or more detailed assessment may indicate that the flood extents should be greater or lesser than those currently mapped. The OPW notes that it will review, and where necessary update, the flood maps on an on-going basis. In this regard, it notes that Flood Mapping produced under the CFRAM Programme is currently under review in Maynooth and Kilcock and accordingly, the mapping in these areas may change.

National Indicative Flood Mapping

States that the updated indicative flood mapping outlined below were prepared for the purpose of an initial assessment, at a national level, to assist in the review of areas of potentially significant flood risk, as required by the EU 'Floods' Directive 2007/60/EC. Notes that they provide only an indication of areas that may be prone to flooding and are therefore not necessarily locally accurate and should not be used as the sole basis for defining the Flood Zones, or for making planning policy.

National Indicative Fluvial Mapping (NIFM)

Notes that Indicative Fluvial Flood Maps have been prepared for all watercourses in the country with a catchment greater than 5km² through the NIFM project. States that these maps provide important flood hazard information for areas not covered under the National CFRAM Programme. Further states that these maps have been prepared for two potential future scenarios taking account of the potential impact of climate change: the Mid-Range future Scenario (MRFS) and High-End Future Scenario (HEFS), as well as for current conditions. Notes that the OPW does not provide any predictive fluvial flood maps for catchments with an area of less than 5km² that were not included in the CFRAM Programme and planning authorities may need to carry out their own Flood Risk Assessments to inform the definition of Flood Zones for these areas. States that further user guidance and details on the preparation on the NIFM outputs are available at: https://www.floodinfo.ie/publications/?t=50

National Costal Flood Hazard Mapping

Submission outlines issues relating to coastal flood risk and flood defences.

National Groundwater Flood Mapping

Notes that probabilistic and historic groundwater flood maps have been prepared by Geological Survey Ireland through the 2016-2019 GWFlood Project and that the Historic Groundwater Flood Map shows the observed peak flood extents caused by groundwater are largely based on the winter 2015/2016 flood event which was the largest flood on record in many areas. States that further user guidance and details on the preparation of the NCFHM are available at: https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/activities/groundwater-flooding/gwflood-project-2016-2019/Pages/default.aspx

Consideration of Climate Change Impacts

Notes the potential impacts of climate change including an increase in rainfall intensities and fluvial flood flows. States that planning authorities need to consider such impacts in the preparation of plans, such as by avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences, specifying minimum floor levels and setting specific development management objectives, in line with the Flood

Risk Guidelines. Notes that the flood maps prepared under the National CFRAM and the national indicative flood maps include maps for future scenarios taking account of different degrees of climate impact.

Drainage Districts

Requests that regard is given in the zoning of land for development to ensure that access requirements are preserved for the maintenance of Arterial Drainage Schemes and Drainage Districts. States that applications for development on land identified as benefiting land may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas. Notes that the location of Arterial Drainage Schemes and Drainage Districts may be viewed on www.floodinfo.ie .

Land Protected by Agricultural Embankments

Notes that the Flood Zones are defined ignoring the presence of flood defences (Section 2.25 of the Guidelines). This is particularly important in the context of land that benefits from some degree of protection from embankments that were constructed to protect agricultural lands (see www.floodinfo.ie). Strongly recommends that land should only be zoned for development in such areas in accordance with the definition of appropriate development as set out in the Guidelines.

Impacts on Other Areas

Notes that in line with the guidelines proposed new development needs to avoid increasing flood risk elsewhere.

Nature-based Solutions and SuDS

Advises that the Plan should take into consideration the opportunities for nature-based solutions but in existing and new developments to reduce run-off and provide other benefits including on water quality and biodiversity, etc. Refers to the Best Practice Interim Guidance Document 'Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas' for further guidance. Notes that the Guidelines recommend that the SFRA provide guidance on the applicability of different SuDS techniques at key development sites and identifies where integrated and area-based provision of SuDS and green infrastructure is appropriate.

Response to Issues Raised

The information contained in this submission is acknowledged and will be taken into full consideration during the preparation of the Plan. The Joint Local Area Plan (JLAP) will be accompanied by a Strategy Flood Risk Assessment (SFRA) which will be prepared in accordance with the requirements of *The Planning System and* Flood Risk Assessment Guidelines for Planning Authorities (2009) and Circular PL02/2014 (August 2014). Consultants with the necessary technical expertise and experience have been appointed to undertake the SFRA for the Plan. The most up to date information on flood risk in Maynooth and Environs will be used in the preparation of the SFRA, as and when it becomes available. Having regard to current extent of flood risk in Maynooth and in light the increasing frequency of flooding due to climate change, along with the need to achieve resilience within the town to mitigate its effects, the Plan will seek to ensure that development in floodplains is avoided entirely or is 'water-compatible,' as per the Flood Risk Guidelines (2009). Areas subject to flooding will therefore be recognised and preserved in the Plan to the maximum extent possible, in both urban and rural locations, as essential green infrastructure that provides a natural defence against flood risk. Furthermore, in light of their additional value as ecological corridors, the Plan seeks to develop an integrated green infrastructure network which will focus on the waterbodies within Maynooth and Environs. It is intended that the Plan will incorporate a range of flood risk management provisions including an objective to support and co-operate with the OPW in augmenting the Lyreen and Meadowbrook Flood Relief Scheme, subject to the statutory environmental considerations. The recently published interim guidance on Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas (DoHLGH, 2022) will be supported by a number of provisions in the Plan. This includes an objective which will support the preparation of a Maynooth Surface Water Drainage Study for both existing and new development areas within the town to provide for a municipal-level, multi-site naturebased solution(s) to surface water management. **Transport** Submission by Transport Infrastructure Ireland (TII) notes that the Maynooth and Environs Joint LAP (JLAP) Pre-14. Infrastructure Draft Issues Paper sets out the hierarchical strategic planning context of the proposed LAP. Submission states that official policy for development at or near national roads is outlined in the DoECLG Spatial Planning and Ireland (TII) National Roads Guidelines for Planning Authorities (2012).

Refers to the Issues Paper which states that it will be critical for the plan to develop an integrated land use and transport strategy in order to determine planned growth in a sustainable manner. Welcomes an evidence-based approach to planning policy and undertaking of detailed transport modelling. Submits that an integrated approach to the design of development areas should include a set of principles and criteria designed to ensure a high standard of access by public transport, foot and private car so that the variety of retail, enterprise and employment zones/areas can be easily accessible by all modes of transport and all sections of society. To assist in such exercises, the submission refers to the Area Based Transport Assessment (ABTA) Guidance which has been jointly prepared by TII and the National Transport Authority (originally published in 2018) which currently consists of the NTA's ABTA Advice Note, ABTA Pilot Methodology and Templates and TII Publications ref. PE-PDV-02046 ABTA Guidance Notes.

Submission encloses a copy of a previous submission ref. TII21-115563 (November 2021) it made to Kildare County Council on foot of Public Consultation (No. 1) of the Maynooth Transport Strategy (see below for summary of this submission). TII recommends that the *Maynooth Transport Strategy* include expanded plan area to progress in tandem with the preparation of the *Joint LAP*. As such, TII request that matters raised in the previous submission are taken into account in the land use transportation assessment to support and inform the *JLAP*. Submission also advises that the National Investment Framework for Transport in Ireland (NIFTI) was adopted in December 2021.

Submission on Maynooth Transport Strategy – Public Consultation No.1 (Enclosed with submission to Predraft Consultation on Maynooth and Environs JLAP 2024-2030) Strategic Context

Submission notes that the M4, national primary route, is part of the TEN-T Comprehensive Network, a strategic national road and is an important inter-urban transport corridor linking strategic regional centres including through strategic airport and port locations. Refers to National Strategic Outcome 2 (NSO 2) of the NPF which includes seeks to maintain the strategic capacity and safety of the national roads network. States it is also an investment priority of the National Development Plan 2018 – 2027 to ensure that transport networks are maintained to a high level to ensure quality levels of service, accessibility, and connectivity to transport users. Notes the inclusion of the M4 Maynooth to Leixlip Scheme in the National Development Plan. Further notes the

need to manage national road assets in accordance with national policy is outlined in Project Ireland 2040 - NPF (NSO 2 and NSO6) and National Development Plan 2018–2027, the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) and the NTA's Greater Dublin Area Transport Strategy. Recommends that the Council undertakes necessary and appropriate traffic and transport analysis to ensure that the strategic function of the M4 and associated junction(s) can be safeguarded.

Emergency Diversion

Outlines the importance in providing the appropriate level of resilience for motorway infrastructure considering the impact that major traffic incidents requiring a motorway closure can cause. In this regard, the submission notes that the NTA, in collaboration with relevant local authorities, will seek the development and construction of an appropriate road link between the N3 and N4 roads, which can provide a satisfactory alternative in the event of incidents arising on the M50 between Junctions 6 and 7, in addition to providing potential additional public transport linkages. The submission further advises that the transport strategy for Maynooth needs to also be informed that emergency diversion due to motorway incidents through Maynooth may occur and therefore should be built into any evolving transport response for the town.

Land Use and Transport Integration

Submits that the Transport Strategy which should inform any future Plan, should be prepared on the basis of an evidence-based area transport assessment in accordance with the requirements of the DoECLG Spatial Planning and National Roads Guidelines. Notes that Section 1.4 of the TII Traffic and Transport Assessment Guidelines (2014) addresses Area Based Transport Assessment for Forward Planning as well as guidance is available in TII Area Based Transport Assessment (ABTA) Guidance Notes.

Response to Issues Raised

The contents of the submission from Transport Infrastructure Ireland are acknowledged. It should be noted particular emphasis will be placed on the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) when reviewing current land use zoning objectives and any potential new land use zoning designations at or near national roads. Furthermore, the Plan will incorporate a specific objective to safeguard the development and carrying capacity of the national road infrastructure along the M4 and its

associated junctions in accordance with the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).

The Maynooth and Environs Area-Based Transport Assessment MEABTA is currently being progressed and will play a critical role in assisting in the consideration of all land use zoning designations within the plan area. Crucially it is being prepared in tandem with the Joint Local Area Plan (JLAP) with consultations taking place on an ongoing basis between the relevant teams. The MEABTA is designed to provide the evidence-base for the Plan with regard to recommendations relating movement and transport measures, in order to initiate a permanent shift away from private car use towards an integrated land use and transport model based around the development of sustainable movement patterns. This also aligns with Maynooth's impending designation as a Decarbonisation Zone. Accordingly, all aspects of the submission (including the submission to Public Consultation Exercise No. 1) relating to both the methodology and outputs of the MEABTA will be taken into consideration in progressing the final draft of the document. In this regard, the boundaries of the assessment area have been expanded to include the Maynooth Environs.

18. Department of Transport

Submission from the Department of Transport notes that since the previous plan was published there have been important policy developments which are relevant to accessible, integrated, and sustainable public transport which should be reflected in the proposed Plan. Submission notes the "whole of Government" National Disability Inclusion Strategy (NDIS) 2017-2022 includes specific actions assigned to local authorities such as action 108 relates to the 'dishing' of footpaths and action 109 relates to accessible infrastructure, including bus stops. Refers to the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) ratified by Ireland in 2018. The UNCRPD puts obligations on State Parties to ensure access for persons with disabilities to the physical environment and transportation in both urban and rural areas.

Notes that the DMURS Interim Advice Note – Covid-19 Pandemic Response (2020) includes guidance that designers should ensure that:

- measures align with the principles of universal design,
- consider Government policy on accessibility for people with disabilities and
- consult people with disabilities to further appraise measures.

Further notes that all reference in the draft Plan to the 2019 version of DMURS should be replaced with references to the 2020 DMURS Interim Advice Note – Covid-19 Pandemic Response.

		States that making public transport fully accessible to people with disabilities requires a 'whole journey approach' from its starting point to destination. Submits that Local Authorities are a key stakeholder by ensuring a universal design approach to the built environment with attention needing to be paid to footpaths, tactile paving, cycle lanes, roads, pedestrian crossing points, town greenways and bus stops/shelters.
		Response to Issues Raised
		A key element of the Joint Local Area Plan (JLAP) will seek to implement universal accessibility with regard to transport infrastructure in the town, in accordance with the principles of people-centred urban design and healthy placemaking. It is envisaged that the Plan will incorporate a range of provisions both through overarching objectives and specific measures to support universal movement throughout the town. Furthermore, it is intended that Kildare County Council will, in conjunction with the Maynooth Access Group, undertake a Walkability Audit during 2023 which will focus on ease of movement for both pedestrians and people who have impaired mobility within Maynooth Town Centre. The JLAP will seek to include an objective to support the implantation of any recommended actions of the audit. Furthermore, the JLAP will include specific reference to the 2020 DMURS Interim Advice Note. It is noted that both the Kildare County Development Plan 2023-2029 and the Meath County Development Plan 2021-2027 have provisions which support the National Disability Inclusion Strategy (2017- 2021).
19.	Dublin Airport Authority	The authority notes the preparation of the Maynooth and Environs Joint Local Area Plan and has no comment to make, other than to recommend consultation with the IAA and the IAA-ANSP. Response to Issues Raised
20	Donartment of	The submission is noted. Submission notes that the local authorities in making the Plan, are obliged to comply with the provisions of the
20.	Department of Education	Submission notes that the local authorities, in making the Plan, are obliged to comply with the provisions of the NPF and RSES. Refers to the population targets for Maynooth including the additional population allocation under the RSES and states that if these targets materialise the need for additional education provision at both primary and post-primary level may emerge over the lifetime of the Plan.
		Submission refers to the issue of compact development and regeneration of the urban core. States that population growth within the existing 'built-up' footprint of the town has the potential to upset the balance of

use relative to education provision in the area. Further states that the absence of school site provision in such locations can cause challenges to the provision of school places and accordingly it is critical that explicit provision is made to cater for school development within the existing built-up area of the town. Notes the reference to the vital role of community infrastructure in the Issues Paper and requests that the Plan be explicit in its support for the provision of adequate and suitable school accommodation, including the development of new schools and the expansion/alteration of existing ones.

Refers to unforeseen circumstances such as the war in Ukraine which can put undue pressure on school place provision and necessitate reassessment of need. Undertakes to engage with the Council where the findings of such an assessment requires a review of school site provision.

Response to Issues Raised

The contents of the submission are noted. The Draft Joint Local Area Plan will include a specific objective in relation to supporting the delivery of schools in Maynooth at appropriate locations, in keeping with the principles of the 10-minute settlement. As part of the preparation of the Plan a Social Infrastructure Audit will be undertaken in Maynooth. This will, inter alia, look at the anticipated demand for further school places in the town at both primary and secondary levels, taking into consideration the targeted population growth over the life of the Plan. Kildare and Meath County Councils will continue to engage and work closely with the Department of Education to ensure adequate provision for schools in Maynooth, in accordance with the provisions of the Memorandum of Understanding agreed between the City and County Managers Association and the Department.

21. Land Development Agency (LDA)

Submission from the Land Development Agency (LDA) states that the focus of the organisation is to secure the most effective use of public lands where appropriate and to support a stable, sustainable supply of land for housing into the future and states that it is leading projects that will result in the development of thousands of new homes, delivering compact and sustainable growth. Having reviewed the Pre-Draft Issues Paper (referred to by the submission as the 'Pre-draft Plan') the organisation seeks to ensure that its views and objectives as a key stakeholder within counties Kildare and Meath, and the Dublin Metropolitan Area are recognised. Notes the Agency's identification of state lands within Maynooth for the supply of land for housing into the future. States that the Agency will be submitting a Report on Relevant Public Land to the Government by Quarter 1, 2023 which will detail lands it considers suitable for the development of affordable housing. States that the focus for

the LDA is on assessing relevant public lands in towns and cities with a population base of over 10,000, including Maynooth.

Role of the Land Development Agency

Notes its role, as set out in the LDA Act 2021, is to act as a commercial state agency to undertake strategic land assembly and optimise relevant public lands to build affordable homes and sustainable communities. In this regard, it states that it has a key role in working with local authorities and state bodies to make the most effective use of public lands and working to unlock land to provide affordable housing nationwide with a key focus on delivering compact urban and sustainable growth to facilitate the provision of housing for the public good. Submission seeks that the Plan refers to relevant public lands and the potential role of the LDA in the delivery of affordable and sustainable residential development. Having cognisance to their role in supporting Local Authorities to masterplan and progress plans for strategically important development and regeneration areas the agency also recommends that the commitment to active land management and working with State Agencies such as the LDA to bring forward the delivery of housing is referenced in the Plan.

Commitment to Sustainable Mobility

States that through the design and development of our housing schemes the LDA will support sustainable travel options, as a priority to deliver low carbon and climate-resilient development. Submission recommends that some 'New Residential' zoning be located within proximity of the Proposed Train Station to the West of Maynooth, alongside the already identified 'Potential Transit-Orientated Development'.

Response to Issues Raised

The contents of the submission are noted. The important role of the Land Development Agency (LDA) in increasing the supply of housing in the State is acknowledged. Accordingly, it is intended that the Plan will include a specific objective which seeks to support the work of the LDA and other relevant state agencies with regard to the potential development of sites for residential housing in Maynooth. The principle of active land management is considered to be a central component of the overall development strategy for Maynooth and Environs. It is envisaged that the Plan will include a range of provisions to facilitate active land management, with particular emphasis on the delivery of residential development at sustainable densities on appropriate lands

within the town centre, and along existing and planned high-capacity public transport routes, in keeping with national and regional policy. **Environmental** Climate 24. **Health Service** Notes the provisions in the National Climate Action Plan and states its implementation will require dedicated (EHS) – Health allocation of resources and sustained policy implementation. Welcomes that the Pre-Draft Issues Paper notes **Service Executive** that climate change is a key consideration in the Plan. Submits that the key aims of the Kildare Climate Change (HSE) Adaptation Strategy and Meath Climate Action Strategy should be integrated into the Development Plan. Notes the leadership roles both authorities have in achieving decarbonisation goals. It recommends that Kildare and Meath County Councils set specific targets for greenhouse gas reduction and outline achievable actions that seek to combat, reduce, or eliminate the emissions of greenhouse gases. Key indicators for monitoring of progress on climate action must be outlined to ensure progress is achieved. **Environmental Noise** Notes that the issue of environmental noise as an increasing cause of ill health and detrimental effect on wellbeing. Recommends that a Noise Impact Assessment is carried out at the pre-planning stage for any development proposals with the potential to give rise to a significant noise impact. Refers to the Kildare County Council Third Noise Action Plan 2019-2023 and County Meath Noise Action Plan 2019. Recommends that environmental noise should be considered in the context of specific new developments including (inter alia) roads, railways, airports industry, housing, or other noise sensitive premises such as schools or hospitals. Notes there is no provision in legislation upon which the actions outlined in the Kildare and Meath Noise Action Plans can be enforced. Advises that the measures outlined in the Noise Action Plans are included in the Joint Development Plan for Maynooth to ensure their implementation. States that the Plan will also provide the basis for feedback and input from statutory authorities and the public to help inform the Action Plan in relation to management of environmental noise including helping to prioritising initiatives laid out in the noise action plan such as identification and delimitation of 'quiet areas.' **Air Quality** Submission recommends that the Plan should aim to increase the quality of air in Maynooth and surrounding

areas through: the involvement in national programmes of air quality monitoring; working to develop and

promote the Air Quality Index for Health; Developing local Air Quality Management Plans that identify pollution

"hot spots" and aim to reduce pollution through local action on emissions, increasing the number of fixed air quality monitoring stations in the area, expand the involvement of both local authorities in the URTAP Air Quality initiative and; taking into consideration the existing air quality when considering new developments in close proximity to all major roads. Submits that the location of residential development should be set as far as possible back from major roads.

Sustainable Development

Refers to the Government's policy document *Our Sustainable Future – A Framework for Sustainable Development*. Submits that the local authorities should ensure that climate considerations are fully integrated into the planning of new projects and their design and that all future development in the town should have a green procurement approach, which incorporates carbon pricing and climate criteria into decision making. Submits that environmentally friendly features such as green infrastructure and water recycling should all be incorporated into the design stage of all development. Submits the need to lead the promotion of innovative, low carbon, renewable energy technology in the provision of local authority housing and that a carbon audit of existing building stock in Maynooth should be undertaken with a view to retrofitting buildings with insulation and sustainable technologies.

Energy

Refers to Ireland's Second National Energy Efficiency Action Plan to 2020. Submits that the local authorities provide dedicated funding to invest in upgrading BER ratings, assist with the provision of heat pumps and roof solar panels to reduce energy consumption. States that the creation of digital working hubs in population centres like Maynooth should be a priority to reduce the need for commuting and that new developments should have open access fibre connections. Submits that the Development Plan should: Promote and facilitate the incorporation of energy efficiency design into projects; develop and implement an energy management programme for all public buildings; develop new key skill sets in areas such as green procurement, carbon accounting, carbon management and energy management; and support the Better Energy Communities Scheme. Recommends that a renewable energy strategy is prepared to investigate its potential in Maynooth and that all renewable energy options be explored and facilitated.

Transport

Submits that Kildare and Meath County Councils should aim to implement a sustainable transport model for Maynooth which would identify small scale projects that can achieve significant gains i.e. segregated pedestrian and cycle lanes to key destinations in the town. Notes the need for a comprehensive cycle lane and pedestrian network and recommends the following:

- A "quality audit" is carried out of existing pedestrian and cycle facilities in Maynooth.
- Permeability links and shorter connectivity route options for pedestrians should be explored and improved through housing estates if necessary.
- Targets for trips for pedestrians/cyclists are set and progress on achieving these targets is monitored throughout the lifetime of the development plan.
- States that all opportunity for "greening" of routes should be considered which will make it more attractive for uses.
- Enhanced bus lane provision and infrastructure improvements to provide shelter and real time travel information at all bus stops should be considered.

Submission refers to the Government's Smarter Travel Policy which outlines a detailed array of proposals with regards to the implementation of compact growth development including sequential mixed-use development, implementing a maximum level of car parking on commercial lands, providing transport facilities and recreational and amenity facilities within walking/cycling distance in the town. Also, requests a wide array of further transport measures with the intention of initiating a modal shift towards sustainable movement (walking, cycling and public transport). Submission refers to the National Cycle Policy Framework and recommends that the Plan include an array of measures including a series of infrastructural improvements that would address and support the needs of cyclists in the town.

Refers to the policy document *Get Ireland Active – National Physical Activity Plan for Ireland* and states that a strategic aim for the local authorities should be to promote the active school flag in every school in Maynooth. Further submits that the Councils establish processes that enable consultation with young people in the development and implementation of programmes in which they are involved, i.e. playgrounds, activity centres and public spaces. Contends that suitable facilities that cater for all age ranges, including teenagers, should be provided. Requests that planned nursing homes or residential care facilities should include proposals for gardens

and recreational activities. Submission outlines an array of measures relating to the promotion of opportunities for physical activities which it recommends should be incorporated into the Plan.

Employment

States that the planning of large-scale employment sites must take into consideration the wellbeing of workers including the preparation and implementation of a travel plan which facilitates sustainable modes of travel. Notes the need for quality pedestrian/cycle links and that appropriate cycling infrastructure (including parking and shower facilities) and recreational amenities for employees should be provided on site. Further notes the need for employment lands to be well-designed and incorporate natural features including wildlife gardens and outdoor dining facilities in order to promote wellbeing.

Housing and Urban Design

States that it should be the objective to provide attractive, interesting, and well-used public realm and open spaces and to create pedestrian-centred, quality environment. States that the Councils should implement the concept of '20-minute neighbourhoods' in larger conurbations using the 12 criteria outlined in the Urban Design Manual. Recommends that residential development is made up of a variety of household types and tenures and that the development proposals for large housing or urban areas should be accompanied by a design statement. Advises that the Councils outline an implementation and sequencing strategy for Maynooth which would identify and outline the key infrastructural requirements and ensure that the necessary infrastructure, facilities, and amenities are provided in conjunction with residential development. Also recommends on measures to tackle vacant units, repurposing of office accommodation into alternative uses and rezoning of retail areas.

Green Infrastructure and Biodiversity

Notes the importance of recreational spaces to promote the health and wellbeing of residents and the wider community. States that the provision of quality open space facilities is even more important in the context of increase densities and compact growth. Recommends that all future developments in Maynooth are examined for the opportunity to integrate green infrastructure into the design at planning stage. Submits that "For amenity purposes at least 9m2/person of accessible open green space are recommended by the World Health Organisation, however, it is recognised that this may depend on various circumstances. Recommends an array of proposals in relation to the consideration of planning parks and recreational areas including the need to such

amenities to be within a walkable distance from residential areas, the need for quality linear connections between such spaces and the nature of the design of such open spaces.

Biodiversity and Green Areas

Submits that it should be a strategic aim to bring biodiversity into the planning decision making process and that a biodiversity action plan should be developed which aims to conserve and restore biodiversity and ecosystem services. Outlines the importance of nature-based solutions to better manage flooding and biodiversity in the planning of public areas. Notes the need to protect existing green spaces. States that nature-based solutions should be explored and integrated into the design of public areas. Further states that the provision of pedestrian and cycle routes through green areas should be a key provision of their design as this would also aid the movement of fauna, creating ecological corridors. Submits that all development should identify areas where biodiversity can be integrated into the urban fabric and requests that Maynooth should commit to a pollinator plan.

Older People

Notes the issue of aging in Ireland and states that the plan must cater for the housing needs of the elderly as suitable housing is a key aim in the National Positive Ageing Strategy. Submits that a key strategic aim for any housing development in Maynooth should be to carry out an assessment of housing need and provision and consider all housing options in the development and that all residential development should incorporate the 'universal design' principle to ensure housing can meet the needs of the occupants regardless of their age, size, ability, or disability. States that another key objective of the Plan should be to enable people to 'get out and about' as they age through the provision of affordable and flexible transport systems. Submission outlines an array of measures relating to the provision of age friendly public transport services and associated infrastructure, including the provision of age friendly urban environments which will assist in improving opportunities for engagement and participation of people of all ages in their local communities.

Social Inclusion

Refers to the policy document *Time to move on from congregated settings – A strategy for community inclusion*. States that planning for any new residential and employment zones should undertake a number of steps to improve community inclusion of people with disabilities in their local community and community-based services.

Also urges a need to focus on meeting the housing and accommodation needs of people with disabilities. Submits that the Plan should be based on best practice in including people with disabilities in local communities and that consideration should be given to reserving a certain proportion of dwellings for people with disabilities. Refers to the steering group report on the 'National Substance Misuse Strategy' and states that the Plan should have a provision of alcohol-free venues e.g. youth cafés. States that all community facilities provided should have shared services making them more sustainable. Submits that a strategic aim for the Plan should be to implement the tobacco free playgrounds initiative and promote tobacco free environments.

Notes the publication *Food Healthy Ireland – A Healthy Weight for Ireland*. States that Step 2 is to regulate for a healthier environment. Suggests that an assessment of food outlets in Maynooth should be carried out to ensure that choices of healthy food options are equally available and to prevent a proliferation of fast-food outlets. Outlines the need to include measures in the plan which promote healthy lifestyles including the development of sports partnerships.

Outlines the need to facilitate community gardens/allotments through identifying and releasing suitable publicly owned land. Refers to the publication *Waste: A Resource Opportunity – Waste Management Policy in Ireland*. States that the Plan should implement the waste hierarchy set out in the Waste Framework Directive and place prevention at the forefront of any waste policy. Seeks the inclusion of easily accessible public recycling bins in public areas that will allow for adequate waste segregation.

Water

States that a strategic aim should be to ensure the provision of safe secure drinking water and promote the reduction in waste and overuse of water. Submits that water usage audits of public buildings should be carried out and water conservation measures implemented. Further requests that a strategic aim of the Plan should be that water treatment plants, wastewater plants and domestic septic tanks work effectively to protect the groundwater quality in the Maynooth area.

Implementation and Evaluation

Submits that a review of the previous Maynooth Local Area Plan 2013 -2019 should be undertaken to assess progress on achievement of strategic aims included in this plan. Recommends that progress in the

implementation of the new Plan is constantly measured throughout its timeframe. Also submits that the local authorities should develop and publish specific measures or performance indicators to establish how progress will be quantified and measured to assess why strategic aims were not achieved and investigate the reasons why.

Response to Issues Raised

This submission covers a wide range of issues ranging from climate action, energy, transport, housing and social inclusion. It is noted that many of the issues raised are already addressed at county development plan level and are not specific to the town of Maynooth.

Climate

It is acknowledged that planning authorities have a critical role in effecting meaningful climate action at a local level, particularly within settlements, through the Local Area Plan. In this regard and aligning with the need to transition to a low carbon model of development, it is considered that climate action represents a key opportunity when planning for the future development of Maynooth. The realisation of Maynooth as a low carbon town will provide huge tangible benefits for its residents and the wider community, in terms of improved experience of place and quality of life. It is considered that a low carbon town is a compact, healthier and more inclusive settlement and crucially, one which is more resilient to the effects of climate change. In preparing the Plan both authorities will engage with their respective climate action officers as well as the Climate Action Regional Office (CARO). The Plan will also include an objective to support the full implementation of each respective local authority's Climate Change Adaptation Strategy. While the Council seeks to align with national targets for greenhouse gas reductions it is considered that setting a specific target for the town and monitoring that target is outside the remit of this land use plan. However, it should be noted that the envisaged designation of Maynooth as a Decarbonisation Zone will require the preparation of a Maynooth Decarbonisation Action Plan which may include specific targets and monitoring provisions. Furthermore, it will be an objective of the Plan to support the full implementation of the action plan, with regards to its goals, objectives and actions relating to planning and development within Maynooth Decarbonisation Zone.

Environmental Noise

The Plan will include an objective supporting the implementation of each local authority's Noise Action Plan. The JLAP will also include an objective to support mixed tenure in house developments, as per national policy. The preparation of Noise Impact Assessments for proposed developments is part of the development management process.

Air Quality

On the issue of air quality, it should be noted that while there are objectives relating to the protection of air quality in each local authority's respective County Development Plan, the Environmental Protection Agency (EPA) is the principal authority in charge of the enforcement of air quality standards in Ireland. Standards relating to setting back of residential developments from major roads are considered to be development management issues and therefore outside the remit of the Local Area Plan. Any monitoring of air quality conducted by the respective environmental sections of each local authority is considered to be an operational matter outside the remit of this Local Area Plan

Sustainable Development

It is considered that climate action will be a central consideration of the Joint Local Area Plan (JLAP). Accordingly, the Plan will include provisions to support inclusive and comprehensive climate action in Maynooth and Environs, insofar as its remit extends. The development and enhancement of a green infrastructure network will be an integral feature of the Plan. The requests for specific measures relating to green procurement, carbon pricing and auditing are acknowledged. Whilst these issues are considered to be outside the scope of this land use plan, the preparation of a Maynooth Decarbonisation Action Plan may include some or all of the measures requested in addition to other measures, particularly in the areas of energy efficiency and local renewable energy generation.

Energy

The plan will support measures to increase the energy efficiency of the existing building stock and the overall reduction of greenhouse gas emissions in Maynooth, as far as its remit extends. There will also be provisions to include support for remote working hubs to be located at appropriate locations within the town, including the town centre. The requests for specific measures relating to green procurement and carbon accounting are

noted. Whilst these issues are considered to be outside the scope of this land use plan, they may be considered as part of a Maynooth Decarbonisation Action Plan which will be supported by a specific objective of the JLAP.

Transport

The Plan will seek to implement both national and regional transport policy within the Plan area. As part of the preparation of the JLAP a Maynooth and Environs Area Based Transport Assessment (MEABTA) is being undertaken. The outputs of the MEABTA will include a range of actions to promote sustainable movement options in the town, in order to initiate a permanent shift away from private car use. This includes a walking strategy and a cycling strategy which will seek to create a comprehensive high-quality active movement (pedestrian and cycle) network in the town. The MEABTA will place a particular emphasis on ensuring that walking and cycling to both school and university can become a more realistic, convenient and safer option for pupils and students alike. On the specific issue of walkability, it is intended that Kildare County Council will, in conjunction with the Maynooth Access Group, undertake a Walkability Audit in 2023 which will focus on ease of movement for both pedestrians and people with disabilities within Maynooth Town Centre. The Plan will seek to include an objective to support the implantation of any recommended actions of the audit. Targets relating to modal shift will be based on those set out in the Greater Dublin Area Transport Strategy 2022-2042. The Plan seeks to incorporate an integrated land use and transport strategy which implements the principle of the 10minute town to ensure that key neighbourhood services including schools are accessible within a 10-minute walk or cycle from peoples' homes. Specific issues relating to car parking standards will be considered as part of the overall transport and movement strategy for the town.

The undertaking of specific consultation with children, young people and other key stakeholders in the provision of recreational facilities forms a key element of the Kildare Play Strategy 2018–2028, the full implementation of which is already supported by an objective (LR O87) of the Kildare County Development Plan 2023-2029. The layout and design features of nursing homes and residential care facilities is considered to be a development management matter and therefore outside the remit of the local area plan.

Employment

Issues including the preparation of travel plans and cycle parking facilities and supporting infrastructure are assessed under the development management standards, outlined in the respective county development plan of

Kildare and Meath, and therefore outside the remit of the local area plan. The incorporation of natural features on employment lands will be considered in the preparation of the JLAP, having regard to the outputs of a Green Infrastructure Survey and Habitat Mapping Exercise.

Housing and Urban Design

The Plan will include an array of provisions to support the implementation of compact growth and sequential development. This will focus on the improving accessibility between residential areas and key destinations including the town centre, train station, schools, neighbourhood centres (existing and proposed) and employment areas. The Plan will also seek to deliver the 10-minute-settlement concept by ensuring compliance with the principles of people-centred urban design and healthy placemaking by providing increased opportunities for active travel, physical activities, and social interaction, through the development of well-designed, compact neighbourhoods which feature high-quality pedestrian and cyclist connectivity, accessible to a range of local services and amenities. It is intended that the Plan will be accompanied by an infrastructure delivery schedule which will require that specific and critical pieces of servicing infrastructure and amenities are delivered either prior to or in tandem with development. The Plan will also incorporate a range of regeneration provisions to tackle vacancy issues and promote alternative uses in the town centre.

Green Infrastructure and Biodiversity

As part of the preparation of the Plan a Social Infrastructure Audit (SIA) will be carried out which, inter alia, will examine the provision of open space in the town. It is intended that the outputs of the SIA will be crucial in informing the Plan on the need for particular types of open space (i.e., playgrounds or neighbourhood parks). It should be noted however that the Plan will seek to place emphasis on the quality of public open space rather than solely applying any particular qualitative figure. In keeping with the principles of the 10-minute town accessibility and distribution of open space within the town will be a key consideration. The Plan will seek to deliver a network of high-quality walking and cycling routes within the town, including green infrastructure routes.

Biodiversity and Green Areas

The enhancement of biodiversity will be a key consideration of the Plan. It should be noted that a Biodiversity Action Plan has been prepared for Maynooth and will inform the Plan. Furthermore, as part of the preparation of

the JLAP, a Green Infrastructure Survey and Habitat Mapping Exercise will be undertaken. This exercise will make a number of recommendations to enhance the overall level of biodiversity within the Plan area through the protection of existing green infrastructure links and the development of new links between various habitats. The important role of nature-based solutions to drainage will be acknowledged in the Plan which will incorporate the provisions contained in the interim guidance on Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas (DoHLGH, 2022). The Plan will also recognise the multifunctionality of green corridors in terms of reducing flood risk, enhancing biodiversity and providing for active travel routes. The Plan will seek to support the implementation of the Maynooth Biodiversity Action Plan which has a range of actions relating to supporting pollinators in the town.

Older People

The Plan will include objectives, in keeping with the provisions of the respective county developments plans, to ensure the development of a range of housing types to meet the needs of an aging population. Issues relating to universal design is considered to be a development management matter which is dealt with at county development plan level. The Plan will include a range of policies to ensure that Maynooth develops as 'age friendly' town, including a universally accessible public realm.

Social Inclusion

A key aim of the Plan is to ensure that Maynooth grows and develops in a socially inclusive manner. Central to this is the incorporation of a comprehensive suite of measures to support, promote and secure the delivery of universal accessibility and appropriate levels of social infrastructure, along with the provision of housing in the town with an appropriate mix of types and tenures to meet the long term needs of the population of the town including older people and people with disabilities. Kildare and Meath County Councils are committed to implementing the framework for the delivery of housing for disabled people, as set out under the National Housing Strategy for Disabled People 2022-2027 which seeks to facilitate people who wish to live independently within their communities and to further enable equal access for disabled people to housing. In this regard, the Kildare County Development Plan 2023-2029 has a range of provisions to support the strategy including an Action which seeks that 10% of acquired housing stock and 12% of all Council new builds are universally designed.

It is considered that policies relating to the designation of smoke free environments such as playgrounds and parks would be more appropriately considered at county development plan level. However, the Plan will consider the potential for supporting smoke and alcohol-free venues such as a youth cafés or centre in the town. The restricting of fast-food outlets including the designating of 'no-fry' zones is also considered to be more appropriately considered at county development plan level. However, the potential of incorporating an updated version of Policy TCS 9 of the Maynooth Local Area Plan 2013-2019 (amended) will be considered, subject to further analysis. This policy states that no further standalone takeaways will be permitted in the town centre.

Kildare and Meath County Councils undertake to investigate the potential/feasibility of the development of a community garden and allotments as part of the preparation of the Plan. The Plan will incorporate provisions with regard to the promotion of appropriately sited local recycling centres in the town.

Water

Objectives will be included in the Plan to work in conjunction with Irish Water to ensure the provision of a safe and secure water supply to support the planned expansion of the town. Furthermore, the plan will include provisions to ensure the protection and safeguarding groundwater quality in Maynooth.

Implementation and Evaluation

As part of the preparation of the JLAP all policies and objectives contained in the Maynooth Local Area Plan 2013-2019 (as amended) will be reviewed. There is currently no mandatory requirement to monitor the implementation of local area plans or conduct follow-up assessments. However, it should be noted, that as per the provisions of Objective MI O1 and Action MI A1 of the Kildare County Development Plan (CDP) 2023–2029, elements of the JLAP particularly relating to housing and population allocations will be required to be monitored on an ongoing basis over the life of the CDP, in keeping with the requirements of the Section 28 Guidelines on Development Plans (2022) on planning monitoring and implementation.

45. Department of Environment, Climate and Communications

Outlines the Department's vision of a climate neutral, sustainable, and digitally connected Ireland and states that it will drive the climate agenda by engaging with local authorities to build resilience to overcome climate adaptation challenges, maximising climate mitigation/adaptation opportunities and facilitating the transition to a truly circular economy. States that the contents of the submission align with their Statement of Strategy for the

period 2021-2023, Le Chéile 23, which itself sets out our vision, mission, and five strategic goals in key policy areas.

Climate Action

Notes that the Climate Action and Low Carbon Development (Amendment) Act 2021 (Climate Act 2021) sets Ireland on a legally binding path to net-zero emissions no later than 2050, and to a 51% reduction in emissions by the end of this decade. Draws attention to Section 15(1) of the Act (as amended), which requires public bodies to perform their functions in a manner consistent with, the most recent approved climate action plan, the most recent approved national long term climate action strategy, the most recent approved national adaptation framework and approved sectoral adaptation plans, the furtherance of the national climate objective, and the objective of mitigation greenhouse gas emissions and adapting to the effects of climate change. Also refers to the provisions of the Climate Action Plan regarding emission reduction targets and submits that it will put Ireland on a more sustainable path creating a cleaner, greener economy and society which will be updated annually. Requests that the planning authorities consider how the actions set out therein can be incorporated into the Plan, where relevant.

Refers to the National Adaptation Framework (NAF) which sets out the national strategy to reduce the vulnerability of the country to the negative effects of climate change and to avail of positive impacts. Notes that local authorities should also consult directly with their own Climate Action Regional Offices (CAROs).

Renewable Energy

Notes that the target of delivering up to 80% of Ireland's electricity from renewable sources by 2030 which will indicatively include up to 5.5 GW of grid-scale solar and up to 8 GW of onshore wind. Seeks the inclusion of an objective in the Plan to promote the development of appropriately scaled renewable energy installations (rooftop solar, geothermal energy and other types of installations appropriate to urban environments) and to support the development of additional grid infrastructure and, where possible, aim for developments that are carbon or energy use neutral. Notes the regional focus of Regional Policy Objective (RPO) 6.9 of the RSES which states support for the Regional Enterprise Plans to focus on (inter alia) ensuring that the Midlands is well positioned to address the challenges posed by the transition to a low carbon economy and renewable energy. *In this regard, it states that* Response no. 25 of the National Energy Security Framework (NESF) proposes to align all

elements of the planning system to fully support accelerated renewable energy development and ensure that the local planning policy framework "fully supports the national objectives." Notes that a key aspect of this is local, community-based approaches to renewable energy, the reduction in the reliance on the grid transmission system (through local and domestic generation) and through microgeneration.

