

22<sup>nd</sup> May 2024

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

**Re: Issues Paper for the Monasterevin Local Area Plan 2025-2031**

A chara,

Thank you for your authority's work in preparing the Issues Paper (the Issues Paper) for the proposed Monasterevin Local Area Plan 2025 - 2031 (the LAP).

The planning authority is commended for publishing an Issues Paper, engaging proactively with the public, and notifying the Office of the Planning Regulator (the Office) of the intention to prepare the LAP.

In accordance with the provisions of section 31AO of the *Planning and Development Act 2000*, as amended (the Act), the Office is obliged to evaluate and assess local area plans to ensure alignment with national and regional planning policy and the objectives of your county development plan.

The Office has set out some broad issues relevant to the preparation of local area plans, in addition to some specific issues of particular relevance to the preparation of the LAP, under the following headings:

1. [Strategic policy framework](#)
2. [Development plan and core strategy](#)
3. [Zoning, compact growth and infrastructural services](#)
4. [Regeneration](#)
5. [Education, social and community amenities](#)
6. [Economic development, employment and retail](#)

7. [Transport and mobility](#)
8. [Flood risk management](#)
9. [Climate action](#)
10. [Environment, built and natural heritage](#)
11. [Implementation and monitoring](#)

The comments are offered without prejudice to any observations and recommendations by the Office at future stages of the plan-making process. They also do not affect the obligation on your planning authority to comply with the relevant legislative requirements, or to be consistent with the fullness of the detailed policy context of the higher order plans and strategies and Ministerial guidelines.

## **1. Strategic policy framework**

Section 20(5) of the Act requires the LAP to be consistent with the objectives of the Regional Spatial and Economic Strategy (RSES), *National Planning Framework* (NPF), the specific planning policy requirements (SPPRs) of section 28 guidelines and the relevant development plan.

Of particular relevance to the preparation of the LAP is the preparation of a local transport plan (LTP) for Monasterevin, consistent with RPO 8.6, which will inform land use and the preparation of the LAP, including the identification of any strategic development sites for the delivery of residential, employment or other uses.

The Office encourages the planning authority to liaise with the Eastern and Midland Regional Assembly (EMRA) in preparation of the draft LAP, particularly where clarity is required on how the objectives and guiding principles set out in the RSES relate to the LAP.

## **2. Development plan and core strategy**

Section 19(2)(b) of the Act requires the LAP to be consistent with the objectives of the development plan and its core strategy. This is also a key message of the section 28 *Local Area Plans, Guidelines for Planning Authorities* (2013) (LAP Guidelines).

In this regard, the Office notes that the core strategy of the Kildare County Development Plan 2023-2029 (the Development Plan) provides for a population increase of 654 persons with a requirement for 238 housing units and 8 hectares of residential land over the 2023 - 2029 plan period.

A key part of the Office's assessment of the draft LAP is to consider whether the objectives and zoning provisions of the LAP are consistent with the level of growth set out in the core strategy for the settlement.

### **3. Zoning, compact growth and infrastructural services**

Where proposed, our assessment will carefully consider whether proposed zoning objectives are consistent with the core strategy and objectives of the Development Plan and whether they can demonstrate consistency with the objectives for compact growth and densification<sup>1</sup> under the NPF (NPO 3 and NPO 35) and the RSES (RPO 3.2). The implementation of effective compact growth to avoid urban sprawl also plays a key role in climate change mitigation.

Zoning objectives should also be consistent with any strategic development sites for the delivery of residential, employment or other uses identified in the RSES.

In relation to residential development, any provisions or standards for density or building height in the LAP is required to have regard to relevant section 28 guidelines and to comply with any SPPRs therein, including, in particular:

- *Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024);*
- *Urban Development and Building Heights, Guidelines for Planning Authorities (2018);* and
- *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2023).*

Land use zoning should follow a sequential approach so that the development of lands closest to the town centre are prioritised over lands on the outskirts of the town, as set out

---

<sup>1</sup> Including through reductions in vacancy, re-use of existing buildings, infill development, area or site-based regeneration and increase building heights.

under section 6.2.3 of the *Development Plans, Guidelines for Planning Authorities (2022)* (the Development Plans Guidelines).