Retrofitting

Notes the Government's ambitious to retrofit 500,000 homes to a Building Energy Rating of B2 (or cost optimal equivalent), and to install 400,000 heat pumps to replace existing heating systems by 2030 and the new National Retrofit Plan which sets out how this will be achieved. Refers to RPO 7.40 of the RSES which requires local authorities to include policies in statutory land use plans to promote high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing buildings and ensure that all new buildings achieve the Nearly Zero-Energy Buildings (NZEB) standard.

District Heating

Refers to the issue of District Heating, and notes that Response No. 18 of the NESF aims to accelerate the delivery of home retrofits by implementing the National Retrofit Plan, including by providing targeted supports. Notes that Action 190 of the CAP 2021 seeks to ensure national, regional, and local planning frameworks encourage and facilitate the development of district heating where appropriate to facilitating compact urban development. Encourages the Local Authority to contact the Department in relation to District Heating policy and refers to RPO 7.38 of RSES which relates to the promotion of high levels of energy efficiency and conservation in existing and new buildings. Submits that Local authorities should consider policies to enable the development of district heating systems, in tandem and in advance of the regulatory framework being established under action 189 of the CAP 2021.

Heating

Notes Response No. 17 of the National Energy Security Framework, which seeks to reduce the reliance on fossil fuel heating systems. Requests consideration of how the Plan, through its development management policies, could contribute to this ambition. Notes that the National Heat Study also provides a comprehensive assessment of the options available to decarbonise Ireland's energy used for heating and cooling homes, businesses, and industry, the outputs of which could be incorporated into the Plan.

Circular Economy

States that meeting climate action targets requires a transition to a circular economy. Notes the challenge in creating a policy framework that will radically shift focus back to the start of the product life cycle, to focus on prevention and designing out waste, and to effect behavioural change at all levels. Refers to relevant policy set out in the Waste Action Plan for a Circular Economy, and the Whole-of-Government Circular Economy Strategy. Further refers to the Circular Economy Act 2022, which provides for improved waste services and reconfigures the Environment Fund to become Ireland's Circular Economy Fund. Requests that the Plan considers all aspects of how the Whole-of-Government Circular Economy Strategy can support the transition to a circular economy.

Telecommunications

Notes the importance of digital connectivity and infrastructure to enhancing competitiveness in global markets and in the knowledge/information economy. Refers to the national digital strategy, *Harnessing Digital – The Digital Ireland Framework*, to drive and enable the digital transition. Notes the Dimension 2 of the Framework places importance on supporting 5G rollout. Refers to National Strategic Outcome (NSO) 6 of the NPF in relation to the delivery of quality, secure, and reliable connectivity to global telecommunications networks. Notes that the need to develop high-capacity and diverse digital infrastructure to ensure that Ireland becomes a central connectivity hub. Submits that the national policies in relation to digital infrastructure can be supported by local authorities via specific reference in LAPs and in particular providing direct support for 5G rollout and the National Broadband Plan. Submits that further measures to consider include a commitment to identify suitable urban and suburban locations owned by the State for masts/small cells to support smart town initiatives/programmes for 5G /small cell rollout and encourage a commitment to replicate smart programmes/initiatives across all towns and villages with respect to Smart Programmes.

Geoscience Policy

Notes that public consultation took place in 2021 on the draft Policy Statement on Mineral Exploration and Mining. States that the goal of this is to provide a sustainable policy framework that can play a role in the transition to a circular economy and net-zero targets. Notes that the Draft Policy Statement on Geothermal Energy for a Circular Economy is an important step in addressing the barriers to the development of geothermal energy. States that it will outline the regulatory framework, highlight the requirement for meaningful

engagement with the public, and for further work in the collection of data on geothermal resources to help to attract interest in this renewable energy and realise a number of associated environmental, circular economy and climate benefits. Submission includes a list of Geological Survey Ireland's (GSI) Publicly Available Datasets Relevant to Planning, EIA and SEA processes which provides the datasets available for the following areas: Land and Soil, Water, Landscape, Air and Climate.

Geological Survey Ireland (GSI) (attached submission)

The Department attaches a submission by Geological Survey Ireland (GSI). This notes its role as the national earth science agency and provides independent geological information and advice and gather various data for that purpose. Recommends using various data sets, available on their website (www.gsi.ie), when conducting the EIAR, SEA, planning and scoping processes. Notes that this data/maps should be attributed correctly to 'Geological Survey Ireland'. Attaches a list of our publicly available datasets that may be useful to the environmental assessment and planning process.

Geoheritage

Notes it is in partnership with the National Parks and Wildlife Service to identify and select important geological and geomorphological sites throughout the country for designation as geological NHAs (Natural Heritage Areas). States that County Geological Sites (CGSs), as adopted under the National Heritage Plan, include additional sites that may also be of national importance, but which were not selected as the very best examples for NHA designation. Notes that all geological heritage sites identified by GSI are categorised as CGS pending any further NHA designation by NPWS. Notes that the audit for County Kildare was carried out in 2005 and that records show that there is a there are no CGSs in the vicinity of the Plan area.

Dimension Stone/Stone Built Ireland

Notes that Stone Built Ireland was a research collaboration agreement between GSI, Trinity College Dublin and the OPW. The project aims to document building and decorative stone in Ireland to inform government agencies, building owners and conservationists of the sources for suitable replacement stone in restoration work and to develop a greater awareness among the general public. Notes that a preliminary data-base is available at: www.stonebuiltireland.com with the complete online database is due to be released shortly.

Geotourism

Submission notes the increasing importance of the role of geotourism projects in promoting Irish tourism. Encourages Kildare County Council to continue this trend of geotourism, and to use the geological audit information making it easily available to the general public.

Groundwater

States that proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. Recommends using the groundwater maps on their viewer platform. Submits that the Groundwater Data Viewer indicates two aquifers classed as a 'Poor Aquifer - Bedrock which is Generally Unproductive except for Local Zones' and a 'Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones' underlie the LAP area. Further notes that the Groundwater Vulnerability map indicates the range of groundwater vulnerabilities within the area covered is variable. Therefore, recommends the use of the Groundwater Viewer to identify areas of High to Extreme Vulnerability and 'Rock at or near surface' in preparing the Plan, as any groundwater-surface water interactions that might occur would be greatest in these areas.

States that GWClimate is a groundwater monitoring and modelling project that aims to investigate the impact of climate change on groundwater in Ireland and may be useful in relation to Flood Risk Assessment (FRA) and management plans. Notes that GSI has completed Groundwater Protection Schemes (GWPSs) in partnership with local authorities, and there is now national coverage of GWPS mapping. Further notes that a Groundwater Protection Scheme provides guidelines for the planning and licensing authorities in carrying out their functions, and a framework to assist in decision-making on the location, nature and control of developments and activities in order to protect groundwater. Notes that the Kildare Groundwater Protection Response overview and link to the main reports is available at: https://www.gsi.ie/en-ie/publications/Pages/Kildare-Groundwater-Protection-Scheme-Reports.aspx.

Geological Mapping

Notes GSI's online datasets of bedrock and subsoils geological mapping and encourages the use of this data. States that they have recently launched QGIS compatible bedrock (100K) and Quaternary geology map data, with

instructional manuals and videos which makes our data more accessible to general public and external stakeholders.

Geotechnical Database Resources

Notes it continues to populate and develop the national geotechnical database and viewer with site investigation data. Encourages the use of this database as part of any baseline geological assessment of the proposed development as it can provide invaluable baseline data for the region or vicinity of proposed development areas.

Geohazards

States that Geohazards can cause widespread damage to landscapes, wildlife, human property and human life and that in Ireland, landslides, flooding and coastal erosion are the most prevalent of these hazards. Recommends that geohazards be taken into consideration, especially when developing areas where these risks are prevalent, and we encourage the use of our data when doing so. States that GSI has information available on landslides in Ireland via the National Landslide Database and Landslide Susceptibility Map. Submits that they also have engaged in a national project on Groundwater Flooding and that the data from this project may be useful in relation to Flood Risk Assessment (FRA) and management plans and is described in more detail under 'Groundwater' above.

Geothermal Energy

Notes the potential of geothermal energy which harnesses the heat beneath the surface of the Earth for heating applications and electricity generation, and has proven to be secure, environmentally sustainable and cost effective over long time periods. Submits that Ireland has widespread shallow geothermal resources for small and medium-scale heating applications, which can be explored online through GSI Geothermal Suitability maps for both domestic and commercial use.

Natural Resources (Minerals/Aggregates)

States that GSI provides data, maps, interpretations and advice on matters related to minerals, their use and their development in the Minerals Section of their website. Notes that Active Quarries, Mineral Localities and the Aggregate Potential maps are available on their Map Viewer. Recommends use of the Aggregate Potential Mapping viewer to identify areas of High to Very High source aggregate potential within the area and also to

identify and ensure that natural resources used in any proposed developments are sustainably sourced from properly recognised and licensed facilities, and that consideration of future resource sterilisation is considered.

Geochemistry of Soils, Surface Waters and Sediments

States that GSI provides baseline geochemistry data as part of the Tellus programme which can be used to assess the chemical status of soil and water at a regional scale and to support the assessment of existing or potential impacts of human activity on environmental chemical quality. Submits that Tellus is a national-scale mapping programme which provides multi-element data for shallow soil, stream sediment and stream water in Ireland. Notes that at present, mapping consists of the border, western and midland regions and that this data is available at https://www.gsi.ie/en-ie/data-and-maps/Pages/Geochemistry.aspx. Sates that this page also hosts Geochemical Mapping of Agricultural and Grazing Land Soil of Europe (GEMAS) and lithogeochemistry (rock geochemistry) from southeast Ireland datasets. Notes that GSI are undertaking applied geochemistry projects to provide data for agriculture, waste soil characterisation and mineral exploration.

Response to Issues Raised

It is considered that climate action will be a central consideration of the Joint Local Area Plan (JLAP). In this regard, all aspects relating to the development strategy in Maynooth will be considered in light of the need to plan for a substantial reduction in greenhouse gas emissions and to promote low carbon development in the town, in line with national targets. Accordingly, the Plan will include provisions to support inclusive and comprehensive climate action in Maynooth and environs, insofar as its remit extends. Furthermore, on foot of the town's impending designation as a Decarbonisation Zone (DZ) a separate Decarbonisation Action Plan will be prepared which will outline further measures that are needed to make the transition to a low carbon town. It will be an objective of the Plan to support the full implementation of any Maynooth Decarbonisation Action Plan, with regards to its goals, objectives and actions relating to planning and development within Maynooth Decarbonisation Zone. It should be noted that as part of the preparation of the JLAP ongoing engagement is taking place with the Climate Action Regional Office (CARO) as well as the respective Climate Action Officers of each local authority.

The Plan will include provisions to support renewable energy and low-emission technology along with supporting local renewable energy production and energy efficiency measures, in keeping with national and regional policy.

It is envisaged that specific targets on the generation of locally based renewable electricity will be detailed in the Maynooth Decarbonisation Action Plan. In planning for a low carbon town the JLAP will support the development of a circular economy in Maynooth insofar as its remit as a land use plan extends. In this regard, a key element of the Plan will seek to incorporate a range of active land management measures to maximise the efficient use of land, along with the reuse of brownfield sites and vacant buildings in the town.

On the issue of telecommunications, it should be noted that the Plan will include provisions to support and facilitate the provision of telecommunications infrastructure, including broadband services in the town, subject to safety and amenity requirements. On the request that the Plan identify suitable locations owned by the State for masts/small cells to support smart town initiatives/programmes for 5G /small cell rollout, it is considered that such a task would be more appropriately undertaken by telecoms service providers, who have the required technical expertise in this area.

The aspects of the submission relating to geoscience policy as was well as the contents of the attached submission by the GSI are noted and welcomed. Their contents will be fully considered in progressing the JLAP to draft stage, particular in the undertaking of the Strategic Environment Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA). The absence of County Geological Sites (CGSs) within the Plan area is noted. It should be noted that some issues raised in the submission from GSI, for example objectives affording protection to particular sites, are more appropriately dealt with under the auspices of county development plan process.

47. Electricity Supply Board (ESB)

Submission outlines the role of ESB as a landowner and employer with property and infrastructural assets throughout the county and serving the Maynooth area. Notes that the organisation operates across the electricity market, from generation, through transmission and distribution to customers. Further notes that it uses its networks to carry fibre for telecommunications and to provide charging infrastructure for electric vehicles (EVs). States that it is objective of the ESB to develop and connect renewables to decarbonise the electricity system by 2040 which is consistent with the NPF and the RSES.

Notes that ESB is the asset owner of the Transmission System and Distribution System and ESB Networks provides the essential service of building, managing and maintaining the electricity networks in Kildare. States that recent investment in the network is on continuing the reinforcement of the system to facilitate the

connection of new renewable electricity generation. Notes its actions in relation to the development of EV charge points. States that in accordance with the 2019 Climate Action Plan for EV adoption, ESB with the support of the Government's Climate Action Fund, is rolling out high power charging hubs across the country. Notes it has become a leading telecommunications infrastructure provider, with over 400 locations nationwide. States that all its sites are made available to third party operators for co-location which limits the overall number of telecoms structures in our landscape. Notes that telecoms fibre network is wrapped on the 110kV electricity network and in addition SIRO (a joint venture between ESB and Vodafone) is bringing 100% fibre-to-the-building to 50 towns, including Maynooth.

Submission recognises the role of the planning hierarchy has in setting the parameters for the Plan and notes that both the NPF and the RSES also contain policies in relation to energy infrastructure. Acknowledges the role of Maynooth as a Metropolitan Key Town by the RSES and states that ESB will work to support the delivery of key development parameters that will guide its strategic growth. Notes the emphasis of the Issues Paper on low carbon development and states that they are working to be a net zero producer of electricity by 2040.

States that it fully supports the reinforcement of the policies contained in the NPF, RSES and Kildare CDP in relation to energy infrastructure at a local level in order to support the enhancement and upgrading of existing infrastructure and the safeguarding of strategic energy corridors from encroachment by other developments that would compromise the delivery of energy networks. States that the driver for reinforcing the Transmission and Distribution Networks in the Greater Dublin Area (GDA) is security of supply and that there is a requirement for additional capacity.

Refers to the targeted population growth in Maynooth and also the phasing/enabling works required for the DART expansion. Notes that the present electrical load of Maynooth and its surrounding area is served by Moneycooley 38kV station and that there is adequate capacity in this station to facilitate new developments in the town in the near term. States that Moneycooley 38kV station and in turn the Maynooth area are fed from Griffinrath 110kV/38kV station and that the Distribution System Operator (DSO) are currently uprating a 38kV Busbar at Griffinrath 110kV/38kV station to facilitate DART+ West. Notes that further works will be required and there are plans to develop a new 110kV/38kV station approx. 6km east of Maynooth. States that further deep reinforcements may be required in the region in the next 5-10 years and that the exact nature of a HV station

will depend on the location and scale of development. Submits that the Plan should ensure that the long-term operational requirements of existing utilities are protected as the importance of existing energy infrastructure is strategic and national in nature. Further submits that the Plan include policies which protect the town's future capacity for the development of energy infrastructure.

Notes the provision of high-quality telecommunications infrastructure is critical to the development of a knowledge economy and the ability to attract inward investment. States that this should be reflected in the Plan. Outlines its support for the approach that to facilitate the provision of telecommunications services at appropriate locations, the applicant must demonstrate compliance with national guidance. States that the Draft Kildare CDP recognises that applications for telecommunications development shall be consistent with the updated guidelines (PL 07/2012) and promotion of a policy of co-location.

Submission welcomes initiatives to increase the rate of provision of charging points for electric cars and submits that the Plan ensure to incorporate the latest standards for the provision of EV Charge points as set out in S.I. No. 393/2021 as this will facilitate growth in charge point infrastructure, and ensure it becomes a comprehensive network with open systems and platforms accessible to all supply companies and all types of electric cars. The submission also states that the Plan should include provisions promoting, encouraging and facilitating the use of sustainable modes and patterns of transport, including electric vehicles, with appropriate parking standards that will set minimum levels of parking provision for EVs.

Response to Issues Raised

The information in the submission from ESB with regard to the planned and envisaged upgrades to its electricity and telecommunications infrastructure in the Maynooth area is noted. The Plan will include provisions to support the providers of energy related infrastructure by safeguarding existing infrastructure and strategic corridors from encroachment by development that might compromise the operation, maintenance and provision of energy networks. The Plan will also seek support and facilitate the provision of telecommunications infrastructure, including broadband services in the town, subject to safety and amenity considerations.

Given that the DART+ West project is supported by national and regional policy, the Plan will include a specific

objective to supporting the delivery of the projects, including ancillary supporting infrastructure, subject to planning and environmental considerations. It should be noted that applications for telecommunications will be dealt with having regard to the relevant development management provisions of the respective county development plans of each local authority.

The JLAP will be informed by a Maynooth and Environs Area Based Transport Assessment (MEABTA) which will include a comprehensive and far-reaching range of provisions to support active travel and low carbon development, including support for the continued rollout of EV charging infrastructure. With regard to the request that the Plan must incorporate the standards for the provision of EV Charge points as set out in S.I. No. 393/2021, it should be noted that the Section 28 Ministerial Guidelines on Development Plans (2022) states that planning authorities must exercise caution not to inappropriately seek to address the operation of other statutory codes or regulatory regimes that relate to the development sector but are outside the remit of a land use plan.

55. National Transport Authority (NTA)

The submission from the National Transport Authority (NTA) outlines a number of comments (as set out below) for consideration on the basis of the *Transport Strategy for the Greater Dublin Area 2016-2035* and the *Greater Dublin Area Transport Strategy 2022-2042*.

Guiding Principles

Recommends that the preparation of the Joint Local Area Plan (JLAP) should be guided by and include land use policies and objectives, which support the consolidation of urban-generated development within existing urban areas, in complement with the integration of land use and transport planning:

- For urban-generated development particularly within the largest urban areas, the development of lands, within or contiguous with existing urban areas should be prioritised.
- To the extent practicable, residential development in urban areas should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport, including infill and brownfield sites, are prioritised;
- Larger scale, trip intensive developments, such as offices and retail, should primarily be focused into central locations in urban areas;

- The management of space in town centres should deliver a high level of priority and permeability for walking, cycling and public transport modes. The key outcome of such an approach would be town centres that are accessible, attractive, vibrant and safe, as places to work, live, shop and engage in community life;
- Planning at the local level should promote walking, cycling and public transport by maximising the number of people living within walking/cycling distance of their neighbourhood or district centres, public transport services and other services at the local level such as schools;
- New development areas should be fully permeable for walking/cycling and the retrospective implementation
 of walking and cycling facilities should be undertaken, in order to a give competitive advantage to these
 modes for local trip making;
- The density and location of employment development should maximise the potential for the use of walking, cycling and public transport;
- Where possible, new residential developments should provide for filtered permeability, to provide for walking/ cycling, public transport and private vehicle access while restricting private car through trips;
- Trip destinations (employment sites, schools, retail, etc.) should be developed at locations that can maximise the potential to access such developments by walking, cycling or on public transport;
- The strategic transport function of national roads should be maintained and protected in accordance with national policy;
- All non-residential development proposals should be subject to maximum parking standards;
- In locations where the highest intensity of development occurs, particularly within the larger urban areas, an approach that caps car parking on an area-wide basis should be applied; and
- For all major employment developments and all schools, travel plans should be conditioned as part of planning permissions and be carried out in a manner consistent with existing NTA guidance.

Movement at Settlement Level – Local Transport Plans (LTP)

Recommends that the JLAP should be accompanied by, and be developed in tandem with, the preparation of a Local Transport Plan (LTP) and notes that the preparation of an LTP has commenced. Recommends that this process is informed by the NTA/TII *Area Based Transport Assessment* Advice Note and Pilot Methodology. Notes that LTPs represent the lowest tier of the NPF's framework for the integration of land use and transport planning and the achievement of compact growth. States that the LTPs should:

• Maximise the opportunities for the integration of land use and transport planning

- Assess the existing traffic, transport and movement conditions within the Plan area and in its wider context;
- Plan for the efficient movement of people, goods and services within, to and from the Plan area;
- Identify the extent to which estimated transport demand associated with local development objectives can be supported and managed on the basis of existing transport assets; and
- Identify the transport interventions required within the Plan area and in the wider context to effectively accommodate the anticipated increase in demand.

Movement at Inter-Settlement level

Notes that while movement at inter-settlement level will largely be dealt with at the County Development Plan (CDP) level, there is also an opportunity to explore the commuting patterns to and from Maynooth as part of the LPT which may help to identify the transport infrastructure and services that are required to serve the town. Submits that the commuting profiling can be used to better understand the relationship between current land use patterns and associated travel patterns and help in the formulation of land use policies that can promote and facilitate more sustainable travel pattern outcomes, as well as the transport infrastructure and services needed to meet future inter-settlement travel demand.

Provision of Public Transport Services in Rural Areas

States that Maynooth will continue to be a large draw for the rural hinterland and neighbouring towns, particularly as a result of Maynooth University. Notes that the NTA provides rural transport services through the Local Link Rural Transport Programme. States that the key priorities of this programme continue to be directed at addressing rural social exclusion and the integration of rural transport services with other public transport services. States that the NTA intends to develop and expand the Local Link Rural Transport Programme. Recommends that the JLAP acknowledge the role rural transport services can perform in providing for social and economic connectivity between small villages/rural areas and larger towns and include policies and objectives to support the role of rural transport.

Planning for Rail Provision

Submits that the NTA will continue to work with Irish Rail and local authorities to make improvements to both rail services and infrastructure. Notes the Draft Railway Order Application for the DART+ West project. Recommends that the JLAP acknowledge the potential of the DART+ West project has in facilitating sustainable

transport patterns and include policies that enhance the accessibility of the train station from the town centre and surrounding areas.

Walking and Cycling

Outlines the need to promote the required modal shift to sustainable modes though the development and implementation of appropriate policies and objectives a local level where specific measures can be identified. States that the LTP, following the ABTA process, will focus on the identification of the required networks and measures to improve sustainable modes. Submits that the LTP should identify the weaknesses in the walking/cycling networks and provide the measures required to provide safe and efficient routes from origin (housing) to destination (school, work and services). Notes that the LTP can identify measures such as permeability and junction improvements and footpath and cycle track upgrades required as well as other potential improvements that can ensure walking/cycling networks are closely integrated with the Dart+ West project and BusConnects. Notes the recent announcement of funding which target improvements in the built environment for walking, cycling and other public realm measures which will assist with the realisation of the measures that could be identified as part of the LTP. Refers the Safe Routes to Schools programme and states that enabling journeys to school to be completed by walking and cycling, should be a key priority for the LTP and the JLAP.

Indicators - Mode Share

Recommends that it may be appropriate at the JLAP level to include sustainable transport indicators, including mode share, for the purpose of monitoring the efficacy of policies and development objectives against a range of sustainable development indicators, in line with the Greater Dublin Area Transport Strategy.

Accessibility

Notes that the NPF recognises that social inclusion can be improved in the transport sector through, among other things, universal design. States that facilitating and promoting universal design should be a key consideration in the JLAP, as it relates to transport policies and objectives. Submits that making the external built environment accessible to all can facilitate and promote the greater use of public transport, walking/cycling for all in society, including those with specific mobility issues and requirements. States that objectives that promote

universal design in the external built environment, such as providing separate pedestrian entrances, and the provision of dropped curbs/raised crossings, will provide a safer and more attractive environment for all.

National Transport Authority Guidance Documents

The NTA recommends that the preparation of the JLAP is informed by the following NTA guidance, available on the NTA website:

- The National Cycle Manual;
- Permeability Best Practice Guide;
- Achieving Effective Workplace Travel Plans: Guidance for Local Authorities;
- Workplace Travel Plans: A Guide for Implementers;
- Toolkit for School Travel; and
- Advice Note and Pilot Methodology on Area Based Transport Assessment (NTA and TII).

Recent Planning Applications in Kildare and Meath

Reiterates that the integration of transport and land use planning is a key consideration in the preparation of LAPs and LTPs and states that this principle was central to a number of submissions by the NTA on recent planning applications in the Maynooth Environs. Outlines concerns regarding the extent to which the proposed developments in the Moygaddy Masterplan area would be served by public transport and queried the proposed function of the MOOR. States that the current Transport Strategy and the Draft Transport Strategy (of the GDA) set out a range of transport proposals of relevance to Maynooth, including BusConnects and substantial investment in rail infrastructure and services. States that higher density developments, particularly high-intensity employment proposals, should align with high-capacity public transport proposals such as DART+ West, and recommends that such matters should be a key consideration in the preparation of the JLAP.

Response to Issues Raised

Guiding Principles

The comments from the NTA relating to the guiding principles for preparing a Local Area Plan are noted. Kildare and Meath County Councils acknowledge the need to pursue a robust evidence-led approach to developing an integrated land-use and transport strategy for the town, which fully aligns with national and regional spatial and transport policy. In this regard, several supporting studies, including an Area Based Transport Assessment, a

Social Infrastructure Audit and a Settlement Capacity Audit (i.e., Infrastructure Assessment) are being prepared to inform the preferred development strategy that will be contained in the JLAP. Noting Maynooth's impending designation as a Decarbonisation Zone, the Plan will seek to adopt a low carbon development approach, by implementing the principles of compact growth and sequential development, as well as maximising opportunities with regard to the access and usage of public transport services planned as part of the DART+ West and BusConnects projects. In this regard, the Plan will incorporate a range of provisions to facilitate active land management, with particular emphasis on the delivery of residential development on appropriately located lands and at sustainable densities within the town centre, and along existing and planned high-capacity public transport routes. Furthermore, the Plan will seek to ensure that other uses, including employment uses and community uses, are zoned at appropriate locations within the town.

Movement at Settlement Level – Local Transport Plans (LTP)

The Plan will be accompanied by a Local Transport Plan – the Maynooth and Environs Area-Based Transport Assessment (MEABTA) which is being prepared alongside the Plan having full regard to the NTA/TII *Area Based Transport Assessment* Advice Note and Pilot Methodology. The role of the MEABTA is to initiate a permanent shift in the town away from the private car towards more sustainable modes of movement, particularly active modes travel (walking and cycling) for short trips within the town.

It is of importance to note RPO 4.33 of the RSES which sets out to support the continued development of Maynooth, coordinated with the delivery of strategic infrastructure including pedestrian and cycle linkages within the town and to the Royal Canal Greenway, DART expansion and road linkages forming part of the Maynooth Outer Orbital Route in a manner which supports future development and population growth and builds on synergies with Maynooth University promoting a knowledge-based economy.

Movement at Inter-Settlement level and Provision of Public Transport Services in Rural Areas

Acknowledging Maynooth's role as a Metropolitan Key Town which also serves a wide rural hinterland the MEABTA has examined both inter-settlement movement and potential role of public transport in rural areas which could serve Maynooth. As part of the second round of the public consultation for the MEABTA (advertised as the Draft Transport Strategy for Maynooth and Environs) a public transport strategy is proposed which outlines the potential for a series of short-, medium- and long term measures to promote modal shift away from

the private car to bus or rail, particularly for medium/long distance trips linking with adjacent towns and to other more rural settlements in the wider catchment area. The local authorities look forward to discussing these proposals in more detail with the NTA in the finalisation of the MEABTA. An objective will also be included in the Draft Plan to support the enhancement of Local Link Rural Transport services which will connect Maynooth with its wider rural catchment area, subject to demonstrable demand, in consultation with the National Transport Authority.

Planning for Rail Provision

The proposals for enhanced rail services in Maynooth including the DART+ West project and the second train station to the west of the town will be fully supported by provisions of the Plan and incorporated into its overall development strategy. The potential of the lands surrounding a proposed train station to be developed as a Transport-Oriented Development (TOD) is recognised and will be further explored in the preparation of the Plan. It is acknowledged that the phasing of any future development around a new train station to the west of the town will be heavily dependent on the commencement of DART+ West services, along with the construction and operation of the new train station itself and supporting servicing infrastructure.

Walking and Cycling

A critical part of this work is to identify current deficiencies in the pedestrian and cycling network in Maynooth, including permeability links and pedestrian/cycle lanes. The outputs of the MEABTA will include both a walking strategy and a cycling strategy which will seek to create a comprehensive high-quality active movement network in the town, in order to initiate a permanent shift away from private car use. As part of the second round of the public consultation for the MEABTA, a comprehensive series of walking and cycling upgrades as well as permeability measures are proposed for the town. It is considered that the implementation of such measures is critical for realising the concept of 10-minute settlement within Maynooth by helping to promote a culture of active movement between key destinations within the town, whilst also making longer distance trips via public transport services more accessible to pedestrians and cyclists. The MEABTA will place a particular emphasis on ensuring that walking and cycling to both school and university can become a more realistic, convenient and safer option for pupils and students alike.

Indicators – Mode Share

It is anticipated that the MEABTA and consequently the JLAP will apply the targets for mode share proposed in the Greater Dublin Area Transport Strategy 2022-2042 to Maynooth and Environs. Given Maynooth's strategic location within the Dublin Metropolitan Area such targets are seen to be both appropriate and realistic for the town.

Accessibility

The JLAP will seek to implement universal accessibility with regard to transport infrastructure in the town, in accordance with the principles of people-centred urban design and healthy placemaking. It is envisaged that the Plan will incorporate a range of provisions both through overarching objectives and specific measures to support universal movement throughout Maynooth and Environs.

The National Transport Authority Guidance Documents

The suite of guidance documents outlined by the NTA are noted and will be taken into full consideration in the preparation of both the MEABTA and the JLAP.

Recent Planning Applications in Kildare and Meath

The concerns outlined relating to development in the Maynooth Environs (Moygaddy) are acknowledged.

56. Irish Water (IW) (now Uisce Éireann)

Submission from Irish Water (IW) notes that they provided comments on the Draft County Development Plan pertaining to Maynooth and Water Services Infrastructure which still apply. Submission notes the role and responsibilities of IW regarding the provision of water and wastewater services across the region including investment in capital infrastructure projects.

Maynooth (General) - Wastewater Treatment

Notes that Maynooth is part of the Lower Liffey Valley Drainage Area Plan which is at Stage 4 (Solution Development). As part of this it notes that the Maynooth Wastewater Transfer Pipeline project is due for completion early in 2026. States that in the interim, infiltration into the sewer network will need to be reduced.

Maynooth (General) - Water Supply

Notes that Maynooth lies in GDA so can experience some constraints during drought or freeze events. Submits that some level of service improvements may be required, and leakage control continued. States that new trunk mains to the North and West of the town shall be developer driven.

Maynooth Northern Environs / Moygaddy

Submission notes that this area is not serviced with a sewer or water network and no project is currently planned for this area and that infrastructure provision will be developer driven.

Maynooth East / Railpark – LIHAF

States that the water and sewer network is in design stage and that a new 1,500m Eastern Link watermain is to be constructed with an estimated completion in Q2 2024. Further states that the water network connecting the Maynooth East/LIHAF main routed along the R157 regional road and terminating at Dunboyne Road junction is at planning and design stage.

General Comment on Land Use Zonings

States that available network information indicates network extensions may be required to service some zoned sites. Notes that depending on the extent of development realised, localised network upgrades may also be required. Further notes that third-party agreement may be required where it is proposed to service a new development via private property or private water services infrastructure. States that where development sites are not serviced by existing infrastructure, the feasibility of extending the network to the un-serviced sites would be assessed via IW's pre-connections enquiry process and notes that the discharge of additional surface water to combined (foul and surface water) sewers is not permitted.

Submits that the removal of stormwater from combined sewers as part of roads, public realm, residential or other developments is strongly encouraged, noting that this is particularly relevant to the achievement of compact growth objectives. To support sustainable use of the available hydraulic capacity in combined sewers, IW welcomes the proposal in the recent Kildare CDP to promote Nature based SuDS (NbSUDS). Recommends the introduction of further objectives in the Plan to promote the introduction of NbSUDS in areas contributing to combined drainage systems including streetscape enhancement programmes or resurfacing programmes are planned.

States that where network reinforcements such as upgrades / extensions are required, these shall be developer driven unless there are committed IW projects already in place. Submits that all new residential and commercial/industrial developments wishing to connect to an IW network are to be assessed through IW's Connections and Developer Service with connections to networks being subject to IW's Connections Charging Policy. Further information on this process is available at: https://www.water.ie/connections/developer-services/ Spatial Extent of Networks —

Spatial extent of Irish Water's networks: Accessible through Irish Water's ArcGIS Online web viewer at https://irishwater.maps.arcgis.com/home/index.html, which provides information on the position of its underground network as a general guide only, on the strict understanding that it is based on the best available information. Submission concludes by stating that where IW assets are within a development site, these assets must be protected or diverted and that in some instances, a diversion agreement may be required. Notes that development in the vicinity of IW assets must be in accordance with IW's standard details and codes of practice. Notes that further information is available at: https://www.water.ie/connections/developer-services/diversions/

Response to Issues Raised

The issues raised by Irish Water (IW) relating to water supply and wastewater services infrastructure availability and capacity in Maynooth are noted. Kildare and Meath County Council commit to continuing to engage with Irish Water in progressing the Joint Local Area Plan (JLAP) to draft stage, and in particular in the preparation of the Settlement Capacity Audit (Infrastructure Assessment) for Maynooth and Environs. The outputs from the SCA will inform an infrastructure delivery schedule for certain lands proposed to be developed over the life of the Plan. In this regard, it is considered that input from Irish Water will be critical in outlining the particular infrastructural requirements on sites in relation to water supply and wastewater servicing infrastructure.

The Plan will support the ongoing upgrade and expansion of water supply and wastewater services to meet the future needs of Maynooth and Environs, including the delivery of the Maynooth Transfer Pipeline. The Plan will acknowledge the need for localised network upgrades in instances relating to brownfield and infill development within the existing footprint of the town.

The recently published interim guidance on *Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas* (2022) will be supported by a number of provisions in the Plan. This includes an objective which will support the preparation of a Maynooth Surface Water Drainage Study for both existing and new development areas within the town to provide for a municipal-level, multi-site nature-based solution(s) to surface water management. Furthermore, it is an action (IN A3) of the Kildare County Development Plan 2023-2029 to develop a 'Sustainable Urban Drainage Systems Guidance Document' for County Kildare within one year of the adoption of the Plan.

61. Office of the Planning Regulator (OPR)

The submission welcomes the publication of the Issues Paper for the Maynooth and Environs Joint Local Area Plan 2024- 2030 (JLAP) and commends the on-going collaboration between Kildare and Meath County Councils in the preparation of the Plan. The submission agrees with the key challenges identified in the Issues Paper. The Office outlines its statutory role in relation to the evaluation of Local Area Plans (LAPs) outlined in section 30 AO of the Planning and Development Act 2000, as amended (the 'Act') in the context of certain parameters including:

- Matters generally within the scope of section 19
- Consistency with the objectives of the Kildare County Development Plan (CDP), including its core strategy, and with the Regional Spatial and Economic Strategy (RSES); Eastern and Midland Regional Assembly
- Consistency with the transport strategy of the National Transport Authority (NTA)
- Ministerial guidelines under section 28
- Ministerial policy directives issued under section 29
- Such other matters as the Minister may prescribe under section 262, or otherwise prescribe.

Strategic Policy Framework

The submission notes the requirement for the JLAP to be consistent with the RSES, the National Planning Framework (NPF) and the Development Plans. States that in ensuring consistency with the two development plans and their respective core strategies, the planning authorities can ensure that it is also generally consistent with the RSES and NPF. Encourages the planning authorities to liaise closely with the Eastern and Midland Regional Assembly in preparation of the draft JLAP to ensure consistency with the RSES, particularly where clarity is required on the objectives and guiding principles set out in the RSES.

Welcomes that the preparation of the JLAP will enhance co-ordination of development in Maynooth, including its environs in County Meath, in accordance with RPO 4.34. Notes that the Issues Paper demonstrates a clear understanding of the town's strategic role as a key town within the metropolitan area, and the aspirations for the delivery of significant housing and employment consistent the RSES and the Dublin Metropolitan Area Strategic Plan (MASP). Welcomes that the issues paper sets out a strategic purpose of the new JLAP which seeks to provide an overarching land use strategy for the proper planning and sustainable development of the town, across the two planning authorities to 2030.

Core strategy

Submission acknowledges the highly ambitious population and housing targets set for Maynooth under the RSES and the Dublin MASP, having regard to reallocation of the population growth from Dublin city and suburbs to the metropolitan key towns in line with NPO 68 of the NPF. Notes that the additional population allocation of up to 10,000 persons was agreed with EMRA in July 2020 for Maynooth, within County Kildare. States that this has been considered as part of the core strategy of the draft Kildare CDP 2023-2029. States that while the core strategy of the Meath CDP 2021-2027 provides for population growth of 1,000 people, half of this was a preliminary figure based on an assumed future agreed population reallocation under NPO 68. Submits that no additional population growth was assigned to that portion of the settlement with County Meath and as such, the draft Plan should provide clarity regarding the balance of growth between the Kildare and Meath areas, also taking account of existing and planned infrastructure so that the settlement grows in a sustainable manner.

Zoning, Compact Growth and Infrastructural Services

The submission outlines the need to ensure consistency with both local authorities' development plans (including their objectives and core strategies) and the RSES in setting out the intended land use strategy having regard to the provision under section 19(2) of the Act. States that as no land use zoning objectives for Maynooth have been included in the draft Kildare County Development Plan 2023-2029, it can be expected that land use zoning objectives will be included in the future JLAP. Submits that in determining zoning objectives the planning authorities will need to ensure consistency with the provisions for tiered approach to zoning under NPO 72 a-c of the NPF.

Notes that the Issues Paper highlighted the delivery of critical infrastructure as a key challenge. In this regard, the submission states that an infrastructure assessment will be required as per the provisions of Appendix 3 of the NPF and with section 4.5.2, Settlement Capacity Audit, of the *Development Plan, Guidelines for Planning Authorities* (2022) to ensure that all lands zoned for residential and other development are serviced or will be serviceable during the plan period. Submits that this will enable the planning authorities to meet the growth targets for Maynooth through the delivery of lands including Greenfield and Railpark, as well as consolidation lands to the northwest and southwest of the town, as identified in the RSES.

Submission refers to the lands that have been zoned for Maynooth under the Meath CDP 2021-2027 and notes that these objectives were not informed by an infrastructure assessment report forming part of the Plan, which matter was raised by the Office in its recommendations on the draft Plan (MA Recommendation 1). States that it is the understanding of the Office that the said lands are not serviced or serviceable over the plan period, notwithstanding their identification in the RSES for future development. Further notes objective CS OBJ 11 of the Meath CDP regarding the undertaking of detailed infrastructure assessment consistent with the Tiered Approach to Zoning (TAZ) Appendix 3 of the NPF as part of the preparation of the JLAP.

Notes the potential of infrastructure capacity issues including in the area of water/wastewater services which could significantly affect the ability of the settlement to accommodate strategic growth. States it is important that these constraints and the time frame in which they can be realistically resolved are fully understood and are seen to inform the Plan. Advises the planning authorities to liaise closely and collaborate with Irish Water concerning the delivery of wastewater and water infrastructure to facilitate the implementation of a sustainable JLAP (RPO 5.1). Notes that the town appears to have short term wastewater treatment capacity issues, which are projected to be resolved by 2026 and that certain lands in the town have network issues that will also need to be addressed. Submits that the JLAP should therefore prioritise the development of serviced and/or serviceable land in order to ensure the objectives for housing, employment and other development growth can be achieved during the plan period.

States that the delivery of transport infrastructure consistent with the RSES will also be vital to ability of Maynooth to accommodate the rapid growth proposed. Notes that walking and cycling infrastructure will be vital to facilitate the sustainable development of the town. Submits that it is critical that the density and height

of development is sufficient to maximise the return on the significant public investment in sustainable transport consistent with RPO 5.2. Notes that the zoning of land will also have to be consistent with the objectives of the NPF (NPO 3c) and the RSES (RPO 3.2) to achieve compact growth of at least 30%, in addition to similar objectives in the development plan for each planning authority. States that land use zoning should also follow the sequential approach to zoning for residential development set out under section 6.2.3 of the Development Plan Guidelines. Welcomes that the Issues Paper identifies that the promotion of increased density of development and taller buildings at appropriate locations within the town is a key challenge. States that the inclusion of an evidence-based policy approach in this regard has the potential to help achieve compact growth and optimise the use of public infrastructure.

Submits that the Issues Paper correctly highlights the regeneration of the town centre, Canal Harbour and Carton Park as one of the key parameters to guide the growth of the town. States that the facilitation of development of backlands, brownfield lands and vacant buildings can assist in the revitalisation of the centre of the settlement with residential population as well as help it meet and exceed the compact growth target, in accordance with RPO 3.3 and RPO 4.36. Encourages the inclusion in the JLAP of clear, practical provisions for active land management and a clear strategy for the implementation of regeneration objectives.

Economic Development and Employment

Submission notes the provisions in the RSES relating to the development of knowledge-based employment on research and technology campus to the west of the existing university campus and that the lands at Moygaddy, County Meath, are identified for science and technology-based development. Submission states that while the Issues Papers note these as key elements of employment growth over the next decade, the challenge for the JLAP will be to facilitate and guide such development in a sustainable way, including planning for and facilitating the delivery of enabling infrastructure. Refers to the objectives for sustainable transport in Meath CDP and the Draft Kildare CDP, to national investment proposed for sustainable transport modes, and to the obligation to reduce GHG emissions by 51% by 2030. In this regard, submission states that it will also be essential to ensure that such development is easily accessible by sustainable / active modes. States that the provision of retail facilities will also need to be considered to provide for the anticipated population growth having regard to the position of Maynooth within the retail hierarchy of the CDP and the provisions of the *Retail Planning Guidelines* for *Planning Authorities* (2012), including the sequential approach to the location of retail development.

Movement and Active Travel

The submission notes the strategic location of Maynooth on national transport and rail routes and refers to the provisions contained in the RSES relating to the planned upgrades of transport infrastructure. Agrees that it will be critical for the JLAP to develop an integrated land use and transport strategy and states that this approach will help ensure the JLAP is consistent with NPO 27 and with RPO 5.3 and should have regard to the RSES guiding principles. Reiterates that the JLAP is required to be consistent with the NTA's GDA Transport Strategy and notes its provision for a second train station for the settlement. States that the Strategy is likely to be finalised in advance of the publication of the draft JLAP.

Notes that RPO 8.6 of the RSES requires that Local Transport Plans (LTP) will need be prepared for selected settlements in the region to give local expression to the Transport Strategy, including for certain large settlements within the Dublin Metropolitan Area. The submission advises the planning authorities to liaise closely with the NTA in the preparation of the draft JLAP and, in particular with its requirements regarding the preparation of the LTP in accordance with the evidence-based approach. Directs the planning authorities to the guiding principles for integration of land use and transport in the RSES, which provides the appropriate policy approach to be followed in the JLAP. Notes the challenge of achieving climate resilience in the town and states that the implementation of an appropriate integrated approach to land use and transport planning will ensure that the growth of the settlement will contribute to the achievement of Government targets to reduce GHG emissions by 2030.

Environment and Climate Change

The submission notes the intent of the planning authorities, as the competent authorities to undertake Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) as part of the JLAP process. On the issue of climate change and adaption, the submission states that the JLAP should be consistent with the relevant objectives and be informed by the guiding principles of the RSES. Submits that the measures to be included in the JLAP should also be cognisant of the need to implement the binding interim target to reduce greenhouse gas emissions by 51% by 2030 under the Climate and Low Carbon Development Act and the Climate Action Plan 2021. States that flood risk management, including the avoidance of flood risk, is an essential consideration in plan preparation and, in particular, in determining land use zoning objectives for the draft JLAP to avoid

inappropriate development at risk of flooding and to inform placemaking, consistent with NPO 57 and with RPO 3.7.

Submits that it is also a requirement of the RSES that Strategic Flood Risk Assessment (SFRA) be carried out as part of the draft JLAP preparation (RPO 7.12). Notes the requirement to have regard to the Section 28 Flood Risk Guidelines in preparing the JLAP. States that any land intended to be zoned for highly vulnerable development (flood zone A or B) or less vulnerable development (flood zone A) must have passed a plan-making Justification Test in accordance with the Flood Guidelines. Further advises that flood maps be overlaid on proposed zoning maps in the JLAP to provide clarity and transparency for members of the public.

Strongly advises the planning authorities to liaise with the OPW in preparing the draft to ensure the provisions of the guidelines are met. In this regard, the submission highlights the following issues for consideration:

- the arterial drainage scheme to the north of the settlement;
- the existing Flood Relief Scheme for Maynooth (Lyreen Meadowbrook), which must be taken into account in the preparation of the draft JLAP (RPO 7.14) and a proposed Flood Relief Scheme to augment the existing scheme;
- the CFRAMs would indicate the town has extensive flood risk, including lands at and surrounding the location of the indicative second train station; the planning authorities are required to work with EMRA and other agencies to implement the recommendations of the CFRAM programme and to ensure that flood risk; management policies and infrastructure are progressively implemented (RPO 7.13)
- the Justification Test will need to be passed where it is proposed to zone lands at risk of flooding for vulnerable or highly vulnerable uses; and
- the SFRA will need to take account of climate change impacts on future likely flood risk.

Noting the responsibility of the two planning authorities for surface water drainage, submits that it would be appropriate for the JLAP to provide for the implementation of the *Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas: Water Sensitive Urban Design Best Practice Interim Guidance Document* (2022) to ensure consistency with NPO 57, to integrate sustainable water management solutions and facilitate adaption to climate change within the surface water drainage system.

Heritage and Amenities

The submission agrees that the protection of Maynooth's natural and built heritage assets will be a key challenge in view of the significant residential and employment growth envisaged for the town. States that such assets need to be taken into account in the preparation of the Plan and appropriately protected consistent with NPO 17, NPO 60 and RPO 3.5, having regard to the RSES guiding principles. Submits that the draft JLAP should include appropriate protections for St. Patrick's College, the Royal Canal, Maynooth Castle and the nearby demesne landscape of Carton House identified as key assets and attractions in the RSES. Notes however, that a balance will have to be struck between appropriate protections and the facilitation of development to achieve residential and employment growth ambitions, including provisions for increased density and tall buildings and accordingly advises the planning authorities are advised to have regard to the *Architectural Heritage Protection Guidelines for Planning Authorities* (2011) and to liaise with the Heritage Section of the Department of Housing, Local Government and Heritage in preparing the draft JLAP.

On this issue of natural heritage, the submission highlights the requirement to promote the ecosystems services approach to the preparation of statutory plans under RPO 7.21 and states that the protection of natural heritage should also be considered in the development of green infrastructure (RPO 7.22) and greenways and blueways (RPO 7.24) and the inclusion of riparian setbacks (RPO 7.26). Submission concludes with a list of areas summarising the main recommendations of the submission and stated that particular attention should be made to these issues in the preparation of the JLAP.

Response to Issues Raised

Strategic Policy Framework

The contents of the submission regarding the strategic policy framework are noted. It is the intention of both Kildare and Meath County Councils that the Draft Joint Local Area Plan (JLAP) for Maynooth and Environs will be consistent with the respective core strategies of both local authorities and with the provisions of the NFP and RSES, in so far as practicable. Kildare and Meath County Councils look forward to engaging with EMRA in progressing preparation of the Plan both at pre-draft and draft stages of the plan-making process.

Core strategy

The population and housing targets proposed in the Draft JLAP will seek to align with the provisions of the respective core strategies of Kildare and Meath County Councils and the Regional Spatial and Economic Strategy

(RSES). It is recognised by both local authorities that the targets are ambitious, particularly the additional population growth allocated to Maynooth by EMRA under NPO 68 of the NPF. In this regard, it should be noted that if capacity/infrastructural constraints are identified in the town, which cannot be resolved over the life of the JLAP to 2030, then the figures for growth (particularly in relation to the National Policy Objective (NPO) 68 allocation) will be reduced accordingly, to ensure the growth of the town does not exceed the capacity of both its servicing and social infrastructure. With regard to the figure allocated to the Maynooth Environs, under the core strategy of the Meath County Development Plan 2021–2027 Meath County Council acknowledges the issues that presently exist in the population and housing growth allocation for the Maynooth Environs. This will be the subject of further discussion between both Local Authorities during the preparation of the Plan and clarity will be provided at a later stage of the plan-making process.

Zoning, Compact Growth and Infrastructural Services

The Draft Joint Local Area Plan will include zoning objectives for lands in Maynooth (County Kildare) and Maynooth Environs (County Meath). All lands zoned in the Maynooth Local Area Plan 2013-2019 (as amended) and in the Maynooth Environs plan (Meath County Development Plan 2021-2027) will be reviewed as part of the preparation of the Joint Local Area Plan (JLAP). The review of zoned land will be underpinned by *inter alia* an infrastructure assessment for the town in accordance with NPO 72 a-c and Appendix 3 of the NPF and section 4.5.2, Settlement Capacity Audit, of the *Development Plan, Guidelines for Planning Authorities* (2022).

The potential of both servicing and community infrastructural constraints affecting the capacity of the town to accommodate targeted growth is acknowledged. Accordingly, the Plan will be accompanied by several supporting studies which will provide a detailed analysis with regard to the availability and capacity of the required physical and social infrastructure within Maynooth and Environs over the life of the Plan. Such evidence-led studies will include an Area Based Transport Assessment, a Social Infrastructure Audit and a Settlement Capacity Audit (i.e. Infrastructure Assessment). These supporting documents will also be critical in providing safeguards which will be incorporated into an overall infrastructure delivery schedule in the Plan. This will ensure that where lands are identified as being suitable for residential or employment purposes, their development will be dependent on the delivery of identified key servicing and community infrastructure either prior to or in tandem with development.

On the specific issue of water and wastewater services, the planning authorities are in ongoing consultation with Irish Water. It is intended that the agency will provide crucial information to the authorities which will inform the outputs of the Settlement Capacity Audit (SCA). The SCA in addition to the other supporting documents will seek to identify and prioritise the development of *Tier 1: Serviced Zoned Land* in the first instance, in order to grow the town in a sustainable manner in keeping with the principles of compact growth and sequential development, as set out in the NPF and in the Development Plan Guidelines (2022).

The JLAP will seek to prioritise the development of transport infrastructure that is consistent with the provisions of the RSES and the Transport Strategy of the Greater Dublin Area 2022-2042. In order to maximise opportunities associated with the development of key public transport infrastructure, the Plan will incorporate a range of provisions to facilitate active land management in the town. This will include the placing of particular emphasis on the delivery of residential development on appropriately located lands and at sustainable densities within the town centre, and along existing and planned high-capacity public transport routes (BusConnects and DART+ West). Furthermore, it is envisaged that a comprehensive suite of active land management measures will be proposed to provide for the long term regeneration of the Town Centre and Canal Harbour areas. The Plan will also, insofar as practicable, seek to achieve to deliver at least 30% of all new residential units within the defined settlement area of Maynooth. This will be assessed on foot of the full publication of the results of Census 2022 and the consequent demarcation of a new settlement boundary for the town.

Economic Development and Employment

The comments from the OPR with regard to economic development and employment growth in the town are noted. It is the intention of the Plan to incorporate a comprehensive economic development strategy for the town which is consistent with both the RSES and the respective county development plans of both local authorities. A priority of the strategy will be to ensure that employment lands are developed in a plan-led, orderly and sequential manner. Furthermore, the Plan will seek to create the right jobs in the right places by placing a particular emphasis on achieving greater alignment between where people live and work, to reduce the need to travel and facilitating sustainable travel modes. The JLAP will have full regard to the provisions of the *Retail Planning Guidelines for Planning Authorities* (2012).

Movement and Active Travel

The Plan will be accompanied by a Local Transport Plan (LPT) which will take the form of an Area-Based Transport Assessment for Maynooth and Environs (MEABTA). The purpose of the MEABTA is to place the integration of land use and transport planning at the centre of the plan-making process for the town and its environs. This assessment will examine the existing and proposed transport infrastructure and service provision across all modes of transport including sustainable means such as active modes (walking and cycling). The MEABTA will provide an insight into the existing constraints and modal share in Maynooth and will also identify the interventions required within the Plan area and in the wider context. This is in order to effectively accommodate the anticipated increase in demand and ensure the optimal transportation interventions can be put in place to drive a long-term shift towards sustainable movement and the development of a low carbon town. The outputs of the MEABTA will both adhere national and regional spatial and transport policy and align with Maynooth's anticipated designation as a Decarbonisation Zone.

Environment and Climate Change

The comments of the OPR in relation to the issues of climate change and the environment are noted. It is acknowledged that Planning Authorities have a critical role in effecting meaningful climate action at a local level, particularly within settlements, through the Local Area Plan process. In this regard and aligning with the need to transition to a low carbon model of development, it is considered that climate action represents a key opportunity when planning for the future development of the town. The realisation of Maynooth as a low carbon town will provide huge tangible benefits for its residents, workers, visitors and students alike, in terms of improved experience of place, liveability and quality of life. Accordingly, the Plan will include provisions to support inclusive and comprehensive climate action required to reduce greenhouse gas emissions, insofar as its remit extends. Furthermore, an objective will be included to support the full implementation of any Maynooth Decarbonisation Action Plan, with regards to its goals, objectives and actions relating to planning and development within Maynooth Decarbonisation Zone.

The Plan will be informed by Strategic Flood Risk Assessment (SFRA) which will be prepared in accordance with the requirements of *The Planning System and Flood Risk Assessment Guidelines for Planning Authorities* (2009) and published alongside the JLAP. The Plan will seek to ensure that development in flood risk areas is avoided entirely or is 'water-compatible,' as per the Flood Risk Guidelines. Such locations will be recognised and preserved in the Plan, to the maximum extent possible, as essential green infrastructure that provides a natural

defence against flood risk. Furthermore, in light of their additional value as ecological corridors and potential contribution in terms of developing a greater 'sense of place,' the Plan will seek to develop an integrated green infrastructure network which will focus alongside the waterbodies within Maynooth and Environs. A map which integrates the Land Use Zoning Objective Map with the Maynooth and Environs Flood Risk Assessment Zone (including Flood Zones A and B) will also be included as part of the JLAP.

The specific issues highlighted by the OPR with regard to flood risk in Maynooth will be taken into full consideration when preparing both the SFRA and incorporating subsequent provisions in the Plan. The Plan will include an objective to support and co-operate with the OPW in augmenting the Lyreen and Meadowbrook Flood Relief Scheme, subject to the statutory environmental considerations. Furthermore, the recently published interim guidance on Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas (DoHLGH, 2022) is supported by the Kildare County Development Plan 2023-2029 and will be supported by a number of provisions in the JLAP. This includes an objective to provide for the preparation of a Maynooth Surface Water Drainage Study for both existing and new development areas within the town to provide for a municipal-level, multi-site nature-based solution(s) to surface water management.

Heritage and Amenities

The Plan will seek to ensure the safeguarding of all built and natural heritage assets in Maynooth and Environs, in particular those identified in the RSES. It should be noted that under the Kildare County Development Plan 2023-2029, the Maynooth Architectural Conservation Area (ACA) encompasses all key built heritage features of the town including its 18th Century Street grid, Maynooth Castle, Grand Canal Harbour and large portions of St. Patrick's College campus. It also has been expanded to include the unique planned landscape of Carton Avenue which acts a crucial spatial and visual connector linking the historic town centre with Carton Demesne. It is further noted that the Kildare County Development Plan 2023-2029 provides for a range uses to be created within St. Patrick's College campus. It is envisaged that the Plan will provide additional details in this regard to ensure that any new development on the lands will have to have full regard to the historic nature and setting of the campus. Overall, the Plan will seek to incorporate a comprehensive suite of provisions that will seek to sensitively and appropriately develop the existing natural and built heritage assets of the town in order to realise a number of regeneration and economic development opportunities.

With regards to the issue of building heights, the Plan will seek to comply with the provisions of the Section 28 Ministerial Guidelines on Urban Development and Building Heights (2018) including its Specific Planning Policy Requirements (SPPRs). It is further noted that the Plan will seek to expand on the provisions of the respective county development plans of Kildare and Meath which have identified lands in Maynooth which could support increased density and building heights of 6+ stories. The Plan will have regard to the *Architectural Heritage Protection Guidelines for Planning Authorities* (2011) and take into full consideration the recommendations of the Department of Housing, Local Government and Heritage included as part of the submission to the authorities as part of the Pre-draft Public Consultation Exercise for the JLAP.

A Green Infrastructure Survey and Habitat Mapping Exercise will be undertaken for the purposes of protecting and enhancing the overall level of biodiversity within the Plan area. It is envisaged that the Plan will also contain provisions to require biodiversity net gain on specific sites to encourage the development of natural habitats in the town and to promote increased levels of biodiversity carbon sequestration. The Plan will also include a Green Infrastructure Map, based on the Habitat Mapping Exercise which will illustrate 'Notable Green Infrastructure Routes'. This will be accompanied by a series of objectives providing for their protection and enhancement. It is anticipated that key waterbodies such as the Lyreen and Rye Water will form the core of the green infrastructure network in Maynooth. The Plan will also seek to align with Inland Fisheries Ireland's Urban Watercourses Planning Guide (2020) with regard to development within riparian areas.

65. Department of Housing, Local Government and Heritage

Archaeology

Submission notes the importance of archaeological heritage as a unique, finite and non-renewable resource and states that Maynooth and its environs represent a physical representation of mankind's endeavours over millennia. Notes that evidence for Neolithic settlement in the town was identified directly beneath the site of Maynooth Castle. Further notes the subsequent development of the town from the 12th Century. Refers to the development of the formal layout of the town in the 18th Century and states that many built heritage features are represented in the buildings and structures to be seen today.

Strategic Vision

Notes the need for a strategic vision which should be specific to the needs of the population and reflective of the unique characteristic of the town. Submits the vision statement should include an appreciation of the built and cultural heritage of the area and have strategic goals which tie-in to the wider regeneration, economic

development of the town. Notes the importance of incorporating heritage to create an attractive environment and an enhanced sense of place which in turn promotes increased social responsibility – both individually and at a community level.

Climate Action

Notes the need for the Plan to incorporate specific actions and objectives on climate action including for specific commitments in relation to climate change and archaeology, architectural and cultural heritage. Submits that the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage under the current National Adaptation Framework (NAF) should be utilised to develop such policies and objectives. States that where flood relief schemes are being undertaken the Councils should have regard to the Archaeological Guidelines for Flood Relief Schemes (Draft document, DHLGH 2022).

Homes and Communities, Urban Regeneration and Placemaking

States that in determining appropriate lands for new housing, cognisance should be had to landscape types, past land-uses and associated archaeological potential. Notes the need to avoid areas of high heritage sensitivity – both natural and man-made. Submits that the unique identity of Maynooth can be enhanced through appropriate policies, objectives and guidance which seek to highlight the importance of the town's heritage.

Green Infrastructure and Biodiversity

Submits that biodiversity is intrinsically linked to heritage (both natural and man-made) and sensitively maintained archaeological features are often excellent repositories for flora and fauna. States that green infrastructure forms a vital part of the response to the climate crisis and that heritage elements in the town can be integrated into the green infrastructure network, thereby assisting in enhancing biodiversity and carbon sequestration.

Recommends the Plan includes specific reference to the policy document *Framework and Principles for the Protection of the Archaeological Heritage* (1999) in establishing appropriate provisions for the protection and promotion of archaeological heritage and must be explicit in stating this. Further recommends that the Plan includes specific provision on compliance with national policy on the protection of built and archaeological heritage. Refers to the *National Policy on Architecture – Places for People* and states that it has specific relevance

to urban regeneration, including in historic towns. Advises that policies for the protection of archaeological heritage must also incorporate explicit protection for underwater sites and archaeology including waterbodies such as the Rye River and Royal Canal. Recommends that the Plan contains a specific section on underwater archaeology and that the protection of underwater cultural heritage in all its forms is included as a core objective. Submission outlines a range of additional government policies with relevance to the protection and promotion of built and cultural heritage.

Nature Conservation / Nature Conservation Policy

Notes that the Plan will provide an opportunity for the local authorities to work together to support the achievement of the Rye Water Valley/Carton Special Area of Conservation's (SAC) conservation objectives. Notes that Ireland has ratified the United Nations (UN) Convention on Biological Diversity, and all subsequent protocols, is a signatory to the UN Sustainable Development Goals (SDGs) and is fully committed to halting the loss of biodiversity and the degradation of ecosystem services as set out in the EU Biodiversity Strategy for 2030. States that Government policy on nature conservation is outlined in the National Biodiversity Action Plan 2017-2021 (NBAP) which includes Ireland's vision for biodiversity. Refers to Regional Strategic Outcome (RSO) 11 of the RSES relating to biodiversity, heritage and landscape protection. Notes that RSO 11 is also reflected in the vision of the County Kildare Biodiversity Plan. Advises that these policy commitments to biodiversity conservation are included in the Plan.

Submits that given the experience of the COVID-19 pandemic a Plan that has biodiversity embedded in its core policies will help build a healthy place for residents and visitors alike, as well as providing fully functioning and resilient ecosystems. Notes the importance of the Plan setting out legislative requirements in relation to the protection of designated sites and protected species under both European (i.e., Birds and Habitats Directive) and national legislation (i.e., Wildlife Act 1976-2021) and ensuring government policy on biodiversity can be delivered at local level. Refers to Objective 1 of the NBAP is to 'mainstream biodiversity into decision-making across all sectors'. Notes the real opportunities to protect and enhance biodiversity and submits that the current Plan's provision should be reviewed with a view to streamlining and strengthening them and ensuring that they are consistent with current EU and national plans, reports, guidance documents and case law relating to biodiversity.

Natural Heritage

Recommends the inclusion of clear and robust natural heritage objectives, and that there is an objective to protect, conserve and enhance biodiversity both within and outside protected sites. States that this is critical in order for local authorities to meet their obligations in relation to nature conservation and for Ireland to meet its target to halt the loss of biodiversity. Notes that Objective 1.1.3 of the NBAP requires all public authorities and private sector bodies to 'move towards no net loss of biodiversity through strategies, planning, mitigation measures, appropriate offsetting and/or investment in Blue-Green infrastructure' and advises that the Plan incorporate 'no net loss' biodiversity target for all developments, activities, programmes and plans arising from this Plan. Advises that objectives related to biodiversity and ecosystem conservation, protection, enhancement and restoration should be separated from objectives related to other matters, such as amenity provision and landscape, in the Plan as such an approach will assist in the implementation and monitoring aspects of the Plan. Submits that clear and robust objectives are required to ensure the strict protection of all bat species and otter, species listed under Annex IV species under the European Communities (Birds and Natural Habitats) Regulations, 2011 to 2021 and that the publication 'Guidance on the Strict Protection of Certain Animal and Plant Species under the Habitats Directive in Ireland' should be consulted. Advises that projects relating to the restoration and re-use of historic buildings must be accompanied by a bat survey report.

On the issue of light pollution, it is recommended that objectives are included within the Plan to reduce the impact of lighting on wildlife, including bat species. Notes that artificial light at night (ALAN) has been identified as a potential contributing factor to wildlife decline and that recent scientific evidence indicates that ALAN and the ongoing shift toward white LEDs will have substantial consequences for insect populations and ecosystem processes. Advises that there should be a presumption against the lighting of entire footpaths and cycle tracks, in areas with low or no levels of background light and along ecological/green corridors, riparian corridors, woodlands and other habitat areas. Further recommends that documents which provide further information on reducing lighting impacts, such as EUROBATS, Dark Sky Ireland and the Institute of Lighting Professions lighting guidance, should be consulted.

Notes the Maynooth's swift population is a significant biodiversity asset and recommends that swift conservation measures are included in the Plan including an objective that all new public buildings consider swift nest bricks/boxes at development pre-planning stage. Submits that Measures in the *All-Ireland Pollinator Plan*

2021 – 2025 should be included in the Plan, in particular actions outlined in the 'Council's Actions to Help Pollinators Guide'. Recommends that an objective be included in the Plan to ensure the control and containment of Invasive Alien Species (IAS), in accordance with the EC Regulations.

Green Infrastructure (GI)

Submits that the incorporation of Green Infrastructure (GI) in spatial planning is one of the ways in which the National Biodiversity Action Plan 2017-2021 proposes to address the main drivers of biodiversity loss and welcomes that the Plan will seek to create an integrated GI network within the town that will support increased levels of biodiversity and carbon sequestration. Submits that there should be a commitment made to protect existing ecological corridors associated with the Royal Canal Proposed Natural Heritage Area (pNHA), the Rye Water and Lyreen Rivers and the railway line. Further submits that a distinction should be made between GI and greenways and other trail development within the Plan and that any development of new greenways should look to support rather than replace existing GI and avoid the development of hard infrastructure in existing GI areas. Refers to the issues of appropriate riparian setback distances to support the attainment of high ecological status for water bodies, the conservation of biodiversity and provide buffer zones for flood plains. Requests that riparian areas, particularly within a minimum of 10m of the top of the riverbank should be protected from all development, which is in accordance with the Inland Fisheries Ireland's Urban Watercourses Planning Guide (2020).

Water

Notes that in urban areas, where natural infiltration is reduced, rainfall runoff can be 400% greater than in rural areas and prone to extreme flows in severe rainfall events and that the runoff in urban areas can include pollutants washed off the urban impermeable areas which has been identified by the EPA as one of the primary sources of pollution from urban areas. Refers to the recently published Best Practice Interim Guidance Document 'Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design (2021)' and advises that incorporation of a rainwater management plan and Strategic SUDS measures are considered as part of the Plan.

Climate Change

States that an objective of Ireland's Biodiversity Climate Change Sectoral Adaptation Plan (2019) is to 'Protect, restore and enhance biodiversity to increase the resilience of natural and human systems to climate change'. Submits that this objective is particularly relevant to all wetland habitats and flood plains which provide an essential service in relation to flood alleviation and recommends the inclusion of objectives to ensure that undesignated wetland areas and flood plains are protected within the Plan area.

Response to Issues Raised

With regard to archaeology, and built heritage in general, it is considered that all types of built heritage represent intrinsic assets which provides a crucial sense of place and have the potential, if appropriately managed and enhanced, to increase the overall quality of life within a community. Accordingly, it is intended that the Joint Local Area Plan (JLAP) will include provisions which seek to conserve and manage Maynooth's built heritage assets, including archaeological features, for the benefit of present and future generations.

The JLAP will present an overarching and holistic vision to guide the development of the town, one which places the historic and commercial core of Maynooth firmly at the centre of a sustainable growth strategy. The town centre is considered to be a critical environmental asset which has untapped potential not only in terms of generating further economic activities but also in providing an area of focus for place-based regeneration projects. It is intended that the Plan will contain an array of provisions and supporting objectives to create a more attractive and welcoming environment, enhancing the overall visitor experience whilst also protecting the historic character of the town centre.

Climate action will be a central consideration of the JLAP. It is envisaged that the Plan will include a comprehensive range of provisions to support a meaningful transition towards low carbon development in Maynooth and environs, including support for Maynooth as a Decarbonization Zone. The provisions of the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage under the current National Adaptation Framework (NAF) will be integrated into the Plan where relevant. The local authorities will take into consideration the Archaeological Guidelines for Flood Relief Schemes (Draft document, DHLGH 2022) when preparing objectives in the Plan on flood risk relief schemes.

The JLAP will seek to balance the requirement of strategic development and growth, with the need to protect and enhance both built and natural heritage assets. In this regard, it should be noted that under the Kildare County Development Plan 2023-2029, the Maynooth Architectural Conservation Area has been expanded to include the unique planned landscape of Carton Avenue. Furthermore, as part of the preparation of the JLAP, a Green Infrastructure Survey and Habitat Mapping Exercise will be undertaken. This exercise will result in a number of recommendations to protect and enhance the overall level of biodiversity within the Plan area. It is envisaged that the Plan will also contain provisions to require biodiversity net gain on specific sites to encourage the development of natural habitats in the town and to promote increased levels of biodiversity carbon sequestration. The Plan will also include a Green Infrastructure Map, based on the Habitat Mapping Exercise which will illustrate 'Notable Green Infrastructure Routes'. This will be accompanied by a series of objectives providing for their protection and enhancement. It is anticipated that key waterbodies such as the Lyreen and Rye Water will form the core of the green infrastructure network in Maynooth.

Objectives will be included in the Plan to ensure the continued protection of designated sites, including Natura 2000 sites and proposed National Heritage Areas (i.e., Royal Canal) in line with legislative requirements. Both national policy and the provisions of each respective county development plan will be taken into full consideration when preparing objectives and supporting text on biodiversity.

Requests raised relating to the integration of provisions to require the preparation of bat surveys as part of the development of historic buildings, the reduction of light pollution and swift conservation measures are noted. In order to avoid unnecessary policy duplication, the inclusion of such measures will be considered having regard to the content of any similar existing policies outlined in the respective county development plans of Kildare and Meath County Councils. The Plan will seek to align with Inland Fisheries Ireland's Urban Watercourses Planning Guide (2020) with regard to applying development set back distances within riparian areas.

The recently published interim guidance on Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas (DoHLGH, 2022) will be supported by a number of provisions in the Plan. This includes an objective which will support the preparation of a Maynooth Surface Water Drainage Study for both existing and new development areas within the town, to provide for a municipal-level, multi-site nature-based solution(s) to surface water management. Having regard to current extent of flood risk in Maynooth and

in light the increasing frequency of flooding due to climate change, along with the need to achieve resilience
within the town to mitigate its effects, the Plan will seek to ensure that development in floodplains is avoided
entirely or is 'water-compatible,' as per the Flood Risk Guidelines (2009).

Table 4: Summary of Submission and Response to Main Issues Raised in Submissions from Members of the Public and Other Stakeholders

Sub.	Name	Summary of Submission
No.		
1.	Steve Power	Submission asks if it possible to have a car free day, once a month on the Main Street. States that this would be good for climate action and the environment and would encourage more people on the Main Street helping to support local businesses.
		Response to Issues Raised Whilst the implementation of a car free day is considered an operational (traffic management) issue not within the remit of the Plan, it should be noted that given the lack of alternative routes through and around Maynooth, it may not be feasible to hold a car free day on Main Street in the short term. However, as part of the development of the Joint Local Area Plan (JLAP) a Maynooth and Environs Area Based Transport Assessment (MEABTA) is being undertaken. A key element of this work is to foster a long-term shift in movement patterns in the town. This will see reduced congestion in the town centre, particularly on Main Street. As part of the second round of the public consultation for the MEABTA (advertised as the Draft Transport Strategy for Maynooth and Environs) a proposal envisages Main Street becoming accessible to public transport, pedestrians and cyclist only with private vehicular traffic being prohibited. It is noted however that this will depend on all sections of the MOOR being developed in order to provide alternative routes for people to access all destinations in and around the town.
2.	Steve Power	Submission asks if it possible to have a bike rental scheme for short term rental of bikes from the train station to Maynooth University and other areas of the town. Submits that this would encourage more people to cycle and could reduce car trips (suggested locations for stations including the university, GAA grounds, primary and secondary schools, and Tesco).
		Response to Issues Raised It is intended that the Maynooth and Environs Area Based Transport Assessment (MEABTA) will include a proposal for a bike rental scheme in the town which will be supported by an objective of the Plan.
3.	Inland Fisheries Ireland	Prescribed or public body. Please refer to Table 3 .

Sub.	Name	Summary of Submission
No.		
4.	North Kildare Basketball Club	Submission outlines the critical need for an expansion in the provision of sports facilities in Maynooth. The focus of the submission is on basketball infrastructure and states that the town has one completely inadequate, unlit outdoor court, aside from the courts inside school grounds which are inaccessible to all without prior permission and payment of an onerous fee. Submits that the Plan should make Maynooth a hub for basketball and should include provision for construction of a purpose-built indoor/covered (e.g., with a dome) basketball facility. Notes that 250 children around, aged 5-18, play organised basketball with the club and that there is growing demand, including demand from families with disabilities.
		Response to Issues Raised The present deficit in the provision of amenity infrastructure in Maynooth is acknowledged. As a response to this the Kildare County Development Plan 2023–2029 has included a specific objective in Chapter 10 'to proactively seek suitable sites within the Key Towns of Naas and Maynooth for the provision of Municipal Sporting Facilities where shared amenities are provided for sports clubs and the general public.' It is envisaged that the Joint Local Area Plan (JLAP) will seek to advance this objective through the identification of a potential suitable and walkable location within the town for such a facility to be developed. It is further noted that the JLAP will be accompanied by a Social Infrastructure Audit (SIA) which will examine the current context with respect to social infrastructure provision in Maynooth whilst also identifying the future requirements of the town, including the making of recommendations on priority areas for investment within the Plan area.
5.	Michael Costelloe	Submission states that the eastern bypass of the town (the Maynooth Eastern Ring Road - MERR) needs to be a priority as this has been a long time in the pipeline for Kildare County Council. Submits that there should be another access to relieve the pressure from the M4 Motorway. States that the Maynooth Outer Orbital Route (MOOR) may actually get started at the same time and possibly completed quicker in Meath County Council as it is a private project. Contends that when these routes get completed the town will be able to function more efficiently and improve the position of the town with regards to the development of the town.
		Response to Issues Raised The development of the MERR is being progressed by Kildare County Council and as of early 2023 has reached Compulsory Purchase Order (CPO) stage. It should be noted that the planned upgrade to the M4 motorway is the

Sub.	Name	Summary of Submission
No.		
		subject of a separate M4 Maynooth – Leixlip Project which is outside the remit of the Plan. The project currently has two options in relation to Maynooth, one of which involves upgrading the existing Junction 7 and the second envisages the closing of the existing junction and the construction of a new junction further to the west. A public display of the emerging preferred option is scheduled for Quarter 2 2023. Given that the M4 Maynooth – Leixlip Project is supported by both the National Development Plan 2021-2030 and the Greater Dublin Area Transport Strategy 2022-2042, the Joint Local Area Plan will include a specific supporting objective.
		The MOOR is a developer driven road project and shall be planned, developed and completed in parallel with appropriate development. Recent planning applications submitted to respective Kildare and Meath County Councils include all relevant parts of the proposed MOOR. All planning applications are currently out on requests for further information that will further clarify and coordinate the development of the MOOR.
6.	Public Health	Prescribed or public body. Please refer to Table 3 .
	Heath Service –	
	Executive (HSE)	
7.	Michael Murphy	The submission notes the need to make better use of the Royal Canal Greenway as it is a safe, traffic free cycle and walking path and outlines issues relating to lack of access to the greenway. Notes that if an opening was created at Carton Retail Park it could greatly encourage active travel for those living in the Parklands/Railpark area and other parts of Maynooth. Further notes that residents on the west side of Maynooth (Newtown/Castledawson area) live right beside the greenway but they need to use Newtown Road and Parson Street to access the town/railway station. States that these streets have no cycle path in sections and the footpath is very narrow and that an access bridge at Newton Hall or Castledawson estates over the train line and canal would encourage walking and cycling. Concludes by stating that any new roads, estates, or shopping areas should have access to the greenway where possible.
		Response to Issues Raised The potential of the Royal Canal Greenway to act as a key sustainable movement connector linking key destinations in Maynooth is recognised and will be reflected accordingly in the Plan. As part of the development of the Joint Local Area Plan (JLAP) a Maynooth and Environs Area Based Transport Assessment (MEABTA) is being

Sub.	Name	Summary of Submission
No.		
		undertaken. A critical part of this work is to identify current deficiencies in the pedestrian and cycling network in Maynooth, including permeability links and cycle lanes. The outputs of the MEABTA will include both a walking strategy and a cycling strategy which will seek to create a comprehensive high-quality active movement (pedestrian and cycle) network in the town, in order to initiate a permanent shift away from private car use. It should be noted that as part of the second round of the public consultation for the MEABTA (advertised as the Draft Transport Strategy for Maynooth and Environs) a series of permeability connections and upgrades are proposed along the Royal Canal Greenway, including at Carton Retail Park and at Newtown.
8.	Pirowell Ltd.	Submission by Tom Phillips and Associates, Town Planning Consultants on behalf of Pirowell Ltd. relates to lands extending to c. 14.3 ha, located in the southeast of the town (see lands outlined in red on map below) and requests the lands are rezoned from 'I: Agriculture' to 'C: New Residential' in the Joint Local Area Plan (JLAP). The submission notes the following characteristics about the site: The lands are strategically located adjacent to Railpark Key Development Area (KDA), located c. 1km from the train station, 500m north of the M4 motorway; within c. 130m of high-quality bus services (including future BusConnects services); and within walking distance of key social and community infrastructure. The subject site currently constitutes farmland paddocks but is bound by the R405 Celbridge Road to the
		 south, by residentially zoned lands to the west and south and educational lands to the south-west. The subject site is free from restrictions in terms of built heritage/archaeology or natural heritage and no fluvial or pluvial flood risk has been identified. States that there is no planning history on the subject site. Submission outlines the national and regional spatial planning context, noting the National Policy Objectives (NPOs) relating to compact growth and submits that residential development on the subject site would accord with the principles of compact growth. Notes Maynooth's designation in the RSES (and the Metropolitan Area Spatial Plan contained therein) as a Metropolitan Key Town located on the North-West corridor in the Dublin Metropolitan Area (DMA). Further notes that the RSES envisage increase population and employment densities in the town alongside the development of enabling infrastructure. Submits that the rezoning of the subject site is fully consistent with the policy objectives of the RSES. Refers to the provisions of the Greater Dublin Area (GDA)

Sub.	Name	Summary of Submission
No.		Transport Strategy 2022-2042. Also notes the DART+ West Draft Rail Order. Submits that the project will essentially provide sustainable public transport services in proximity to the subject site.
		Refers to the provisions of the Maynooth Local Area Plan 2013-2019 and the Draft Kildare County Development Plan (CDP) 2023-2029 and notes the site's location adjacent to the Railpark Key Development Area (KDA) and the Maynooth Eastern Relief Road (MERR). Submits that the delivery of the MERR will unlock development within the southeast of the town. Refers to the additional population allocation of up to 10,000 persons for Maynooth over the period to 2031, which was allocated in the MASP under the provisions of NPO 68. Notes that the provisions of the draft CDP relating to the precise allocation under NPO 68. However, submission refers to objective CSO 1.1 and policy HO P4 of the Draft CDP and states that these provisions inherently support the need for additional residential zoned lands in the town.
		Notes the Chief Executive's response to their submission on the Draft CDP in respect of the subject site and welcomes the commitments that the local authority has made in respect of the supporting studies that will be carried out to determine the proposed zoning designations in the Plan. Also notes the preliminary results of Census 2022 released by the CSO and hopes that this will be taken into consideration. Refers to the contents of the pre-draft Issues Paper which notes the challenges posed relating to housing and employment delivery in the town over the life of the Plan. States that based on the household size of 2.5 there is not enough land zoned in Maynooth to accommodate the projected increase of c. 10,000 people. Submission requests that the Railpark KDA should be extended to the east to encompass the subject site.
		Submission details the suitability of the subject site to accommodate residential development to cater for the acute housing need and population projections in the town. Also states that there is adequate water and drainage infrastructure including the delivery of new servicing infrastructure a part of the MERR. Notes the pedestrian and cycling links in vicinity of the site and the enhanced connections being proposed as part of the MERR, linking into the greenway. Further notes existing and planned public transport services and the presence of educational facilities in the area. Contends that the lands fully adhere to the sequential approach regarding the zoning of residential lands and are contiguous to existing residential zoned lands/housing areas.