The planning authority also needs to ensure that lands that cannot be serviced within the lifetime of the LAP are not zoned for development, consistent with the tiered approach to zoning under NPO 72 a-c of the NPF. In this regard, an infrastructure assessment should be prepared in accordance with Appendix 3 of the NPF and having regard to section 4.5.2 (Settlement Capacity Audit) of the Development Plans Guidelines.

In this regard, the Office notes that Uisce Éireann has not raised an issue with infrastructure capacity for the town. The planning authority is advised to liaise closely with all of the relevant prescribed authorities concerning the delivery of essential services and infrastructure.

#### **4. Regeneration**

Both the NPF (NPO 4 urban places; NPO 6 urban regeneration; NPO 18a proportionate growth; NPO 18b new homes and NPO 35 increasing residential use) and the policy objectives of the RSES emphasise the importance of opportunities for urban and village regeneration to create attractive, liveable, and high quality urban places. The reuse of brownfield sites and vacant buildings will also contribute to climate change mitigation.

The Development Plan seeks to prepare and implement a Town/Village Renewal Masterplan for Monasterevin (Action UD A3). The Office encourages the planning authority to prepare a masterplan as part of the draft LAP to ensure that an appropriate implementation strategy is prepared to deliver on this objective.

The LAP also provides an opportunity to identify any further opportunity and regeneration sites, or vacant or underutilised buildings, in accordance with the guiding principles of the RSES for urban infill and regeneration, where applicable.

Where such sites are identified, the planning authority should prepare a development framework for future development with appropriate guidance regarding layout, massing, permeability, green infrastructure and Sustainable urban Drainage Systems (SuDS) etc., as set out in section 5.7 of the LAP Guidelines.

The Office recommends that the LAP includes a strong policy framework to support the utilisation of existing buildings, brownfield / infill sites and derelict and underutilised sites.



The planning authority should consider proactive land activation measures including the planning authority's powers for land acquisition / compulsory purchase and derelict sites and vacant land. The LAP should also align with sources of funding to facilitate key regeneration projects such as the recently announced *Croí Cónaithe (Towns) Fund Scheme*, and Town Centre First-aligned funding streams under the Government's *Town Centre First: A Policy Approach for Irish Towns (2022)*.

## **5. Education, social and community amenities**

Access to quality childcare, education and health services is a National Strategic Outcome of the NPF. The LAP should therefore seek to align population growth with investment in childcare and education facilities on well-located sites within or close to the existing built-up areas, to meet the diverse needs of local populations.

As such, the LAP should be informed by a social or civic infrastructure audit to establish the capacity of existing facilities, including community centres, leisure, amenity and cultural facilities to serve existing and future residents, and identify the need for any additional facilities.

It is also important that access to existing and proposed facilities by walking or cycling is prioritised consistent with the sustainable approach to settlement and mobility discussed below.

Specifically, in relation to schools, the planning authority should consult with the Forward Planning Section and Site Acquisition and Property Management Section of the Department of Education.

The planning authority's *Local Economic and Community Plan 2024 - 2029* and *Traveller Accommodation Programme 2019 - 2024* should also inform the LAP to provide for the co-ordinated spatial planning of housing and community services for the area.

## **6. Economic development, employment and retail**

The NPF, RSES and section 28 guidelines emphasise the need to take an evidence-based approach to the inclusion of objectives for employment and other commercial uses.

In particular, the LAP should be aligned with the detailed economic strategy and all relevant guiding principles of the RSES, in addition to any objectives concerning strategic

enterprise / employment sites. It will also need to ensure it is consistent with the economic strategy of the Development Plan and any associated objectives.