Sub.	Name	Summary of Submission
No.		
		Submission refers to a residential land supply study published by Savills (October 2022) which states that in implementing the policies of the NPF, there has been a reduction in zoning of residential supply of land in the Greater Dublin Area which had the capacity to accommodate 100,000 people. States that there are 4 key obstacles halting delivery of the NPF, as follows; the reduction of essential land for development; inaccurate population projections; lack of flexibility on targets and timelines and; rigid site development rules e.g. 40% of the delivery of new homes must take place on brownfield sites. Submits that as a response to this the government has decided to review the NPF. Concludes by stating the real demand for housing will become clear when the census figures are fully released during 2023.
		Response to Issues Raised
		The contents of the submission are noted. As part of the preparation of the Joint Local Area Plan (JLAP), all land use zoning objectives for all lands zoned in the Maynooth Local Area Plan 2013-2019 (as amended) and in the Maynooth Environs plan (Meath County Development Plan 2021-2027) are being reviewed. This will be
		underpinned by <i>inter alia</i> an infrastructure assessment for the town in accordance with Appendix 3 of the NPF
		and with section 4.5.2 Settlement Capacity Audit, of the Development Plan, Guidelines for Planning Authorities
		(2022). Accordingly, the subject site will be included as part of the wider review of the settlement and its
		environs. However, it should be noted that any changes to its zoning will be determined on an evidence-led basis
		having regard to the availability and capacity of the receiving environment with respect to both physical and
		social infrastructure. In this regard, several supporting studies, including an Area Based Transport Assessment, a

Sub.	Name	Summary of Submission
No.		Social Infrastructure Audit and a Settlement Capacity Audit (i.e. Infrastructure Assessment) are being prepared to inform the preferred development strategy that will be contained in the Draft Maynooth and Environs JLAP.
		The importance of the Maynooth Eastern Relief Road (MERR), which will form a key component of the wider Maynooth Outer Orbital Route (MOOR), is acknowledged by both local authorities and will be supported by provisions of the Plan. It is noted that the delivery of the MERR is being advanced by Kildare County Council and is as of early 2023, at Compulsory Purchase Order (CPO) stage.
		The population and housing targets proposed in the Draft JLAP are required to align with the provisions of the respective core strategies of Kildare and Meath County Councils and the Regional Spatial and Economic Strategy (RSES). It should be noted however, that if capacity/infrastructural constraints are identified in the town, which cannot be resolved over the life of the JLAP to 2030, then the figures for growth (particularly in relation to the National Policy Objective (NPO) 68 allocation) will be reduced accordingly, to ensure the growth of the town does not exceed the capacity of both its servicing and social infrastructure.
		The publication of the preliminary results of Census 2022 are noted. It is understood that the Department of Housing, Local Government and Heritage will be updating both the National Planning Framework and the Housing Needs Demand Assessment toolkit following the publication of the Census population statistics from the CSO. In this regard, it should be noted that Objective CS O19 of the Kildare County Development Plan (CDP) 2023-2029 provides Kildare County Council with the opportunity to align the CDP with any subsequent changes to population and housing growth figures when they become available, as necessary.
		With regard to household size, it should be noted that the Kildare County Development Plan (CDP) 2023-2029 sets an average occupancy size target in the county at 2.75 over the life of the Plan. The Joint Local Area Plan (JLAP) will be required to comply with this target for lands in Maynooth located in County Kildare. A reduction in the unit occupancy rate towards an average of 2.75 is considered to be both an appropriate and realistic target, taking into consideration the particular circumstances of Maynooth being a student town with naturally higher

Sub.	Name	Summary of Submission
No.		
		levels of average household occupancy due to many students living in shared occupancy accommodation arrangements.
9.	County Kildare	The submission states that it is the business organisation representing 400 businesses and over 38,000
	Chamber	 employees across the county. Commits to improving the business environment and quality of life in Kildare, and strongly supports the vision of growth contained within the NPF and the Mid-Eastern Enterprise Plan. Contends that it is the ambition of the Chamber, as the 'Voice of Business in Kildare', to see Kildare and Maynooth, develop in a sustainable way that: Helps achieve the UN sustainable development goals, delivers on enterprise development ambitions by creating and retaining high value sustainable jobs attracting foreign direct investment. Provides affordable urban housing options; supports the development of our third level institutions. Promotes a culture of innovation and research. Submission outlines the need to support these actions by reorienting how we move through and around Maynooth. States that much of which is already outlined in the 2013-2019 LAP.
		Population Growth and Housing Requests a commitment in the Plan to look at developing centre of the town through mixed development including housing, small enterprise incubation hubs, work from home hubs and other uses. Contends that the delivery of housing could be accelerated by ensuring the Maynooth Eastern Ring Road (MERR) is accelerated and delivered during the life of the Plan. States the need for the Plan to support choice, affordability, and sustainability in housing which means such as building costs, unit density and unit types being driven by actual data rather than historical demand. Requests flexibility in planning permissions to allow for the development of multi-use buildings rather than single use. Asks how we are addressing the issue of an aging population and states the principle of 'inclusion' needs to be a key element in the delivery of housing needs. Notes that a development like McAuley Place could be replicated in Maynooth very easily. Transport and Sustainable Mobility
		Submits the need to consider the application of the '15-Minute City' model, to Maynooth. States that the Plan needs to look inward to all public service vehicles and that Kildare County Council should add the stipulation for

Sub.	Name	Summary of Submission
No.		
		all service providers, that they sub-contract to, to have a fully electric fleet. Requests more detail around the issue of climate action, as well as pedestrian and cycle modes of transport for a growing community. States the needs for active travel scheme/route between Maynooth Business Campus and the town centre.
		Response to Issues Raised
		The contents of the submission from County Kildare Chamber are acknowledged. The plan will seek to promote Maynooth as a centre for research and development that will attract inward investment and act as a driver for economic growth for both north Kildare and south Meath. In this regard, the role of third level institutions, particularly, Maynooth University will be an important consideration of the economic development strategy of the Plan.
		The Plan will contain a range of provisions relating to the regeneration and development of the town centre including supporting alternative uses such as dedicated remote working hubs. The Plan will also include a specific objective to support the delivery of the Maynooth Eastern Relief Road (MERR). It should be noted that the critical role of the Joint Local Area Plan (JLAP) with regard to the provision of housing is to ensure the zoning of an adequate quantum of appropriately located serviced and serviceable land to provide for residential development, in keeping with the provisions of the respective core strategies of Kildare and Meath County Councils and the Regional Spatial and Economic Strategy (RSES). The Plan will also include a range of provisions relating to the promotion of active land management and the achievement of appropriate levels residential density, mix and design within the Plan area.
		On the request for flexibility in specific planning permissions, it should be noted that this issue is within the purview of relevant planning and development legislative which is implemented during the development management process. Issues relating to social inclusion and the creation of an age friendly town will be a central consideration of the Plan. It is noted that an objective contained in Chapter 10 of the Kildare County Development Plan seeks to emulate the model of McAuley Place within each of the five municipal districts in Kildare, at appropriate and sustainable locations. This issue will be examined further by the local authorities in

Sub.	Name	Summary of Submission
No.		
		the context of the preparation of the JLAP and the identification of a proposed location for a municipal sports facility in the town.
		The Dueft leight level Ages Diagonillingly de a gracific abientine in galaties to every outline the development in
		The Draft Joint Local Area Plan will include a specific objective in relation to supporting the development in Maynooth at appropriate locations, in keeping with the principles of the 10-minute settlement as reflected in
		Chapter 14 of the Kildare County Development Plan 2023–2029. Issues relating to the electric vehicle provision in the Kildare County Council fleet are considered to be an operational matter outside the remit of this Plan.
		On the issue of active travel, it should be noted that as part of the development of the Joint Local Area Plan
		(JLAP) a Maynooth and Environs Area Based Transport Assessment (MEABTA) is being undertaken. A critical part
		of this work is to identify current deficiencies in the pedestrian and cycling network in Maynooth, including
		permeability links and cycle lanes. The outputs of the MEABTA will include both a walking strategy and a cycling strategy which will seek to create a comprehensive high-quality active movement (pedestrian and cycle) network
		in the town, in order to initiate a permanent shift away from private car use. As part of the second round of the
		public consultation for the MEABTA (advertised as the Draft Transport Strategy for Maynooth and Environs) the
		following series of active travel interventions and upgrades are proposed to improve linkages between
		 Maynooth Business Campus and surrounding areas: Upgrade of Ballygoran Road required to facilitate bus services.
		 Opgrade of Ballygoran Road required to facilitate bus services. Interurban cycle route on Straffan Road.
		 New signalised junction to replace roundabout at entrance to campus.
		New bridge and permeability link over the M4 to tie into existing road infrastructure
		Climate action will be a central consideration of the JLAP. It is envisaged that the Plan will include a
		comprehensive range of provisions to support a meaningful transition towards low carbon development in
		Maynooth and environs, including support for Maynooth as a Decarbonization Zone.
10.	Office of Public	Prescribed or public body. Please refer to Table 3 .
	Works (OPW) –	

Sub.	Name	Summary of Submission
No.		
	Flood Risk Management	
11.	Valerie Kennedy	Submission states that residents in the Moyglare area and students attending the Maynooth Education Campus would welcome a bus service. Contends that the Moyglare area was promised a bus service connection several years ago, but this has not happened. Appeals to the Council to consider this submission and help the people and students of Moyglare.
		Response to Issues Raised Moyglare Road is proposed to get a new bus service (W6 Orbital Route) as part of the BusConnects project for the Dublin. While it is noted that this public transport initiative is being progressed by the National Transport Authority (NTA) and therefore outside the remit and control of the local authorities, the Draft Joint Local Area Plan will include a specific objective to support the continued rollout of BusConnects services in Maynooth.
12.	Mike O'Neill	Submission refers to the three schools located on the Maynooth Education Campus (MEC) that are causing traffic chaos even though they are operating below capacity. States that each should have a walking/cycling policy for students. Contends that when students do walk/cycle they end up having to cross the completed section of the Maynooth Outer Orbital Route (MOOR). Considers this undesirable and questions the planning decision behind this situation and if it should be acceptable for children. Notes that the MOOR is being planned to be located between the MEC and the town. States that the more successful the route will be in removing traffic from the town the worse the issue will become for the schools and students. States it will mean continued traffic problems due to reasons of safety, distance, or bad weather. Submits that the MOOR is not yet a permanent fixture and asks if it can be rerouted north of the MEC to avoid making the area a rat run. States that the stretch of the MOOR from Moygaddy to Moyglare should be the last link completed and that this should only be a cyclist or pedestrian link in the short-medium term. Submission encloses 4 no. images illustrating what it states is current traffic congestion at Moyglare Hall.
		Response to Issues Raised With regard to the Maynooth Outer Orbital Route (MOOR), it should be noted that its general layout and route through the north of the town has been fixed for the last number of decades. For example, it is identified on Map

Sub.	Name	Summary of Submission
No.		
		No. 1: Land Use Zoning and Specific Objectives in the Maynooth Town Development Plan 2002. The purpose of this is to give long term certainty to residents, landowners, developers and other key stakeholders. Furthermore, proposals to connect the MOOR across the border to lands in Moygaddy in Meath (the Maynooth Environs) are currently the subject of live applications to Kildare County Council (Plan Ref. 22/1213 and 22/1214) and to Meath County Council (Plan Ref. 22/1250). Regardless of the outcome of these applications it is not envisaged that the identified route of MOOR will be altered. However, it should be noted that the MOOR will be designed as an urban street, in keeping with the provisions of the Design Manual for Urban Roads and Streets (updated 2019). The MOOR will incorporate high-quality cycle lanes and pedestrian footpaths and will have limited speeds for vehicular traffic.
		A far-reaching package of measures to actively promote walking and cycling in Maynooth will be included in the Draft Joint Local Area Plan. These will be based on the outputs of an Area Based Transport Assessment which is currently being prepared for Maynooth and Environs. A key aim of the assessment is to create a comprehensive high-quality active movement (pedestrian and cycle) network in the town over the longer term, in order to
13.	Ray McTernan	initiate a permanent shift away from private car use, particularly for short journeys to school and college. The submission seeks the rezoning of the subject site at 4 Dillon's Row, Maynooth from public open space to
13.	Nay INICIEIIIaii	private use. Submitter states that they are full owners of this site since 2018. Submission attaches a map of the property outlined in red (see below). Control College Col

Sub.	Name	Summary of Submission
No.		
		Response to Issues Raised It should be noted that the site is currently zoned 'A1: Town Centre' in the Maynooth Local Area Plan 2013-2019 (as amended), a zoning designation which in no way conflicts with the existing, established residential use of the site. While all land use zoning designations in Maynooth and Environs will be reviewed as part of the preparation of the Draft Joint Local Area Plan (JLAP), given the site's location in an established residential area, it is not envisaged to make any changes that may compromise the existing residential and private use of this property.
14.	Transport Infrastructure Ireland (TII)	Prescribed or public body. Please refer to Table 3 .
15.	Grainne O'Rourke	The submission seeks the rezoning of existing residential lands at Innisfree, Celbridge Road from 'I: Agricultural' to 'B: Existing Residential' within the new Plan. States that these lands have been in residential use, built upon and occupied as a residence since 1988 and that the Plan should reflect the actual existing and current use of the site. Further states that these lands lie within the CSO Settlement Boundary (CSO, Census 2016) and the current development boundary (Maynooth LAP 2013-2019) and should be re-zoned to accord with surrounding lands that also lie within these boundaries. Submission includes a map of the subject site outlined in red (see below). **Response to Issues Raised** All existing zoning designations within Maynooth and Environs will be reviewed as part of the preparation of the of the Joint Local Area Plan (JLAP). Consideration of changing a site's zoning designation from 'I: Agriculture' to 'B: Existing Residential' will be based (inter alia) on the site's location in relation to the defined CSO settlement

Sub.	Name	Summary of Submission
No.		
		boundary to the town, established uses on the site, and current or planned developments within the surrounding area.
16.	Eileen O'Rourke	The submission mirrors the submission made by Grainne O'Rourke (please refer to Submission No. 16 for a summary of this submission and a response to the issues raised).
17.	Christopher O'Rourke	The submission mirrors the submission made by Grainne O'Rourke (please refer to Submission No. 16 for a summary of this submission and a response to the issues raised).
18.	Department of Transport	Prescribed or public body. Please refer to Table 3 .
19.	Dublin Airport Authority	Prescribed or public body. Please refer to Table 3 .
20.	Department of Education	Prescribed or public body. Please refer to Table 3 .
21.	Land Development Agency (LDA)	Prescribed or public body. Please refer to Table 3 .
22.	John and Paul Doyle	 Submission from Kiaran O'Malley and Co. Ltd. on behalf of John and Paul Doyle concerns three plots of land cumulatively extending to 4.98 ha located on the Dublin Road in the east of the town (see lands outlined in red on map below). The zoning details and individual size of each parcel of land is outlined as follows: Plot adjacent to east of Carton Retail Park (2.18 ha) is zoned H2: Office/ Light Industry and Warehousing. Notes this was the subject of a planning permission (Plan Ref. 09/396) for vehicular access, site distributor road and ancillary works which was granted but subsequently lapsed. Plot between the R157 and the Carton Wood residential estate (2.08 ha) is zoned F: Open Space and Amenity. Notes these lands enjoy the benefit of access to existing servicing infrastructure in Carton Wood and if developed would fully integrate with the Carton Wood development. Plot located to the east of the R157 (0.72 ha) which is zoned I: Agriculture and is expected to be subject of a CPO as part of the construction of the Maynooth Eastern Ring Road (MERR).

Sub.	Name	Summary of Submission
No.		The submission requests that the 2.18 ha site adjacent to the Carton Retail Park be rezoned to A2: Town Centre Expansion and the 2.08 ha site to the east of Carton Gardens be rezoned to C: New Residential. The submission refers to the key challenges for the town outlined in the Issues Paper and contends that the rezoning of these sites would address the stated challenges.
		Submission refers to the RSES and the additional allocation for the town of up to 10,000 persons to 2031 and states that given the current population there is a requirement for a significant increase in residential zoned land to accommodate the allocated population. States that the optimal location of site that is requested for residential zoning, in terms of servicing, public transport options and walking distance from the town centre. Contends that the existing open space zoning is not consistent with the private ownership status of the site and there are substantial grounds at Carton House which will provide a permanent transition between urban and rural areas. States that the regeneration of the site currently zoned 'H2' would enable the regeneration of this strategic site and provide for a possible mixed-use development at the edge of the town centre which would be more compatible and will cater for future demand for additional services that will arise. Submits that there is no demand for warehousing on this site and that it is too close to the town centre and too remote from the national roads network for such a use.
		The submission refers again to the challenges facing the development of the town which were outlined in the Issues Paper and states that the proposed rezoning would address each challenge. Regarding the need to maximise public transport investment, it submits that the council needs to prioritise compact growth adjacent to public transport options such as the BusConnects services on the Dublin Road. In making the town a safer place for pedestrians and cyclists it states that warehousing provision proximate to the town centre should be avoided. On the issue of urban regeneration and the creation of a high-quality environment, it states that the prominent 'H2' zoned site which is vacant and unused is along a key road and has the potential do act as a gateway location.

Sub. No.	Name	Summary of Submission
		Lineway A i i i i i i i i i i i i i i i i i i
		Response to Issues Raised It should be noted that all land use zoning designations will be reviewed as part of the preparation of the Joint Local Area Plan (JLAP). Accordingly, the subject sites will be included as part of the wider review of the settlement and its environs. Any changes to zoning designations will be determined on an evidence-led basis having regard to the availability and capacity of the receiving environment with respect to both physical and social infrastructure. In this regard, several supporting studies, including an Area Based Transport Assessment, a Social Infrastructure Audit and a Settlement Capacity Audit (i.e. Infrastructure Assessment) are being prepared to inform the Plan.
		The specific request to rezone a 2.18 ha site to the east of Carton Retail Park to A2: Town Centre Expansion is noted. The prominent location of the subject site at the entrance to the east of the town is acknowledged. In addition to the supporting assessments outlined above this will be considered in the context of the overarching economic development strategy for the town.
		In response to the request to rezone the 2.08 ha site to the east of Carton Wood from F: Open Space and Amenity to C: New Residential, that as noted above the suitability of the site for residential development will be assessed <i>inter alia</i> an infrastructure assessment for the town in accordance with Appendix 3 of the NPF and with section 4.5.2 Settlement Capacity Audit, of the Development Plan, Guidelines for Planning Authorities (2022). Furthermore, consideration will be given to the outputs and recommendations of the Social Infrastructure Audit

Sub.	Name	Summary of Submission
No.		
		(SIA) with regard to the provision of open space in Maynooth, and the Green Infrastructure Survey and Habitat Mapping Exercise on issues relating to the presence of natural heritage features on the site.
		With regard to the population targets, and the additional allocation of up to 10,000 persons provided for under National Policy Objective (NPO) 68 and the Dublin Metropolitan Area Strategic Plan (MASP), it should be noted however, that if capacity/infrastructural constraints are identified in the town, which cannot be resolved over the life of the JLAP to 2030, then the figures for growth (particularly in relation to the NPO 68 allocation) will be reduced accordingly, to ensure the growth of the town does not exceed the capacity of both its servicing and social infrastructure.
23.	Maria Carty-Mole	Submission states that Maynooth desperately needs a 'town centre' which would consist of one or more buildings located in the middle of the town and provide key services including: • A portal through which residents can interact with local leaders and conduct business with the government. • A place for public meetings. • A new location for the library. • A hall and/or rooms that could be booked privately by the public. Contends that residents are confused as to where the centre (i.e., a civic centre) of the town actually is. States that for decades this town has needed, and has been promised, such a place and given that the fire brigade is being relocating, this site would offer a perfect opportunity for many reasons including its safe and easily accessible location. Concludes by stating that this is an opportunity for Maynooth which should not be ignored.
		Response to Issues Raised The contents of the submission are noted. An important element of the plan will be to provide for the long term regeneration of the Canal Harbour area of the town. This will include support for alternative uses for the Fire Station site when it becomes available. It is envisaged that the development of a key community use or uses on the site will form a key element of any rejuvenation plan for the area.
24.	Health Service Executive (HSE) -	Prescribed or public body. Please refer to Table 3 .

Sub. No.	Name	Summary of Submission
NO.	Environmental Health	
25.	Health SSC Sustainable Community Ltd.	The submission from David Mulcahy Planning Consultants Ltd. on behalf of SSC Sustainable Community Ltd. relates to lands located in Crewhill which extends to c. 32 hectares (see map outlining location in red below). The lands are currently zoned 'I: Agriculture' and it is requested that they be rezoned from to New Residential and Neighbourhood Centre. The submission notes the following characteristics about the site: The lands are 1.18km from the town centre and are strategically located between the new school campus to the east and the 'Research and Technology' lands to the west. The subject site is free from restrictions in terms of built/natural heritage, archaeological or flood risk constraints. The lands are c.290 metres from the Rye River but there is no hydrological connection to same. The Land has road frontage (with partial footpath and cycle lane) along the Moyglare Road, is composed of fields along with Crewhill House. 220KV overhead line traverses the site. It is contended that zoning the lands will deliver significant planning gain including helping to alleviate the housing crisis, assisting in the delivery in the population growth targets, facilitating the Maynooth Outer Orbital Route (MOOR) and the provision of a neighbourhood centre (along Moyglare Road), along with delivering community centre facilities and sustainable movement infrastructure. Submission provides an outline of the national and regional policy context including the Government's Housing
		for All plan, RSES, the Kildare County Development Plan (CDP) 2017-2023 (as varied) and notes that Maynooth is designated as a Key Town within the Dublin Metropolitan Area with an additional population allocation of up to 10,000 persons in the period to 2031, arising from NPO 68. Notes that in the making of the Maynooth LAP 2013-2019 a portion of the site was proposed as new residential in the proposed Material Alterations, but this was not included in the adopted Plan.

e	Summary of Submission
	Notes the 2013-2019 LAP's movement objectives for the site including a pedestrian and walking cycleway along Moyglare Road along with Objective TR O2d which relates to the development of a section of the Maynooth Outer Orbital Route (MOOR) through the subject site. Notes the indicative development strategy included in the Issues Paper showed the subject site being included as part of a landbank designated for residential and economic development. Also notes the route of the MOOR through the lands in the development strategy. Submission outlines the key rationale for its proposed rezoning, this includes the fact Maynooth is a Key Town with substantial housing and employment targets, the optimal location and nature of the lands and the zoning recommendation in the Manager's Report on Submissions Received to the Draft Maynooth LAP 2013-2019. Contends that a <i>New Residential</i> zoning would be compatible with adjoining residential lands to the south and the research and technology zoned lands to the west and could meet the increased accommodation needs of Maynooth University. Submission includes 3 no. appendices including: • Extract zoning map from Maynooth LAP 2013-2019 showing the lands at Crewhill to be contained within the development (LAP) boundary and zoned 'Agriculture' along with an indicative road objective • Recommendation in the Kildare County Council Manager's Report (March 2013) recommending 5.7 hectares of the lands be zoned for New Residential including neighbourhood retail and services.

onse to Issues Raised contents of the submission are noted. Kildare and Meath County Councils are, as part of the preparation of
coint Local Area Plan (JLAP), reviewing the land use zoning objectives for all lands zoned in the Maynooth Larea Plan 2013-2019 (as amended) and in the Maynooth Environs plan (Meath County Development Plan -2027). The review of zoned land will be underpinned by <i>inter alia</i> an infrastructure assessment for the in accordance with Appendix 3 of the NPF and with section 4.5.2, Settlement Capacity Audit, of the elopment Plan, Guidelines for Planning Authorities (2022). Accordingly, the subject site will be included as of the wider review of the settlement and its environs. It should be noted that notwithstanding the subject inclusion in the indicative development strategy contained in the Pre-Draft Issues Paper as an 'identified ion for future Economic and Residential Development', any changes to its zoning will be determined on an ence-led basis having regard to the availability and capacity of the receiving environment with respect to physical and social infrastructure. In this regard, several supporting studies, including an Area Based seport Assessment, a Social Infrastructure Audit (which includes open space and recreation provisions) and a sement Capacity Audit (i.e. Infrastructure Audit (which includes open space and recreation provisions) and a sement Capacity Audit (i.e. Infrastructure Assessment) are being prepared to inform the preferred lopment strategy that will be contained in the Draft Maynooth and Environs JLAP. Submission from David Mulcahy Planning Consultants Ltd. on behalf of Olympic Cars Ltd. relates and sextending to circa 4.2 hectares located at Ballygoran Road, which adjoin but are located outside the mooth LAP 2013-2019 boundary (see map below showing lands outlined in red). The submission includes 3 rish Water maps showing drainage infrastructure in the vicinity of the site. The subject site currently consists detached dwelling (Greenfield House) and a car sales business (Olympic Cars Ltd.). It is proposed to have the zoned 'Existing Residential/Infill' and 'Industrial/Warehouse' which it
elopment Plan, Guidelines for Planning Authorities (2022). Accordingly, the subject site will be included as of the wider review of the settlement and its environs. It should be noted that notwithstanding the subject inclusion in the indicative development strategy contained in the Pre-Draft Issues Paper as an 'identified ion for future Economic and Residential Development', any changes to its zoning will be determined on an ence-led basis having regard to the availability and capacity of the receiving environment with respect to physical and social infrastructure. In this regard, several supporting studies, including an Area Based sport Assessment, a Social Infrastructure Audit (which includes open space and recreation provisions) and ement Capacity Audit (i.e. Infrastructure Assessment) are being prepared to inform the preferred lopment strategy that will be contained in the Draft Maynooth and Environs JLAP. Submission from David Mulcahy Planning Consultants Ltd. on behalf of Olympic Cars Ltd. relates and sextending to circa 4.2 hectares located at Ballygoran Road, which adjoin but are located outside the mooth LAP 2013-2019 boundary (see map below showing lands outlined in red). The submission includes in the National Maynooth and Environs Lap. It is proposed to have to zoned 'Existing Residential/Infill' and 'Industrial/Warehouse' which it is stated would reflect long olished uses and its location adjoining existing zoned lands. Notes the site, located to the south of the mooth Business Campus and the M4 Motorway, features significant frontage along Ballygoran Road. State the lands are free from any restrictions in terms of built/natural heritage, archaeological or flood risk
-:-:

Sub. No.	Name	Summary of Submission
NO.		Refers to the planning policy context and notes that Maynooth is identified as a Key Town within the Metropolitan Area Strategic Plan (MASP). Notes the provisions of the Draft Kildare County Development Plan (CDP) relating to Maynooth including the additional population provision and objectives relating to economic development. Notes that the lands are un-zoned in the Maynooth LAP 2013-2019 but includes an objective (Map No.1) 'Roads and Street Improvements (Including Footpath and Cycling Track if Required)' to the north of the subject lands which has not been implemented. Requests that this objective be included in the new Plan. Notes that Map No. 4 'Natural & Archaeological Heritage' of the 2013- 2019 Plan shows a recorded monument located on the western portion of the site. States however that a review of the DHLGH'S Historic Monument Viewer shows this same recorded monument to be located further north within the Maynooth Business Campus. Notes topics in the Pre-Draft Issues Paper relating to economic development, and in particular employment and enterprise opportunities. In support of this zoning request, the submission states that the business campus has already set a precedent for employment lands at the edge of the town and south of the motorway and that the proposed zoning would be an extension of this employment hub. States that there are no other similar employment lands at the target for significant employment growth targets means that established employment generating land uses should be encouraged and facilitated.

Sub.	Name	Summary of Submission
No.		Response to Issues Raised With regard to the request for an 'Industrial/Warehouse' zoning designation, it should be noted that the location and quantum of employment lands to be zoned in the Draft Maynooth and Environs Joint Local Area Plan (JLAP) will be determined on an evidence-led basis taking into consideration the availability and capacity of the receiving environment with respect to both servicing and transport infrastructure. In this regard, a number of supporting studies, including an Area Based Transport Assessment, a Social Infrastructure Audit and a Settlement Capacity Audit (i.e., Infrastructure Assessment) are being prepared to inform the preferred development strategy that will be contained in the Draft JLAP. In conjunction with the various assessments, the zoning of employment lands must adhere to relevant national and regional spatial policy and Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000, as amended. This includes compliance with Guiding Principles to Identify Locations for Strategic Environmental Development (p.24 Regional Spatial and Economic Strategy) and the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012), given the subject site's proximity to Junction 7 of the M4 Motorway. Whilst the subject site is located outside the boundary of the Maynooth Local Area Plan 2013-2019 (as amended) and outside the defined settlement boundary of Maynooth (CSO 2016), it will be included in the Settlement Capacity Audit to determine its suitability for employment use in comparison to other potential sites within
		Maynooth and Environs. On the request to zone part of the subject site (around Greenfield House) as 'Existing Residential and Infill', it should be noted that consideration of the zoning of hitherto un-zoned land to 'B: Existing Residential' will be based (inter alia) on its location in relation to the defined CSO settlement boundary of the town, established existing uses on the site, and current or planned developments within the surrounding area. The request to Maynooth LAP 2013-2019 to include an objective relating to Roads and Street Improvements (Including Footpath and Cycling Track) to the north of the subject lands will be considered as part of the transport and movement measures proposed in the new Plan.

Sub.	Name	Summary of Submission
No.		
27.	Camgill Property a Se Ltd.	Submission from John Spain Associates on behalf of Camgill Property a Se Ltd. relates to lands extending to 1.15 hectares located on the Dublin Road zoned 'I- Agriculture' in the Maynooth LAP 2013–2019 (see map outlining location in red below). The submission notes that the lands are c.1.5 km from the town centre and have good access/frontage to the Dublin Road and regional road network, which will be further enhanced via the delivery of the Maynooth Eastern Ring Road (MERR). States that the lands are ideally located to capitalise on the significant investment in infrastructure, including vehicular, pedestrian and cycle connections to the nearby new residential lands, Maynooth Town Centre, the train station and the Royal Canal Greenway and requests that the lands be zoned be identified for employment related uses and designated either 'H2- Light Industry / Office Park & Warehousing' or 'T- General Development', as per the definitions provided in Part C of the Maynooth LAP 2013–2019.
		Submission notes the potential of the lands, if developed for employment uses, to improve the jobs ratio in the town. Submits that this is critical given the population allocation of up 10,000 persons under the MASP. Refers to the challenges for the town that were identified in the Pre-Draft Issues Paper with regards to housing and employment provision and how sustainable low carbon development can be achieved. Submits that development of the lands for employment uses would help address these challenges and be in accordance with the RSES and Metropolitan Area Strategic Plan (MASP).
		Refers to the provisions of the RSES and the draft Kildare County Development Plan (CDP) regarding Maynooth, noting its designation as a Metropolitan Key Town. Submits that the subject lands are ideally positioned adjacent to a strong road and public transport network, both existing and proposed (including DART+ West) which have strong connection to the town and the surrounding metropolitan area. Notes sites development potential if given the requested zoning and submits that it could also provide for additional flexibility so that other commercial uses could be delivered alongside planned new housing to the east/southeast. Notes its location within an area that will undergo rapid change due to the construction of MERR and the development of housing. Further notes the provisions of the Draft CDP regarding employment opportunities in the town and states that the subject lands, whilst relatively small in scale, form a natural and logical extension of the zoned lands to the east of the town and can deliver warehousing / light industrial or office based floorspace which could attract

Sub.	Name	Summary of Submission
Sub. No.	Name	envisaged employment uses and thereby delivering on RSES and Draft CDP objectives relating to economic and employment development. Also notes the location of the lands proximate to pedestrian and cycle linkages, the greenway, DART expansion and road linkages. States that development on the site, given its locational attributes will assist in the implementation of the local authority's climate action policies.
		Response to Issues Raised The request for an 'H2- Light Industry / Office Park & Warehousing' or 'T- General Development' zoning designation on the subject site is acknowledged. It should be noted that the location and quantum of employment lands to be zoned in the Draft Maynooth and Environs Joint Local Area Plan (JLAP) will be determined on an evidence-led basis taking into consideration the availability and capacity of the receiving environment with respect to both servicing and transport infrastructure. In this regard, a number of supporting studies, including an Area Based Transport Assessment, a Social Infrastructure Audit and a Settlement Capacity Audit (i.e., Infrastructure Assessment) are being prepared to inform the preferred development strategy that will be contained in the Draft JLAP. In conjunction with the various assessments, the zoning of employment lands must adhere to relevant national and regional spatial policy and Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000, as amended. This includes compliance with Guiding Principles to Identify Locations for Strategic Environmental Development (p.24 Regional Spatial and Economic Strategy).

Sub.	Name	Summary of Submission
No.		
		Whilst the subject site is located outside the defined settlement boundary of Maynooth (CSO 2016), it will be
		included in the Settlement Capacity Audit to determine its suitability for employment uses in comparison to
28.	John Geoghan	other potential sites within Maynooth and Environs. Submission from McCutcheon Halley Planning Consultants on behalf of John Geoghan relates to lands extending
20.	John Geognan	to c.28 hectares located at Crewhill to the north of the town (see map outlining location in red below). The lands
		are currently undeveloped but are located within the Maynooth LAP 2013-2019 boundary. Submission states
		that they do not host any environmental sensitivities. Refers to the new Plan and states that it should help to
		alleviate the housing crisis, achieve sustainable living patterns, and creating a high-quality living environment.
		Refers to the causes of the current slowdown in housing supply and states that building targets have not been
		met in the Rebuilding Ireland - Action Plan (2016) and in the current Housing for All plan. States that the new
		Plan needs based on the most current statistical evidence and ensure that the lands identified for development
		are capable of delivery over its lifetime.
		Refers to the quantum of homes targeted for Maynooth in both the Draft Kildare County Development Plan (CDP) and under NPO 68 of the RSES relating to an additional population allocation of up to 10,000 persons. Submits that the core strategy of the Draft CDP provides for a household size of 2.75 persons as per Census 2016 which if applied would generate a requirement for an additional 4,633 new homes in Maynooth. Submits that the Plan must include a scenario that recognises the reduction in household size that is occurring, consistent with the UK, and other European countries. Note that the NPF acknowledges that household size will reduce to an expected 2.5 people per household by 2040. Refers to lower household size figures in Northern Ireland, Scotland and Wales and submits that we need to plan for household size of 2.2 by 2040. Accordingly, the submission recommends that the Plan provide for a household size of 2.4.
		Refers to the issue of population projections and the preliminary results of Census 2022 noting that Kildare is one of the fastest growing counties. Contends that the figure is +2.1% above the established NPF population projections in the draft CDP, meaning that c. 18,600 more persons in the county by 2028 than previously projected. Submits that this would generate a requirement for an additional c. 7,750 homes (based on 2.4 persons per household) above the current draft housing target. Notes this significant divergence and states that

Sub.	Name	Summary of Submission
No.		it doesn't account for Ukrainian or other migration patterns. Notes the plans (October 2022) to review the NPF based on Census 2022 figures. Submits the need for an adequate supply of zoned land and provision of social infrastructure is critical. Recommends that outdated population estimates should be disregarded, and that the planning authority is not limited in the type of information about population change that it can consider and that there is a requirement to examine new and emerging data, to inform the preparation of their core strategies.
		Refers to the NPF's National Policy Objective 3c (compact growth) and Section 2.6 (active land management). Notes that further provisions relating to this are outlined in the RSES which in the case of Maynooth requires realistic prioritisation of the available undeveloped land within the plan boundary. Notes that the Plan needs an evidence-based approach to Maynooth's settlement strategy. Submits that the extant Maynooth LAP if developed applying a unit density of 35 per hectare would generate only 1,820 homes which would leave a large shortfall. Submits that a review of the CSO's Housing Completions identifies 667 new homes were delivered in Maynooth in the period between 2016-2023 and that this was only 20% of the overall housing target to 2023.
		Refers to the DART+ West proposal and states the need for proactive land management to support this investment in public infrastructure. Notes that development at this location would facilitate compact growth and that the subject site is free from any flood risks. Submits that it the benefits of development of the land would include providing 40 hectares of net developable area with a capacity to deliver approx. 1,400 new homes, the delivery of a section of the MOOR (as per Objective TRO2 (D) of the Maynooth LAP 2013-2019), while also providing opportunities to link the River Rye, Lyreen and the Royal Canal with a network of off-road cycle/pedestrian links.
		On the issue of climate action, it is submitted that compact growth policies would contribute to climate mitigation/adaptation. States that housing delivery can be planned in conjunction with the protection and enhancement of environmentally areas, through the identification of green infrastructure opportunities which promote the multifunctionally of spaces. Notes the opportunities for developing a network in the north of the town between the Royal Canal, Rye and Lyreen Rivers.

Sub. No.	Name	Summary of Submission
		The submission states that the integration of land use and transport must be embedded in the Plan with policies included to support a modal shift away the private car. Outlines the subject site's proximity to existing and planning public transport services, the town centre, Maynooth Education Campus, and GAA club. States that the lands benefit from road frontage that would offer an opportunity to deliver a new cycle route along the Moyglare Road consistent with an objective of the Greater Dublin Area Cycle Network Plan. Recommends that the Plan ensure maximum benefit from existing transport, community, and social infrastructure through future development occurring in a planned manner utilising infill opportunities. Submission includes schematic opportunities map which illustrates the benefits that would result from developing the subject site.
		Application of the desirability of the desirab
		Response to Issues Raised On the issue of the household occupancy size, it is noted that Maynooth has an average occupancy size of 2.98 which is higher than the recorded national average of 2.75 (Census 2016). This is due to the presence of third level institutions in the town and the fact that many students either share rented accommodation or are in digs arrangements with families already living in the town. The Kildare County Development Plan (CDP) 2023-2029 sets an average occupancy size target in the county at 2.75 over the life of the Plan. The Joint Local Area Plan (JLAP) will be required to comply with this target for lands in Maynooth located in County Kildare. A reduction in the unit occupancy rate towards an average of 2.75 is considered to be both an appropriate and realistic target for the town over the life of the Plan.

Sub.	Name	Summary of Submission
Sub. No.	Name	The population and housing targets proposed in the Draft JLAP are required to align with the provisions of the respective core strategies of Kildare and Meath County Councils and the Regional Spatial and Economic Strategy (RSES). It should be noted however, that if capacity/infrastructural constraints are identified in the town, which cannot be resolved over the life of the JLAP to 2030, then the figures for growth (particularly in relation to the National Policy Objective (NPO) 68 allocation) will be reduced accordingly, to ensure the growth of the town does not exceed the capacity of both its servicing and social infrastructure. Issues raised relating to the preliminary results of Census 2022 are noted. It is understood that the Department of Housing, Local Government and Heritage will be updating both the National Planning Framework and the Housing Needs Demand Assessment toolkit following the publication of the population statistics from the CSO. In this regard, it should be noted that Objective CS O19 of the Kildare County Development Plan (CDP) 2023–2029 provides Kildare County Council with the opportunity to align the CDP with any subsequent changes to population and housing growth figures when they become available, as necessary. As part of the preparation of the Joint Local Area Plan (JLAP), all land use zoning objectives for all lands zoned in the Maynooth Local Area Plan 2013-2019 (as amended) and in the Maynooth Environs plan (Meath County Development Plan 2021-2027) are being reviewed. This will be underpinned by <i>inter alia</i> an infrastructure assessment for the town in accordance with Appendix 3 of the NPF and with section 4.5.2 Settlement Capacity Audit, of the Development Plan, Guidelines for Planning Authorities (2022). Accordingly, the subject site will be included as part of the wider review of the settlement and its environs. However, it should be noted that notwithstanding the subject site's inclusion in the indicative development strategy contained in the Pre-Draft Issues Paper as an 'id
		zoning will be determined on an evidence-led basis having regard to the availability and capacity of the receivi environment with respect to both physical and social infrastructure. In this regard, several supporting studies, including an Area Based Transport Assessment, a Social Infrastructure Audit and a Settlement Capacity Audit (i

Sub.	Name	Summary of Submission
No.		
		The Draft JLAP will present an integrated land use and transport strategy based on the principles of compact growth, people-centred urban design and universal accessibility. An array of active land management measures, along with provisions ensuring residential development is built at appropriate densities in the town will be incorporated in the Plan. This will support increased levels of sustainable movement in the town and act to help Maynooth pivot away from a 'business as usual' development strategy towards a path of low carbon growth over the life of the Plan and beyond.
29.	Paul Dormer	Submitter states that they are owner of lands located at Parson Street and seeks confirmation for high density and an indication on zoning of taller buildings as part of the Plan. (No map has been included with the submission).
		Regarding the issue of high-density development in Maynooth, it is noted that in accordance with the Section 28 Ministerial Guidelines on Urban Development and Building Heights (2018), Table 14.4 of the Kildare County Development Plan 2023-2029 has identified lands in Maynooth 'immediately outside the historic core' as an area which could support increased density and building heights of 6+ stories. This provision will be incorporated into the Joint Local Area Plan (JLAP) and expanded on in further detail. As outlined in the Guidelines on Building Heights (p.13) it should be noted that any planning application for taller buildings such an established urban setting will be required (inter alia) to 'successfully integrate into/enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views'. It is further noted that the general location of Parson Street is partially covered by the Maynooth Architectural Conservation Area (ACA).
30.	Kildare Greens – Maynooth Group	The submission prepared by the Kildare Greens Local Group in the Clane-Maynooth MD raises a number of issues relating to the Joint Local Area Plan, as outlined under a number of headings set out below. Low Carbon Community Submission requests that a very clear Low Carbon Community Decarbonising Zone Plan is included in the Plan, bringing together the sources of funds into a joined-up plan to put Maynooth on the path to be a net-zero community and a regional and national pathfinder. Submits that the Decarbonising Zone (DZ) Plan has a strong

Sub.	Name	Summary of Submission
No.		focus on community engagement and addresses areas such as transport, nature, energy, and green business and the circular economy. Requests that the Community Climate Action Fund is leveraged to mobilise and support community action together with sustainable transport, public realm and urban renewal funding stream and retrofit and energy to support 'joined-up' planning for the future of Maynooth as a low carbon community.
		Notes the positive momentum in Maynooth for a low carbon community with 27 different groups providing letters of support for the selection of Maynooth as a DZ. Refers to the An Taisce Legacy4Life Low Carbon Plan which it states is providing a solid academic base and data baseline for a low carbon community. Outlines the opportunity to create a virtuous circle, bringing together existing sources of investment and funding, the county council, and community and academic engagement into a very focused plan for a low carbon community and DZ. Notes that the Maynooth University Green Campus initiative is providing strong collaboration and has begun a working process with the Maynooth Green Forum towards this objective.
		Growth and Infrastructure Deficits Requests that infrastructure audits are carried out for Maynooth, and that all growth is dependent on the result of this assessment. Further requests that a follow-up assessment is completed every two years during the lifetime of the Plan, and that housing completions, and housing occupancy are made dependent on the infrastructure audit results based on a staged infrastructure dependent growth plan. Seeks the inclusion of infrastructure-first policies which are tied to the growth strategy for Maynooth to make the population targets dependent on critical transport, education, water and drainage services. Also seeks that developer-led policies are not applied to critical infrastructure including the southern, western and northern relief roads, and to the water and drainage services and that housing commencement and housing occupancy is made depended on a set of infrastructure targets being met.
		States that Maynooth is one of Ireland's fastest growth communities and has been given significant growth targets in the RSES and its Dublin Metropolitan Area Strategic Plan (MASP). States that its 2022 population is 18,600 and that there is a proposed further population increase of up to 10,000 persons to 2031 proposed in the MASP, in addition to the 1,000+ people in the Environs (County Meath). Submits that Maynooth University has a

Sub.	Name	Summary of Submission
No.		population of approximately 18,800 and is continuously growing resulting in a total community served of more up to 50,000 by 2031 if all proposals are implemented. States that this represents total a growth of over 1,000% from the 1981 census. Notes the inadequacy of Maynooth's supporting infrastructure and that the further almost doubling of the population risks causing severe damage to the town if appropriate levels of infrastructure are not in place. Further notes that the RSES acknowledges the need to link growth with infrastructure where it directs such growth in Maynooth 'provided there is the necessary investment in employment creation, services, amenities and sustainable transport'.
		Refers to the housing crisis and states that it is essential to support the younger generation and the growing population with good value and high-quality housing choices. States that it is the responsibility of public officials and elected members to put in place proper plans to support communities. Submits that the developer-led model creates very significant infrastructure lags and that more compact growth, better public and active transport and more local economic opportunities will help support a lower carbon town. However, it notes that the level of growth targeted creates significant challenges for emissions reduction objectives and that growth without quality transport infrastructure, more local economic and employment options and a circular economy approach will make it impossible to become a low-carbon community.
		Active and Sustainable Transport Requests that the Plan significantly increases support for public transport options, including the identification of a bus terminal site to meet forecast volume of public/private buses, and work with all transport authorities to increase bus routes and bus stops including both local and regional routes connecting adjacent towns, with positive connections planned between the train station, bus and cycling facilities. Further requests that an objective and plans be established to complete an active and sustainable transport network so that it becomes the "most pedestrian and cycle friendly town in Ireland". Seeks the inclusion of plans for greenway connections to other regional towns and large employers. Requests that the cycling infrastructure planned and delivered by the sustainable transport plan and by developer-led investments is clearly shown on maps on the LAP. Further requests that supports are included in the LAP for bike rental schemes, bike parking and support for bicycle storage close to public transport, the train station, and the university. Seeks an increase in EV infrastructure with

Sub.	Name	Summary of Submission
No.		
		designated locations identified for public/private-sector charge points and that an LAP provides for a parking
		system to support a preference for e-vehicles.
		Nature and Biodiversity
		Submission requests that a vision for a green town and city park is established to bring nature through the town.
		Seeks that the greenspace vision and strategy provide for high-quality amenity space and incorporates pathways
		for biodiversity with nature corridors. Further seeks support for pocket parks and urban vegetation to support
		well-being, biodiversity and carbon sequestration. With regard to the support of Maynooth's Decarbonised Zone status, the submission requests than an integrated approach is taken to the MERR (Maynooth Eastern Relief
		Road), and the plans for nature spaces at Carton Avenue to support biodiversity, carbon sequestration and active
		movement, by joining up green spaces and supporting pedestrians/cycling connections to the Greenway and the
		town centre, as part of a circular park loop through the town. States that this motion was agreed at the October
		2021 Clane Maynooth Municipal District Meeting. Requests that a comprehensive greenspace map is included to show all green space, protected trees, hedgerows and protected structures. Further requests nature corridors
		for animals and plants including animal routes for safe crossing in new road plans to prevent fragmentation of
		wildlife zones and that zones of natural hedgerow, native trees and ancient woods are protected and increased under the Plan.
		Urban Renewal and Public Realm
		Requests that joined-up thinking across all the funding streams to create a 'positive circle' of funding potential to
		support the Maynooth DZ and low carbon community objectives. Seeks the Urban Renewal Development Fund
		(URDF) and Public Realm Improvement funding to prioritise the Harbour Field, Main Street and Square renewal
		projects and support for net zero targets. Requests that the URDF planning for Main Street, Square, Dublin Road
		and Dunboyne Road due to start create positive connections with existing public spaces, active and public transport links.
		Green Business and the Circular Economy

Sub.	Name	Summary of Submission
No.		
		Seeks that the Plan supports less carbon intensive work patterns, local employment zones, reduced commuting, blended/remote working and support for local work hubs. Requests that the economic zones proposed are supported for local employment with quality active travel connections from residential areas. Seeks the inclusion of a circular economy objective in the plan to support local sourcing of supplies, local employment, re-use and significantly reduced waste. Further seeks that the Plan supports positive engagement with the business community and chamber of commerce towards achievement of the requested objectives.
		Community and Amenity
		Requests that community and amenity needs are addressed by a strategy as part of the Plan and want the infrastructure audit process to include provision for the following: Public parks and greenspace allocation, playing fields and sports facilities, medical and dental centres, cinema and theatre, and a regional swimming pool. Further requests that a central landmark site is identified, and plans are developed for a vibrant community centre, theatre, arts, hospitality location at a central location.
		Ten-Minute Town and Car-free Centre
		Requests that an objective is included for the significant reduction of traffic in the town centre and as part of this plans are made for a one-way system and car-free days in the Maynooth central area towards the ultimate achievement of a traffic free square kilometre at the town centre. Further requests quarter-based planning is applied allocating space for retail services in each 'quarter' of the town to support the 10-minute settlement principle creating positive and attractive service clusters. Seeks that planning processes are established to support planning for new streetscapes in development areas in place of car parks and out-of-town retail creating new attractive community spaces throughout the town. Notes that there are the beginnings of positive service clusters in the 'quarters' of the town with examples including the Greenfield centre in the southeast, Beaufield and the south-west, the new facilities proposed in the Mariavilla, and proposals in Meath for similar services in the proposed development. States that their proposal is that these service clusters are prioritised.
		Requests that the relief roads outlined as part of the MOOR are prioritised to enable the town-centre traffic reduction and are completed in an infrastructure-led approach, with housing commencement and occupation

Sub.	Name	Summary of Submission
No.		
		conditioned on the completion of this infrastructure. Seeks that the MOOR is designed to connect new communities and prioritises active transport, pedestrians, cyclists and vulnerable road-users, and protect and support biodiversity with nature corridors. Further seeks the MOOR route selection is carefully done to create an attractive urban route as close to the town as possible that supports nature and active travel on a human scale. Notes the congested nature of the Main Street and seeks the town centre should be reclaimed from traffic to reduce pollution, noise and impacts on vulnerable users. Notes the limited development of planned relief roads and states that the MERR is a positive case where infrastructure is being put before housing. States that a well-planned MOOR that is not developer-led will create the potential to take back the town centre.
		Response to Issues Raised
		Low Carbon Community Acknowledging Maynooth's impending designation as a Decarbonisation Zone (DZ) it is considered that climate action will be a central consideration of the JLAP. It is recognised that all aspects relating to the development strategy in Maynooth need to be reviewed in light of the need to plan for a substantial reduction in greenhouse gas emissions and to promote low carbon development in the town, in line with national targets. Accordingly, the Plan will include provisions to support inclusive and comprehensive climate action in Maynooth and environs, insofar as its remit extends. On the request that a Low Carbon Community Decarbonising Zone Plan is included in the Plan, it should be noted that the town's designation as a DZ will require the preparation of a Decarbonisation Action Plan which will be progressed separately to the process in which the Joint Local Area Plan (JLAP) is prepared. However, an objective will be included in the JLAP to support the full implementation of any Maynooth Decarbonisation Action Plan, with regards to its goals, objectives and actions relating to planning and development within Maynooth Decarbonisation Zone. The JLAP will include a specific objective supporting the work of the Maynooth University Green Campus initiative.
		Growth and Infrastructure Deficits
		The preparation of the JLAP, and in particular the zoning of land, will be progressed through a robust evidence-
		led and data-driven process which will include a comprehensive suite of supporting documents published alongside the Plan. These studies include (inter alia) an Area Based Transport Assessment, a Social Infrastructure

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		Audit and a Settlement Capacity Audit (i.e., Infrastructure Assessment) which will inform all residential zoning decisions in order to ensure the zoning of an adequate quantum of appropriately located serviced and serviceable land to provide for new housing in the town. The Plan will also include a range of provisions relating to the promotion of appropriate levels of residential density, mix and high-quality design within the Plan area. There is currently no mandatory requirement to review the content or objectives of local area plans or to conduct follow-up assessments. However, as per the provisions of Objective MI O1 and Action MI A1 of the Kildare County Development Plan (CDP) 2023–2029, elements of the JLAP particularly relating to housing and population allocations will be required to be monitored on an ongoing basis over the life of the CDP, in keeping with the requirements of the Section 28 Guidelines on Development Plans (2022) on planning monitoring and implementation. A similar objective, CS OBJ 3, exists in the Meath County Development Plan 2021-2027 in relation to monitoring the number of residential units permitted and under construction/completed.
		With regard to the delivery of servicing and social infrastructure, the Plan will also be accompanied by an infrastructure delivery schedule which will require that specific and critical pieces of servicing infrastructure and amenities are delivered either prior to or in tandem with development. The request that developer-led policies are not applied to critical infrastructure including the southern, western and northern relief roads, and to the water and drainage services is noted. However, there may be instances where in the absence of planned publicly funded infrastructural improvements in the town, developers may be required to deliver specific pieces of infrastructure, including roads and water services to make the lands serviceable. Such instances will be the subject of clear and comprehensive requirements set out in the infrastructure delivery schedule.
		The comments relating to envisaged population growth in Maynooth are noted. The population and housing targets proposed in the Plan are required to align with the provisions of the respective core strategies of Kildare and Meath County Councils and the Regional Spatial and Economic Strategy (RSES). It should be noted however, that if capacity/infrastructural constraints are identified in the town, which cannot be resolved over the life of the JLAP to 2030, then the figures for growth (particularly in relation to the National Policy Objective (NPO) 68 allocation) will be reduced accordingly, to ensure the growth of the town does not exceed the capacity of both its servicing and social infrastructure. Therefore, a population of 50,000 in Maynooth is by 2031 is not envisaged.

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		With regard to the projected number of students attending Maynooth University, it should be noted that the vast majority of students comprise a transient population. In essence, this means that, while they attend the university during term time and on weekdays, they are not considered to be permanent residents of the town as they don't have the needs/requirements that local residents have in terms of social infrastructure (i.e. they don't have a requirement for schools spaces and community facilities for example).
		Active and Sustainable Transport
		As part of the development of the Joint Local Area Plan (JLAP) a Maynooth and Environs Area Based Transport Assessment (MEABTA) is being undertaken. A critical part of this work is to identify current deficiencies in the active transport network in Maynooth, along with public transport provision. The outputs of the MEABTA will initiate a permanent shift away from private car use towards sustainable and active modes of travel. It should be noted that as part of the second round of the public consultation for the MEABTA (advertised as the Draft Transport Strategy for Maynooth and Environs) a bus interchange is proposed in the town centre. The Plan will also support the completion of the Royal Canal Greenway which will link Maynooth to neighbouring settlements and key employers such as Intel and those located in the Kildare Innovation Campus. The proposals outlined in the finalised MEABTA will be incorporated into the Movement and Transport Chapter of the Plan as a list of proposed interventions presented in a both tabular format and also on a specific Movement and Transport Objectives map.
		The Plan will have provisions to support the rolling out of a bike rental scheme and enhanced EV charging infrastructure in the town.
		Nature and Biodiversity
		As part of the preparation of the JLAP, a Green Infrastructure Survey and Habitat Mapping Exercise will be undertaken. This exercise will make a number of recommendations to protect and enhance the overall level of biodiversity within the Plan area. It is envisaged that the Plan will also contain provisions to require biodiversity net gain on specific sites to encourage the development of natural habitats in the town and to promote

Sub.	Name	Summary of Submission
140.		increased levels of carbon sequestration. The open space strategy of the Plan will be developed around the principle of multifunctionality of open space where it is considered that such spaces have a wide number of functions which benefit the town as a whole. These include flood risk protection, the safeguarding of natural heritage, the incorporation of active travel links (cycling/pedestrian links) and benefits to the population in terms of improved wellbeing.
		Urban Renewal and Public Realm Provisions to support applications to funding schemes related to proposed climate action projects in the town can be considered in the preparation of the JLAP. The Plan will include provisions to rejuvenate key spaces in the town. This will include support for drawing down of funds available under the Urban Renewal and Development
		Fund. Green Business and the Circular Economy In keeping with its status as a Metropolitan Key Town and the fact that it is recognised by the RSES as an
		economic driver in the Dublin Metropolitan Area, the Plan will include an ambitious economic development strategy which will seek to transform Maynooth from a commuter town to an employment destination. The Plan will also seek to locate new employment lands in close proximity to residential areas in order to help reduce commuting times. Furthermore, the Plan will also include provisions supporting the development of dedicated remote working hubs at appropriate locations in the town, including within the town centre. The JLAP will
		support the development of a circular economy in Maynooth, insofar as its remit as a land use plan extends.
		Community and Amenity The current deficit in the provision of community infrastructure in Maynooth is acknowledged. The JLAP will be accompanied by a Social Infrastructure Audit (SIA) which will examine the current context with respect to social infrastructure provision in Maynooth whilst also identifying the future requirements of the town, including the making of recommendations on priority areas for investment within the Plan area. On the basis of the SIA, and as part of the preparation of the Plan, measures to support the provision of such specific facilities in the town will be examined. It should be noted that while the SIA will look at medical and dental provision in the town, it is

Sub.	Name	Summary of Submission
110.		outside the remit of the JLAP to provide for specific provisions with regards to such health services. With regard to the identification of a central landmark site for community uses, it is envisaged that the Plan will include provisions for alternative uses for the Fire Station site when it becomes available. It is considered that the development of a key community use or uses on the site will form a key element of any rejuvenation plan for the area.
		Ten-Minute Town and Car-free Centre A key aim of the Maynooth and Environs Area-Based Transport Assessment (MEABTA) will be to seek a reduction in congestion within the town centre. As part of the second round of public consultation for the MEABTA a number of proposals have been suggested. These include a one-way system and the closing of Main Street to private vehicular access. However, these are long term objectives dependent on the completion of the Maynooth Outer Orbital Route (MOOR). The Draft Joint Local Area Plan will include an array of provisions to supporting the implementation of the 10-minute-settlement concept in the town. These will focus on the improving accessibility between residential areas and key destinations including the town centre, train station, schools, neighbourhood centres (existing and proposed) and employment areas.
		The comments on the MOOR are noted. The Plan will include an objective to facilitate and support the delivery of the MOOR. It is envisaged that the MOOR will promote increased accessibility to both existing and newly developing areas and also encourage active travel (walking and cycling). It should be noted that the MOOR will be designed as an urban street, in keeping with the provisions of the Design Manual for Urban Roads and Streets (updated 2019). Accordingly, the road will incorporate high-quality cycle lanes and pedestrian footpaths and will have limited speeds for vehicular traffic.
31.	Demid Tishin	Economic Development, Tourism and Retail Services Submission states that a cinema in the town could serve the residents of Maynooth, Leixlip, Celbridge and Kilcock, as well as smaller surrounding villages and notes that Maynooth Business Campus or its environs, with its proximity to the M4, might be a good location.
		Movement and Transport

Sub.	Name	Summary of Submission
No.		Notes that the coach service to Dublin Airport (Maynooth Hopper bus route) has stopped during the pandemic and is yet to recommence service. States that this needs to be resumed as soon as possible. Submission notes that there are non-permeable housing estates in Maynooth, such as Silken Vale (which only has one exit) even though the back of the estate borders with Meadowbrook Road. Notes that automated bike hire is not available in Maynooth, despite its substantial size, with many adjacent sightseeing and recreational opportunities. Submits that visitors are limited to short walking distances or are forced to hire a car. Suggests that bike hire station could be positioned in the town square or at the bus terminus opposite the Glenroyal Hotel.
		Homes and Communities States that there is substantial noise pollution in the residential estates located close to the M4 and that these residents would benefit from noise barriers installed along the section of M4 running along these estates. Submission states that the town square is not used efficiently (currently only for seating). It could host a weekend fair, a souvenir kiosk, a permanent outdoor exhibition space and a bike hire station. Contends that Maynooth has too few bins to support its population and suggests the need to place bins at various locations. Notes that the plan for developing Harbour Field includes removal of existing high-quality playground equipment which is not necessary as they are in great condition. Contends that replacing the existing playground facilities is a waste of taxpayers' money. Notes that the is solid waste dumping in several ditches around the town and that these need to be cleaned out and further measures undertaken to help manage refuse.
		Green Infrastructure and Biodiversity Notes that trees (especially the larger species) are critical for biodiversity, air conditioning, noise reduction, wind protection and rainwater retention and that research shows that trees provide unique amenity value and are associated with higher property values. States that current tree management practices in Maynooth are outdated and go against practices outlined in the Dublin City Tree Strategy as large trees are regularly cut down, either replaced with much smaller species or not replaced. Notes that in line with advanced practices in the US and the UK, the vast majority of conflicts between utilities and trees can be solved without killing the tree. Submission includes links to a number of sources for urban tree management, including the Dublin City Tree Strategy.

Sub.	Name	Summary of Submission
No.		Response to Issues Raised The contents of the submission are acknowledged. It should be noted that it is not the function of the Joint Local Area Plan (JLAP) to identify a preferred location for a specific privately operated use such as a cinema. However, it is seen that the Land Use Zoning Matrix of the Maynooth Local Area Plan 2013-2019 (as amended) provides for cinema uses in general, to be 'permitted in principle' on 'A1: Town Centre' and 'A2: Town Centre Expansion' zoned lands. Cinema uses are also permitted in principle in 'H2: Office, Light Industry and Warehousing' zoned lands, with the exception of Maynooth Business Campus. The provision for cinemas on zoned lands within the Plan area will be examined as part of an overarching review of the land use zoning matrix during the preparation of the JLAP.
		The operation of bus services is a matter for the National Transport Authority (NTA) and is therefore outside the remit of this land use plan. On the issue of permeability, it should be noted that an Area Based Transport Assessment for Maynooth and Environs is currently being progressed. As part of the second round of the public consultation for this transport assessment (advertised as the Draft Transport Strategy for Maynooth and Environs) a series of permeability connections and upgrades are proposed for the town in order to create a truly integrated pedestrian and cycling network for Maynooth. Such proposed links including a connection between Silken Vale ('the Arches') and Meadowbrook Road. The establishment of a rental bike scheme in Maynooth will be supported by an objective of the Plan.
		Issues relating to noise reduction on the M4 Motorway are the responsibility of Transport Infrastructure Ireland (TII) which manages our national roads and motorways network, and therefore is outside the remit of this Plan. The Plan will, however, seek to implement the provisions of the Kildare and Meath's respective Noise Action Plans, where appropriate. With regard to the upgrading of the public realm, it is noted that the Plan will include provisions to rejuvenate key spaces in the town centre including Courthouse Square. Issues relating to waste management in the town and the provision/distribution of litter bins is considered an operational issue and therefore outside the remit of this land use plan. With regard to the replacement of playground equipment, it is the policy of Kildare County Council to relocate and reuse the equipment in another proposed play area,

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		following a thorough inspection. However, this is dependent on the equipment not having decay or damage in its structure or it being out of date whereby it is not possible to obtain replacement parts.
		As part of the preparation of the JLAP, a Green Infrastructure Survey and Habitat Mapping Exercise will be undertaken. This exercise will make a number of recommendations to enhance the overall level of biodiversity within the Plan area through the protection of existing green infrastructure links and the development of new links between various habitats. On the issue of tree management, it is noted that Action 35 of the Open Space and Outdoor Recreation Strategy (Appendix 3 of the Kildare County Development Plan 2023–2029) seeks to prepare an open space strategy which will assist in tree management in the county. It is intended that this piece of work will be completed before the end of 2024.
32.	Eoghan Murray	Leinster Cottages
		Submission requests that Cross Lane be omitted from the general town parking, and either made pedestrian/cycling only, or converted to residential parking only to create a more liveable child-friendly space. Further requests that an automatic one-way bollard be installed at the intersection of Cross Lane to the Dunboyne Road to prevent dangerous and illegal 'rat run' behaviour through a residential area in which children use as a play area. Note: Submission refers to the location of Cross Lane on maps attached but no map has been included with the submission.
		Pound Park and Lyreen Lodge
		States that Pound Park is a destination for anti-social behaviour beside the Lyreen river and notes that the new ungated opening into the Lyreen Lodge development is welcome as it creates passive surveillance and footfall. Requests a new linear "Lyreen Park" as the Pound Park, along with the new riverside path in the Lyreen Lodge is sorely missing a connection to the corresponding path along the river/under the bridge in the Mariavilla estate. Notes that there are proposals for some footbridges to make this connection but submits that a more direct option is to open a route through the Irish Water lands which would directly connect these two walks and new linear park as a new recreational amenity for the town.
		Mariavilla to Moyglare Hall Permeability

Sub. No.	Name	Summary of Submission
NO.		Refers to an agricultural passage connecting the extant farm at Mariavilla with its remaining outlying fields, which is bordered by the walls of the Mariavilla estate to the south and Moyglare Hall to the north. Submits that a pedestrian/cycling connection between the two which crosses this passage would be of great benefit to the eastern side of the town enabling an alternative cycling/walking route between the residential areas to the schools to the north and by extension providing a new walking/cycling route from Moyglare Hall towards the town centre. Notes that there are logistical issues relating to this connection given the fact that it would be crossing a working farm. In conclusion, the submission states that it agrees with submission No. 12 regarding the town bypass (MOOR) route and how it, as currently planned, would cut off the schools in the Maynooth Education Campus from the homes where these children can currently walk/cycle from and create further traffic congestion.
		Response to Issues Raised The specific issue of residential parking provision and management in the town centre is considered to be an operational issue for the local authority and therefore outside the remit of this land use plan. The potential of developing new linear park along the Lyreen River and Rye Water will be investigated as part of
		the preparation of the Joint Local Area Plan. On the issue of connectivity between the town centre and Lyreen Lodge (via Pound Park), and between Mariavilla and Moyglare Hall, it should be noted that an Area Based Transport Assessment for Maynooth and Environs is currently being progressed. As part of the second round of the public consultation for this transport assessment (advertised as the Draft Transport Strategy for Maynooth and Environs) a series of permeability connections and upgrades are proposed along between the town centre and Mariavilla, including a new pedestrian and cycling bridge over the Lyreen. Permeability linkages between the Mariavilla and Moyglare Hall residential estates and beyond to the Maynooth Education Campus are also proposed.
		On the issue of the route of the MOOR, it should be noted that its general layout and route through the north of the town has been fixed for the last number of decades. For example, it is identified on Map No. 1: Land Use Zoning and Specific Objectives in the Maynooth Town Development Plan 2002. The purpose of this is to give long

Sub.	Name	Summary of Submission
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		term certainty to residents, landowners, developers and other key stakeholders. It is not envisaged that the
		identified route of MOOR at this location will be altered at this stage.
33.	Mary McGaver	Roads and Traffic Submission states that the delivery of the Outer Orbital Route (MOOR) in its entirety is essential. Notes that the present design for the eastern portion of the ring road requires a roundabout, not traffic lights. States that pedestrian traffic lights will suffice and give rise to far less disruption / back-up of road traffic. Submits that a new access to/from M4 is required west of Junction 7, close to the proposed new train station and interlinking with the new ring road. Contends that over-wide footpath, alongside R148, at the corner closest to the traffic lights at the intersection of Mill Street and Kilcock Road, causes unnecessary blockage to traffic heading for Kilcock. Submits that the traffic lights' synchronization at the square and Garda Station junctions are very poor.
		Bicycle Lanes / Bike Paths Notes that cycle lanes require reform of existing routes and joined-up thinking when laying out new cycle routes and that the cycle lanes, further out along the Dunboyne Road, should be extended back into the town. States that cycling and scootering on the pedestrian path on Carton Avenue is dangerous for pedestrians and should not be permitted. Notes that cyclists can already use the cycle lane on the R148 (Dublin Road) to the SE of Carton Avenue and that the boreen (path between Carton Wood and fields adjoining Carton Avenue) can easily be upgraded and link up with the cycle lane at the McDonald's roundabout. Submits that the cycle path on the NE side of Main Street is very dangerous, owning to the existence of cycle lanes on the footpaths. Outlines concerns over the use of bells on bikes and states that signage is urgently required to direct cyclist to cycle in on-road cycle lanes in the same direction as vehicular traffic.
		Response to Issues Raised It is noted that both the Regional Spatial and Economic Strategy for the Eastern and Midlands Region and the respective county development plans of Kildare and Meath support the development of the Maynooth Outer Orbital Route (MOOR). Accordingly, its delivery will be facilitated and supported by an objective of the Plan. The installation of traffic lights as opposed to roundabouts at junctions in urban areas is considered to be best practice, in keeping with the statutory provisions of the Design Manual for Urban Streets (DMURS, updated

Sub.	Name	Summary of Submission
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		2019). Traffic lights are preferred to roundabouts within urban locations as they are easier and safer to navigate for both pedestrians and cyclists, and thereby encourage greater levels of active movement. Specific issues regarding traffic light synchronisation and footpath widths are considered to be operational matters and therefore outside the remit of this land use plan.
		As part of the development of the Joint Local Area Plan (JLAP), a Maynooth and Environs Area Based Transport Assessment (MEABTA) is being undertaken. A critical part of this work is to identify current deficiencies in the pedestrian and cycling network in Maynooth, including permeability links and cycle lanes. The outputs of the MEABTA will include both a walking strategy and a cycling strategy which will seek to create a comprehensive high-quality active movement (pedestrian and cycle) network in the town. It should be noted that as part of the second round of the public consultation for the MEABTA (advertised as the Draft Transport Strategy for Maynooth and Environs), a series of walking and cycling connections and upgrades are proposed to be including at Main Street, Carton Avenue, and along the Dublin and Dunboyne roads.
34.	Justin Moran	Submission relates to a request to incorporate parts of the townlands of Ballygoran and Moneycooley into the Joint Local Area Plan area. States the lands are currently un-zoned but located along the southern boundary of the existing Maynooth Business Campus, outside the boundary of the Maynooth Local Area Plan 2013-2019. Submission notes the response to submission No. 354 (submitted by Councillor Naoise O'Cearúil) to the Draft Kildare County Development Plan on this matter where it states the response of the Chief Executive stated that 'any proposals to amend the boundary of the Maynooth Local Area Plan (LAP) area falls outside the scope and remit of this draft Plan and therefore cannot be taken into consideration at this stage.' The submission states that it should therefore fall on the Council to consider that submission under the Maynooth Local Area Plan and that based on the proposed town boundary, it is clear that the Council has not considered that submission, which renders the existing boundary incompatible with the overall Kildare County Development Plan and also fails to maximise the objective of sustainable and equitable development of Maynooth as a key growth town for the entire period of the plan through to 2030.

Sub. No.	Name	Summary of Submission
140.		Submits that the existing LAP boundary does not include the growth opportunities for a major employment area in Maynooth to expand in an area serviced by existing infrastructure. States that the existing boundary makes no provision for the development of lands running both adjacent to the M4 adjacent to Maynooth Business Campus, which forms part of Maynooth by virtue of address and by the fact that residents patronise Maynooth schools and businesses. Contends that the boundary is over indexed to the west i.e., Meath and fails to include development along the M4. States that if a major employer wants to place industrial, warehousing or logistics, the existing town boundary makes no provision for this along the major transport route. Asks if the plan to place this type of employment close to the main town and/or beside Carton to the Meath side. States that the town must cater for these development needs and maximise the use of the M4.
		Submits that the existing town boundary adversely impacts the ability of the Plan to ensure that there is adequate development of lands to provide employment opportunities to meet population growth. Contends that this is not about CSO statistics or urban sprawl and submits that the ABTA will not provide a relevant basis to help inform a decision on this as it excluded roads adjacent to the Maynooth Business Campus and the scope of that assessment did not fully assess the traffic which exits onto the Straffan Road and which runs alongside the campus and over/across to Intel. States that the ABTA failed to understand the full real town boundary of Maynooth.
		States that the existing boundary is not aligned to the objectives of KCC and refers to the submission of Kildare County Chamber (Ref. No. 385) to the Draft Kildare County Development Plan 2023-2029 which specifically highlight the need for the zoning of lands along the M4 corridor. Contends that the Chief Executive specifically stated that the zoning of specific lands will be undertaken as part of the local area plan processes for Maynooth, Celbridge and Kilcock. Questions how the Council will meet this objective. States that if the boundary is not amended to include such lands this means that the campus will have no expansion in the next 8 years which will adversely impact on the ability of the town to provide equitable and growth opportunities alongside population growth.

Sub.	Name	Summary of Submission
No.		States that the boundary does not support the objective of equitable development when considering the combined objectives of Maynooth, Leixlip and Celbridge. Submits that the business campus, continuing south to Ray Crofton's and the M4 Celbridge business park form a natural corridor for Industrial and Warehousing lands and the existing town boundary fails to fill that void in the middle.
		Response to Issues Raised The request to incorporate the subject lands into the Plan area for the purpose of designating them for employment uses is acknowledged. The contention that the Council has not considered the lands as part of the Plan boundary is not accepted as at this early pre-draft stage of the Plan, no defined Plan area for the Maynooth and Environs has been established. It should be noted that the boundary line shown as part of the indicative development strategy for Maynooth in the Pre-Draft Issues Paper relates to the settlement boundary of the town as defined by the Central Statistics Office based on the results of Census 2016. The proposed boundary of the Plan area will depend on the outputs of a number of supporting studies which will be published alongside the Draft Joint Local Area Plan.
		With regard to the issues raised in the submission relating to the ABTA, it should be noted that both Maynooth Business Campus and adjacent roads have been considered from the outset. As outlined in the second round of the public consultation for the ABTA (advertised as the Draft Transport Strategy for Maynooth and Environs), the following draft measures are proposed (some of which are outside the initial study area) which affect access to the general location of the subject lands: • Upgrade of Ballygoran Road required to facilitate bus services. • Interurban cycle route on Straffan Road. • New signalised junction to replace roundabout at entrance to campus. • New bridge and permeability link over the M4 to tie into existing road infrastructure. The contention that the ABTA failed to understand the full real town boundary of Maynooth is not accepted. The project team developing the ABTA have engaged in substantial public consultation, extensive desktop study and
		carried out comprehensive site visits in order to develop the proposals to date and do have an intimate understanding of the transport issues effecting the entire settlement and its surrounding hinterland.

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		With regard to the zoning request, it is noted that the location and quantum of employment lands to be zoned in the Draft Maynooth and Environs Joint Local Area Plan (JLAP) will be determined on an evidence-led basis taking into consideration the availability and capacity of the receiving environment with respect to both services and transport infrastructure. As outlined above a number of supporting studies, including an Area Based Transport Assessment, a Social Infrastructure Audit and a Settlement Capacity Audit (i.e., Infrastructure Assessment) are being prepared to inform the preferred development strategy that will be contained in the Draft JLAP. In conjunction with the various assessments, the zoning of employment lands must adhere to relevant national and regional spatial policy and Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000, as amended. This includes compliance with <i>Guiding Principles to Identify Locations for Strategic Environmental Development</i> (p.24 Regional Spatial and Economic Strategy) and the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012), given the subject site's proximity to Junction 7 of the M4 Motorway.
		Whilst the subject lands are located outside the boundary of the Maynooth Local Area Plan 2013-2019 (as amended) and outside the defined settlement boundary of Maynooth (CSO 2016), they will be included in the Settlement Capacity Audit to determine their suitability for employment use in comparison to other potential
		lands within Maynooth and Environs.
35.	Social Democrats	Submission from the Kildare North Social Democrats Branch calls on the Council to ensure the future proofing of infrastructure considering the potential significant population increase. Requests the inclusion of measures in the Plan across a series of areas (as set out below) which it is stated align with the principles of universal design.
		Sustainable Transport
		Objective 1: The development of a new train station, including a 'park and ride' facility.
		Objective 2: The development of a 'school link' shuttle bus service that services all housing estates and all schools.
		Objective 3: The consideration of an isolated cycle track linking residential areas to the Moyglare Road and the R405 for children and young people to safely cycle to school and college.

Sub.	Name	Summary of Submission
No.		 Objective 4: Consideration should be given to develop a new M4 Motorway exit between Maynooth and Kilcock to service western part of the town. States that data from the Transport Infrastructure Ireland website shows an average 34,206 vehicles go through the M4 junction at Maynooth. Objective 5: Maximise the use of the greenway focusing on dedicated walking and cycling permeability between the greenway and town centre, bus and rail services, cycle infrastructure and charging/storage/rental, enterprise, and amenity both in proximity of the greenway but also at various points throughout the town. Objective 6: The roll out of 'School Streets' where possible at all schools in Maynooth. Objective 7: To facilitate transport solutions to encourage older residents and those with reduced mobility to have ease of access between the town centre and outlying areas.
		 Housing Objective 1: That this plan implements an evidence-based approach to sustainable planning and residential development throughout the lifetime of the plan. Objective 2: That this plan commits to a mix of residential development in any lands identified as new residential, to ensure accessibility, real affordability and sustainability are priority issues of consideration. Objective 3: That developments are encouraged to provide for solar panels and other sustainability initiatives. Objective 4: To deliver sustainable student accommodation and encourage development of same. Objective 5: New car parking areas to be encouraged to fit solar panel roofs.
		 Community Facilities Objective 1: The development of the Fire Station as a dedicated Community / Youth Facility for the Town with shared community services. States that the development of the HIVE in Kildare Town is a useful example to model a new Community / Youth facility. Objective 2: The development of a public sports campus – to include basketball courts, tennis courts, AstroTurf pitches etc. Objective 3: An objective to see a full time Garda Station in operation.

Sub.	Name	Summary of Submission
140.		 Objective 4: A partnership with the Department of Education to ensure population growth in the lifetime of the plan and beyond is catered for in terms of primary and secondary school capacity, and lands identified for the development of same. Objective 5: To encourage the enhancement of the trading by laws to encourage local produce to be sold at sustainable markets. Objective 6: To actively encourage the use of vacant spaces to encourage local enterprise. Objective 7: To encourage biodiversity in urban settings using innovative design. Objective 8: To facilitate free Wi-Fi within the town centre and to develop micro business site to encourage start-up businesses and development of social enterprises. Objective 9: To promote the night economy of Maynooth and the town as a tourist destination.
		Response to Issues Raised Sustainable Transport The Plan will include an objective supporting the development of a second train station to the west of Maynooth as this is included in the Greater Dublin Area (GDA) Transport Strategy 2022-2042 (Measure Rail6). On the issue of a 'park and ride' facility for Maynooth, it is noted that Figure 9.1 of the GDA Transport Strategy 2022-2042 provides for such a development to be located either at 'Collinstown OR Maynooth Depot'. Accordingly, the Plan will include provisions to support the potential development of a 'park and ride' facility at this general location. The development of specific transport services, such as 'school link' services is outside the remit of this land use plan. The upgrading of the M4 Motorway is subject to a separate process (M4 Maynooth-Leixlip Project) which is outside the remit of this Plan. However, given its inclusion in the GDA Transport Strategy and in the National Development Plan 2021-2030 it will be supported by an objective of the Plan.
		With regard to the development of a dedicated cross-town cycleway linking the R405 regional road with the Moyglare Road, it should be that a Maynooth and Environs Area Based Transport Assessment (MEABTA) is being undertaken to support and inform the transport provisions of the Plan. As part of the second round of the public consultation for the MEABTA (advertised as the Draft Transport Strategy for Maynooth and Environs) a series of cycling interventions are proposed to upgrade the links between the Maynooth Education Campus (MEC) and

Sub. No.	Name	Summary of Submission
NO.		the rest of the town. The potential of creating a linear park incorporating off-road cycling/pedestrian routes along the Lyreen and Rye Water rivers, as far as the MEC, will also be examined as part of the preparation of the Plan.
		With regard to the issue of walking and cycling, a critical element of the MEABTA is to identify current deficiencies in the pedestrian and cycling network in Maynooth, including cycle lanes. The outputs of the MEABTA will include both a cycling strategy and a walking strategy which will seek to create a comprehensive high-quality active movement (pedestrian and cycle) network in the town. The potential of the Royal Canal Greenway to act as a key sustainable movement connector linking key destinations in Maynooth and beyond is recognised. It is envisaged that the MEABTA will propose a series of permeability connections along the Royal Canal Greenway maximise its integration into the cycling and pedestrian network of the town. It is intended that the Maynooth and Environs Area Based Transport Assessment (MEABTA) will include a plan for bike rental in the town which will be supported by an objective of the Plan. On the issue of 'Schools Streets', it is noted that an objective to support their implementation across the county is already included in the Kildare County Development Plan 2023–2029. The creation of an age friendly town, including the implementation of a universally accessible transport network, will be a central consideration of the Plan.
		Housing It is considered that the gathering of spatial information is becoming ever more critical to all stages of the planning process in supporting transparent and evidence-based decisions. Accordingly, the preparation of the JLAP will be progressed through a robust evidence-led and data-driven process which will include a comprehensive suite of data-based documents published alongside the Plan. These supporting studies include (inter alia) an Area Based Transport Assessment, a Social Infrastructure Audit and a Settlement Capacity Audit (i.e., Infrastructure Assessment) which will inform all residential zoning decisions in order to ensure the zoning of an adequate quantum of appropriately located serviced and serviceable land to provide for new housing in the town. The Plan will also include a range of provisions relating to the promotion of appropriate levels of residential density, mix and high-quality design within the Plan area. The Plan will include an objective promoting the use of renewable energy technologies in existing and proposed building stock and in commercial

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		developments, including district heating, micro-generation (solar, photovoltaic, micro-wind, micro-hydro and micro combined heat and power), and other renewable energy technologies. The Plan will also include provisions to support the development of student accommodation at appropriate locations in the town.
		The request to require solar panels to be installed on all new car parks is noted. It is considered that this is a development management specific issue which is in the purview of the respective county development plans of each local authority. The impending designation of Maynooth as a Decarbonisation Zone (DZ) will require the setting of targets for locally generated renewable energy in the town. In this regard, such a measure may be considered as part of the Decarbonisation Action Plan for Maynooth which will be prepared on foot of the town's designation as a DZ. An objective will be included in the Plan to support the full implementation of any Maynooth Decarbonisation Action Plan, with regards to its goals, objectives and actions relating to planning and development within Maynooth Decarbonisation Zone.
		Community Facilities The Plan will include provisions to support alternative uses for the Fire Station site when it becomes available. It is envisaged that the development of a key community use or uses on the site will form a key element of any rejuvenation plan for the area. The current deficit in the provision of community infrastructure in Maynooth, including amenities for younger persons is acknowledged. The JLAP will be accompanied by a Social Infrastructure Audit (SIA) which will examine the current context with respect to social infrastructure provision in Maynooth whilst also identifying the future requirements of the town, including the making of recommendations on priority areas for investment within the Plan area.
		With regard to the request for the development of a public sports campus in Maynooth, it is noted that the Kildare County Development Plan 2023–2029 has included a specific objective in Chapter 10 'to proactively seek suitable sites within the Key Towns of Naas and Maynooth for the provision of Municipal Sporting Facilities where shared amenities are provided for sports clubs and the general public.' It is envisaged that the Joint Local Area Plan (JLAP) will seek to advance this objective through the identification of a potential suitable and walkable location within the town for such a facility to be developed.

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No.		The request for an objective to support a full-time garda station in Maynooth is noted. Such a consideration is an internal operational matter of An Garda Síochána and outside the remit of this land use plan. In relation to the request for a partnership with the Department of Education, it should be noted that Kildare and Meath County Councils engage with the Department on an ongoing basis to ensure adequate provision for schools across both counties. This consultation is conducted under the auspices of a Memorandum of Understanding signed between the City and County Managers Association and the Department. Bylaws relating to trading are undertaken by a separate legislative process of the council and therefore are outside the remit of this land use plan. The JLAP will include a range of measures to ensure that vacant spaces in the town are actively managed and brought back into use for a variety of different functions.
		As part of the preparation of the JLAP, a Green Infrastructure Survey and Habitat Mapping Exercise will be undertaken. This exercise will make a number of recommendations to protect and enhance the overall level of biodiversity within the Plan area. It is envisaged that the Plan will also contain provisions to require biodiversity net gain on specific sites to encourage the development of natural habitats in the town and to promote increased levels of carbon sequestration. The urban design of new developments will be required to comply with the provisions outlined in the interim guidance on <i>Nature-based Solutions to the Management of Rainwater and Surface Water Run-off in Urban Areas</i> (DoHLGH, 2022) in order to support both sustainable drainage solutions and increased biodiversity within open spaces.
		The support of free Wi-Fi within Maynooth Town Centre and the development of a micro business site at an appropriate location in the town are issues that will be considered as part of the preparation of the Plan. The Draft JLAP will incorporate a range of measures to develop and upgrade the visitor experience in Maynooth in order to promote the town as both a tourist and night-time destination.
36.	Demesne Architects	The submission by Demesne Architects relates to a derelict cottage and surrounding site currently zoned 'B: Existing Residential and Infill' in the Maynooth 2013-2019 LAP. The site is located on the Straffan Road located

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		approximately 250 metres to the southeast of Maynooth Train Station (see map below). The submission states that the site, which is currently in a derelict condition and represents an ideal location for high density development featuring taller buildings and this would be in accordance with the Government Guidelines for Urban Development and Building Height. It requests that the new Plan recognise that high density accommodation is an appropriate use for this site.
		Submission highlights several of the key challenges outlined in the Pre-Draft Issues Paper facing the development of Maynooth including the accommodation of substantial residential and employment growth, and the delivery of compact growth and taller buildings. It contends that high density development featuring taller building in the Harbour Area (which it states the site is located) would help address these challenges and outlines several reasons why such proposals would represent the optimal planning solution for the site. These include its proximity to the existing train station (future DART station) and the high level of pedestrian/cyclist accessibility to the town centre which is within 500 metres of the site. Notes that higher density development with taller buildings of four or five storeys is appropriate at this location and states the natural ground levels, contrasting with the level of main access road, means this site can accommodate taller buildings, without detracting from the historic core and key vistas in the town. Submission concludes by stating that Maynooth's designation as a decarbonisation area, requires sustainable high-density development in the town centre, immediately adjacent to DART, train, and bus services which this derelict site in the Harbour Area, can contribute towards.