The Office notes the Development Plan designation of Monasterevin as a self-sustaining town and Table 4.1 of the Development Plan identifies sectoral opportunities for the town which include biotechnology, knowledge based digital enterprise, tourism, food and beverage products. Further, the Development Plan Objective RE O31 encourages job creation in Self-Sustaining Towns such as Monasterevin.

The RSES describes settlements, such as Monasterevin, as having high levels of population growth and a weak employment base, and which is reliant on other areas for employment and/or services and therefore which requires targeted investment to become more self-sustaining. Therefore, the LAP should seek to achieve a balancing effect and shall be focused on consolidation and inclusion of policies in relation to improvements in employment provision.

In this regard, the Office welcomes the specific employment objectives in the Development Plan, in respect of Monasterevin, in particular policy objective RE O135 which identifies the need to look at the feasibility of creating linkages between the proposed Umeras Peatlands Park and Monasterevin train station. Furthermore, the Development Plan (policy objective RE O88) identifies distilling and brewing as a strategic employment opportunity and there is potential for a centre to be provided that would develop on the history of Monasterevin (Cassidy Distillery and Brewing Co.) and the current investment at the Church of Oak Distillery. The Office welcomes that both of these projects are raised in the Issues Paper and advises that further details in relation to these projects, and their respective implementation, should be provided as part of the draft LAP.

In terms of identifying the optimal locations for employment zonings, the key criteria should be compact growth, the sequential approach to development and the options for sustainable transport having regard to the need to mitigate climate change. These should be supported by an infrastructure assessment report and/or settlement capacity audit. As noted under section 3, above, such lands should be either serviced or serviceable within the LAP period. The reuse of appropriate brownfield sites and vacant premises should also be prioritised.

The facilitation of retail facilities also need to be considered to provide for the anticipated population growth. Particular regard should be given to the sequential approach to the location of retail development, particularly the underutilised lands and buildings within the existing core retail area (Development Plan Objective RET O45), other provisions of the *Retail Planning, Guidelines for Planning Authorities* (2012) and the position of the town in the retail hierarchy of the Development Plan.

## **7. Transport and mobility**

The *Climate Action Plan 2024* identifies the need to significantly reduce car kilometres and increase sustainable journeys, guided by the *National Sustainable Mobility Policy* (2022) and the proposed *National Demand Management Strategy*.

The integration of land use and transportation is centrally important to this objective and to the objectives and provisions of the NPF (NPO 27 alternatives to the car; NPO 33 location of new homes, NPO 54 to reduce our carbon footprint and NPO 64 air quality, among others) and the RSES.

The RSES identifies the requirement for an LTP for selected settlements (although not limited to these settlements), and certain large settlements for development within the Dublin Metropolitan Area. The Development Plan (policy TM A2) commits to the preparation of an LTP to inform land use and the preparation of the LAP in collaboration and with the support of the relevant transport agencies.

The planning authority has experience in preparing quality LTPs to inform LAPs. The planning authority is therefore aware that the National Transport Authority's (NTA) *Area Based Transport Assessment Advice Note* (2018) (ABTA) and *ABTA How to Guide Guidance, Document Pilot Methodology* (2021) as well as Transport Infrastructure Ireland's (TII) *Area Based Transport Assessment (ABTA) Guidance Notes* (2018) should be considered by the planning authority in preparing the LTP. The LTP should inform the preparation of the LAP and, in particular, the zoning provisions.

The planning authority is strongly advised to liaise with the NTA and TII in the preparation of the LTP and to incorporate the main objectives, targets and measures of the LTP, along with relevant associated maps, into the LAP in support of the NPOs referred to above.

In addition, the LAP should set out an ambitious (but realistic) modal shift target for Monasterevin as part of the LAP.



In order to increase the potential for trips to be made on foot, bicycle or public transport, the LAP should demonstrate consistency with the 'Avoid-Shift-Improve' principle and the '10-minute town concept', as well as providing for the proactive implementation of the *Design Manual for Urban Roads and Streets* (revised 2019) (DMURS) and the NTA's *Permeability Best Practice Guide*.