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		Response to Issues Raised The contents of the submission are noted. It is not considered that the subject site is located in the Canal Harbour area, an area which has been identified in the Regional Spatial and Economic Strategy for regeneration. Given the limited size of the site and its location adjacent to a low rise established residential area, it is not envisaged that the site will be designated in the Plan for the purpose of accommodating high density development. However, by virtue of its infill character and location, proximate to Maynooth Train Station (and future DART+ station), the site has the potential to be identified as an 'Existing Built-up Footprint Site' in the JLAP, as per the Section 28 Development Plan Guidelines (2022). Accordingly, it is considered that any development proposal for the subject site would be most appropriately dealt with through the general development management process having regard (inter alia) to the provisions of the relevant Section 28 Ministerial Guidelines on building heights and densities.
37.	Westin Homes	This submission from Declan Brassil and Company Ltd. on behalf Westin Homes Ltd. relates to lands located in Newtown, adjacent to the M4 Motorway (see map below). States that Westin Homes Ltd. has a proven history in the delivery of high-quality development, having over 1,000 residential units constructed, under construction or in planning in the county and is committed to the ongoing delivery of necessary physical and community infrastructure to support the development of sustainable communities in Maynooth. The submission refers to the matters raised in the Issues Paper and outlines the potential of the subject lands to deliver compact and sequential urban development at a location accessible to sustainable modes, consistent with the town's designation as a Metropolitan Key Town within the Metropolitan Area Strategic Plan (MASP). Notes the provisions of the RSES relating to Maynooth. Also notes the provisions for additional growth to be allocated to Key Towns such as Maynooth under National Policy Objective (NPO) 68. States the provision is contingent on the area being served by high-capacity public transport and/or related to significant employment provision. Submission supports the approach of the draft Kildare CDP relating to the provision to allocate an additional population of up to 10,000 to Maynooth up to 2031. Notes the provisions of the Draft County Development Plan (CDP) including Objective HO O2 which seeks to ensure that sufficient land is zoned at

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No.		appropriate locations in compliance with the Core Strategy and Settlement Strategy, in order to meet the likely future housing demands.
		Outlines the strategic importance of the Newtown landbank which it states was specifically referenced in the Draft RSES. States that the subject lands meet all the national, regional and county policy objective criteria relating to compact, consolidated and sequential growth. Contends that they represent a sustainable infill consolidation site that is accessible by sustainable modes including walking and cycling to transport services, and employment, education and retail locations in the town. Also notes that the lands can facilitate the completion of the Maynooth Outer Orbital Route (MOOR), linking the northern environs of the town to the M4 Motorway, reliving congestion, and facilitating pedestrian and cyclist improvements in the town centre. Further notes that the lands can facilitate the delivery of the enhanced or a new junction on the M4.
		Response to Issues Raised The contents of the submission are noted. As part of the preparation of the Joint Local Area Plan (JLAP), reviewing the land use zoning objectives for all lands zoned in Maynooth and Environs. The review of zoned land will be underpinned by inter alia an infrastructure assessment for the town in accordance with Appendix 3 of the NPF and with section 4.5.2 Settlement Capacity Audit, of the Development Plan, Guidelines for Planning Authorities (2022). Accordingly, the subject site will be included as part of the wider review of the settlement and its environs. In this regard, its zoning will be determined on an evidence-led basis taking into consideration the availability and capacity of the receiving environment with respect to both physical and social infrastructure.

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No.		As noted above, supporting studies including an Area Based Transport Assessment, a Strategic Flood Risk Assessment, a Social Infrastructure Audit and a Settlement Capacity Audit (i.e., Infrastructure Assessment) are being prepared to inform the preferred development strategy that will be contained in the Draft Maynooth and Environs JLAP. It should also be noted that in accordance with the provisions outlined in Chapter 15 of the Kildare County Development Plan, a 91-metre minimum setback line will be applied to all lands along the M4 Motorway, thereby having an impact on the development potential of the lands.
38.	Derrinstown Stud Ltd.	Submission from Declan Brassil and Company Ltd. on behalf of Derrinstown Stud Ltd. relates to lands located at Derrinstown, to the south of the existing Maynooth Business Campus (see map below). The submission refers to the contents of the Pre-Draft Issues Paper and outlines the potential of the Derrinstown strategic landbank to support national and regional policy objectives relating to plan-led employment generation on sites accessible to high-capacity public transportation and town centres. Notes that the strategic location and potential of these lands could ensure that Maynooth acts as a key economic driver in the region.
		Submission outlines provisions of the NPF relating to the challenges of managing future growth of the Mid-East region and the need to priorities a more sustainable pattern of development with a greater focus on employment creation. Notes the provisions of the RSES (and the Metropolitan Area Strategic Plan contained therein) relating to Maynooth including its designation as a Metropolitan Key Town and its role within the Dublin Metropolitan Area (DMA). Further notes economic provisions of RSES including RPO 4.27 and RPO 4.34. Refers to provisions for additional growth under National Policy Objective 68 noting it is contingent on the area being served by high-capacity public transport and/or related to significant employment provision. Submission supports the approach of the draft Kildare CDP relating an additional population allocation of up to 10,000 to Maynooth up to 2031.
		Notes and supports provisions of the draft Kildare CDP relating to economic development, including the designation of a MASP Economic Cluster in northeast Kildare. States that strategic location of the subject lands between Maynooth and Celbridge could assist with the provisions of the development relating to clustering and developing a resilient economic base in the area. Outlines the necessity to support the future consolidation and sequential expansion of established employment generating locations such as Maynooth Business Campus which

Sub. No.	Name	Summary of Submission
NO.		comprises a strategically located employment hub adjacent to the M4 Motorway. Notes that the M4 corridor represents a significant opportunity for attracting employment and enterprise that are consistent with the objectives of the Draft CDP and capitalising on existing infrastructure.
		Refers to the Greater Dublin Area (GDA) Transport Strategy 2022-2042 and notes the inclusion of the DART+ West project which will enable compact growth, unlock regeneration opportunities, and allow for the more effective use of land. Further states that the project will provide sustainable public transport service in proximity to the subject site, fully supporting the delivery of new economic development within the Plan area. Notes the potential of the subject site to support policy context as the strategic landbank meets all of the national policy objective criteria, and regional and county level criteria for consolidated and sequential growth. Contends that the lands represent an opportunity for expanding employment generating uses at this location, assisting the town in fulfilling its role as a Key Town. Also notes that sites proximity to the train station, bus services and the proposed Eastern Ring Road (MERR) and Outer Orbital Route (MOOR).
		Submission concludes by stating that subject site can also assist in addressing a number of key challenges affecting the future development of Maynooth as identified in the Issues Paper which includes the need to develop a framework to accommodate substantial residential and employment growth to ensure that Maynooth acts as a key economic driver in the region by providing for strategic employment locations and achieve greater alignment between where people live and work.

Sub.	Name	Summary of Submission
No.		
		Response to Issues Raised The request to rezone the subject site to support plan-led employment generation activities is noted. The determination of the location and quantum of employment lands to be included in the Draft Maynooth and Environs Joint Local Area Plan (JLAP) will be decided on an evidence-led basis having consideration for the availability and capacity of the receiving environment with respect to both services and transport infrastructure. In this regard, a number of supporting studies including an Area Based Transport Assessment, a Social Infrastructure Audit and a Settlement Capacity Audit (i.e., Infrastructure Assessment) are being prepared to inform the preferred development strategy that will be contained in the JLAP. In conjunction with the various assessments outlined above, the zoning of employment lands must adhere to relevant national and regional spatial policy and Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000, as amended. This includes compliance with Guiding Principles to Identify Locations for Strategic Environmental Development (p.24 Regional Spatial and Economic Strategy) and the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012), given the subject site's proximity to Junction 7 of the M4 Motorway. Whilst it is noted that the subject site is located outside the boundary of the Maynooth Local Area Plan 2013-2019 (as amended) and outside the defined settlement boundary of Maynooth (CSO 2016), it will be included in the Settlement Capacity Audit to determine its suitability for employment use in comparison to other potential lands within Maynooth and Environs.
39.	Demesne Architects	Submission states that Maynooth is badly served by sports infrastructure which needs to be provided given the recent rapid growth of population in the town. States that a publicly accessible swimming pool should be developed to serve the town and wider environs of North Kildare. Asserts that operational energy costs of such a facility need to be considered along with its location and the operational model. Contends that adopting low energy usage NZEB design principles are essential and would make such a facility economically viable and align with Maynooth's potential designation as a Decarbonisation Zone. Suggests that locating a pool adjacent to or within the University campus could avail of operational synergies and ensure ongoing commercial viability.

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No.		
		Response to Issues Raised
		The present deficit in the provision of amenity infrastructure in Maynooth is acknowledged. It is noted that the Kildare County Development Plan (CDP) 2023-2029 has included an action to progress plans for the provision of a new fully accessible regional swimming pool in North Kildare in conjunction with other relevant bodies. This issue will be examined further by the Council in the context of the preparation of the Joint Local Area Plan. Furthermore, it should be noted that the Kildare CDP has included a specific objective 'to proactively seek suitable sites within the Key Towns of Naas and Maynooth for the provision of Municipal Sporting Facilities where shared amenities are provided for sports clubs and the general public.' It is envisaged that the Plan will seek to advance this objective through the identification of a suitable location within the town.
40.	Kilcloon	This submission from KEAA notes that Maynooth is identified as a "Key Town" in the National Planning
40.	Environmental	Framework 2018 and in the Regional Spatial and Economic Strategy (RSES) adopted by the Eastern and Midlands
	Action	Regional Authority. KEAA also note that the RSES includes references to an area of rural County Meath
	Association	contiguous with the County Kildare border as a future area for development designated as Maynooth Environs.
	(KEAA)	Under the section on Maynooth, the RSES states "To enhance co-ordination of development in Maynooth, including its environs in County Meath, the preparation and adoption of a Joint Local Area Plan (JLAP) should be carried out by Kildare and Meath County Councils". KEAA raises concerns to the efficacy of this statutory planning and consultation process and its credibility being undermined in advance of the JLAP being prepared through these proposals to develop large areas of "Maynooth Environs" in the RSES.
		Draft Kildare County Development Plan
		Submission supports the principles set out in Section 1.8.1 and submits that, in drafting the forthcoming JLAP for Maynooth and Environs, Kildare County Council and Meath County Council should follow these Guiding Principles which are consistent with the National Planning Framework, the RSES and with the National Climate Action Plan.
		Integrated Land Use and Transport Strategy Submission notes that the consultation document refers to a proposal in the draft Transport Strategy for the Greater Dublin Area 2022–2042 for a second railway station west of the town which would, ultimately, be served

Sub.	Name	Summary of Submission
No.		by the approved major upgrade to the railway serving Maynooth under the DART+ West programme. KEAA suggest that the integrated land use and transportation study, evaluate and consider land use optimisation based on compact growth and request that both planning authorities refuse any applications for permission to construct all or part of the Maynooth Outer Orbital Route (MOOR) pending the completion of the proposed integrated land use and transportation strategy for the key town of Maynooth.
		Cycle Lanes Submission outlines best practice to support a modal shift to cycling across all age groups.
		New DART Station Submission welcomes the proposed train station to the west of the existing station as part of the DART + (West) upgrade. States that this location will serve and enable multiple purposes.
		Maynooth Outer Orbital Route (MOOR) Submits that priority must be given to sections which will provide the maximum level of relief to traffic congestion in the town centre, enable access to public transport and access to the M4 interchange and support compact and sequential growth. KEAA submit that priority must be given a 'C' ring route circling Maynooth to the west from Straffan Road to the Moyglare Road and to the east from Straffan Road to the R148. States that a completed 'C' ring will resolve traffic congestion, open-up lands close to the town core for development and, together with the link road through the Moyglare Hall site to the Dunboyne Road. Proposes that the 'C' ring, which will provide in excess of 80% of the orbital route, is more likely to meet requirements of the National Climate Action Plan.
		Sustainable Compact Growth Submission urges both planning authorities to incorporate the principles set out in the consultation document into the approach taken to the land use and spatial planning decisions to be taken when drafting the JLAP.
		Growth Scenarios and Sequential Growth

Sub.	Name	Summary of Submission
No.		It is the position of KEAA that the JLAP and SEA process should recognise the need for the JLAP outcomes to support and put into practice a range of national and regional policies that explicitly require that future growth of urban areas, particularly Key Towns such as Maynooth should be based on compact growth with developments within the town core prioritised over those areas that are more remote from the town centre.
		Climate Action Submission notes that the proposed JLAP will have a major influence of the carbon footprint of Maynooth. Most immediate positive impact of the JLAP would be through the emphasis on compact and high-density growth within the town core, close to sustainable transport and close to existing retail centres, schools, university, and other facilities.
		Maynooth Environs States the planned sequential growth of Maynooth may lead to a need to expand the growth of Maynooth Key Town to the north extending into County Meath but argue that, given the lifetime of the joint LAP from 2024 to 2030, there are adequate lands available under a combination of scenarios 1 and 4 to allow for planned growth during that period. Reiterates its position that the design of the MOOR section within Meath, its alignment and location should be decided only as part of the proposed integrated land use and transport strategy covering the entire JLAP area.
		Infrastructure Notes that Irish Water (IW) has identified significant constraints in the existing capacity of both the water and wastewater infrastructure serving the Key Town of Maynooth. Outlines that IW have already prepared proposals to improve the wastewater capacity of the existing Maynooth Wastewater Pumping Station (WWPS). States that the JLAP should prioritise (in conjunction with IW) the provision of water and wastewater services to serve zoned areas within the town's built-up area thus enabling compact growth.
		Response to Issues Raised Maynooth Outer Orbital Route (MOOR)

Sub.	Name	Summary of Submission
No.		Kildare and Meath County Councils note the concerns of KEAA in relation to the lodgment of the MOOR application in advance of an integrated land use and transportation study for Maynooth. Notwithstanding this, it is considered that the current road network in the Maynooth Environs requires significant upgrading to both safely accommodate current levels of traffic and cater for the projected increase in traffic volume given the quantum of development envisaged for this area. The MOOR project will be facilitated and supported through an objective in the JLAP and shall be developer driven.
		It is nonetheless the view of Kildare and Meath County Councils that the proposed MOOR would ensure the integration of land use and transport and contribute to the sustainable growth and development of Maynooth in a manner that supports a compact and accessible urban form. This is supported at a regional level within the RSES which has a specific objective (RPO 4.33): to 'support the continued development of Maynooth, coordinated with the delivery of strategic infrastructure including road linkages forming part of the Maynooth Outer Orbital Route in a manner which supports future development and population growth and builds on synergies with Maynooth University promoting a knowledge-based economy.
		The MOOR is supported in the Meath County Development Plan 2021-2027 in MAY OBJ 4: 'To support and facilitate in conjunction with Kildare County Council and private developers and landowners, the construction of the Maynooth Outer Orbital Route'. It is also supported in the Kildare County Development Plan 2023-2029 in TM O67 'Support and facilitate in conjunction with Meath County Council, private developers and landowners, the construction of the Maynooth Outer Orbital Route.'
		The above policy context underpins the requirement for Meath County Council and Kildare County Council to deliver on the policies and objectives set out in both the RSES and the respective County Development Plans. It is understood that the submission seeks that priority be given to a 'C' ring route circling Maynooth to the west from Straffan Road to the Moyglare Road and to the east from Straffan Road to the R148. It is considered that a 'C' ring would compromise the delivery of the zoned lands contained within Masterplan areas 16 and 17 located within the Meath Environs and would therefore undermine the ability of both Meath and Kildare to sufficiently comply with and/or deliver on the objectives contained within the RSES and CDPs. Maynooth is identified as a

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No.		Key Town in the RSES. These lands are contiguous to the current Maynooth 2013-2019 LAP boundary and hold potential to accommodate strategic employment and residential development. Critically, the development of these lands will also facilitate the delivery of the MOOR which is supported in the RSES and is a critical piece of infrastructure in the future growth and development of Maynooth.
		In this context and given the regional policy objectives which are reinforced in the Meath CDP (Objectives MAY OBJ 4 and MOV OBJ 54), it is considered the indicative route for the MOOR must remain. Planning applications have been lodged with both Meath and Kildare County Council for the delivery of the MOOR in its entirety and these are currently being considered by respective local authorities and are on requests for further information.
		Maynooth Environs It is envisaged that any development in the Maynooth Environs should integrate with the settlement of Maynooth in County Kildare. The vision for the Environs as set out in the Meath County Development Plan is that the area becomes a focal point for science and technology employment, with high quality knowledge-based jobs utilising the synergy with Maynooth University as a centre of excellence for research and innovation. The intention, as set out in the Meath CDP, is to create a unique employment hub centred on a high tech/bio tech campus within the lands, supported by a 'live-work-play' community with a mixture of residential, employment, community, open space and tourism zoning.
		Maynooth is located within the Dublin Metropolitan Area. It is identified in the RSES as a key town with the assets and capacity to grow in a sustainable manner while minimising impacts on the receiving environment. It is recognised in the RSES that Key Towns should act as economic drivers and provide for strategic employment locations to improve their economic base by increasing the ratio of jobs to workers. While the number of people at work within the town is relatively high, a significant number of residents commute to Dublin. The Maynooth Environs lands are contiguous to the current Maynooth 2013-2019 LAP boundary.
		Owing to its location within the Metropolitan Area and the need to frame a cohesive long-term plan with all the enabling infrastructure to release serviced lands, it is considered prudent to ensure there is sufficient land and

Sub.	Name	Summary of Submission
No.		choice of land identified with the JLAP plan area to cater for the projected population over the lifetime of both County Development Plans. It should also be noted that a Maynooth and Environs Area Based Transport Assessment (MEABTA) and a Settlement Capacity Audit (SCA) are being prepared as part of the preparation of the Joint Local Area Plan and both these studies will assess the infrastructure requirements for Maynooth in addition to the development capacity of all zoned lands.
41.	Ann Moran and the Moran Family	Submission on behalf of Ann Moran and the Moran family relates to lands comprising of 6.24 hectares abutting the eastern boundary of the Maynooth Business Campus (see map below). States that the lands which reside within Maynooth are located outside the town boundary. Requests that they be included in the new Plan for the purposes of providing commercial, technological and business uses. Contends that the lands are classified as agricultural but are no longer sustainable for that purpose. Submits that the lands form a natural extension to the boundary of the Maynooth Business Campus and would allow for expansion of existing business activities along the M4 Motorway which would be fully consistent with the Council's plan framework. Notes the area has adequate water/ wastewater services and outlines solutions for surface water management. States that access will be through the business park and notes its proximity to the train station (2 km) and the university (3 km). Response to Issues Raised The request for rezone the lands for purposes of providing commercial, technological and business uses is
		acknowledged. It should be noted that the location and quantum of employment lands to be zoned in the Draft Maynooth and Environs Joint Local Area Plan (JLAP) will be determined on an evidence-led basis having regard to the availability and capacity of the receiving environment with respect to both services and transport infrastructure. In this regard, several supporting studies, including an Area Based Transport Assessment, a Social

Sub.	Name	Summary of Submission
No.	ranic	Summary of Submission
		Infrastructure Audit and a Settlement Capacity Audit (i.e., Infrastructure Assessment) are being prepared to inform the preferred development strategy that will be contained in the Draft Maynooth and Environs JLAP. In conjunction with the various assessments outlined above, the zoning of employment lands must adhere to relevant national and regional spatial policy and Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000, as amended. This includes compliance with <i>Guiding Principles to Identify Locations for Strategic Environmental Development</i> (p.24 Regional Spatial and Economic Strategy) and the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012), given the subject site's proximity to Junction 7 of the M4 Motorway.
		Whilst it is noted that the subject site is currently outside the boundary of the Maynooth Local Area Plan 2013-2019 (as amended) and outside the defined settlement boundary of Maynooth (CSO 2016), the lands will be included in the Settlement Capacity Audit to determine their suitability for employment use in comparison to other potential lands within Maynooth and Environs.
42.	Pat and Michelle Farrell	This submission was subsequently withdrawn.
43.	St. Patrick's College Maynooth	This submission from John Spain Associates on behalf of St Patrick's College Maynooth (SPCM) relates to its response to the topics raised in the Pre-Draft Issues Paper with regard to its landholding in Maynooth (see map below showing extend of the lands under the ownership of SPCM). Submission refers to the planning policy context noting the provisions of the NPF and the RSES. Notes that Maynooth is a designated Metropolitan Town located on the North-West corridor of the Dublin Metropolitan Area (DMA). States that the RSES specifically identifies lands at 'the north and west of the town near Maynooth University' for significant residential development and identifies the important employment potential of the new research and technology park. Refers to the Regional Planning Objectives (RPO 4.33 – RPO 4.35) relating to the economic and spatial development of Maynooth. Notes the additional population allocation to the town of up to 10,000 persons up to 2031. Submits that Maynooth is targeted to grow by as much as 100% over the next decade, with most of this to occur to the west and north of the town. Requests that the provisions of the RSES be fully reflected in the Plan.

Sub.	Name	Summary of Submission
No.		Notes the Proposed Material Alterations of the Draft Kildare County Development Plan (CDP) relating to the inclusion of a 'park and ride' facility at the new train station to the west of the town and the reference to the opportunity presented by the DART+ projects. Notes that the Draft CDP supports the development of a second train station in Maynooth. Notes Objective TM O25 in the draft CDP relating to the Maynooth Outer Orbital Route (MOOR) and the Proposed Material Alterations in this regard. Requests the sections of the MOOR listed in the Table 5.4 Priority Projects of the draft CDP (including Proposed Material Alterations) be included as specific objectives to be included in the Plan. Welcomes the inclusion of both the MOOR and the proposed second train station.
		Refers to the topics raised in the Issues Paper including the need for an integrated planning and transport strategy to guide the development of the town. Agrees with this approach and supports compact growth occurring in a sequentially sustainable manner linked to sustainable mobility and the support of economic development. Notes the challenges outlined in the Issues Paper including the development of transport infrastructure and the delivery of taller buildings and increased densities. Notes the Issues Paper diagram illustrating an indicative development strategy for Maynooth and states its overall support for this strategy.
		Submission includes an indicative design scheme for how the lands under the ownership of SPCM can be developed in a coherent and sequential manner. Submits that its total landholding should be treated as being Tier 1 lands, and be appropriately zoned to reflect this status, as it is appropriately located in sequential terms to meet a significant element of Maynooth's housing needs over the plan period, along with supporting local services and facilities. Notes such development would be consistent with the provisions of the draft CDP, including Objective UD A2 relating to the development of a masterplan for the lands to the west of Maynooth. Outlines its willingness to work with the Council in the implementation of this objective. Requests that Collegelands North and Collegelands South, should each be identified as Key Development Areas in the Plan.
		Notes that significant parts of SCPM landholding are located within the built-up area of Maynooth as defined by the CSO and could make a significant contribution to assisting in the delivery of housing. Notes the potential to develop a more intensive Transit Orientated Development (TOD) concentrated around the proposed train

Sub. Name	Summary of Submission
No.	station. Requests greater flexibility in the mix of permitted uses within the community and education or similar zoning objective for the existing south campus, incorporating appropriate flexibility and with a range of permitted uses, including residential.
	Notes the importance of creating a network of active transport routes, focused on walking and cycling. Includes an illustration of proposed series of green routes (including along the Lyreen River), which it is contended would provide strong connections between the Collegelands and the town centre. Requests the inclusion of a 'park and ride' facility located at the proposed Maynooth West train station, and the re-alignment of the proposed MOOR to tie in with the bridge being proposed as part of the DART + West Railway Order application. Submission includes an illustration showing how a 'park and ride' facility and realigned MOOR could operate.
	Submits that lands to the west of the town can only be catered for by modest improvements in public transport services, and the development of various active travel routes over the life of the Plan. Accordingly, it is requested that an immediate priority for the Plan is the roll out of new active transport routes linking the key development areas with the town centre, as well as improvements to bus services within the town. States that climate action targets require a fresh approach to transport planning and therefore it is important that the Plan contains an integrated approach to placemaking that demonstrates how it can support the model of mixed-use, walkable 15-minute neighbourhoods. Submits therefore that the Plan should make direct reference to developing a coordinated vision for the new developing areas, including the subject lands, by helping to maximise active travel. Suggests that the Plan include a strategy for a longer 10-12-year planning horizon so that and that key development areas which likely to be developed over the short and medium term, can be identified in the Plan.

Sub.	Name	Summary of Submission
No.		Response to Issues Raised The contents of the submission are noted. It is the intention that the development strategy of the Plan will adhere to and reflect the provisions of the Regional Spatial and Economic Strategy regarding the development of Maynooth and Environs. The Joint Local Area Plan (JLAP) will seek to develop the town in a sustainable manner in keeping with the principles of compact growth and sequential development, maximising opportunities with regard to access and usage of high capacity and high frequency public transport services planned as part of the DART+ West and BusConnects projects. In relation to increased building height and densities, it should be noted that both Kildare and Meath County Councils' respective county development plans identify particular locations in the town as being suitable for increased building height and densities, including immediately outside the historic core and within lands to the west of Maynooth (adjacent to the future train station). It is the intention that these provisions will be incorporated into the JLAP and will be expanded on in further detail.
		Notwithstanding the inclusion of the subject lands in the indicative development strategy of the Pre-Draft Issues Paper as an 'identified location for future Economic and Residential Development', any changes to its zoning will be determined on an evidence-led basis having regard to the availability and capacity of the receiving environment with respect to both physical and social infrastructure. In this regard, several supporting studies, including an Area Based Transport Assessment, a Social Infrastructure Audit and a Settlement Capacity Audit (i.e. Infrastructure Assessment) are being prepared to inform the preferred development strategy that will be contained in the Draft Maynooth and Environs JLAP. Furthermore, on the issue of population targets, it should be noted, that if capacity/infrastructural constraints are identified in the town, which cannot be resolved over the life of the JLAP to 2030, then the figures for growth (particularly in relation to the NPO 68 allocation) will be reduced accordingly, to ensure the growth of the town does not exceed the capacity of both its servicing and social infrastructure. On the issue of a 'park and ride' facility for Maynooth, it is noted that Figure 9.1 of Greater Dublin Area Transport Strategy 2022-2042 provides for such a development to be located either at 'Collinstown OR Maynooth Depot'. Accordingly, the Plan will include provisions to support the potential development of a 'park and ride' facility at

Sub.	Name	Summary of Submission
No.		this general location. Given their support at regional policy level, the Plan will include specific objectives supporting the delivery of a second train station in Maynooth and the delivery of the Maynooth Outer Orbital Route (MOOR). Issues relating to the alignment of the MOOR and its interaction with access arrangements with the proposed the DART+ West Depot are outside the remit of the Plan. However, the Draft JLAP will seek to support the co-ordinated delivery of such critical transport infrastructure in the area, including DART+ West, the Maynooth West train station, the MOOR and upgrades to the M4.
		The request relating to designating the lands within SPCM as Tier 1 is noted. A key requirement of the JLAP is to ensure the zoning of an appropriate quantum of land for residential development, in keeping with the provisions of the respective core strategies of Kildare and Meath County Councils and the Regional Spatial and Economic Strategy (RSES). As noted above, the land use zoning proposals will be based on a data-driven approach having regard to a number of evidence-led supporting documents, including the preparation of a Settlement Capacity Audit (Infrastructure Assessment). This is a requirement of Appendix 3 of the NPF and with Section 4.5.2 of the Ministerial Guidelines for Development Plans (2022). Under the provisions of the NPF only land either serviced or serviceable during the life of the Plan can be zoned for such purposes. The requests of the designation of Key Development Areas on specific sites is noted. However, such designations will depend on the outputs of the supporting assessments and the overall direction of the development strategy.
		The potential of the lands surrounding a proposed second train station in Maynooth to be developed as a Transport-Oriented Development (TOD) is acknowledged. It should be noted however that the phasing of any future development around a second train station will be heavily dependent on the commencement of DART+ West services, along with the construction and operation of the new train station itself and supporting servicing infrastructure.
		Requests regarding greater flexibility in the mix of permitted uses for the existing south campus is noted. Such an issue will be considered in the preparation of the Plan having regard to the provisions of the Kildare County Development Plan 2023-2029 which provides for a range of uses to be created within St. Patrick's College campus. However, it is envisaged that the Plan will also ensure that any new development on the lands will have

Sub.	Name	Summary of Submission
No.		
		full regard to the historic nature and setting of the campus, including its partial inclusion within Maynooth Architectural Conservation Area (ACA).
		With regard to the issue of climate action, all aspects relating to the JLAP's development will need to be considered in light of the need to plan for a substantial reduction in greenhouse gas emissions and to promote low carbon development in the town. Accordingly, the Plan will seek to implement the principles of the 10-minute settlement within Maynooth so that key neighbourhood services are accessible within a 10-minute walk or cycle from peoples' homes. As part of the preparation of the JLAP a Maynooth and Environs Area Based Transport Assessment (MEABTA) is being undertaken. The outputs of the MEABTA will include both a walking strategy and a cycling strategy which will seek to create a comprehensive high-quality active movement (pedestrian and cycle) network in the town, in order to initiate a permanent shift away from private car use.
44.	Sherwood Homes	The submission from Brock McClure Planning and Development Consultants on behalf of Sherwood Homes Ltd.
	Ltd.	(SHL) relates to c. 38 ha (93 acres) of land at Newtown (see map below). The lands are zoned 'I: Agriculture' under the Maynooth LAP 2013-2019.
		Notes Roads Objective TRO2 contained in Maynooth LAP 2013-2019 traverses the site. This statutory objective seeks to provide a c. 1km stretch of the south-western section of the Maynooth Outer Orbital Route (MOOR). States this section of the MOOR is also included in the planned M4 Maynooth to Leixlip Project. Notes that due to the DART+ West project CIE proposes to permanently acquire 6.6 ha of the north and north-western portion of its lands. Further notes that the Issues Paper, indicatively shows a second train station for Maynooth located within SHL's lands. Accordingly, the submission asserts the strategic importance of the SHL lands with regard to the delivery of critical transport projects in the town as well as meeting housing and population targets.
		Submission refers to objective TRO 2 of the Maynooth Local Area Plan 2013-2019 regarding the development of the MOOR through the subject lands and states that its development will be a critical part of the Plan. Notes the impact of the DART+ West proposal on the subject lands but states its confidence that issues relating to layout can be overcome. States that their traffic consultants have identified a potentially more cost-effective layout for the MOOR, that takes advantage of the proposals within the DART+ West by incorporating the new roundabout

Sub.	Name	Summary of Submission
No.		
		proposed south of Jackson's Bridge which provides access to the DART depot. States that the section of the MOOR which is proposed to traverse SHL's lands can thereby connect to this diversion as opposed to a second new bridge east of Jackson's Bridge. Submission includes schematic drawings of this arrangement. Submits that a co-ordinated approach to the delivery of the MOOR and the Maynooth to Leixlip Project occur in tandem with DART+ West. Refers to SHL's discussions with CIE and reiterates their willingness to provide lands for a 'park and ride' facility. States the opportunity now exists to co-locate this facility with the second train station on SHD lands and commits to working with key stakeholders to delivery these transportation infrastructure projects.
		Submission refers to the challenge of delivering housing and employment growth over the life of the Plan, in the context of the envisaged population target for the town. In response to the question posed in the Issues Paper regarding the location of housing development in the town it is recommended that by virtue of their strategic location adjacent to the urban edge and the site of proposed transport projects the subject site be designated as a Key Development Area for housing, student accommodation and supporting neighbourhood services. Submission notes the potential for increased height and density on the lands for which there should be clear policy provisions in the Plan. Further recommends the inclusion of objectives and policies that supports the provision of housing and mixed-use schemes in areas that will promote sustainable modes of transport alongside planned new road and public transport infrastructure.
		The Draft Kildare County Development Plan includes the MOOR as a key priority and requests that this be a key priority of the Plan. Requests that the Council provide clarity on the intentions and routing of the MOOR given the DART+ West proposal and consider the alternatives presented. Recommends that policies and objectives on compact growth and sustainable movement be achieved through the promotion of compact growth, higher densities and height and co-location alongside new road and public transport infrastructure. Further recommends that the Plan include clear provision to support sustainable transport modes in the vicinity of any emerging proposed train station.

Sub.	Name	Summary of Submission
No.		To Provide the State of State
		Response to Issues Raised
		The contents of the submission are noted. All lands zoned in the Maynooth Local Area Plan 2013-2019 (as amended) and in the Maynooth Environs plan (Meath County Development Plan 2021-2027) will be reviewed as part of the preparation of the Joint Local Area Plan (JLAP). The review of zoned land will be underpinned by <i>inter alia</i> an infrastructure assessment for the town in accordance with Appendix 3 of the NPF and with <i>section 4.5.2 Settlement Capacity Audit</i> , of the Development Plan, Guidelines for Planning Authorities (2022). It should be noted that notwithstanding that the Regional Spatial and Economic Strategy (RSES) has identified lands to the southwest of the town for future residential development, any alterations to its zoning will be determined on an evidence-led basis having regard to the availability and capacity of the receiving environment with respect to both physical and social infrastructure. In this regard, several supporting studies, including an Area Based Transport Assessment, a Social Infrastructure Audit and a Settlement Capacity Audit (i.e., Infrastructure Assessment) are being prepared to inform the preferred development strategy that will be contained in the Draft Maynooth and Environs JLAP. Furthermore, issues relating to potential flood risk will be considered as part of a Strategic Flood Risk Assessment (SFRA) which will also inform all land use zoning proposals.
		The designation of a Key Development Area on the subject lands and adjacent areas will depend on the outputs of the supporting assessments. On the issue of high-density residential development, it is noted that in accordance with the Section 28 Ministerial Guidelines on Urban Development and Building Heights (2018), Table 14.4 of the Kildare County Development Plan 2023-2029 has identified sites located on key transport corridors in urban areas including 'lands west of Maynooth (adjacent to future train station)' as suitable for the purposes of
		supporting increased density and building heights of 6+ stories, subject to planning and design considerations. This provision will be incorporated into the Joint Local Area Plan (JLAP) and expanded on in further detail, subject

Sub.	Name	Summary of Submission
No.	reame	Summary of Submission
		to site specific considerations. It should be noted that in accordance with the provisions outlined in Chapter 15 of the Kildare County Development Plan, a 91-metre minimum setback line will be applied to all lands along the M4 Motorway, thereby having an impact on the development potential of the subject lands.
		The strategic nature of the site with regard to the potential delivery of future transport infrastructure is noted. Issues relating to the alignment of the MOOR and its interaction with access arrangements with the proposed the DART+ West Depot is outside the remit of the Plan. However, the Draft JLAP will seek to support the coordinated delivery of such critical transport infrastructure in the area, including DART+ West, the Maynooth West train station, the MOOR and upgrades to the M4. On the issue of a 'park and ride' facility for Maynooth, it is noted that Figure 9.1 of Greater Dublin Area Transport Strategy 2022-2042 provides for such a development to be located either at 'Collinstown OR Maynooth Depot'. Accordingly, the Plan will include provisions to support the potential development of a 'park and ride' facility at this general location.
45.	Department of Environment, Climate and Communications	Prescribed or public body. Please refer to Table 3 .
46.	Farrell and Montane Developments Ltd.	The submission from McGill Planning and Development Consultants on behalf of Farrell and Montane Developments Ltd. relates to 4.89 acres of land currently zoned C: New Residential which is located in the eastern part of the town, to the south of the existing cul de sac which extends from the Parklands estate. Notes that the site has approximately 88m of road frontage onto the cul de sac which has a right of way extending through Parklands Way. Refers to the contents of the Pre-Draft Issues Paper and notes that the proposed Maynooth Eastern Ring Road (MERR) transects the site in a north-south direction. States that the lands are 1km from the train station and there is a footpath on both sides of the Castlebridge Road through Parklands Close with public lighting to the cul de sac. Notes that the lands are ideally located proximate to the town centre and accessible to public transport. Outlines the regional and county planning policy context relating to Maynooth and its designation as a Metropolitan Key Town in the RSES and Metropolitan Area Strategic Plan (MASP).

Sub.	Name	Summary of Submission
No.		
		Requests the Plan incorporate the proposed Maynooth Eastern Relief Road (MERR) which received Part 8 planning permission in 2019. States that the maintenance of the residential zoning of these lands is important for the realisation of the proposed MERR and that their development which as an optimal location would be in accordance with the orderly development of the town. Submits that the delivery of high-density residential development on the subject site which would incorporate an upgrade of the existing cul-de-sac, is not dependent on the implementation of the MERR due to their proximity to the town centre and to public transport routes. Submission understands that the estate road in Parklands which accesses the cul-de-sac has been taken in charge.
		Submits that development of the subject site could be done on a phased basis and should not be delayed unreasonably pending the completion of the MEER. However, the submission asserts it must be acknowledged that the MERR is a critical piece of infrastructure for Maynooth and that its delivery should be appropriately funded through public funds and not reliant on private development. Requests that the Plan must provide some form of certainty and timeframe for delivery of such infrastructure. Submits that a Special Contribution Scheme should form part of the JLAP to ensure that sufficient funds are raised to facilitate the delivery of the MOOR and other critical infrastructure. States it would be reasonable that all new development within the Maynooth and surrounding area which would benefit from MERR should be required to contribute financially towards such infrastructure on a pro-rata basis.
		Submission attaches a letter from TPS M Moran and Associates traffic consultants which details the results of a preliminary traffic assessment for the site. This states that the subject site has the potential to be developed from the existing road network through the upgrading of the existing cul-de-sac which accesses the site, as per the principles set out in DMURS. The letter details the proximity of the site to the services of the town centre and to existing and planned public transport routes, and states that if developed it would increase sustainable transport modes in the area.

Sub.	Name	Commons of Colomicsion
No.	ivame	Summary of Submission
NO.		
		Response to Issues Raised The contents of the submission are noted. While it is noted the lands are currently zoned 'C: New Residential' and part of a Key Development Area (KDA) under the Maynooth Local Area Plan 2013-2019 (as amended), all lands currently zoned, including the subject site will be reviewed as part of the preparation of the new Plan. This is in accordance with Appendix 3 of the NPF, and with section 4.5.2 Settlement Capacity Audit of the Development Plan, Guidelines for Planning Authorities (2022). It should be noted that notwithstanding that the subject lands has being identified in the Regional Spatial and Economic Strategy (RSES) as a location for future residential development, any alterations to its zoning will be determined on an evidence-led basis having regard to the availability and capacity of the receiving environment with respect to both physical and social infrastructure. The Settlement Capacity Audit will play a critical role in determining the level of infrastructure required to service a development including issues relating to access. This will inform site-specific phasing and infrastructure delivery provisions to be contained in the Draft Joint Local Area Plan. Notwithstanding the outputs of the SCA, it should be noted that any planning application to develop the land (if zoned) would be considered on its merits and any upgrades to the existing access would be carried out by the developer following discussions with the Roads and Transportation Department. The consideration of a development contribution scheme to fund the construction of MERR is outside the remit of this Plan. Comments regarding the MOOR and funding mechanisms for delivery of same are noted.
47.	Electricity Supply	Prescribed or public body. Please refer to Table 3 .
	Board (ESB)	

Sub.	Name	Summary of Submission
No. 48.	Carton Demesne (Moygaddy Lands)	The submission by Muir Associates on behalf of Carton Demesne Development Limited (CDDL) refers to lands located along the western edge of the Carton Demesne. The lands which extend to 44 ha of which approximately 16 ha. is currently zoned for strategic employment. The land is bound to the northwest by the R157 Dunboyne Road, to the south by the Rye Water and to the southeast by Carton House (see map below).
		Wastewater Disposal
		Submission states that in order to accommodate the successful development of the zoned lands the capacity of the existing Maynooth Wastewater Pumping Station will need to be increased and that these upgrade works should be included as an objective within the Joint Local Area Plan. It is also stated that the existing water supply for the Moygaddy/Carton area should be increased.
		Broadband Suggested to include an objective to ensure that adequate broadband services will be provided as this will be a key requirement for the successful development of the zoned lands.
		Movement and Transport

Sub.	Name	Summary of Submission
No.		
		Suggested that all transport modes within the Maynooth Environs require upgrading to safely accommodate current levels of traffic and to facilitate the development of the zoned lands. Given the proximity of the zoned lands at Carton to Maynooth town centre it would be feasible to operate a shuttle bus service from Maynooth Train Station to the Moygaddy area. Suggests the Joint Local Area Plan should include an objective to provide the necessary infrastructure to facilitate the upgrading of the rail links to Maynooth. Submits that the Joint Local Area Plan should also include an objective on the provision of cycle infrastructure with any planned road upgrades to link with existing cycle networks. States that the Plan should also include a further objective on the provision of pedestrian routes with any planned road upgrades to link with the existing pedestrian networks.
		MOOR CDDL are fully supportive of the implementation of the Maynooth Outer Orbital Route based on the indicative alignment shown in the Meath County Development Plan 2021-2027 subject to the accommodation of adequate vehicular access to the zoned lands under their control.
		Permitted R157 realignment and Moygaddy Junction Upgrade Submission states that the permitted road scheme when implemented can provide access to the zoned lands in the control of CDDL via a connection to this roundabout and can accommodate the connection of the Maynooth Outer Orbital Route to the R157 Dunboyne Road (see map below). Submits that the implementation of the permitted R157 Realignment and Moygaddy Junction Upgrade scheme should be included as an objective.