The Office welcomes specific Development Plan policy objectives in respect of Monasterevin, in particular TM O12 which notes the intention to undertake a feasibility study in relation to cycling pathways including connections to Monasterevin, and further policy objective TM O24, which intends to investigate reopening the historic Barrow Drainage Scheme access routes and trails between Monasterevin and Athy. The Office welcomes that both of these projects are referenced in the Issues Paper, and the Office advises that the draft LAP includes further details including a strategy for their implementation.

It is also noted that the Development Plan includes an objective, TM O16, which supports the improvement of public transport for Monasterevin. This is appropriate in the context of Monasterevin having a regular train service and good connections with Dublin city centre.

Consistency with the NTA's *Transport Strategy for the Greater Dublin Area 2022-2042* is required for LAPs within the Greater Dublin Area planning authorities.

## **8. Flood risk management**

Having regard to the location of Monasterevin along the River Barrow, flood risk management will be the most critical climate change adaptation measure to be addressed in the LAP, informed by a Strategic Flood Risk Assessment (SFRA).

The planning authority should ensure that the LAP is consistent with NPO 57 by avoiding inappropriate development in areas at risk of flooding, in accordance with the detailed requirements and provisions of section 28 *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009). These guidelines require a staged approach to flood risk assessment and, in particular, the application of the sequential approach and the requirement to carry out the plan-making justification test where appropriate.



Flood risk zones<sup>2</sup> should also be clearly overlaid on any proposed land use zoning maps to illustrate the potential flood risk arising and to demonstrate how the sequential approach has been applied. The planning authority is also requested to make a copy of digital mapping data available to the Office and to the Office of Public Works (OPW) to facilitate assessment.

The planning authority is strongly advised to liaise with the OPW in the early stages of preparing the SFRA to avoid issues arising at draft LAP stage. In particular, you should be aware that the Preliminary Flood Risk Area maps are preliminary assessments and should not be relied upon to inform zoning decisions.

In accordance with NPO 57, the LAP is required to integrate sustainable water management solutions, using SuDS nature-based solutions. The use of nature-based solutions for rainwater management is supported and required to have regard to section 28 guidelines and Government guidance including, in particular:

- *Nature Based Management of Urban Rainwater and Urban Surface Water Discharges, A National Strategy (2024);*
- *Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024);*
- *Development Plans, Guidelines for Planning Authorities (2022);*
- *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);* and
- *DMURS Advice Note 5, Road and Street Drainage using Nature Based Solutions (2023).*

The guidance promotes a more systemic and plan-led approach to water sensitive urban design that combines nature-based solutions with spatial planning, and advises on the cross-sectoral benefits of nature-based solutions in terms of protecting against pluvial

---

<sup>2</sup> With flood zones A and B separately identifiable on the zoning maps.



flood risk, climate adaptation, water quality, biodiversity and road safety in active travel schemes.

## 9. Climate action

It is a National Strategic Outcome of the NPF to transition to a low carbon climate resilient society. The effective implementation of climate mitigation objectives through the LAP are critical to the achievement of the Government's greenhouse gas emissions reduction target to mitigate climate change under the *Climate Action and Low Carbon Development Act 2015*, as amended (the Climate Act).

The efficient use of land, including through infill development and brownfield development consistent with compact growth, will ensure consistency with NPO 53 (land use). An integrated approach to land use and transport planning will help ensure that climate action is integral to the LAP in support of national mitigation targets (NPO 54) under the Climate Act. The LAP should also consider how development in the area might best contribute to the delivery of renewable energy consistent with NPO 55. These NPOs, together with the relevant objectives of the RSES and Development Plan, will be of particular importance in this respect.

The effective implementation of climate adaption objectives through the LAP will be essential to ensure Monasterevin is climate resilient into the future. As noted above, flood risk management will be the most critical climate change adaptation measure to be addressed in the LAP. The National Adaptation Framework (2018)<sup>3</sup> (NAF) specifies the national strategy for the application of adaptation measures in different sectors and by local authorities in their administrative areas in order to reduce the vulnerability of the State to the negative effects of climate change and to avail of any positive effects that may occur.