Sub. No.	Name	Summary of Submission
		PREVIOUSLY PREMITTED R.137 SEALIGNMENT AND MOTIVACION SEALIGNMENT AND MOTIVACION (IREF. NO.7W) 2010.1
		Response to Issues Raised It is understood that the thrust of the submission seeks the inclusion of a specific objective and / or upgrades to servicing infrastructure including public transport, wastewater / water supply, broadband and transport infrastructure.
		The lands form part of the Carton Estate and are strategically located along the R157 road that runs along its western boundary. The lands are heavily wooded and contain a large open area just west of the Carton Hotel itself. The lands provide the potential for expansion and growth and shall be appropriately considered within the SCA and the wider context of the town.
		It is considered Carton House (a Protected Structure) and its demesne landscape constitute one of the most important elements of Ireland's architectural, cultural and historic heritage. The siting of appropriately scaled and designed development within the area of Carton Demesne must ensure that the character and integrity of this sensitive designed landscape and setting of Carton House within this landscape is respected and protected. There are two protected structures and one National Monument located within the plan area, namely Carton

Sub.	Name	Summary of Submission
No.		
		Demesne Wall, Moygaddy House and Tower House. Any development proposal must be sensitively designed to ensure the integrity of these structures.
		It should be noted that the lands will be included in the Settlement Capacity Audit to determine their suitability for employment use in comparison to other potential lands within Maynooth and Environs.
		Wastewater Disposal and Water Supply
		There are substantial capacity restrictions associated with the existing Maynooth Wastewater Pumping Station, the associated wastewater works and water upgrades that will be required to service these lands. Maynooth Environs lands situated within County Meath are currently not served by water or wastewater services. Lands associated with Maynooth Environs nonetheless can be serviced through developer driven infrastructure. Uisce Éireann has been in strategic discussions with developers in this area to deliver the required strategic water and wastewater infrastructure to serve these lands and the future growth of Maynooth. The required water and wastewater services will need to be installed as part of any planning applications granted for this area.
		Broadband
		The National Broadband Plan is the Government's plan to deliver high speed broadband services to all businesses, farms, and households in Ireland. It will ensure that people living and working in rural areas have the same digital opportunities as those in urban areas. Policies relating to the implementation of broadband at a county level are already present in the Meath County Development Plan 2021-2027. These policies relate to the lands referred to and states the following: 'INFO POL 51: To support the delivery and implementation of the National Broadband Plan' and 'INF POL 54: To facilitate the delivery of a high-capacity Information and Communications Technology (ICT) infrastructure and broadband network and digital broadcasting throughout the county.'
		Public Transport
		Observations in respect of public transport upgrades are acknowledged in respect of the Maynooth Environs. It is considered that the required objectives and / or policies for public transport provision will be further examined

Sub.	Name	Summary of Submission
No.		in the overall preparation of the Plan and will be informed by the Maynooth and Environs Area Based Transport Assessment (MEABTA).
		Maynooth Outer Orbital Route (MOOR) With respect to the proposal to access the lands via a roundabout, issues such as access to zoned lands will be assessed at a high level as part of the MEABTA and SCA.
49.	Randalswood Holdings Ltd.	The submission by Downey Chartered Town Planners on behalf of Randalswood Holdings Ltd. seeks to outline the importance of sustainable development in Maynooth and how increased height and density developments will support such development and will assist in providing student accommodation to the students of an expanding Maynooth University. The submission outlines the legislative basis under the Planning and Development Act 2000 for the making of a Local Area Plan and notes the contents of the Pre-Draft Issues Paper.
		Refers to national spatial planning policy as outlined in the National Planning Framework (NPF) including its emphasis on town and village renewal and compact growth and in particular notes National Policy Objectives (NPOs) relating to compact development, sustainable movement, the provision of new homes and increases in densities. Refers to the provisions of the RSES relating to Maynooth, noting its designation as a Metropolitan Key Town within the North-West Corridor of the Dublin Metropolitan Area. Notes Regional Policy Objective (RPO) 4.8 relating to the support of town centre and brownfield/infill development to achieve compact growth targets. Further notes RPOs relating to development of Maynooth along with the regeneration of its town centre.
		Refers to Section 4.7 of the Kildare County Development Plan (CDP) 2017-2023 which provides for specific housing needs for the county including the placing of particular emphasis on the delivery of student accommodation for MU. Notes the provisions of the draft Kildare CDP 2023-2029 relating to Maynooth include population targets for the town along with the contents of section 14.8.2. relating to the potential for taller buildings within Transit-Oriented Developments. Also notes draft CDP objectives relating to the support for the provision of student accommodation in Maynooth. States that given its strategic location and public transport links, an emphasis should be placed on increasing the height, density, and quantity of residential development in the town. Refers to the provisions of the Meath CDP relating to the Maynooth Environs and notes objective DM

Sub.	Name	Summary of Submission
No.		
		OBJ 25 to provide for increased building height within the environs and POL 12 which encourages apartment schemes within settlements including Maynooth. Submits that an increase in student accommodation is central to the growth prospects for Maynooth and as such this type of development should be delivered at increased height and densities in the town and environs.
		Notes the projected population growth for the town and submits that Maynooth has an average household size that is higher than the national average. Refers to statistics on the spatial distribution of single-person households in the town and notes that the stock of housing in Maynooth is largely comprised of family houses with four or more bedrooms. Submits that this reveals a gap in housing supply and demand in terms of housing typology, which will result in an increased potential for overcrowded accommodation in the coming years.
		Notes the sustained growth of Maynooth University over the last number of years and that this corresponds to a growth in student accommodation needs in the town. Outlines the provision of on-campus student accommodation and notes the limited amount of off-campus accommodation in Maynooth and the surrounding hinterland. Notes live and active planning applications for student accommodation in the town as of November 2022. Outlines the discrepancy between supply and demand for such accommodation given that 15,182 students were registered with the University in the 2021/2022 academic year. Notes the demand and dependence on public transport options for students attending Maynooth. Submits that specific sites for student accommodation within appropriate areas be explored and prioritised for student accommodation and requests that such sites be located proximate to the university to ensure the sustainable development of the area.
		Response to Issues Raised The comments on height and density in Maynooth and the policies of the respective county development plans, on this issue are noted. It is the intention of the local authorities to that these provisions will be incorporated into the Joint Local Area Plan (JLAP) and will be expanded on in further detail. Emphasis will be placed on increased densities and heights in certain specific locations within Maynooth including immediately outside the historic core and within lands to the west of Maynooth (adjacent to the future train station). It should be noted that, as outlined in the Guidelines on Building Heights (p.13), any planning application for taller buildings such an

Sub. No.	Name	Summary of Submission
IVO.		established urban setting will be required (inter alia) to 'successfully integrate into/enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views'.
		On the issue of the household occupancy size, it is noted that Maynooth has an average occupancy size of 2.98 which is higher than the recorded national average of 2.75 (Census 2016). This is due to the presence of third level institutions in the town and the fact that many students either share rented accommodation or are in digs arrangements with existing families in the town. The Kildare County Development Plan (CDP) 2023-2029 sets an average occupancy size target in the county at 2.75 over the life of the Plan. The Joint Local Area Plan (JLAP) will be required to comply with this target for lands in Maynooth located in County Kildare. A reduction in the unit occupancy rate towards an average of 2.75 is considered to be both an appropriate and realistic target for the town over the life of the Plan.
		The principle of active land management is considered to be a central component of the overall development strategy for Maynooth and Environs. The Plan will include a range of provisions to facilitate active land management, with particular emphasis on the delivery of residential development (including student accommodation) on appropriate lands and at sustainable densities within the town centre, and along existing and planned high-capacity public transport routes, in keeping with national and regional policy. It should be noted that Kildare County Council has a track record of supporting and facilitating the development of student accommodation, with over 1,100 student bed spaces currently having extant planning permission in the town. The Joint Local Area Plan will include specific provisions to support the development of student accommodation at appropriate locations (including within potential identified sites) in Maynooth, subject to planning and design considerations.
		The comments relating to population projections are noted. The delivery of residential development in Maynooth is considered to be a critical role of the Plan. It should be noted that the Plan is required to ensure the zoning of an adequate quantum of appropriately located serviced and serviceable land to provide for residential

Sub.	Name	Summary of Submission
No.		development, in keeping with the provisions of the respective core strategies of Kildare and Meath County Councils' County Development Plans and the Regional Spatial and Economic Strategy 2019–2031 (RSES).
50.	Maynooth University	The submission from Brock McClure Planning and Development Consultants on behalf of Maynooth University (MU) relates to the lands at the university in the context of the preparation of the Maynooth and Environs Joint Local Area Plan (JLAP). Submission notes that the university is unique, located in Ireland's only university town and ranked as one of the world's leading young universities and ranked #1 in Ireland in the latest Times Higher Education (THE) Best Young University Rankings in 2022. Also notes it provides education to over 15,000 students. Outlines the areas of focus for the university and states that research is very much central to its activities. Submission refers to MU's current Strategic Plan 2018-2022 and states that a new strategic plan is in preparation and will be published in 2023. Further states that the university would welcome the opportunity to share the objectives of the new Strategic Plan, so that they can align with the forthcoming JLAP.
		Zoning, Economic Development, Tourism and Retail Services States that under the current Maynooth Local Area Plan 2013-2019, the university lands are zoned 'E: Community and Educational' and that lands bounding the MU to the West are zoned 'P: Research and Technology'. Welcomes the opportunity to promote and build upon research, educational and technological activities in the university leading to potential synergies to large new and established employers. Outlines support for the economic development in the form of Research and Technology to the west of the university campus. Further supports the expansion and growth of the town but states it is critical that areas of the town with a sensitive heritage context are recognised and protected in the Plan.
		Poses the question of how to best take advantage of the presence of Maynooth University and recommends that the Council retains the current 'E' zoning for the University's Strategic Plan and planned future expansion. Also welcomes efforts to promote growth of the University, particularly acknowledging the importance of sports facilities to the institution and town as a whole. The submission requests that the Plan recognise the ambition of MU to create a landmark sports campus which would promote partnerships with sport's governing bodies and the local community. Also encourages the Council to incorporate objectives RE 017, RE 60, RE 061, SC 073 and LR 075 of the Draft Kildare CDP into the new Plan.

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		Home and Communities Notes the challenge of accommodating substantial residential and employment growth over the life of the Plan to 2030. Refers to the additional allocation as part of the Metropolitan Area Strategic Plan (MASP) for up-to 10,000 persons and states that it is imperative that the Plan recognises that in Maynooth, housing demand features a significant cohort of both students and staff of the University. Submits that the Issues Paper failed to mention the critical need for student housing for the large student body present in the town and that student sector should be formally supported in the Plan, as has been recognised in the draft Kildare County Development Plan (CDP). Notes that the university intends to provide over 800 student housing bedspaces on campus lands. States that MU is particularly keen to support student housing within Maynooth. Further notes that student numbers are projected to growth to 22,000 over the life of the Plan. Recommends the inclusion of objectives and policies in the Plan (such as objectives HO O36 and HO O37 of the Draft Kildare CDP) that supports the provision of high-quality, professionally managed, purpose-built student accommodation on campus which has access to quality public transport corridors and active travel routes.
		Movement and Transport Notes Maynooth's efforts to improve the modal share for sustainable transport modes for trips. Includes a table based on survey data carried out by the National Transport Authority showing an increase in the modal shift of trips to/from the MU by sustainable means as a result of tangible efforts made by the university. Submits that such efforts should be explicitly supported by mobility measures within the new Plan. Submits its commitment to being as environmentally conscious and welcomes that the Plan will include emphasis on low carbon development, climate resilience, compact growth, sustainable movement and green infrastructure. States that MU has a policy of prioritising sustainable transport modes, in particular encouraging pedestrian and cyclist movement on campus over vehicular movement and would like to seek support and a
		partnership with the Council in the implementation of 'last kilometre' mobility measures in the town. Furthermore, it requests the measures be included in the Plan to improve the accessibility and safety of the Royal Canal footbridge, which is an important piece of pedestrian infrastructure currently in a poor state of

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		disrepair. Submission also recommends that the Plan should contain policy provisions that aim to support sustainable transport modes and prioritise traffic alleviation transportation projects. States that infrastructure that should be prioritised in the Plan should include the Maynooth Outer Orbital Route (MOOR), DART+ West and Kilcock Road improvements.
		States that the upgrade of the access to the M4 Motorway and the provision of an additional access may also be necessary and considers that there is an opportunity to better link the various pieces of new infrastructure by way of a new motorway access serving the new DART+ Station with access straight onto the MOOR. Submits that this approach would reduce the extent of MOOR to be constructed and further ensure traffic is directed away from town centre. States that pedestrian and cycling facilities should be developed particularly in linking new development areas to the town centre and the university.
		Welcomes the DART+ West proposal. Notes that while Maynooth is considered a commuter town there are also a significant number of persons commuting to Maynooth from the Dublin direction and states that pedestrian connections to and from the train station are important for the university. Asks how the Plan can maximise opportunities arising from major public transport investment projects such as DART+ West and recommends that there are opportunities to enhance the sustainable travel connections to/from the train station to the university and the town at large. Notes the recent works to the university's 'super crossing' on the Kilcock Road have greatly enhanced permeability for students between the North and South Campuses. States that the university is supportive of future proposals to improve the Kilcock Road in terms of connectivity and safety and looks for these measures to be incorporated into the Plan.
		Response to Issues Raised The comments regarding the zoning of the land both the university lands and the lands adjacent to the west of Maynooth University in the Maynooth Local Area Plan 2013-2019 are noted. All zoned lands in Maynooth and Environs will be reviewed as part of the preparation of the Joint Local Area (JLAP). Accordingly, the subject site will be included as part of the wider zoning review. It should be noted that notwithstanding the opportunities identified in the Regional Spatial and Economic Strategy (RSES) on lands to the west of the university for 'the

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No.		development of a research and technology campus', their proposed zoning designation in the Draft Plan will be determined on an evidence-led basis having regard to the availability and capacity of the receiving environment with respect to both physical and social infrastructure. In this regard, several supporting studies, including an Area Based Transport Assessment, a Social Infrastructure Audit and a Settlement Capacity Audit (i.e. Infrastructure Assessment) are being prepared to inform the preferred development strategy that will be contained in the Draft Maynooth and Environs JLAP.
		In keeping with the provisions of regional and county policy regarding economic development, it is envisaged that the economic development strategy of the Plan will seek to target knowledge-based employment by capitalising on the presence of several enterprise development and innovation assets which are located in the town, the most notable of which is Maynooth University. Accordingly, the Plan will acknowledge the vital role that Maynooth University has in promoting enterprise and advancing the knowledge economy, and will proactively support its strategic long-term expansion, in addition to supporting the development of its ongoing activities in the areas of research and development, the development of spin-off businesses, enterprise incubation and increased levels of collaboration with industry.
		The projected growth in the university's student population to 2030 and the corresponding increase in demand for student accommodation is acknowledged. Accordingly, the Plan will seek to complement the existing policy measures outlined in the respective county development plans by incorporating a range of provisions to facilitate active land management, with particular emphasis on the delivery of residential development and purpose built student accommodation on appropriate lands and at sustainable densities within the town centre, and along existing and planned high-capacity public transport routes, in keeping with national and regional policy. The Plan will also include specific provisions to support the development of student accommodation at appropriate locations (including within potential identified sites) in Maynooth, subject to planning and design considerations.
		The intention of MU to create a landmark sports campus which would promote partnerships with sport's governing bodies and the local community is noted. The Kildare County Development Plan 2023–2029 has

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No.		included a specific objective in Chapter 10 'to proactively seek suitable sites within the Key Towns of Naas and Maynooth for the provision of Municipal Sporting Facilities where shared amenities are provided for sports clubs and the general public.' It is envisaged that the Plan will seek to advance this objective through the identification of a suitable location within the town for such a facility to be developed, potentially in collaboration with third level institutions in the town. Furthermore, it should be noted that any identified or designated location for such a facility must be in keeping with the 10-minute settlement principle and therefore easily accessible for the majority of the residents of the town. As outlined above, the JLAP will be accompanied by a Social Infrastructure Audit which will determine the needs of the residential population of the town with regard to the provision of recreational and amenities infrastructure.
		The work by the university over the past number of years to promote a shift toward sustainable movement patterns to and from its campus is acknowledged by Kildare and Meath County Councils. The Plan will include an objective which supports the continuance of such efforts in a spirit of close co-operation and partnership with both local authorities. With regard to the issue of climate action, the Plan will seek to implement the principles of the 10-minute settlement within Maynooth to promote a culture of active movement between key destinations within the town. As part of the preparation of the JLAP a Maynooth and Environs Area Based Transport Assessment (MEABTA) is being progressed. The outputs of the MEABTA will include both a walking strategy and a cycling strategy which will seek to create a comprehensive high-quality active movement (pedestrian and cycle) network in the town. As part of the second round of the public consultation for the MEABTA (advertised as the Draft Transport Strategy for Maynooth and Environs) a proposal envisages a new 'active mode' bridge being constructed at the Royal Canal Harbour which will be accessible for cycling as well as walking and thereby improve links between the train station and the university. The Plan will include a comprehensive range of sustainable movement provisions, including pedestrian and cyclist measures along the Kilcock Road, as well as supporting DART+ West and the phased delivery of the Maynooth Outer Orbital Route (MOOR).
		The MOOR is a developer driven road project and shall be planned, developed and completed in parallel with appropriate development. Recent planning applications submitted to respective Kildare and Meath County

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		Councils include all relevant parts of the proposed MOOR. All planning applications are currently out on requests
		for further information that will further clarify and coordinate the development of the MOOR.
		Issues relating to the alignment of the MOOR and its interaction with access arrangements with any proposed
		new/replacement junction of the M4 are outside the remit of the Plan. However, the Draft JLAP will seek to
		support the co-ordinated delivery of such critical transport infrastructure in the area, including DART+ West, the
54	Andre Dürterle	Maynooth West train station, the MOOR and upgrades to the M4.
51.	Andre Düsterhus	Network for Pedestrians and Cyclists
		Submission notes Maynooth's serious traffic congestion which is linked to the 'school run' and traffic generated
		by Maynooth University (MU). Notes that pedestrian/cyclist links are unsafe due to limited width and
		uncoordinated connections, particularly to the school campus. Submits that alternatives to cars need to be viable and include safe non-car corridors. Submission goes on to detail opportunities for such routes in the town which
		it is submitted are for the most part not new but were not implemented as they were partly not seen in the
		overall context. Submission includes a series of detailed maps which illustrate 'red' (existing and planned)
		pedestrian/cycle connections along main roads and 'blue' connections which depict potential secondary
		pedestrian/cycle connections, which it is submitted, if designed to be wide enough (a minimum of 2.5 metre per
		direction or 4 for bi-directional), would offer a safe alternative. Submission looks that such links for specific areas
		in the town including the northeast adjacent to the Maynooth Education Campus. Makes a detailed estimate on
		likely car trips generated and states that an alternative cycling route is required. Outlines a new alternative
		pedestrian/cycling route through Mariavilla, crossing the crossing over Lyreen Avenue bridge and up to Moyglare
		Hall. States that further access to the town centre can be given through the suggested Pound Park Bridge. Also
		submits that leisure path along the Lyreen and Rye which would connect with the ring road in County Meath and
		should also be part of the Plan. States that the centre of Maynooth, due to congestion and narrow paths is not
		capable of catering for the amount of pedestrian/cyclist and car traffic expected. Notes that Mill Street is a major
		bottleneck which will not be solved by planned upgrades. Submits that additional paths e.g., behind Manor Mills
		towards Kilcock Road or through the South Campus should be discussed. States it is necessary to have an
		alternative pedestrian/cycle route from Main Street and that some relief could also be achieved by the
		connection to the Pound Park Bridge.

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		Outlines issues on Parson Street relating to pedestrians and states the proposed development at the Canal Harbour (Plan Ref. 21/370) will increase the pressure. However, notes that it provides an opportunity for an eastern town centre crossing from the canal connecting through the new development and towards the University (via a new entrance). Notes opportunities for a connection for students to the train station, also offers relief towards Mill Street. Outlines pedestrian/cycle issues on Straffan Road, suggests several solutions including signage showing cyclists the link through the Harbour Park to Leinster Street which should have a 10 km/h reduced speed limit. Submits that cycle traffic on Court House Square need to be taken into consideration. Notes that the Part 8 Planning Application for the Maynooth Eastern Ring Road (MERR) and the amendment to the Local Area Plan in 2018 included a connection between Straffan Road through the Parklands estate towards
		the Ring Road but was omitted. Strongly recommends that this connection be reconsidered for both safety/social reasons and its omission contradicts national guidelines on permeability. Submits that further progress could be made along the R157 towards Dunboyne regarding the development of a pedestrian/cycle link and frequent public transport connections.
		Requests that, the long-term development of the town should prioritise keeping cars away from the Main Street as much as possible and therefore a 'park and ride' facility outside the town should be considered at the location where the western ring road meets the Kilcock Road. States this facility could be expanded in future and align with Bus line 115 and the Royal Canal Greenway. Notes that pedestrian/cycle facilities on the Kilcock Road would also need to be upgraded.
		A New Public Park Notes that the two key open spaces St. Patricks College and the Carton Demesne are in private ownership and that the growing town needs to guarantee its accessibility to green space. Notes the redevelopment of the Harbour Park but submits the need for further facilities such as a new public park on the outskirts of the town, assigning space along the Lyreen and Rye Rivers to the future ring road and School Campus or options along the eastern or north-western portions of the ring road.

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		Response to Issues Raised The contents of the submission regarding suggested interventions to enhance the cycling and pedestrian network in Maynooth are noted. As part of the development of the Joint Local Area Plan (JLAP) a Maynooth and Environs Area Based Transport Assessment (MEABTA) is being undertaken. A critical part of this work is to identify current deficiencies in the pedestrian and cycling network in Maynooth, including permeability links and cycle lanes. The outputs of the MEABTA will include both a walking strategy and a cycling strategy which will seek to create a comprehensive high-quality active movement (pedestrian and cycle) network in the town, in order to initiate a permanent shift away from private car use. It should be noted that as part of the second round of the public consultation for the MEABTA (advertised as the Draft Transport Strategy for Maynooth and Environs) a wide-ranging series of upgrades and interventions (including several suggested in the submission) are being proposed for the town and environs. It is anticipated that subject to further consideration and the feedback of this consultation exercise, these proposals will be incorporated into the JLAP. Regarding the issue of traffic management on Main Street, the MEABTA second round of public consultation proposes an option of Main Street being open to public transport, pedestrians and cyclist only, with private vehicular traffic being prohibited. It is noted however that this will depend on all sections of the MOOR being developed in order to provide alternative routes for vehicular traffic to access destinations in and around the town.
		The request for new public open space is noted. It is acknowledged that Maynooth currently has limited areas of dedicated recreational space in public ownership. The Plan will seek to identify potential new locations for such recreational space within Maynooth and Environs, subject to the results of the Social Infrastructure Audit (SIA). This will determine both the quantum and the type of public open space that will be required over the life of the Plan.
52.	Sky Castle Ltd.	This submission by MKO Planning and Environmental on behalf of Sky Castle Ltd. (SCL) and relates to a landbank in Moygaddy, County Meath. Submission relates to the following strategic issues: 1. Homes and Communities 2. Economic Development, tourism and Retail Services 3. Climate Action

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		4. Movement and Transport5. Green Infrastructure and Biodiversity6. Infrastructure
		Submission states that Maynooth is a Key Town and should improve its economic base by increasing the ratio of jobs to workers. Contends that the development of Maynooth Environs by SCL will be a natural expansion to the town and provide significant employment generation and a self-sustaining 'live work' community. States that a masterplan drafted by SCL includes proposals for the delivery of a mid-density (45 units/ha) residential development which will be phased over 2-3 years within a mixed-use community and will include; a public park, cycleway, greenway and blueway path network and scout den; a childcare facility to accommodate 96 no. children; the construction of a new elective public hospital on site that has a dedicated zoning for this purpose.
		States that Moygaddy masterplan proposal provides for the creation of a strategic Employment Zone that can accommodate inward investment from multinational employers with the aim of promoting high quality jobs, which will be delivered in conjunction with the enhancement of strategic transport linkages. Further states that the masterplan proposal provides that all the developments envisaged will be designed and constructed in accordance with the key principals of sustainable construction, to include sustainable design, durability, energy efficiency, waste reduction, air quality, water conservation and the use of sustainable building material. Contents that all of the proposed developments have been designed to provide for an integrated sustainable drainage system (SuDS), which will help reduce and mitigate flood and pollution risk in the receiving watercourse i.e. the river Ryewater and Blackhall Little stream, maximises green infrastructure and provide biodiversity amenity values across the entire landholding area.
		Submission notes the long-standing statutory planning policy support for the Maynooth Outer Orbital Route (MOOR) and the development of its adjacent lands. States that the Moygaddy Masterplan proposal will facilitate the delivery of the new strategic infrastructure required to enable Maynooth town to grow. The Masterplan proposals envisage an integrated "live work" community which will create a sustainable environment that will reduce the need to travel.

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		Submission notes that Moygaddy lands are bisected by several important green and blue corridors by the Blackhall Little and Rye River, which are natural assets that include valuable biodiversity that will be protected, managed, and integrated within the Masterplan development. Notes that extensive discussions with Irish Water have taken place in relation to the delivery of the new strategic watermain and wastewater infrastructure that is required to serve the Moygaddy lands. States that the proposed masterplan development at Moygaddy intends to provide a centralised strategic wastewater pumping station (WWPS), which would allow for the wider Maynooth Environs area to be served by an independent public wastewater network that in turn, would discharge to the existing municipal WWPS in Maynooth. Submission also identifies a need for enhanced access to public healthcare facilities.
		 Included are a number of attachments as follows: Enclosure 1 Sky Castle Ltd Landownership Map Enclosure 2 Proposed Moygaddy Masterplan Enclosure 3 Civil Engineering Utility Infrastructure Services Briefing Note Enclosure 4 Movement Strategy Briefing Note Enclosure 5 Maynooth Transportation Strategy Submission Enclosure 6 Concept Brief – Maynooth Innovation Campus Enclosure 7 Submission to Slainte Care – Acute Public Hospital Facility
		Response to Issues Raised The contents and justification of this submission are noted and both Kildare and Meath County Councils acknowledge that there are a number of planning applications, including an SHD application currently under consideration at the time of writing. The various residential, community, economic and infrastructural components proposed for Maynooth Environs within these applications are noted, including the facilitation of the Maynooth/Leixlip high pressure sewer line proposed by Irish Water and the extensive studies of Maynooth that have been carried out. The concept of the live – work community is also acknowledged for the northern

Sub.	Name	Summary of Submission
No.		environs of Maynooth however it is important that identified strategic infrastructure is delivered in tandem with development of any type. It is noted that all land use zoning designations and phasing will be reviewed as part of the preparation of the Joint Local Area Plan (JLAP). In this regard, several supporting studies, including an Area Based Transport Assessment, a Social Infrastructure Audit and a Settlement Capacity Audit (i.e. Infrastructure Assessment) are being prepared to inform the Plan.
53.	Brian McArdle	Submission states that the Royal Canal Greenway is an extremely useful transport corridor and will be even better when it connects with Leixlip. Submits that as part of this upgrade, there should be access to Carton Retail Park where a small cut-through with zebra crossing could be developed at the side of Sports Direct. States that this would be ideal and give climate-friendly active travel users access to the area and an alternative to the frequently congested Dublin Road. States that a car-free day once a month would be an ideal way to showcase the possibilities of Maynooth and the Main Street if a ring-road was built and through traffic removed from the town. Refers to a pedestrian crossing recently installed which should revert to a zebra crossing. States that they can see no advantage to the traffic lights here, other than delaying pedestrians' journeys. Supports the inclusion of an objective to significantly reduce the amount of traffic in Maynooth Town Centre. Requests that plans are made for a one-way system and car-free days with the aim of ultimately achieving a traffic free square kilometre at the town centre.
		Response to Issues Raised The potential of the Royal Canal Greenway to act as a key sustainable movement connector linking key destinations in Maynooth and beyond is recognised and will be supported in the Plan. As part of the development of the Joint Local Area Plan (JLAP) a Maynooth and Environs Area Based Transport Assessment (MEABTA) is being undertaken. The outputs of the MEABTA will include both a walking strategy and a cycling strategy which will seek to create a comprehensive high-quality active movement (pedestrian and cycle) network in the town, in order to initiate a permanent shift away from private car use and to promote a low carbon town. It should be noted that as part of the second round of the public consultation for the MEABTA (advertised as the

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		Draft Transport Strategy for Maynooth and Environs) a series of permeability connections and upgrades are proposed along the Royal Canal Greenway, including at Carton Retail Park.
		It is noted that the respective county development plans of Kildare and Meath support the development of the Maynooth Outer Orbital Route (MOOR). Accordingly, its delivery will be supported by an objective of the Plan.
		The MEABTA will also make proposals in relation to traffic management in the town centre which may include a one-way system. Whilst the implementation of a car free day is considered an operational (traffic management) issue not within the remit of the Plan, it should be noted that given the lack of alternative routes through and around Maynooth, it may not be feasible to hold a car free day on Main Street in the short term. However, a key element of the MEABTA is to reduce congestion in the town centre, particularly on Main Street. The second round of public consultation for the MEABTA proposes an option of Main Street being open to public transport, pedestrians and cyclist only with private vehicular traffic being prohibited. It is noted however that this will depend on all sections of the MOOR being developed in order to provide alternative routes for vehicular traffic to access destinations in and around the town.
		Specific issues regarding zebra crossings, traffic lights and footpath widths are considered to be operational matters and therefore outside the remit of this land use plan.
54.	Maynooth Community Council	The submission notes that Maynooth Community Council (MCC) represents residents' associations and voluntary groups and is a significant stakeholder group in the town. Notes that in response to the Issues Paper MCC organised a well-attended public meeting. States that the issues outlined below provide an overview of the issues raise at this meeting and other MCC meetings. Submission notes the historical and political context in which Maynooth has developed over the past several hundred years. Also notes that residents are very aware of its historic significance through the enjoyment of its outdoor spaces and significant built/natural heritage. States that these amenities proved to be an invaluable asset during the pandemic and emphasise the importance of liveability. Notes that being in the unique position as Ireland's only twin university town has led to challenges in the provision of accommodation and significant commuter congestion. Contends this has changed the ambience of the town which has become dominated by cars.

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		Refers to the provisions of the RSES in relation to Maynooth including its designation as a Key Town and the potential additional allocation of up-to 10,000 persons. States that in juxtaposition to this, Maynooth has been designated as a decarbonisation town which will require a major reduction in carbon emissions. Notes the multiple crises including climate change, biodiversity loss and housing and states that delivering solutions will be a challenge and require a coordinated response from stakeholders. Outlines the opportunity, over the life of the plan, to build on Maynooth's foundation as a strategic leader and develop into an exemplar of a sustainable development whilst also protecting its important architectural heritage. Notes that this will require innovation, bold new moves, major funding, collaboration and speed.
		Population Increase - Homes and Communities
		States that the current infrastructure provision cannot support the present population. Outlines issues relating to traffic gridlock and lack of community facilities. States feeling that they are underfunded by the council and outlines need for a range of community infrastructure. Requests more visible incentives with regards to active travel. Submits that the proposed additional population of up to 10,000 persons cannot in any way be considered 'sustainable development'. Outlines problems and some proposed solutions relating to specific pieces of community infrastructure as follows: • Community Creche: Notes major issues in the town relating to childcare provision. States that the idea was
		raised at the Town Centre Renewal Project in June 2018 to house a new community creche facility in the new community centre on the centrally located site where the current fire station is located at the Harbour Field. • Performing Arts Centre: Outlines the range of preforming groups in the town and states that need a suitable location to give performances in the town, perhaps a hall included with the new community centre. Notes that the assembly hall in the former Maynooth Post Primary school was built through fund-raising by the community of Maynooth and that it is the property of the community. States that facility could also make an excellent venue for performing arts.
		 Lack of GPs: Outlines concerns relating to the lack of GPs in the town. Primary Care Centre: States Maynooth needs a full-scale Primary Care Centre.

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140.		Swimming Pool: Notes the provision of a swimming pool in Maynooth has long been an objective of the community.
		 Step-down housing: Notes the need for housing options for older people that would also free up family homes. Young People: Outlines need for facilities such as youth clubs, hang-out areas and skateparks.
		With regard to the proposed development at Moygaddy, the submission states that the meeting voiced extremely strong objections to this as it would further exacerbate the lack of social infrastructure and increase the traffic overload on the Moyglare and Dunboyne roads. On the issue of building height, the submission notes there was consensus at the MCC meeting that building up is preferable to building out and that the conclusion was that 5-6 stories is acceptable.
		Economic Development, Tourism and Retail Services Notes the huge potential to develop the tourism sector further including Maynooth Castle which, would act as a centre destination point / cultural hub for the town. States that it should be more accessible year-round and the OPW do more to promote it. Submits that the greenway has been a huge success and seeks further enhancement including the development of a Tourist Information Centre. Sees an opportunity to develop canal tourism, where for example, the now vacant farmyard area behind St. Patricks College would be an ideal location for cycle-related services. Notes that the Tidy Towns have prepared a historical walking trail and perhaps tours could be established based on it including more connection with Maynooth University/St. Patrick's college. States that Maynooth is a Purple Flag town and is a very popular culinary destination which could be further promoted. Notes some feel that there are enough fast-food outlets.
		Climate Action, Green Infrastructure and Biodiversity States that Maynooth is ideally laid out for a potential 15-minute town. Complements the recent Meadowbrook cycleway and other active travel initiatives in the town. Refers to a black spot around the Rathcoffey Road area and outlines the need for enhanced and off-road cycling facilities in this area linking the Maynooth Education Campus, the canal and the Maynooth University campus. Contends the ring road is critical to further encourage cycling and seeks an increase in cycling infrastructure including bike racks and bike rental scheme. Also seeks for

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No.		overarching improvements to the cycling and pedestrian network including segregated cycleways and walkways. Welcomes the proposed 'park and ride' facility at the college and proposes further enhancements to help move people out of their cars. States the need for a large-scale initiative with the college on this. Suggests further ideas including the initiatives for green vehicles for shopping delivery, more EV charging points including fast charge points near the M4. Requests additional normal chargers in town, increased public transport to neighbouring towns, better permeability (including access to the greenway) and more pedestrian crossings over the railway and canal, a car free day in the town centre and further improvements to the KCC mowing policy.
		Movement and Transport Contends that the delivery of the entire ring road must be in place before considering an increase in population. Refers to transport issues in the west side of the town and states the need for "joined-up thinking" relating to the co-ordinated delivery of the planned road and rail transport projects. States that the recent M4 proposal which would involve a replacement junction built further west does not take account of the unique traffic patterns in the town where the concentration of schools on the Moyglare road must compete with traffic going to the university. Submits that creating a second motorway exit further west towards Jackson's Bridge would separate university and schools' traffic, whilst also serving the DART+ depot, reducing the need for a second bridge to the depot and allowing resources to be focussed on the western ring road. Notes the improvements to public transport in Maynooth including the DART+ but would like to see it extended to Kilcock. Outlines concerns that the BusConnects services only serve the east side of the town. Notes that there were buses serving the west and that the north of the town also needs a bus service. States that the next step is to provide a network of feeder services to the train station and main BusConnects arteries.
		Community Services and Facilities Notes the current sports facilities in the town are carefully shared among the various schools and sports groups. However, states that it is still necessary to use facilities in neighbouring towns for training. Submits that Maynooth needs to have its own facilities centre like Leixlip Amenities. Notes that the town needs not just playing fields but a running track, swimming pool and suitable halls for indoor activities and states that this should be delivered separately or co-located with a community centre.

Sub.	Name	Summary of Submission
		Response to Issues Raised Population Increase - Homes and Communities A key requirement of the Joint Local Area Plan (JLAP) is to ensure the zoning of an adequate quantum of land for residential development, in keeping with the provisions of the respective core strategies of Kildare and Meath County Councils and the Regional Spatial and Economic Strategy (RSES). However, as required by Appendix 3 of the NPF and with section 4.5.2 Settlement Capacity Audit, of the Development Plan, Guidelines for Planning Authorities (2022), only land either serviced or serviceable during the life of the Plan can be zoned for such purposes. Furthermore, the preparation of the JLAP will be based on several other supporting studies including (inter alia) an Area Based Transport Assessment and a Social Infrastructure Audit which will inform all zoning decisions. These supporting documents will also be critical in providing safeguards which will be incorporated into an overall infrastructure delivery schedule in the Plan. This will ensure that where lands are identified as being suitable for residential purposes, their development will be dependent on the delivery of identified key servicing and community infrastructure either prior to or in tandem with development.
		The current deficit in the provision of community infrastructure in Maynooth is acknowledged. The JLAP will be accompanied by a Social Infrastructure Audit (SIA) which will examine the current context with respect to social infrastructure provision in Maynooth whilst also identifying the future requirements of the town, including the making of recommendations on priority areas for investment within the Plan area. On the basis of the SIA, and as part of the preparation of the Plan, measures to support the provision of such facilities as a swimming pool, community creche, preforming arts venue, youth amenity areas and a primary care centre in the town will be examined. It should be noted that while the SIA will assess the overall number of GPs practicing in the town, it is outside the remit of the JLAP to provide for specific provisions with regards to health services. The concerns outlined relating to development in the Maynooth Environs (Moygaddy) are acknowledged. All zoned land, including the Maynooth Environs, will be reviewed as part of the preparation of the JLAP. However, it should be noted that there several live planning applications which are currently being considered by the

Sub. No.	Name	Summary of Submission
NO.		planning authorities for the Maynooth Environs which forms part of a process which is separate to the making of the Plan.
		With regard to the comments on height and density, the Plan must comply with the provisions set out in the relevant Section 28 Ministerial Guidelines on these issues. In this regard, it is noted Table 14.4 of the Kildare County Development Plan 2023-2029 has identified a number of locations in Maynooth which could support increased density and building heights of 6+ stories, subject to planning and design considerations. Furthermore, Objective DM OBJ 25 of the Meath County Development Plan 2021 –2023 has identified the Maynooth Environs as a location that can support increased building height. These provisions are required to be incorporated into the Joint Local Area Plan (JLAP) and will be expanded on in further detail.
		Economic Development, Tourism and Retail Services The economic development strategy of the Plan will include provisions to support the continued operation and appropriate development of Maynooth Castle, as a key tourist attraction. An objective to support the provision of a tourist information centre will also be examined as part of the preparation of the Plan. Provisions to support the development of Maynooth as a key greenway destination town and an 'activity hub' for water-based sports and associated recreational activities, including marked heritage/tourist trails, will be included in the JLAP. The Plan will support Maynooth in retaining a 'Purple Flag' status as a high-quality evening and night-time destination.
		Climate Action, Green Infrastructure and Biodiversity The Draft JLAP will include a specific objective in relation to supporting the development in Maynooth at appropriate locations, in keeping with the principles of the 10-minute settlement as embedded in the Kildare County Development Plan 2023-2029. On the issue of cycling and pedestrian infrastructure provision, it should be noted that a Maynooth and Environs Area Based Transport Assessment (MEABTA) is being undertaken to support and inform the transport provisions of the Plan. A critical element of the MEABTA is to identify current deficiencies in the pedestrian and cycling network in Maynooth, including cycle lanes footpaths, associated infrastructure and permeability. The outputs of the MEABTA will include both a cycling strategy and a walking

Sub. No.	Name	Summary of Submission
NO.		strategy which will seek to create a comprehensive high-quality active movement (pedestrian and cycle) network in the town, including improved access to the greenway. This is in order to initiate a sustainable and permanent shift away from the private car, particularly for short journeys within Maynooth.
		The Plan will include provisions to support the development of EV related infrastructure and a bike rental scheme. While initiatives encouraging green vehicles for shopping delivery are outside the remit of the Plan, it may be a consideration of the Maynooth Decarbonisation Action Plan which will be prepared on foot of the town being officially designated as a Decarbonisation Zone (DZ). In this regard, an objective will be included in the Plan to support the full implementation of any Maynooth Decarbonisation Action Plan, with regards to its goals, objectives and actions relating to planning and development within Maynooth Decarbonisation Zone.
		The implementation of a car free day is considered an operational (traffic management) issue not within the remit of the Plan. However, as part of the second round of the public consultation for the MEABTA (advertised as the Draft Transport Strategy for Maynooth and Environs) a proposal envisages Main Street becoming accessible to public transport, pedestrians and cyclist only with private vehicular traffic being prohibited. It is noted however that this will depend on all sections of the MOOR being developed in order to provide alternative routes people to access destinations in and around the town.
		Issues relating to Kildare County Council's mowing policy are operational matters outside the remit of the Plan.
		Movement and Transport In relation to the request that the entire ring road (MOOR) is delivered prior to any increase in population, it should be noted that the recently published National Investment Framework for Transport in Ireland (NIFTI) clearly establishes that the focus for future investment will be on sustainable travel rather than roads Given that the Maynooth Outer Orbital Route (MOOR) is supported by the Regional Spatial and Economic Strategy, the Plan will include a specific objective to support the phased development of the road over the life of the Plan and beyond.