## 10. Environment, built and natural heritage

The planning authority is the competent authority for Strategic Environmental Assessment and Appropriate Assessment, and will be aware of the *Strategic Environmental Assessment Guidelines for Regional Assemblies and Planning Authorities (2022)* issued

---

<sup>3</sup> A new NAF is under development and will be submitted to Government for approval in early 2024.

under section 28 of the Act and the *Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities* (2009), as revised.

The planning authority should also ensure the LAP is consistent with objectives of the NPF and RSES concerning environmental protection. In this regard, the Office highlights the importance of integrating green and blue infrastructure into the LAP consistent with NPO 58 and planning for greenbelts (NPO 62). Planning for green and blue infrastructure can contribute to climate change adaptation, in particular flood risk management through nature-based solutions (NPO 57 and NPO 63). It can also make a positive contribution to climate mitigation and have positive impacts on biodiversity and clean air (NPO 64).

Regarding built-heritage, the planning authority should consider what location-specific objectives or measures would assist in the protection or improvement of built heritage over the period of the LAP. Accordingly, the planning authority should have regard to the *Architectural Heritage Protection Guidelines for Planning Authorities* (2011).

Having regard to Action AH A22 and AH A23 of the Development Plan, the planning authority should consider how policies and/or objectives can be included in the draft LAP to address the Monasterevin Architectural Conservation Area.

## **11. Implementation and monitoring**

The NPF and the RSES place increased emphasis on the importance of monitoring the implementation of statutory strategies and plans to measure plan effectiveness and to continually update a relevant evidence-base to inform future planning strategies.

The planning authority is therefore encouraged to set out specific provisions for monitoring the implementation of the objectives of the LAP, having regard to the provisions of the Development Plans Guidelines and the LAP Guidelines.

### **Summary**

In summary, the Office commends the planning authority for the preparation of this Issues Paper. The Office advises the planning authority to pay particular attention to the following issues in the preparation of the LAP:

- the delivery of housing in serviced or serviceable areas should be informed by an infrastructure assessment / settlement capacity audit, and consistent with compact growth, the sequential approach and the Development Plan core strategy;

- the inclusion of appropriate policies, objectives and strategies to promote and prioritise regeneration and the development of infill brownfield sites, in particular those in the core retail area, and utilisation of active land management strategies to tackle vacancy and dereliction elsewhere in the LAP area. The Office also encourages the planning authority to prepare the Town/Village Renewal Masterplan for Monasterevin as part of the draft LAP;
- an LTP should be prepared to inform:
  - land use zoning objectives based on accessibility by walking, cycling and public transport;
  - transport initiatives and measures to provide sustainable mobility options for residents and visitors, and in particular providing connectivity from residential areas to services and amenities and reduce dependence on the private car; and
  - public realm enhancements to improve the quality of the public environment within the town by prioritising pedestrians, the heritage of the town and social and commercial activities.

The planning authority is advised to consult with the NTA and TII in this regard;

- the identification of optimal employment lands should be informed by the infrastructure assessment as well as considering matters such as compact growth, the sequential approach to development and options for sustainable transport. The Office encourages the planning authority to address Development Plan objectives relating to employment and job creation as part of the preparation of the draft LAP; and
- preparation of an updated SFRA and include policies and objectives in relation to the implementation of SuDS and nature-based solutions as a means for managing surface water run-off at key development.



The Office looks forward to reviewing the future draft LAP and to continued positive engagement with your authority in the implementation of national and regional policies at the county and local level.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through the undersigned or at [plans@opr.ie](mailto:plans@opr.ie).

Is mise le meas,

\_\_\_\_\_

**Anne Marie O'Connor**

Deputy Regulator and Director of Plans Evaluations

\_\_\_\_\_