Sub.	Name	Summary of Submission
No.		
		With regard to proposed delivery transport infrastructure, particularly within the south/southwest of the town, the Draft JLAP will seek to support the co-ordinated delivery of such critical transport infrastructure in the area, including DART+ West, the Maynooth West train station, the MOOR and upgrades to the M4.
		The upgrading of the M4 Motorway is subject to a separate process (M4 Maynooth-Leixlip Project) which is outside the remit of this Plan. However, given its inclusion in the GDA Transport Strategy and in the National Development Plan 2021-2030 it will be supported by an objective of the Plan. The DART+ West project is also a separate project being progressed by the National Transport Authority. Whilst its delivery is outside the remit of this Plan, the JLAP will include an object to support its delivery in Maynooth, given its importance in providing a high-capacity sustainable transport service for the town. The delivery of the BusConnects project and any associated feeder bus services is also outside the remit of the Plan.
		Community Services and Facilities With regard to the provision of sports facilities in the town, the Kildare County Development Plan 2023–2029 has included a specific objective in Chapter 10 'to proactively seek suitable sites within the Key Towns of Naas and Maynooth for the provision of Municipal Sporting Facilities where shared amenities are provided for sports clubs and the general public.' It is envisaged that the Plan will seek to advance this objective through the identification of a potential suitable location within the town for such a facility to be developed. As noted above JLAP will be accompanied by a Social Infrastructure Audit which will determine the needs of Maynooth in relation to the provision of recreational and amenities infrastructure.
55.	National	Prescribed or public body. Please refer to Table 3 .
	Transport Authority (NTA)	
56.	Irish Water (IW)	Prescribed or public body. Please refer to Table 3 .
57.	Maynooth Access	Movement and Transport
	Group	Submission supports the inclusion of segregated cycle lanes so to ensure that vulnerable pedestrians are not
		brought into conflict with cyclists and e-scooter users. Encourages the provision of dedicated bike stands to avoid poorly parked bikes restricting movement for persons with impaired mobility. States that footpath space of

Sub.	Name	Summary of Submission
No.		2-metre width to be the standard everywhere and that footpath width in the Main Street should be extended. Contends that there are sections of Main Street where vulnerable pedestrians are obliged to walk on the road or encroach on the mandatory cycle lane. States that the completion of the orbital ring road (MOOR) together with a second M4 motorway interchange west of Junction 7 will make Maynooth more accessible for those who need to use the services available in the town centre.
		Infrastructure Submits that all roads, infrastructure including public seating, water refill stations, bins, EV charging bays, disability parking bays, parks and recreational spaces within the public realm should strictly adhere to the principles of universal design and access. States that all disability parking bays must fully comply with the Irish Wheelchair Association Guidelines. Submits that the location of waste bins on footpaths (particularly on Parson Street and Doctor's Lane) blocks the footpath forcing pedestrians, and mobility impaired uses onto the road. Requests that a workable solution which complies with the principles of universal design is needed to address this issue. States that provision of EV charging stations for persons with disabilities need to be incorporated into the plan.
		Homes and Communities States that the social infrastructure deficit in Maynooth needs to be addressed comprehensively to allow for sustainable orderly growth. Contends that provision must be made for inclusive community and sporting infrastructure together with the provision of a community centre and library to be delivered with digitally enabled and accessibility features. States that adequate provision at pre-school, primary and second levels must be provided to address the educational needs of all students and that such provision should include physical infrastructure and human resources in order to cater the educational needs of all students.
		Climate Action Submits the need take disability inclusive climate action in the promotion and development of climate action initiatives to support people with disabilities to adopt a greener lifestyle. Encourages the town planners to

Sub. No.	Name	Summary of Submission
1101		consider the Independent Living Movement Ireland (ILMI) open letter on sustainable inclusive towns and cities [online] available from: https://ilmi.ie/ilmi-open-letter-sustainable-inclusive-towns-and-cities/
		Response to Issues Raised
		On the issue of Movement and Transport. It should be noted that as part of the preparation of the Joint Local Area Plan (JLAP) a Maynooth and Environs Area Based Transport Assessment (MEABTA) for is being progressed. A critical part of this work is to identify current deficiencies in the pedestrian and cycling network in Maynooth, including permeability links and cycle lanes. The outputs of the MEABTA will include both a walking strategy and a cycling strategy which will seek to create a comprehensive high-quality active movement (pedestrian and cycle) network in the town, including enhancements to both cycling and pedestrian provision on Main Street, in order to initiate a permanent shift away from private car use.
		A key element of the JLAP will be to seek to implement universal accessibility with regard to all transport infrastructure in the town, in accordance with the principles of people-centred urban design and healthy placemaking. It is envisaged that the Plan will incorporate a range of provisions both through overarching objectives and specific measures to support universal movement throughout the town. Furthermore, it is intended that Kildare County Council in conjunction with the Maynooth Access Group will undertake a Walkability Audit in 2023 which will focus on ease of movement for both pedestrians and people with disabilities within Maynooth Town Centre. The Draft JLAP will seek to include an objective to support the implantation of any recommended actions of the audit.
		The current deficit in the provision of community infrastructure in Maynooth is acknowledged. The JLAP will be accompanied by a Social Infrastructure Audit (SIA) which will examine the current context with respect to social infrastructure provision in Maynooth whilst also identifying the future requirements of the town, including the making of recommendations on priority areas for investment within the Plan area. The SIA will also examine the provision of childcare and primary and secondary schools' places in the town. The local authorities will also liaise closely with their respective county childcare committees and the Department of Education on these matters.

Sub.	Name	Summary of Submission
No.		
		Acknowledging Maynooth's impending designation as a Decarbonisation Zone (DZ) it is considered that climate
		action will be a central consideration of the JLAP. It is recognised that the entire community has a role to plan in
		reducing greenhouse gas emissions and in promoting low carbon development. Accordingly, the plan will include
		provisions to support inclusive climate action in Maynooth and environs, insofar as its remit extends.
58.	Saint John of God	The submission form Brock McClure Planning and Development Consultants on behalf of the Saint John of God
	Hospitaller	Hospitaller Service Group (SJOG) relates to site at Genil Training Centre, Moyglare Road, Maynooth (see map
	Services Group	below). Requests the need to consider the optimal, sustainable use of this strategically located site, as it
		represents a clear opportunity to develop suitably intense mixed-use scheme. Notes that the site, located to the
		northeast of Maynooth University and to the east of the Moyglare Road, extends to approximately 1.91
		hectares. Further notes that it is zoned 'E: Community and Educational' with a portion of the site being operated
		by Maynooth GAA Club and the remainder operated by SJOG as a day centre. States that the day centre supports
		adults with intellectual disabilities who live in Maynooth and surrounding areas via a variety of programmes.
		Submits that SGOG envisages a new LAP that follows best practice Guidelines, takes full account of current
		strategic planning policy and promotes the sustainable development of the town, so that it can fulfil its role in
		the overall county hierarchy. Refers to the core strategy and states that it is critically important that sufficient
		land is zoned for the expected population in order to achieve critical mast to support regional targets.
		Recommends that the Draft Plan incorporates policies and objectives in line with the NPF and RSES. Such
		provisions should include the identification of key locations for future development to allow for a broad-based
		land use mix, the promotion of intensive forms of development along with increased building heights and
		densities, supporting new development proximate to urban amenities and existing/planned transport services,
		along with the regeneration of key sites in the town.

Sub.	Name	Summary of Submission
No.		
		Subject Site E
		Response to Issues Raised
		The contents of the submission are noted. All existing zoning designations within Maynooth and Environs will be
		reviewed as part of the preparation of the Joint Local Area Plan (JLAP). Any proposals to alter a zoning
		designation from 'E: Community and Educational' to one that would support a high-density mix of uses would be
		based (inter alia) the following considerations:
		The site's characteristics and location within the town.
		The nature and role of existing uses on the site. The nature and role of existing uses on the site. The nature and role of existing uses on the site.
		The 10-minute settlement concept. Para distribution of the settlement concept.
		Potential impacts on adjacent areas which could arise from changes to its zoning designation.
59.	Cairn Homes and	Current or planned developments within the surrounding area. This submission from McCaba Durrous Barross on babalf of Cairn Harross Branching and the Satabusell Family.
59.	Satchwell Group	This submission from McCabe Durney Barnes on behalf of Cairn Homes Properties Ltd. and the Satchwell Family relate to various landholdings to the north and east of the town centre. Submission outlines a list of residential
	Sattiwell Gloup	developments (including creches) and servicing infrastructure delivered by Cairn Homes in towns such as
		Maynooth and Naas. States Cairn have completed almost 1,200 new homes across Kildare over past 5 years with
		a further c. 500 under construction and c. 550 in the planning process. States their developments in Maynooth
		have contributed to housing targets, the consolidation of the urban form and have significantly enhanced the
		green infrastructure and cycle network of the town.
		Submission outlines the national and regional spatial planning context. Refers to the provisions of the NPF including National Policy Objectives (NPOs) which it states should be considered in the preparation of the Plan

Sub. No.	Name	Summary of Submission
140.		with regard to the form, nature and extent of zoning in Maynooth. Submits that effective implementation will require a robust link between the zoning of land and the availability of infrastructure through the tiered approach to zoning under the provisions of NPO 72b. States that all of the requirements set out under this NPO must be used to determine the lands to be zoned. Refers to the procedure for the zoning of land set out in the Development Plan Guidelines including the preparation of a Settlement Capacity Audit and the adoption of a sequential approach to residential zoning. Refers to the provisions of Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) and the Local Area Plan Guidelines (2013) regarding delivering appropriate densities and achieving place-quality in settlements.
		Refers to the provisions of the RSES relating to Maynooth, noting its designation as a Metropolitan Key Town the Dublin Metropolitan Area. Notes Regional Policy Objectives relating to the need to provide for sustainable development patterns, compact growth, regeneration and delivering increased residential densities. Refers to the settlement strategy contained in the RSES and states that it is supportive of the '10-minute settlement' concept. Notes the provisions of RPO 4.33 – 4.36 in relation to the population and employment growth targeted for Maynooth alongside the delivery of enabling infrastructure. Refers to the Transport Strategy for the Greater Dublin Area 2016-2035 and the Draft Transport Strategy 2022-2042 in relation to the development of the transport infrastructure and the rail line. Notes the Draft Rail Order for DART+ West currently under consideration by An Bord Pleanála.
		Notes the provisions of the Kildare County Development Plan (CDP) 2017-2023 and the Draft Kildare CDP 2023-2029 with respect to the development of Maynooth including provisions relating to housing growth as provided under the core strategy and the additional growth allocation of up to 10,000 persons provided under NPO 68. Notes that the draft CDP provides an indicative densities range of between 35-50 unit per ha. Further notes Policy TM P1 in the draft CDP with regards to the promotion of sustainable movement in the county. Refers to the zoning provisions of Maynooth Local Area Plan (LAP) 2013 – 2019. States that there is a significant amount of agricultural land inside the planned outer orbital route (MOOR). Notes the contents of the Pre-Draft Issues Paper.

Sub.	Name	Summary of Submission
NO.		Submits that given the growth targets there is a need for rezoning of a significant quantum of land for residential purposes, including an appropriate level of headroom, which it states is a significant challenge and that a robust and realistic framework that incorporates the phased delivery of infrastructure, schools and amenities is required. Notes the recent population increase in the town and vacancy rate and submits that the growth targets will have to be recalibrated to reflect the data emerging from Census 2022. Refers to the provisions of the RSES regarding future residential development in the town, however it states that it is not a policy or objective of the Strategy to prioritise the development of the subject lands. Submits that there is a need to undertake an infrastructure audit and cost analysis of the various options. Further submits that any growth strategy should be determined by NPF objectives in relation to compact growth and that the rezoning of lands within the Meath County Council area strongly points toward a consolidation of the north-eastern part of the town indicating that consolidation of the urban form here should be a priority.
		Submits that the tiered approach is going to be very important in the identification of lands and notes that the lands to the north-east of the town centre within the Kildare County boundary are readily serviceable from adjoining developments and are served by the existing R157 road (part of the future MOOR) of which the Maynooth Eastern Ring Road (MERR) section has already secured planning permission. Anticipates that an infrastructure assessment will confirm their opinion that these lands to the north-east of the town centre are readily serviceable, and as such should be allocated as Tier 1 lands. Submits that the lands to the west of the town as suggested in the Issues Paper will require significant investment in infrastructure and they are reliant on the proposed railway station which does not form part of the DART+ West project and that the lands to the east and north-east can be served by the existing train station.
		Notes that the rezoning of the lands within the Maynooth Environs would leave a significant gap giving rise to the potential of 'leapfrogging' if consideration is not given to intervening lands being rezoned from their current agricultural zoning to residential purposes. States that the Issues Paper does not set out any criterion for assessing the required quantum of open space for the Plan or the method of establishing the distribution of different classes of open space to serve different needs. Submits that this needs to be confirmed. Refers to an area of land which is currently zoned S: Carton Avenue, and F: Open Space around Carton Avenue. States that a

Sub. No.	Name	Summary of Submission
		portion of this area was omitted from the Carton Avenue AAP Landscape Plan but subsequently zoned F: Open Space in the 2013-2019 LAP (see map below). Submits that the requirement and rational for the zoning of this area for open space is not evident in quantitative, qualitative, or functional terms and that it would be more appropriate to allocate additional lands in this area for residential development. Submission notes that the application of the principles of the 10-minute requires development to be linked to services and community facilities via a network of pedestrian and cycle routes along with good connectivity by road. Outlines the potential for connectivity in the area which can connect to the Maynooth Education Campus, the Maynooth Environs, Carton Avenue, the town centre and the train station. States that such links can also serve as green infrastructure connections.
		Response to Issues Raised The contention that there needs to be a significant rezoning in the town for residential purposes is noted. The population and housing targets are that will be proposed in the Draft JLAP are required to align with the provisions of the respective core strategies of Kildare and Meath County Councils and the Regional Spatial and Economic Strategy (RSES). It should be noted however, that if capacity/infrastructural constraints are identified in the town, which cannot be resolved over the life of the JLAP to 2030, then the figures for growth (particularly in relation to the National Policy Objective (NPO) 68 allocation) will be reduced accordingly, to ensure the growth of the town does not exceed the capacity of both its servicing and social infrastructure. On the issue of the publication of the results of Census 2022, it is understood that the Department of Housing, Local Government and Heritage will be updating both the National Planning Framework and the Housing Needs Demand

Sub.	Name	Summary of Submission
No.		
		Assessment toolkit following the publication of the Census population statistics from the CSO. In this regard, it should be noted that Objective CS O19 of the Kildare County Development Plan (CDP) 2023–2029 provides Kildare County Council with the opportunity to align the CDP with any subsequent changes to population and housing growth figures when they become available, as necessary.
		With regard to the rezoning of the subject lands for residential development purposes, all land use zoning designations will be reviewed as part of the preparation of the Joint Local Area Plan (JLAP). The review of zoned land will be underpinned by <i>inter alia</i> an infrastructure assessment for the town in accordance with Appendix 3 of the NPF and with section 4.5.2, Settlement Capacity Audit, of the Development Plan, Guidelines for Planning Authorities (2022). Accordingly, the subject lands will be included as part of the wider review of the settlement and its environs. It should be noted that notwithstanding the subject site's inclusion in the indicative development strategy of the Pre-Draft Issues Paper as an <i>'identified location for future Economic and Residential Development</i> ', any changes to its zoning will be determined on an evidence-led basis having regard to the availability and capacity of the receiving environment with respect to both physical and social infrastructure. In this regard, several supporting studies, including an Area Based Transport Assessment, a Social Infrastructure Audit and a Settlement Capacity Audit (i.e., Infrastructure Assessment) are being prepared to inform the preferred development strategy that will be contained in the Draft Maynooth and Environs JLAP. Furthermore, particular consideration will be given to the outputs and recommendations of the Social Infrastructure Audit (SIA) with regard to the provision of open space in Maynooth, and the Green Infrastructure Survey and Habitat Mapping Exercise on issues relating to the presence of natural heritage features on the subject sites. Open space provision will be made on the basis of 2.5 ha per 1,000 population, a defined standard which is embedded in the Kildare Open Space and Outdoor Recreation Strategy and in the Kildare County Development Plan 2023–2029.
		The Draft Joint Local Area Plan will include a specific objective in relation to supporting the delivery of an integrated network of active travel (walking and cycling) routes in Maynooth and Environs, in keeping with the principles of the 10-minute settlement. In this regard, the potential for off road pedestrian and cycling links to be developed long the Rye Water is acknowledged. The potential of developing new linear park along the Lyreen River and Rye Water will be investigated as part of the preparation of the Joint Local Area Plan

Sub.	Name	Summary of Submission
No.		
60.	M. P. A. Lavin	This submission relates to lands situated at Moyglare Cross, within the Maynooth Environs, extending to 25 hectares for which it is requested be zoned as 'New Residential'.
		The submission states that due to a lack of availability of centrally zoned land in the town core, an emphasis must be put on developing the Maynooth Environs along with the necessary infrastructural upgrades, in order to achieve new residential development targets. The proposed Maynooth Outer Orbital Route (MOOR) which is to be delivered in the short term, will be a key enabler for improved transport linkages to the town centre. The submission states that in comparison to the 2013-2019 LAP, there is a limited amount of land identified for 'New Residential' with land on the Northwest of the town changing from 'Agriculture' to 'Future Economic and Residential'.
		The submission states that there will be a need for 500,000 new homes (approx. 25,000 per year). It also notes the preliminary 2022 census indicated that Kildare has grown by 11% from 222,504 to 246,977. Notes that the Eastern Region (Louth, Meath, Kildare, Wicklow) in the RSES had the largest population change between 2000-2016 of 102,200 or +17.4%. The submission further notes that the Eastern and Midland Region will be a region of around 2.85 million people by 2040, an increase of 500,000 more than present. The submission states that in order to accommodate the increase in population, the NPF has targeted compact growth for 40% of new developments within our existing urban settlements. The submission further states that planning authorities will need to ensure that there is sufficient zoned land and that the lands north of Maynooth provide a 'blank canvas' to design a compact and sustainable neighbourhood which can help achieve such objectives.
		The submission notes that Ireland needs to deliver 33,000 homes constructed per annum until 2030 to meet targets set out for additional households, as outlined in the NPF and outlines certain actions that planning authorities can take to help reduce these prices include: • Ensure there is sufficient zoned land to meet housing demand • Set higher housing targets than the outgoing LAP • Ensure major infrastructure upgrades don't delay housing completions.

Sub.	Name	Summary of Submission
NO.		 The submission outlines several reasons why the lands at Moyglare Cross, Maynooth are suitable for residential development, as follows: The lands are adjoining the Moygaddy Strategic Housing Development and are conveniently located at the town development boundary. The low-lying southern side of the lands has potential to provide open public green space with trees, shrubbery, walkways and playing fields, which will ensure the existing use of properties in the area and visual amenities will not be unduly impacted. The subject lands are available for development immediately. The necessary services can be accessed at the adjoining public road. The lands can be accessed via Moyglare Cross or via the newly proposed Maynooth Outer Orbital Route (MOOR), which will help with traffic management in the area. It is proposed that there will be bus stops on the MOOR as well as the Moyglare Road which can serve the new residents of the area. There are also sufficient walk and cycleways on the Moyglare Road. The lands development for residential uses has the potential to alleviate prices and meet the demand for housing in the area. There are no protected structures, heritage designations or national monument designations on the subject lands. The subject land is in close proximity to three major employers in the area: Intel Ireland, Maynooth University and Maynooth Business Campus. The proposed adjoining development at Moygaddy will also provide additional nearby employment through its proposed office, healthcare and hospitality developments. There is limited 'New Residential' zoning outlined for the upcoming LAP. If development was to be delayed on either of these sites due to infrastructural upgrades, the housing issue in Maynooth would only continue to worsen. By providing additional 'New Residential' zoning on the subject lands, such risks can be reduced. Response to Issues Raised The submission with respect to lands at Moyglare Cros

Sub.	Name	Summary of Submission
No.		
		As part of the preparation of the Joint Plan, a number of evidence based reports will be prepared to inform the future growth strategy for the plan area, including a Settlement Capacity Audit, an Area Based Transport Assessment and a Social Infrastructure Assessment which will inform the most suitable locations for development in the plan period, in order to facilitate the growth the town and environs in a sustainable manner in keeping with the principles of compact growth and sequential development, as set out in the NPF and in the Development Plan Guidelines (2022). The lands to which this submission refer will be considered in the Settlement Capacity Audit.
61.	Office of the	Prescribed or public body. Please refer to Table 3.1 .
	Planning Regulator (OPR)	
62.	Shane O'Duffy	Outlines concerns relating to the planned expansion of the town, university and employment lands and its
02.	Silane O Duny	impact on traffic congestion. States that the planned new DART depot will also impact the town's traffic congestion. Submits that the Plan should be considering the provision of a second motorway interchange at Millfarm on the L5041 road, which would then allow all traffic for the university to access the university from the Kilcock – Maynooth Road. Submits that such an arrangement will alleviate all traffic from the town centre that is going to the university from the M4 Motorway. Submission includes maps which detail proposed roads interventions. Notes that the proposed canal/railway bridge to access the new DART depot should be relocated so the bridge can better serve not only the depot's purpose but facilitate the development of relief road around the town. Notes the proposal for the Maynooth Eastern Ring Road (MERR) and supports its construction. Also notes the role that relief roads have in keeping reducing noise impact and improving the air quality for pedestrians. States that when this infrastructure is developed there could be a car free day in the town. On the issue of the provision of community facilities the submission notes that the town is also lacking a community centre, a primary care centre, and a swimming pool. States that central locations for these should be
		provided in the Plan. Submits that the provision of a site for second post primary school location near existing primary schools should be included in the plan. Notes the plans for the development of the Harbour Field and hopes it will be built as soon as possible.

Sub.	Name	Summary of Submission
No.		
		Submission requests an increase in tree planting especially along the River Rye and states that this should be accompanied by pedestrian/cycle route along this section, it could be another greenway. Asks that exercise machines and public lighting be provided along these routes. Requests that compulsory cycle lanes should be incorporated into the development of all new/relief roads as Maynooth has a very small amount of cycle lanes and all roads should have proper cycle lanes to reduce our CO2 emissions, make them safer for cyclists and encourage cycling for short journeys. Refers to proposals to develop lands in Moygaddy. Asks if it can be ensured that the relief roads are in situ before any people move into the development and the other impacts be checked to ensure that there are no adverse effects on utilities (electricity, water, wastewater) in the area. States that the provision of such utilities needs to be reassessed to ensure that their ability to cope with anticipated future demand.
		Response to Issues Raised The contents of the submission are noted. Issues relating to the DART+ West project and the upgrading of the motorway junctions is part of a separate project (Maynooth – Leixlip Project) and therefore outside the remit of the Plan. However, given that both DART+ West and the M4 Maynooth – Leixlip Project are supported by national and regional policy, the Plan will include supporting objectives for both. The Plan will also include an objective to support the development of the Maynooth Outer Orbital Route (MOOR).
		Whilst the implementation of a car free day is considered an operational (traffic management) issue not within the remit of the Plan, it should be noted that given the lack of alternative routes through and around Maynooth, it may not be feasible to hold a such an event on Main Street in the short term. However, as part of the development of the Joint Local Area Plan (JLAP) a Maynooth and Environs Area Based Transport Assessment (MEABTA) is being undertaken. A key element of this work is to seek reduced congestion within the town centre, particularly on Main Street. As part of the second round of the public consultation for the MEABTA (advertised as the Draft Transport Strategy for Maynooth and Environs) a proposal envisages Main Street becoming accessible to public transport, pedestrians and cyclist only, with private vehicular traffic being prohibited. It is noted

Sub.	Name	Summary of Submission
No.		however that this will depend on all sections of the MOOR being developed in order to provide alternative routes people to access destinations in and around the town.
		The present deficit in the provision of amenity infrastructure in Maynooth is acknowledged. It is noted that the JLAP will be accompanied by a Social Infrastructure Audit (SIA) which will examine the current context with respect to social infrastructure provision in Maynooth whilst also identifying the future requirements of the town, including the making of recommendations on priority areas for investment within the Plan area.
		The potential for tree planting and a pedestrian connection along the Rye will be explored as part of the provision of open space in Maynooth and the development of active movement (pedestrian and cycling) routes in the town over the longer term. The outputs of the MEABTA will include both a pedestrian and a cycling strategy which will contribute to the development of Maynooth as a low carbon town. In relation to infrastructure and servicing provision, in accordance with Appendix 3 of the National Planning Framework and Section 28 Ministerial Guidelines for Local Authorities on Development Plans a Settlement Capacity Audit (Infrastructure Assessment) will be carried out to determine if specific sites are 'serviced' or 'serviceable' within the life of the Plan. The Plan will also be accompanied by an infrastructure delivery schedule to ensure that specific and critical pieces of servicing infrastructure and amenities are delivered either prior to or in tandem with development.
63.	Corcom Development Partners	The submission by Corcom, on behalf of Edward Cawley, relates to currently un-zoned lands comprising approximately 71.7 ha located to the south of Maynooth. The lands are bordered to the north by the M4 Motorway and the east by Junction 7 and the R406 Straffan Road (see map below). The submission seeks the enlargement of the development boundary of the Maynooth and Environs Joint Local Area Plan 2024 – 2030 to include all or part of the subject lands and proposes that these lands be zoned H2: Office/Light Industry and Warehousing.
		The submission notes the following characteristics about the site:

Sub. Name No.	Summary of Submission
	 Lands comprise of open farmland, strategically located at Junction 7 of the M4 motorway, 1.5km south of Maynooth Railway Station, c.750 metres of high-quality bus services, and within walking distance of Maynooth Business Campus, a key employment centre in the town. There are several yards on the subject lands including a number of residential properties and an industrial warehouse, accessed from the Straffan Road (R406). The subject site is free from restrictions in terms of built/natural heritage, archaeological constraints. Lyreen River borders and interacts with the subject lands on their eastern border. There is a low to medium probability of flood risk impacting on the subject lands. There has been a number of planning applications on the subject site the most recent successful application relates to the construction of a two-storey detached dwelling house (Plan Ref: 16/647). Refers to national and regional spatial planning policy and notes provisions of the National Planning Framework (NPF) including National Policy Objectives (NPOs) relating to the creation of strong urban communities, the development of cities and towns of sufficient scale and to population growths in settlements. Notes the population targets under the NPF and states that the provisional results from the Census 2022 indicates strong growth in the Dublin and the Mid-East. Notes the 2016 jobs ratio in Maynooth and states that this illustrates the need for additional employment lands to facilitate job creation within the town. Refers to the provisions of the RSES relating to Maynooth, noting its designation as a Metropolitan Key Town located within the North-West Corridor within the Dublin Metropolitan Area. Notes Regional Policy Objectives (RPOs) 4.33 – 4.36 relation to the growth and economic development of Maynooth along with the delivery of enabling infrastructure. Refers to the RSES's guiding principles for the identification of st

Sub. No.	Name	Summary of Submission
		Refers to the provisions of the Maynooth Local Area Plan (LAP) 2013-2019 noting the lands lie outside the LAP boundary and are therefore un-zoned. Notes that a considerable portion of the lands lie within 1,500 metres of the town centre. States that Corcom Ltd. have undertaken a survey of lands zoned for employment uses (across 'H2', 'T' and 'P' zoned lands) and contend the Maynooth Business Campus is reaching maximum capacity and that there is a need for additional 'H2' lands in the town. Refers to the provisions of the draft Kildare County Development Plan 2023-2039 (CDP) regarding the key town of Maynooth. Notes and welcomes draft CDP objectives relating to the monitoring of the development of employment lands following the adoption of the CDP and in the preparation of the Joint Local Area Plan (JLAP). Also refers other objectives supporting economic development in Maynooth in both the draft Kildare CDP and in the Meath CDP 2021-2027. Notes the provisions of the Kildare CDP relating to the delivery of roads infrastructure, including a western inner relief road (part of the Maynooth Outer Orbital Route (MOOR)) which it states would increase the accessibility of the subject lands. Further notes the M4 Maynooth — Leixlip Project which would be of significant benefit in the development of the subject site. Refers to the contents of the Pre-Draft Issues Paper in relation to the identification of employment lands for Maynooth, states that the settlement boundary indicated in the Issues Paper corresponds to the CSO, not that set out in the Maynooth Local Area Plan 2013-2019.
		Response to Issues Raised
		The request to rezone the subject lands be zoned H2: Office/Light Industry and Warehousing is noted. The determination of the location and quantum of employment lands to be included in the Draft Maynooth and
		Environs Joint Local Area Plan (JLAP) will be decided on an evidence-led basis having consideration for the availability and capacity of the receiving environment with respect to both services and transport infrastructure.

Sub.	Name	Summary of Submission
No.		
		In this regard, a number of supporting studies including an Area Based Transport Assessment, a Social Infrastructure Audit and a Settlement Capacity Audit (i.e. Infrastructure Assessment) are being prepared to inform the preferred development strategy that will be contained in the JLAP. In conjunction with the various assessments outlined above, the zoning of employment lands must adhere to relevant national and regional spatial policy and Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000, as amended. This includes compliance with <i>Guiding Principles to Identify Locations for Strategic Environmental Development</i> (p.24 Regional Spatial and Economic Strategy) and the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012), given the subject site's proximity to Junction 7 of the M4 Motorway.
		It is noted that the boundary indicated in the Issues Paper corresponds to the defined CSO settlement boundary, not the boundary outlined in the Maynooth Local Area Plan 2013-2019. This was the intention as at this early pre-draft stage of the Plan, the previous LAP boundary is being reviewed and no defined Plan area for the Maynooth and Environs JLAP has been set. The proposed boundary of the Plan area will depend on the outputs of the supporting studies outlined above which will be published alongside the Draft JLAP.
		Whilst it is noted that the subject site is located outside the boundary of the Maynooth Local Area Plan 2013-2019 (as amended) and outside the defined settlement boundary of Maynooth (CSO 2016), it will be included in the Settlement Capacity Audit to determine its suitability for employment use in comparison to other potential lands within Maynooth and Environs.
64.	Cllr. Angela	Community
	Feeney	Submission seeks that the Plan include provision for the delivery of a community centre and hub for Maynooth on the soon to be vacated publicly owned fire station site as a community facility that would include meeting spaces, performance space, a community crèche, allotments, youth space and housing for the aged. States that its central location in the town next to the Harbour Field and train station makes it an ideal location. Seeks a commitment from the council to engage with the relevant stakeholders to address the lack of childcare provision in the town. Submits the need to explore how a blended model of community crèche could be provided alongside the identification of affordable buildings for private providers could work. States that with such a

Sub.	Name	Summary of Submission
No.		
		young population in the town there is a need for better community sports infrastructure including a public swimming pool that will serve the town and North Kildare. Further states that a key objective should be the Harbour Field development along with the improvement of the public realm on Main Street, Courthouse Square and at Maynooth Castle. Seeks that the Plan commit to continue to protect the integrity of Carton Avenue as an historic and treasured space for Maynooth. Requests that the Plan identifies public lands for future educational purposes in a growing town and that continued active engagement and dialogue takes place with the Department of Education for this purpose.
		Sustainable Travel
		States that the delivery of key pieces of infrastructure should be specifically stated as objectives of the Plan and that central to this, is the Orbital Route (MOOR) for the town, a new train station and 'park and ride' facilities. Requests that the Plan should demonstrates how it supports active travel and the creation of a walkable '15-minute neighbourhood'. Submits that the Royal Canal Greenway is a fantastic amenity and there is a need to engage with key stakeholders that back on to the greenway to create access points for walkers/cyclists. States that the green route along Lyreen River has huge tourism potential that needs to be exploited. Supports the provision of a 'park and ride' facility aligned with a new train station and with the orbital route to ensure maximum use. States that fast EV charging points are needed to support electric cars. Submits that increases in active travel require the provision in community cycling infrastructure is needed. States that bus services need to better serve the new estates, the expanded Maynooth School Campus, Maynooth Business Park and not just Main Street. Contends that the Plan should seek to create an additional M4 interchange between Maynooth and Kilcock to better serve Maynooth University and the western side of the town.
		Employment Requests the inclusion of an objective in the Plan to provide spaces for workers to work remotely.
		Housing
		Submits that the Plan includes a key objective to provide social and affordable housing to meet the needs of the growing population. Requests that the Plan demonstrates the commitment of the council to engage with

Sub. No.	Name	Summary of Submission
NO.		Maynooth University to address the student accommodation crisis. Requests that any future housing development in Maynooth is infrastructure-led and informed by current data sets to support sustainable development.
		Response to Issues Raised The contents of the submission are noted. An important element of the Plan will be to provide for the long-term regeneration of the Canal Harbour area of the town. This will include support for alternative uses for the Fire Station site when it becomes available. It is envisaged that the development of a key community use or uses on the site will form a key element of any rejuvenation plan for the area. The current deficit in the provision of community infrastructure in Maynooth, including amenities for younger persons is acknowledged. The JLAP will be accompanied by a Social Infrastructure Audit (SIA) which will examine the current context with respect to social infrastructure provision in Maynooth whilst also identifying the future requirements of the town, including the making of recommendations on priority areas for investment within the Plan area. The SIA will also examine the provision of childcare and primary and secondary school places in the town. The local authorities will also be liaising closely with their respective county childcare committees and the Department of Education on these issues.
		It should be noted that the Kildare County Development Plan 2023–2029, has extended the Maynooth Architectural Conservation Area (ACA) to include Carton Avenue. This will provide an additional level of protection to the site. It is envisaged that the Plan will include further specific provisions relating to the protection and long-term enhancement of this important amenity space for the town.
		It is noted that the Kildare County Development Plan 2023–2029 has included an action to progress plans for the provision of a new fully accessible regional swimming pool in North Kildare in conjunction with other relevant bodies. This issue will be examined further in the context of the preparation of the JLAP and the identification of a proposed location for a municipal sports facility in the town.

Sub. No.	Name	Summary of Submission
NO.		With regard to the upgrading of the public realm within the town centre, it should be noted that the Plan will include provisions to rejuvenate key spaces in the town centre including Main Street, Courthouse Square and within the area adjacent to Maynooth Castle.
		Acknowledging the policy support for both the Maynooth Outer Orbital Route (MOOR) in the Regional Spatial and Economic Strategy (RSES), and the second train station to the west of Maynooth in the Transport Strategy for the Greater Dublin Area 2022–2042 (identified as <i>Measure Rail6</i>), it is intended that the Plan will include specific objectives supporting the phased delivery these two critical pieces of infrastructure. On the issue of a 'park and ride' facility for Maynooth, it is noted that Figure 9.1 of Greater Dublin Area Transport Strategy 2022–2042 provides for such a development to be located either at 'Collinstown OR Maynooth Depot'. Accordingly, the Plan will include provisions to support the potential development of a 'park and ride' facility at this general location.
		The potential of the Royal Canal Greenway to act as a key sustainable movement connector linking key destinations in the town is recognised and will be reflected in the Plan. As part of the development of the JLAP a Maynooth and Environs Area Based Transport Assessment (MEABTA) is being undertaken. A critical part of this work is to identify current deficiencies in the pedestrian and cycling network in Maynooth, including permeability links and cycle lanes. It should be noted that as part of the second round of the public consultation for the MEABTA (advertised as the Draft Transport Strategy for Maynooth and Environs) a series of permeability connections and upgrades are proposed along the Royal Canal Greenway. The development of a pedestrian and cycle link along the Lyreen will also be examined as park of the MEABTA. The Plan will also support the delivery of electric vehicle (EV) infrastructure within the town, including fast charging EV points. Whilst the MEABTA will look at options relating to the improvement of bus services it should be noted that their delivery is a function of the National Transport Authority (NTA) and therefore outside the remit of the local area plan. It is intended that the Plan will include provisions to support dedicated remote working hubs at suitable locations within the town, including within Maynooth Town Centre. With regard to the M4 upgrade, it should be noted that the delivery of this M4 Maynooth – Leixlip Project is outside the remit of the Plan. The Plan will however include an objective to

Sub. No.	Name	Summary of Submission
		support the project, given its inclusion in both the National Development Plan 2021-2031 and the Greater Dublin Area Transport Strategy 2022-2042.
		The critical role of the JLAP with regard to the provision of housing is to ensure the zoning of an adequate quantum of appropriately located serviced and serviceable land to provide for residential development, in keeping with the provisions of the respective core strategies of Kildare and Meath County Councils and the Regional Spatial and Economic Strategy (RSES). The local authorities undertake to engage with Maynooth University, as a key stakeholder in the town, during the preparation of the Plan. The Plan will include specific objectives which will support the delivery of student accommodation and social/affordable housing in the town, insofar as its remit extends.
65.	Department of Housing, Local Government and Heritage	Prescribed or public body. Please refer to Table 3 .

Appendix A: Public Notice of Pre-draft Consultation

Notice of Pre-Draft Public Consultation for proposed Maynooth and Environs Joint Local Area Plan 2024-2030

In accordance with Section 20 (1) of the Planning and Development Act 2000 (as amended), notice is hereby given that Kildare County Council and Meath County Council propose to prepare a Joint Local Area Plan for the Maynooth and Environs area. A Local Area Plan is a statutory document that sets out the land use strategy for the proper planning and sustainable development of an area.

To stimulate discussion and encourage public participation at this stage in this process, an Issues Paper has been prepared which sets out the key planning issues pertaining to Maynooth. A copy of the Issues Paper is available at the following locations to download and/or inspect from **Friday 30**th **September to Friday 11**th **November 2022** (6 weeks) inclusive:

- Online at: https://consult.maynooth.ie
- Maynooth Community Library, Main Street, Maynooth, Co. Kildare.
- Planning Department, Kildare County Council, Áras Chill Dara, Naas, Co. Kildare.
- Planning Department, Meath County Council, Buvinda House, Dublin Road, Navan, Co.
 Meath.

Council staff from both Local Authorities will be available to answer general queries and provide guidance on the pre-draft consultation and plan-making process at a 'drop-in' event in the Glenroyal Hotel, Maynooth from **1pm to 8pm on Wednesday the 12**th **of October 2022.**

Kildare and Meath County Councils now invite submissions from interested parties in relation to the Issues Paper before **4pm on Friday 11**th **November 2022.** Your name and address should be stated in your submission, and where relevant, the body or organisation represented. Children or groups or associations representing the interests of children are welcome to make submissions. Please make your submission in **one** of the following ways **only** (Late submissions, e-mail or faxed submissions will not be accepted):

- Online at https://consult.maynooth.ie; or
- In writing to:
 - Senior Executive Officer, Planning Department, Áras Chill Dara, Naas, Co. Kildare, or
 - Senior Executive Officer, Planning Department, Buvinda House, Dublin Road, Navan, Co. Meath.

A report will be prepared on submissions received and will include the names of those who made submissions. This report will be published on our websites. Details of your privacy entitlements and obligations under GDPR can be read here:

www.kildarecoco.ie/YourCouncil/GovernanceandCompliance/DataProtection/
www.meath.ie/council/your-council/your-data-and-access-to-information/data-protection

This is your opportunity to have a say in the future development of your area. We look forward to hearing from you. **DEADLINE FOR SUBMISSIONS: 4pm Friday 11**th **November 2022.**

Signed:

Eoghan Ryan
Director of Service
Planning & Strategic Development

Department

Kildare County Council

Des Foley
Director of Service
Planning, Economic & Tourism
Department

Meath County Council

Appendix B: Images of Pre-draft Public Consultation Event

Figure A: Entrance to Public Consultation Venue



Figure B: View of Public Consultation Venue Layout



Figure C: Elected Members Attending the Pre-Draft Consultation Event



Figure D: Some Members of the Planning Team from Kildare and Meath County Councils



Figure E: Comments and Feedback from Members of the Public

